GW - 237

GENERAL CORRESPONDENCE

YEAR(S):

2001 → 1995

Ford, Jack

From: Ford, Jack
Sent: Friday, March 30, 2001 10:11 AM
To: 'kchar@duke-energy.com'
Subject: Applications

Dear Ms. Char:

The OCD has not received a renewal application for the Lee Gas Plant (GW-002) nor the Pecos Diamond Gas Plant (GW-237). The last communication, dated November 29, 2000, indicated that Duke Energy was to renew these discharge plans.

The Pecos Diamond Gas Plant discharge plan (GW-237) expired March 29,2001 and Duke Energy Field Services, LP is now in violation of WQCC and OCD regulations.

The Lee Gas Plant discharge plan (GW-002) expired March 16, 2001 and Duke Energy Field Services, LP is now in violation of WQCC and OCD regulations.

Please respond at the earliest to prevent further compliance action by the OCD.

Sincerely,

Jack Ford
OCD Environmental Bureau

Ford, Jack

From: Ford, Jack
Sent: Wednesday, January 24, 2001 4:23 PM
To: 'kchar@duke-energy.com'
Subject: Pecos Diamond Gas Plant Discharge Plan Renewal

Dear Karin
I am replying to your letter of November 29, 2000 regarding the renewal of the above subject gas plant with a discharge plan GW-237.

If there have been no changes in the operation or equipment of the plant since March 29, 1996 the only required information necessary to file with the OCD is the one page application form with the notation for each question as "No changes". If there have been changes the renewal application should include an explanation with the form for each such change for each subject asked for on the application form. The application form is available on our web site under Oil Conservation Division at the address below

http://164.64.103.5/ocd/ocdforms.htm

If you have any questions, please call me at (505) 476-3489 (my new number).

Sincerely,

Jack Ford
Oil Conservation Division

Duke Energy® Field Services

A New Kind of Energy

P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
Direct: 303-595-3331
Fax: 303-389-1957

November 29, 2000

CERTIFIED MAIL
RETURN RECEIPT 7099 3220 0001 5281 6463

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

SUBJECT: Pecos Diamond Gas Plant Discharge Plan Renewal
Discharge Plan No. GW-237
Eddy County, New Mexico

Dear Mr. Ford:

Based upon our conversation today regarding the renewal of the Pecos Diamond Gas Plant discharge plan (GW-237), Duke Energy Field Services, LP (DEFS) would like to notify the New Mexico Oil Conservation Division (NM OCD) of our intent to renew this discharge plan. The Pecos Diamond Gas Plant discharge plan (GW-237) will expire on March 29, 2001.

Per your instructions, DEFS will await notification from the NM OCD for the specific information that DEFS should submit to renew the discharge plan and the schedule in which to submit the information requested.

If you have any questions, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

cc: Harley Temple — Corp. File 2.2.3.3 Pecos Diamond GP
Andy Price — W. Permian Env. File 2.2.3.3 Pecos Diamond GP
Jack Braun — Facility File 2.2.3.3 Pecos Diamond GP

Duke Energy® Field Services

P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
Direct: 303-595-3331
Fax: 303-389-1957

May 30, 2000

CERTIFIED MAIL
RETURN RECEIPT Z 407 761 470

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

RE: Request for Name/Plan Holder Change
NM OCD Discharge Plans

Dear Mr. Ford:

Based upon our conversation on May 10, 2000, it is my understanding that this letter suffices to transfer the seven discharge plans, referenced below, due to a change in plan holder status. The change in plan holder status is a result of a recent internal corporate restructuring and convergence, including a name change. The old company was known as Duke Energy Field Services, Inc., which has now been changed, and the new entity is Duke Energy Field Services, LLC. Please transfer the following discharge plans to above-referenced new entity, effective immediately:

• Burton Flats Gas Plant	GW-127
• Carlsbad Gas Plant	GW-069
• Carrasco Compressor Station	GW-137
• CP-1 Compressor Station	GW-139
• Dagger Draw Gas Plant	GW-185
• Pecos Diamond Gas Plant	GW-237
• Westall (North) Compressor Station	GW-144

Duke Energy Field Services, LLC will continue to comply with the terms and conditions of the previously approved discharge plan for each of the above referenced facilities.

If you have any questions or need any additional information, please contact me at (303) 605-1717.

Sincerely,

Karin Char
Environmental Specialist

cc: Jack Braun
Harley Temple
Grey Hyde
Mel Driver

Facility Env. File 2.2.3.3: Burton Flats GP, Carlsbad GP, Carrasco CS, CP-1 CS, Dagger Draw GP, Pecos Diamond GP, Westall (North) CS
Region Env. File 2.2.3.3: Burton Flats GP, Carlsbad GP, Carrasco CS, CP-1 CS, Dagger Draw GP, Pecos Diamond GP, Westall (North) CS
Corp. Env. File 2.2.3.3: Burton Flats GP, Carlsbad GP, Carrasco CS, CP-1 CS, Dagger Draw GP, Pecos Diamond GP, Westall (North) CS

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

February 14, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-142-564-974

Mr. Stephen Weathers
Environmental Specialist
Duke Energy Field Services Inc
P.O. Box 5493
Denver, Colorado 80217

RE: Minor Modification
GW-237 Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Weathers:

The New Mexico Oil Conservation Division (OCD) has received Duke Energy Field Services Inc. letter dated January 28, 2000 requesting an addendum to the Pecos Diamond Gas Plant (GW-237) discharge plan. The Duke Energy Field Services Inc. request is considered a minor modification to the above referenced discharge plan and public notice will not be issued. **The requested minor modification is hereby approved**, with the following conditions:

1. **Molecular Sieve**: The waste will be transported off-site to the Lee Landfill facility for proper disposal. Documentation of acceptance by Lee Landfill will be retained.

2. **Charcoal Filter Media**: The waste will be transported off-site to the Lee Landfill facility for proper disposal. Documentation of acceptance by Lee Landfill will be retained.

The Application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3107.C and is approved pursuant to WQCC Regulation 3109.

Please note that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3107.C DUKE ENERGY FIELD SERVICES INC. is required to notify the Director of any facility expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

Note, that OCD approval does not relieve Duke Energy Field Services Inc. of liability should Duke Energy Field Services Inc. operation's result in contamination of surface waters, ground waters or the environment.

If you have any questions please feel free to call W. Jack Ford at (505)-827-7156.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

cc: OCD Aztec District Office

Z 142 564 974 OCD

FORD

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to S. Weathers	
Street & Number Duke	
Post Office, State, & ZIP Code Aztec	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date GW-237	

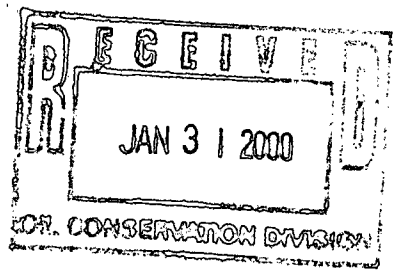
FEB 17 2000 USPS

PS Form 3800, April 1995

Duke Energy Field Services Inc.
A Duke Energy Company

P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303 595-3331
Fax: 303 595-0480

January 28, 2000



Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87502

Re: Addendum to the Duke Energy Field Services Pecos Diamond Gas Plant Discharge Plan

Dear Mr. Ford:

Duke Energy Field Services (DEFS) requests that the Oil Conservation Division (OCD) add the following solid waste streams and disposal options to the Pecos Diamond Gas Plant Discharge Plan. The requested changes are summarized below:

1) **Molecular Sieve** – Molecular Sieve is replaced every 4-5 years at above referenced facility. During each changeover, approximately 30,000 pounds (30 cubic yards) of molecular sieve waste is generated. The waste is then stored on-site in roll offs until disposal. At the present time, two roll offs containing a total of 30 cubic yards of Molecular Sieve is on site for disposal. Malco Trucking located in Midland/Odessa, Texas will transport the waste to the Lea Land, Landfill for disposal. Lea Land has accepted the above-mentioned waste for disposal. Included in Attachment A, you will find a copy of the waste profile, analytical results and the acceptance letter from Lea Land Landfill for disposal.

2) **Charcoal Filter Media** – Charcoal is replaced in the amine unit every 6 months at the above referenced facility. During each changeover, approximately 1.25 cubic yards of spent charcoal is generated. The waste is then stored in 55-gallon drums until disposal. At the present time, approximately 2.50 cubic yards of spent charcoal is on site for disposal. Malco Trucking located in Midland/Odessa, Texas will transport the waste to the Lea Land Landfill for disposal. Lea Land has accepted the waste for disposal. Included in Attachment B, you will find a copy of the waste profile, analytical results and the acceptance letter from Lea Land Landfill for disposal.

Duke Energy

3) **Oil Filters** – At the present time, Lea Land Landfill is written into the Pecos Diamond Discharge Plan to handle the disposal of filters. DEFS would like to add the following recycle facilities to the discharge plan:

- E&E Enterprises
  301 S. Meadow
  Odessa, TX 79761

- Pro Cycle Oil & Metals
  315 Pronto Ave
  Odessa, TX 79762-9761

If you have any questions concerning the request for changes to the Pecos Diamond Gas Plant Discharge Plan, please do not hesitate to give me a call at 303-605-1718.

Sincerely

Duke Energy Field Services, Inc.

Stephen Weathers
Environmental Specialist

cc: DEFS - Environmental file
DEFS - Pecos Diamond Gas Plant

Attachments

ATTACHMENT A
Molecular Sieve

LEA LAND, INC.

___ NEW ___ AMENDMENT PAGE 1 OF 5

Material Profile No: _____

A. GENERATOR INFORMATION

Generator Name Duke Energy Field Services Inc.
Facility Address Pecos Diamond Plant (9 miles southeast of Artesia)
Mailing Address: P.O. Box 1388

City/County Artesia (Eddy County)
State New Mexico Zip Code 88211-1388
State ID# _____

Technical Contact Steve Weathers
Telephone (303) 605-1718 Ext. _____ Fax (303) _____
Billing Name Duke Energy Field Services Inc.
Billing Address P O Box 5493

City Denver State CO Zip Code 80217
Attention Steve Weathers
Telephone (303) 605-1718 Ext. _____

B. RCRA

RCRA Non Hazardous/Exempt? ✓ Yes _____ No
General Description of Process: Spent material from natural gas processing equipment. Molecular sieve from dehydration unit and charcoal from amine unit.

C. ANNUAL REPORT CODES (see attached lists)

NAME OF WASTE STREAM: Spent molecular sieve

SIC Code: 1311
Source Code: A37
Form Code: 319

Origin Code: 1
System Type: M 1 3 2 (Landfill)

LEA LAND, INC. **WASTE PROFILE - PAGE 2 OF 5**

C. ANNUAL REPORT CODES CONT. (see attached lists)

NAME OF WASTE STREAM: Spent charcoal

SIC Code: 1311
Source Code: A37
Form Code: 319

Origin Code: 1
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

LEA LAND, INC. **WASTE PROFILE - PAGE 3 OF 5**

D. OTHER COMPONENTS

PCB's	✓ No	___ Yes	Total ppm _____*
Cyanides	✓ No	___ Yes	Total ppm _____
Sulfides	✓ No	___ Yes	Total ppm _____
Pesticides	✓ No	___ Yes	Total ppm _____
Dioxins	✓ No	___ Yes	Total ppm _____

*If contained in spill media, concentration of original chemical prior to spill.

E. PHYSICAL CHARACTERISTICS

1. Infectious or Biological Waste? ___ Yes ✓ No
2. NRC Regulated Radioactive? ___ Yes ✓ No
3. "Listed" Hazardous Wastes? ___ Yes ✓ No
   (coded in 40 CFR, Part 261)
4. Municipal Waste? ___ Yes ✓ No
5. Asbestos Waste? ___ Yes ✓ No
6. Reactivity? ✓ None ___ Water Reactive
   ___ Cyanides ___ Shock Sensitive
   ___ Sulfides ___ DOT Explosive
   ___ Pyrophoric ___ Other _____
7. Solid 100 %
   Sludges _____ %
   Free Liquids _____ %
   100 %
8. **Weight**
   Density ~75 lbs./cu. foot
9. **pH** ✓ N/A
   ___ 0 - 2 ___ 10.1 - 12.4
   ___ 2.1 - 4 ___ ≥ 12.5
   ___ 4.1 - 10 Exact _____
10. Is this waste stored in vented drums? ___ Yes ✓ No
    Do these drums contain free liquids? ___ Yes ✓ No
    or Unfilled head space? ___ Yes ✓ No

LEA LAND, INC.

WASTE PROFILE - PAGE 4 OF 5

11. Does this waste contain scrap metal pieces greater than 2 inches in size or any protruding re-bar (from concrete pieces)? ___ Yes ✓ No
Please describe _____

F. METALS

✓ NONE ___ TCLP (mg/L)

	Reg. Limit	Below	Above
Arsenic	5 mg/L	✓	
Barium	100 mg/L	✓	
Cadmium	1 mg/L	✓	
Chromium	5 mg/L	✓	
Lead	5 mg/L	✓	
Mercury	0.2 mg/L	✓	
Selenium	1 mg/L	✓	
Silver	5 mg/L	✓	
Others:			

G. PHYSICAL/CHEMICAL CONSTITUENTS

Attach all MSDS, Sample Analysis and Additional Information

H. ANTICIPATED VOLUME

Quantity	Container	Quantity	Container
	5-gal pail		Cubic Yard Box
	15-gal carboy		Super Sack
	30-gal drum	2	Rolloff/Dump Trailer
8	55-gal drum		Tanker
	85-gal drum		Other _____

Per ✓ Time ___ Week ___ Month ___ Year ✓ Other _____

LEA LAND, INC. **WASTE PROFILE - PAGE 5 OF 5**

If empty containers which formerly contained hazardous waste are to be disposed:

Do they contain no more than 1 inch of residue on the bottom of the container?

___ Yes ✓ No

Have they been rendered non-reusable (i.e., crushed, punctured, etc.)?

___ Yes ___ No

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature: _____ Date 1/27/00

Rev. 05-08-97

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Gil Van Deventer
TRW
415 West Wall Suite 1818
Midland, TX 79701

Report Date: 12/15/99

Project Number: Duke Pecos Diamond
Project Name: P//5719/1C
Project Location: N/A

Order ID Number: 99120908

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
136982	Molecular Sieve	Solid	12/7/99	13:00	12/9/99
136983	Spent Charcoal	Solid	12/7/99	13:20	12/9/99

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 3 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Analytical Results Report

Sample Number: 136982
Description: Molecular Sieve

Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH (mg/Kg)										
TRPHC		17700	1	E 418.1	12/13/99	12/14/99	MF	PB03441	QC04452	10

Sample Number: 136983
Description: Spent Charcoal

Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH (mg/Kg)										
TRPHC		8150	1	E 418.1	12/13/99	12/14/99	MF	PB03441	QC04452	10

Quality Control Report
Method Blanks

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
TRPHC (mg/Kg)		<10.0	10	12/14/99	PB03441	QC04451
TRPHC (mg/Kg)		<10.0	10	12/14/99	PB03441	QC04452

Quality Control Report
Matrix Spike and Matrix Duplicate Spike

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	TRPHC (mg/Kg)	<10.0	1	250	262	105		70 - 130	0 - 20	QC04451
MSD	TRPHC (mg/Kg)	<10.0	1	250	268	107	2	70 - 130	0 - 20	QC04451

Quality Control Report
Lab Control Spikes and Duplicate Spike

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	TRPHC (mg/Kg)	<10.0	1	250	278	111		70 - 130	0 - 20	QC04451
LCSD	TRPHC (mg/Kg)	<10.0	1	250	261	104	6	70 - 130	0 - 20	QC04451

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	TRPHC (mg/Kg)	<10.0	1	250	278	111		70 - 130	0 - 20	QC04452
LCSD	TRPHC (mg/Kg)	<10.0	1	250	261	104	6	70 - 130	0 - 20	QC04452

Report Date: 12/15/99 Order ID Number: 99120908 Page Number: 3 of 3

Duke Pecos Diamond P//5719/1C N/A

Quality Control Report
Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	TRPHC (mg/Kg)		100	107	107	70 - 130	12/14/99	QC04451
CCV (1	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04451
CCV (2	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04451
CCV (3	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04451

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	TRPHC (mg/Kg)		100	107	107	70 - 130	12/14/99	QC04452
CCV (1	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04452
CCV (2	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04452
CCV (3	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04452

TRACE ANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
TRW
Attention: Gil Van Deventer
415 West Wall St., Suite 1818
Midland, TX 79701

December 16, 1999
Receiving Date: 12/09/99
Sample Type: Solid
Cost Center No: P/5719/1C
Project Location: Pecos Diamond
COC# 13474

Extraction Date: 12/13/99
Analysis Date: 12/14/99
Sampling Date: 12/07/99
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Duke Energy

TCLP BENZENE (mg/L)	EPA LIMIT	Reporting Limit	T136982 Molecular Sieve	QC	RPD	%EA	%IA
Benzene	0.50	0.05	0.203	0.088	2	94	88

CHEMIST: RC
METHODS: EPA SW 846-1311, 8021B.

Director, Dr. Blair Leftwich

12-10-99
DATE

9912090 8

TRW Inc.
Energy & Environmental Systems
415 West Wall St. Suite. 1818
Midland, Texas 79701
(915) 682-0008
FAX: (915) 682-0028

№ 13474

Chain of Custody

Date _____ Page _____ of _____

Lab Name: Trace Analysis Inc.
Address: 6701 Aberdeen Av., Ste 9
Lubbock, Tx 79424
Telephone: 806/794-1296

Samplers (SIGNATURES)

Sample Identification	Matrix	Date	Time	BTEX (EPA 8021B)	MTBE (EPA 8021B)	SVOC (EPA 8270)	PAH (EPA 8270)	VOC (EPA 8260)	TPH (EPA 418.1)	TPH (TX-1005)	TPH (TX-1006)	GRO (EPA 8015G)	DRO (EPA 8015D)	TDS (EPA 160.1)	Anions/Cations	Total Metals	TCLP Metals	TCLP-Benzene	Ignitability	Reactivity				Number of Containers
Molecular Sieve	solid	12-7-99	1300						✓									✓			136	98	2	1
Spent Charcoal	solid	12-7-99	1320						✓									✓	✓	✓			3	1

Analysis Request

Project Information

Project Name (Location): Pecos Diamond
Project Location (Name): Duke Energy
Project Manager: Gil Van Deventer
Cost Center No.: P/5719/1C
Shipping ID No.:
P O No.: (719)

Sample Receipt

Total Containers:
COC Seals:
Rec'd Good Cond/Cold:
Conforms to Records:
Lab No.:

Special Instructions/Comments:
TRWTCMBZ.XLS (~~719~~) TRWTCMBZ.XLS (719)
TRWBTX84.XLS (719) TRWBZ (719)

Relinquished By: (1)	Relinquished By: (2)	Relinquished By: (3)
Gil Van Deventer 1500	Helen Shelton 5:30PM	
(Signature) (Time)	(Signature) (Time)	(Signature) (Time)
Gil Van Deventer 12-8-99	HELEN SHELTON 12/8/99	
(Printed Name) (Date)	(Printed Name) (Date)	(Printed Name) (Date)
TRW Inc.	TRACE ANALYSIS	
(Company)	(Company)	(Company)
Received By: (1)	**Received By: (2)**	**Received By: (3)**
Helen Shelton 1500		
(Signature) (Time)	(Signature) (Time)	(Signature) (Time)
HELEN SHELTON 12/8/99		Vicki Windham 9:30AM
(Printed Name) (Date)	(Printed Name) (Date)	(Printed Name) (Date)
TRACE ANALYSIS		Vicki Windham 12-9-99
(Company)	(Company)	(Company) TRACE ANALYSIS

Distribution: White, Canary-Laboratory / Pink-TRW

GLI-159-384-673-8 Shipped: Overnight on 5 samples - 4C

JAN-28-2000 14:58 TRW-MIDLAND 915 682 0028 P.09/09

TOTAL P.09

Lea Land Inc.

Non-Hazardous Industrial
Waste Only Landfill

Mile Marker 64 U.S. Highway 62/180 East
Carlsbad, New Mexico 88220
Phone: (505) 887-4048 Fax: (505) 885-7640

Submitted by facsimile to (303) 629-7822

January 20, 2000

Steve Weathers
Duke Energy Field Services Inc.
370 17th Street, Suite 900
Denver, Colorado 80202

RE: **Waste Acceptance**
Pecos Diamond Gas Plant
Artesia, New Mexico

Dear Steve:

The analytical data for the molecular sieve and spent charcoal has been reviewed by Lea Land and is acceptable for disposal. The Waste Profile number for this material is: **0100134.** An original copy of the waste manifest will be sent with the invoice within a few days of disposal.

If you need additional information, please call me at 713-662-8521 or call Shelley Denton in our Oklahoma City office at 405-236-4257.

Very truly yours,

Saralyn Hall

Saralyn Hall, P. E.
Marketing Manager

Post-It® Fax Note 7671	Date 1/20/00	# of pages ▶ 2
To Steve Weathers	From Gil Van Deventer	
Co./Dept. DEFS	Co. TRW	
Phone # 303 605 1718	Phone # 915 682 0068	
Fax # 303 629 7822	Fax # 915 682 0028	

TRW

FACSIMILE TRANSMISSION

415 W. Wall St., Ste. 1818
Midland, Texas 79701

DATE: January 20, 2000

TO: Saralyn Hall FAX: (713) 662-8546

COMPANY: Lea Land Inc. Phone: (713) 662-8521

FROM: Gil Van Deventer FAX: (915) 682-0028

COMPANY: TRW Inc. (Energy & Environmental Systems) Phone: (915) 682-0008

Number of Pages (including cover page): 9

Please profile the following waste streams and fax back your approval to accept the waste at your Lea Land facility if you can accept it. The analytical results are summarized below:

Molecular Sieve (2 roll off bins, ~ 30-40 yds):
TPH = 17,700 mg/kg
TCLP-Benzene = 0.203 mg/L

Spent Charcoal (8 drums):
TPH = 8,150 mg/kg
TCLP-Benzene = 0.14 mg/L
Non-ignitable

The laboratory analytical reports are also attached for your review. The molecular sieve and spent charcoal waste were generated in November 1999 at the Pecos Diamond Gas Plant located approx. 10 miles southeast of Artesia, NM. If you can accept this waste we will include written documentation from the New Mexico Oil Conservation Division approving the disposal of this waste at your facility. The waste is RCRA exempt based on the EPA's Regulatory Determination of oil & gas wastes that are exempt from hazardous waste regulations. Furthermore, the analytical results indicate the waste can be characterized as non-hazardous since TCLP-benzene and ignitability are below EPA-established thresholds. The lab reports also indicate analytical results for some oily dirt piles, however the soil will be treated on site and therefore will not be sent to your facility.

Waste, as described above, will be accepted for disposal at Lea Land facility

Saralyn Hall 1/20/00
Signature Date

Permit No. SWM-131401

Saralyn Hall / Marketing Manager
Printed Name/Title

cc: Steve Weathers, DEFS

ATTACHMENT B
Charcoal Filter Media

LEA LAND, INC.

___ NEW ___ AMENDMENT PAGE 1 OF 5

Material Profile No: _____

A. GENERATOR INFORMATION

Generator Name Duke Energy Field Services Inc.
Facility Address Pecos Diamond Plant (9 miles southeast of Artesia)
Mailing Address: P.O. Box 1388

City/County Artesia (Eddy County)
State New Mexico Zip Code 88211-1388
State ID# _____

Technical Contact Steve Weathers
Telephone (303) 605-1718 Ext. _____ Fax (303) _____
Billing Name Duke Energy Field Services Inc.
Billing Address P O Box 5493

City Denver State CO Zip Code 80217
Attention Steve Weathers
Telephone (303) 605-1718 Ext. _____

B. RCRA

RCRA Non Hazardous/Exempt? ✓ Yes _____ No
General Description of Process: Spent material from natural gas processing equipment. Molecular sieve from dehydration unit and charcoal from amine unit.

C. ANNUAL REPORT CODES (see attached lists)

NAME OF WASTE STREAM: Spent molecular sieve

SIC Code: 1311
Source Code: A37
Form Code: 319

Origin Code: 1
System Type: M 1 3 2 (Landfill)

LEA LAND, INC. **WASTE PROFILE - PAGE 2 OF 5**

C. ANNUAL REPORT CODES CONT. (see attached lists)

NAME OF WASTE STREAM: Spent charcoal

SIC Code: 1311
Source Code: A37
Form Code: 319

Origin Code: 1
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

NAME OF WASTE STREAM: _____

SIC Code: _____
Source Code: _____
Form Code: _____

Origin Code: _
System Type: M 1 3 2 (Landfill)

LEA LAND, INC. **WASTE PROFILE - PAGE 3 OF 5**

D. OTHER COMPONENTS

PCB's	✓ No	___ Yes	Total ppm _____ *
Cyanides	✓ No	___ Yes	Total ppm _____
Sulfides	✓ No	___ Yes	Total ppm _____
Pesticides	✓ No	___ Yes	Total ppm _____
Dioxins	✓ No	___ Yes	Total ppm _____

*If contained in spill media, concentration of original chemical prior to spill.

E. PHYSICAL CHARACTERISTICS

1. Infectious or Biological Waste? ___ Yes ✓ No
2. NRC Regulated Radioactive? ___ Yes ✓ No
3. "Listed" Hazardous Wastes? ___ Yes ✓ No
   (coded in 40 CFR, Part 261)
4. Municipal Waste? ___ Yes ✓ No
5. Asbestos Waste? ___ Yes ✓ No
6. Reactivity? ✓ None ___ Water Reactive
   ___ Cyanides ___ Shock Sensitive
   ___ Sulfides ___ DOT Explosive
   ___ Pyrophoric ___ Other _____
7. Solid 100 %
   Sludges _____ %
   Free Liquids _____ %
   100 %
8. **Weight**
   Density ~75 lbs./cu. foot
9. **pH** ✓ N/A
   ___ 0 - 2 ___ 10.1 - 12.4
   ___ 2.1 - 4 ___ ≥ 12.5
   ___ 4.1 - 10 Exact _____
10. Is this waste stored in vented drums? ___ Yes ✓ No
    Do these drums contain free liquids? ___ Yes ✓ No
    or Unfilled head space? ___ Yes ✓ No

LEA LAND, INC.

WASTE PROFILE - PAGE 4 OF 5

11. Does this waste contain scrap metal pieces greater than 2 inches in size or any protruding re-bar (from concrete pieces)? ___ Yes ✓ No
Please describe _____

F. METALS

✓ NONE ___ TCLP (mg/L)

	Reg. Limit	Below	Above
Arsenic	5 mg/L	✓	
Barium	100 mg/L	✓	
Cadmium	1 mg/L	✓	
Chromium	5 mg/L	✓	
Lead	5 mg/L	✓	
Mercury	0.2 mg/L	✓	
Selenium	1 mg/L	✓	
Silver	5 mg/L	✓	
Others:			

G. PHYSICAL/CHEMICAL CONSTITUENTS

Attach all MSDS, Sample Analysis and Additional Information

H. ANTICIPATED VOLUME

Quantity	Container	Quantity	Container
	5-gal pail		Cubic Yard Box
	15-gal carboy		Super Sack
	30-gal drum	2	Rolloff/Dump Trailer
8	55-gal drum		Tanker
	85-gal drum		Other _____

Per ✓ Time ___ Week ___ Month ___ Year ✓ Other _____

LEA LAND, INC. **WASTE PROFILE - PAGE 5 OF 5**

If empty containers which formerly contained hazardous waste are to be disposed:

Do they contain no more than 1 inch of residue on the bottom of the container?

___ Yes ✓ No

Have they been rendered non-reusable (i.e., crushed, punctured, etc.)?

___ Yes ___ No

Generator's Certification:

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the materials tested are representative of all material described by this profile.

Generator's Authorized Signature: _____ Date 1/27/00

Rev. 05-08-97

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

Gil Van Deventer
TRW
415 West Wall Suite 1818
Midland, TX 79701

Report Date: 12/15/99

Project Number: Duke Pecos Diamond
Project Name: P//5719/1C
Project Location: N/A

Order ID Number: 99120908

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
136982	Molecular Sieve	Solid	12/7/99	13:00	12/9/99
136983	Spent Charcoal	Solid	12/7/99	13:20	12/9/99

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 3 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwich, Director

Analytical Results Report

Sample Number: 136982
Description: Molecular Sieve

Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH (mg/Kg)										
TRPHC		17700	1	E 418.1	12/13/99	12/14/99	MF	PB03441	QC04452	10

Sample Number: 136983
Description: Spent Charcoal

Param	Flag	Result	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
TPH (mg/Kg)										
TRPHC		8150	1	E 418.1	12/13/99	12/14/99	MF	PB03441	QC04452	10

Quality Control Report
Method Blanks

Param	Flag	Blank Result	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
TRPHC (mg/Kg)		<10.0	10	12/14/99	PB03441	QC04451
TRPHC (mg/Kg)		<10.0	10	12/14/99	PB03441	QC04452

Quality Control Report
Matrix Spike and Matrix Duplicate Spike

Standard	Param	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	TRPHC (mg/Kg)	<10.0	1	250	262	105		70 - 130	0 - 20	QC04451
MSD	TRPHC (mg/Kg)	<10.0	1	250	268	107	2	70 - 130	0 - 20	QC04451

Quality Control Report
Lab Control Spikes and Duplicate Spike

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	TRPHC (mg/Kg)	<10.0	1	250	278	111		70 - 130	0 - 20	QC04451
LCSD	TRPHC (mg/Kg)	<10.0	1	250	261	104	6	70 - 130	0 - 20	QC04451

	Param	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	TRPHC (mg/Kg)	<10.0	1	250	278	111		70 - 130	0 - 20	QC04452
LCSD	TRPHC (mg/Kg)	<10.0	1	250	261	104	6	70 - 130	0 - 20	QC04452

Report Date: 12/15/99 Order ID Number: 99120908 Page Number: 3 of 3

Duke Pecos Diamond P//5719/1C N/A

Quality Control Report
Continuing Calibration Verification Standard

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	TRPHC (mg/Kg)		100	107	107	70 - 130	12/14/99	QC04451
CCV (1	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04451
CCV (2	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04451
CCV (3	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04451

Standard	Param	Flag	CCVs TRUE Conc.	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	TRPHC (mg/Kg)		100	107	107	70 - 130	12/14/99	QC04452
CCV (1	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04452
CCV (2	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04452
CCV (3	TRPHC (mg/Kg)		100	104	104	70 - 130	12/14/99	QC04452

TRACEANALYSIS, INC.

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4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
TRW
Attention: Gil Van Deventer
415 West Wall St., Suite 1818
Midland, TX 79701

December 16, 1999
Receiving Date: 12/09/99
Sample Type: Solid
Cost Center No: P/5719/1C
Project Location: Pecos Diamond
COC# 13474

Extraction Date: 12/13/99
Analysis Date: 12/14/99
Sampling Date: 12/07/99
Sample Condition: Intact & Cool
Sample Received by: VW
Project Name: Duke Energy

TCLP BENZENE (mg/L)	EPA LIMIT	Reporting Limit	T136983 Spent Charcoal	QC	RPD	%EA	%IA
Benzene	0.50	0.05	0.14	0.088	2	94	88

CHEMIST: RC
METHODS: EPA SW 846-1311, 8021B.

Director, Dr. Blair Leftwich

12-16-99
DATE

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
TRW INC.
Attention: Gil VanDeventer
415 West Wall St., Suite 1818
Midland, TX 79701

December 16, 1999
Receiving Date: 12/09/99
Sample Type: Solid
Location: Pecos Diamond
Name: Duke Energy
Project No: P/5719/1C

Prep Date: 12/14/99
Analysis Date: 12/14/99
Sampling Date: 12/07/99
Sample Condition: Intact & Cool
Sample Received by: VW

TA#	FIELD CODE	IGNITABILITY
T136983	Spent Charcoal	Non-ignitable
RPD		0

METHODS: EPA SW 846-2.1.1.
CHEMIST: JS

Director, Dr. Blair Leftwich

12-16-99
DATE

TRACEANALYSIS, INC.

6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4725 Ripley Avenue, Suite A El Paso, Texas 79922 888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

ANALYTICAL RESULTS FOR
TRW
Attention: Gil Van Denventer
415 West Wall Suite 1818
Midland, TX 79701

January 20, 2000
Receiving Date: 12/9/99
Sample Type: Solid
Project No: P/5719/1C
Project Location: Pecos Dimond

Prep Date: 1/20/00
Analysis Date: 1/20/00
Sampling Date: 12/7/99
Sample Condition: I & C
Sample Received by: VW
Project Name: Duke Energy

TA#	FIELD CODE	REACTIVITY	SULFIDES (ppm)	CYANIDES (ppm)
	EPA LIMIT =	---	500	250
T136983	Spent Charcoal	Non-reactive	<10	<2.5
QC	Quality Control	---	---	---
RPD		0	0	0
% Extraction Accuracy		---	---	---
% Instrument Accuracy		100	100	100

METHODS: EPA SW 846-Chapter 7 7.3
CHEMIST: JM

Director, Dr. Blair Leftwich

1-20-00
DATE

44120408

TRW Inc.
Energy & Environmental Systems
415 West Wall St. Suite. 1818
Midland, Texas 79701
(915) 682-0008
FAX: (915) 682-0028

№ 13474

Chain of Custody

Date ________ Page ______ of ______

Lab Name: Trace Analysis Inc
Address: 6701 Aberdeen Av., ste 9
Lubbock, Tx 79424
Telephone: 806/ 794- 1296

Samplers (SIGNATURES): [signature]

Analysis Request

Sample Identification	Matrix	Date	Time	BTEX (EPA 8021B)	MTBE (EPA 8021B)	SVOC (EPA 8270)	PAH (EPA 8270)	VOC (EPA 8260)	TPH (EPA 418.1)	TPH (TX-1005)	TPH (TX-1006)	GRO (EPA 8015G)	DRO (EPA 8015D)	TDS (EPA 160.1)	Anions/Cations	Total Metals	TCLP Metals	TCLP-Benzene	Ignitability	Reactivity		Number of Containers
Molecular Sieve	solid	12-7-99	1300						✓									✓			136982	1
Spent Charcoal	solid	12-7-99	1320						✓									✓	✓	✓	983	1

Project Information	
Project ~~Name~~ Location:	Pecos Diamond
Project ~~Location~~ Name:	Duke Energy
Project Manager:	Gil Van Deventer
Cost Center No.:	P/5719/1C
Shipping ID No.:	
P O No.:	(717)

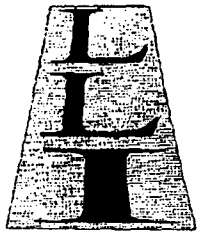
Sample Receipt	
Total Containers:	
COC Seals:	
Rec'd Good Cond/Cold:	
Conforms to Records:	
Lab No.:	

	(1)	(2)	(3)
Relinquished By: (Signature)	[signature]	Helen Shelton	
(Time)	1500	5:30PM	
(Printed Name)	Gil Van Deventer	HELEN SHELTON	
(Date)	12-8-99	12/8/99	
(Company)	TRW Inc.	TRACE ANALYSIS	
Received By: (Signature)	Helen Shelton		Vicki Windham
(Time)	1500		9:30 Am
(Printed Name)	HELEN SHELTON		Vicki Windham
(Date)	12/8/99		12-9-99
(Company)	TRACE ANALYSIS		Trace Analysis

Special Instructions/Comments:
TRW1CMBZ.XLS (~~716~~) TRW1cmbz.xls (719)
TRWBTX84.XLS (714) TRWBZ (719)

Distribution: White, Canary-Laboratory / Pink-TRW

GL1-159-384-673-8 Shipped: Greyhound on 5 samples -HC 12-16



Lea Land Inc.

Non-Hazardous Industrial
Waste Only Landfill

Mile Marker 64 U.S. Highway 62/180 East
Carlsbad, New Mexico 88220
Phone: (505) 887-4048 Fax: (505) 885-7640

Submitted by facsimile to (303) 629-7822

January 20, 2000

Steve Weathers
Duke Energy Field Services Inc.
370 17th Street, Suite 900
Denver, Colorado 80202

RE: **Waste Acceptance**
Pecos Diamond Gas Plant
Artesia, New Mexico

Dear Steve:

The analytical data for the molecular sieve and spent charcoal has been reviewed by Lea Land and is acceptable for disposal. The Waste Profile number for this material is: **0100134.** An original copy of the waste manifest will be sent with the invoice within a few days of disposal.

If you need additional information, please call me at 713-662-8521 or call Shelley Denton in our Oklahoma City office at 405-236-4257.

Very truly yours,

Saralyn Hall

Saralyn Hall, P. E.
Marketing Manager

Post-It® Fax Note 7671	Date 1/20/00	# of pages ▶ 2
To Steve Weathers	From Gil VanDeventer	
Co./Dept. DEFS	Co. TRW	
Phone # 303 605 1718	Phone # 915 682 0068	
Fax # 303 629 7822	Fax # 915 682 0028	

TRW

FACSIMILE TRANSMISSION

415 W. Wall St., Ste. 1818
Midland, Texas 79701

DATE: January 20, 2000

TO: Saralyn Hall FAX: (713) 662-8546

COMPANY: Lea Land Inc. Phone: (713) 662-8521

FROM: Gil Van Deventer FAX: (915) 682-0028

COMPANY: TRW Inc. (Energy & Environmental Systems) Phone: (915) 682-0008

Number of Pages (including cover page): 9

Please profile the following waste streams and fax back your approval to accept the waste at your Lea Land facility if you can accept it. The analytical results are summarized below:

Molecular Sieve (2 roll off bins, ~ 30-40 yds):
TPH = 17,700 mg/kg
TCLP-Benzene = 0.203 mg/L

Spent Charcoal (8 drums):
TPH = 8,150 mg/kg
TCLP-Benzene = 0.14 mg/L
Non-ignitable

The laboratory analytical reports are also attached for your review. The molecular sieve and spent charcoal waste were generated in November 1999 at the Pecos Diamond Gas Plant located approx. 10 miles southeast of Artesia, NM. If you can accept this waste we will include written documentation from the New Mexico Oil Conservation Division approving the disposal of this waste at your facility. The waste is RCRA exempt based on the EPA's Regulatory Determination of oil & gas wastes that are exempt from hazardous waste regulations. Furthermore, the analytical results indicate the waste can be characterized as non-hazardous since TCLP-benzene and ignitability are below EPA-established thresholds. The lab reports also indicate analytical results for some oily dirt piles, however the soil will be treated on site and therefore will not be sent to your facility.

Waste, as described above, will be accepted for disposal at Lea Land facility

Saralyn Hall (Signature) 1/20/00 (Date)

Permit No. SWM-131401

SARALYN HALL / MARKETING MANAGER
Printed Name/Title

cc: Steve Weathers, DEFS

IN COMING!

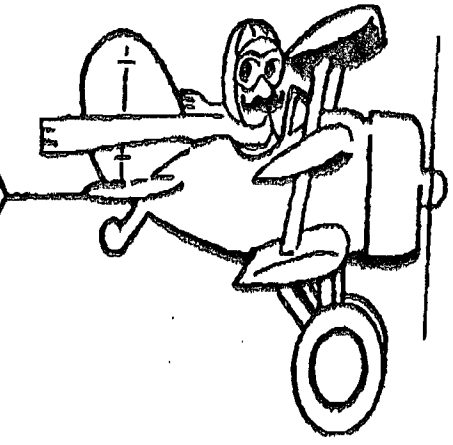
DATE: 5.5.99

ATTENTION: Jack Ford

FROM: mike Stubblefield

NUMBER OF PAGES INCLUDING COVER SHEET:

11



OIL CONSERVATION DIVISION
DISTRICT II
ARTESIA, NM 88210

IF YOU HAVE ANY PROBLEMS WITH THIS TRANSMISSION OR IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL 505-748-1283.
FAX NUMBER: (505) 748-9720

HAVE A GREAT DAY!

Duke Energy Field Services Inc.
A Duke Energy Company

P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303 595-3331
Fax: 303 595-0480

April 29, 1999

Mr. Mike Stubblefield
Oil Conservation Division
State Of New Mexico
811 South First
Artesia, NM 88210

CERTIFIED MAIL Z469311251
RETURN RECEIPT REQUIRED

RE: **RE: FORM C-141**
Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Stubblefield:

The spill area surrounding the reported leak was excavated and soil samples were collected and analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX) using EPA method 8020 and for total petroleum hydrocarbons using EPA method 418.1. The soil sample locations are shown on Figure 1 and the analytical results are provided in Table 1 with the laboratory reports included as Attachment A.

All of the soil samples collected indicated values below detection limits, therefore the soils will be returned to the excavation.

Should you have any questions or need additional information, please telephone me at 303-605-1725.

Sincerely,
Duke Energy Field Services, Inc.

Thomas R. Stotler, P. G.
Environmental Specialist

Encl Figure 1 – Soil Sample Location Map
Table 1 – Soil Analytical Results
Attachment A – Laboratory Report

To: Tom Stolle	From: Gil Van Deventer
Co./Dept. DCP51	Co. TRW
Phone # 918/629-7822	Phone # 915 682 0008
Fax #	Fax # 915 682 0028

Figure 1 SCALE: 1" = 12.5' SHEET 1 OF 1

PROJECT NUMBER: Pecos Diamond

DATE: 4-22-99 CHECKED BY: DATE:

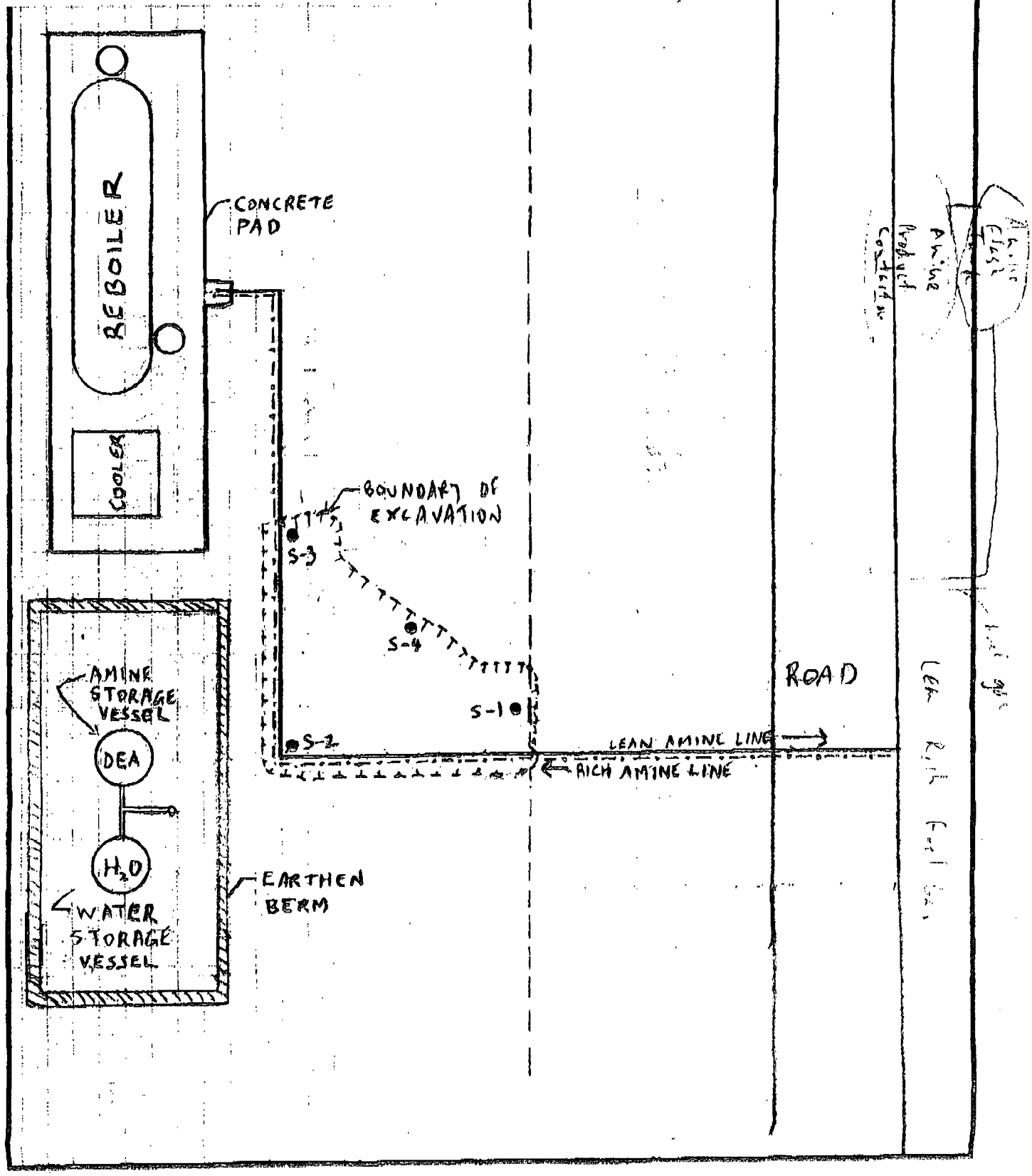


TABLE 1
ANALYTICAL SOIL SAMPLE RESULTS
PECOS DIAMOND GAS PLANT
EDDY COUNTY, NEW MEXICO

Sample Number	Sample Date	Benzene	Toluene	Ethyl Benzene	Xylenes	TPH 418.1
S-1	4/22/99	<0.50	<0.50	<0.50	<0.50	<10.0
S-2	4/22/99	<0.50	<0.50	<0.50	<0.50	<10.0
S-3	4/22/99	<0.50	<0.50	<0.50	<0.50	<10.0
S-4	4/22/99	<0.50	<0.50	<0.50	<0.50	<10.0
Stock Pile	4/22/99	<0.50	<0.50	<0.50	<0.50	<10.0

All values are reported in mg/kg

ATTACHMENT A

TRACEANALYSIS, INC.
6701 Aberdeen Avenue, Suite 9 Lubbock, Texas 79424 800•378•1296 806•794•1296 FAX 806•794•1298
4171h Ripley Avenue, Suite A El Paso, Texas 79922 (888•588•3443 915•585•3443 FAX 915•585•4944
E-Mail: lab@traceanalysis.com

Analytical and Quality Control Report

DRAFT

Gil Van Deventer
TRW
415 West Wall Suite 1818
Midland, TX 79701

Report Date: 4/26/99

Project Number: Duke Pecos Diamond
Project Name: P//5719/1C
Project Location: N/A

Order ID Number: 99042402

Enclosed are the Analytical Results and Quality Control Data Reports for the following samples submitted to TraceAnalysis, Inc. for analysis:

Sample Number	Sample Description	Matrix	Date Taken	Time Taken	Date Received
123394	9904221550 S-1	Soil	4/22/99	15:50	4/24/99
123395	9904221504 S-2	Soil	4/22/99	15:40	4/24/99
123396	9904221525 S-3	Soil	4/22/99	15:25	4/24/99
123397	9904221535 S-4	Soil	4/22/99	15:35	4/24/99
123398	9904221555 Excavated Soil	Soil	4/22/99	15:55	4/24/99

These results represent only the samples received in the laboratory. The Quality Control Report is generated on a batch basis. All information contained in this report is for the analytical batch(es) in which your sample(s) were analyzed.

This report consists of a total of 5 pages and shall not be reproduced except in its entirety, without written approval of TraceAnalysis, Inc.

Dr. Blair Leftwhich, Director

Report Date: 4/26/99 Order ID Number: 99042402 Page Number: 2 of 5

Analytical Results Report

DRAFT

Sample Number: 123394
Description: 9904221550 S-1

Param	Flag	Result	Units	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
MTBE		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Benzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Toluene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Ethylbenzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
M,P,O-Xylene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Total BTEX		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
TRPHC		<10.0	mg/Kg	1	E 418.1	4/26/99	4/26/99	MF	PB00491	QC00586	10

Sample Number: 123395
Description: 9904221504 S-2

Param	Flag	Result	Units	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
MTBE		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Benzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Toluene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Ethylbenzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
M,P,O-Xylene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Total BTEX		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
TRPHC		<10.0	mg/Kg	1	E 418.1	4/26/99	4/26/99	MF	PB00491	QC00586	10

Sample Number: 123396
Description: 9904221525 S-3

Param	Flag	Result	Units	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
MTBE		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Benzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Toluene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Ethylbenzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
M,P,O-Xylene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Total BTEX		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
TRPHC		<10.0	mg/Kg	1	E 418.1	4/26/99	4/26/99	MF	PB00491	QC00586	10

Report Date: 4/26/99 Order ID Number: 99042402 Page Number: 3 of 5

DRAFT

Sample Number: 123397
Description: 9904221535 S-4

Param	Flag	Result	Units	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
MTBE		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Benzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Toluene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Ethylbenzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
M,P,O-Xylene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Total BTEX		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
TRPHC		<10.0	mg/Kg	1	E 418.1	4/26/99	4/26/99	MF	PB00491	QC00586	10

Sample Number: 123398
Description: 9904221555 Excavated Soil

Param	Flag	Result	Units	Dilution	Analytical Method	Date Prepared	Date Analyzed	Analyst	Prep Batch #	QC Batch #	RDL
MTBE		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Benzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Toluene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Ethylbenzene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
M,P,O-Xylene		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
Total BTEX		<0.050	mg/Kg	1	S 8021B	4/26/99	4/26/99	RC	PB00485	QC00578	0.001
TRPHC		<10.0	mg/Kg	1	E 418.1	4/26/99	4/26/99	MF	PB00491	QC00586	10

Quality Control Report
Method Blanks

Param	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
Benzene		<0.050	mg/Kg	0.001	4/26/99	PB00485	QC00578
Toluene		<0.050	mg/Kg	0.001	4/26/99	PB00485	QC00578
Ethylbenzene		<0.050	mg/Kg	0.001	4/26/99	PB00485	QC00578
M,P,O-Xylene		<0.050	mg/Kg	0.001	4/26/99	PB00485	QC00578
Total BTEX		0	mg/Kg	0.001	4/26/99	PB00485	QC00578

Param	Flag	Blank Result	Units	Reporting Limit	Date Analyzed	Prep Batch #	QC Batch #
TRPHC		<10.0	mg/Kg	10	4/26/99	PB00491	QC00586

Report Date: 4/26/99 Order ID Number: 99042402 Page Number: 4 of 5

Quality Control Report
Matrix Spike and Matrix Duplicate Spike

DRAFT

Standard	Param	Units	Sample Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
MS	TRPHC	mg/Kg	<10.0	1	250	178	71		80-120	0 - 20	QC00586
MSD	TRPHC	mg/Kg	<10.0	1	250	171	68	4	80-120	0 - 20	QC00586

Quality Control Report
Lab Control Spikes and Duplicate Spike

Standard	Param	Units	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	Benzene	mg/Kg	<0.050	1	5	0.103	2		80-120	0 - 20	QC00578
LCS	Toluene	mg/Kg	<0.050	1	5	0.101	2		80-120	0 - 20	QC00578
LCS	Ethylbenzene	mg/Kg	<0.050	1	5	0.099	2		80-120	0 - 20	QC00578
LCS	M,P,O-Xylene	mg/Kg	<0.050	1	15	0.294	2		80-120	0 - 20	QC00578
LCSD	Benzene	mg/Kg	<0.050	1	5	0.106	2	3	80-120	0 - 20	QC00578
LCSD	Toluene	mg/Kg	<0.050	1	5	0.103	2	2	80-120	0 - 20	QC00578
LCSD	Ethylbenzene	mg/Kg	<0.050	1	5	0.101	2	2	80-120	0 - 20	QC00578
LCSD	M,P,O-Xylene	mg/Kg	<0.050	1	15	0.300	2	2	80-120	0 - 20	QC00578

Standard	Param		Units	Blank Result	Dil.	Spike Amount Added	Matrix Spike Result	% Rec.	RPD	% Rec. Limit	RPD Limit	QC Batch #
LCS	TRPHC	*	mg/Kg	<10.0	1	250	221	88		80-120	0 - 20	QC00586
* TRPHC - EA & RPD												
LCSD	TRPHC	*	mg/Kg	<10.0	1	250	208	83	6	80-120	0 - 20	QC00586
* TRPHC - RPD												

Report Date: 4/26/99 Order ID Number: 99042402 Page Number: 5 of 5

Quality Control Report
Continuing Calibration Verification Standard

DRAFT

Standard	Param	Flag	CCVs TRUE Conc.	Units	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	Benzene		0.1	mg/Kg	0.101	101	80 - 120	4/26/99	QC00578
ICV	Toluene		0.1	mg/Kg	0.103	103	80 - 120	4/26/99	QC00578
ICV	Ethylbenzene		0.1	mg/Kg	0.104	104	80 - 120	4/26/99	QC00578
ICV	M,P,O-Xylene		0.3	mg/Kg	0.298	99	80 - 120	4/26/99	QC00578
CCV (1)	Benzene		0.1	mg/Kg	0.095	95	80 - 120	4/26/99	QC00578
CCV (1)	Toluene		0.1	mg/Kg	0.095	95	80 - 120	4/26/99	QC00578
CCV (1)	Ethylbenzene		0.1	mg/Kg	0.095	95	80 - 120	4/26/99	QC00578
CCV (1)	M,P,O-Xylene		0.3	mg/Kg	0.272	91	80 - 120	4/26/99	QC00578

Standard	Param	Flag	CCVs TRUE Conc.	Units	CCVs Found Conc.	CCVs Percent Recovery	Percent Recovery Limits	Date Analyzed	QC Batch #
ICV	TRPHC		100	mg/Kg	95.5	96	80 - 120	4/26/99	QC00586
CCV (1)	TRPHC		100	mg/Kg	93.5	94	80 - 120	4/26/99	QC00586
CCV (2)	TRPHC		100	mg/Kg	93.8	94	80 - 120	4/26/99	QC00586

Duke Energy Field Services Inc.
A Duke Energy Company

P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303 595-3331
Fax: 303 595-0480

March 30, 1998

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87502

GW-237

Re: Facility Name Change for the PanEnergy Field Services, Inc. Pecos Diamond Gas Plant and the Liquid Energy Dagger Draw Gas Plant

Dear Jack:

Effective July 1, 1997 the name PanEnergy Field Services, Inc. was changed to Duke Energy Field Services, Inc. for the Pecos Diamond Gas Plant. In addition, Duke Energy acquired the Dagger Draw Gas Plant from Liquid Energy Corp. on December 1995. The name should be changed to the Duke Energy Field Services, Inc. Dagger Draw Gas Plant.

If you have any questions concerning this information, please feel free to call me at 303-595-3331.

Sincerely,
Duke Energy Field Services, Inc.

Kristin M. Koblis
Environmental Scientist

Duke Energy Field Services Inc.
A Duke Energy Company

P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303 595-3331
Fax: 303 595-0480

August 12, 1997

RE: Announcement of Name Change

We are pleased to announce that effective June 24, 1997, the Board of Directors voted to change the names of the following entities:

FROM:	**TO:**
PanEnergy Field Services, Inc.	Duke Energy Field Services, Inc.
PanEnergy Transport and Trading Company	Duke Energy Transport and Trading Company

Please let this letter serve as official and required notification of our name changes. **This is a name change only.** The companies remain the same. Federal Identification Numbers and tax identification numbers have not been changed. There has been no transfer of any interest by virtue of these name changes.

We look forward to a continuing successful business relationship.

Sincerely,

Keith J. Miller

Keith J. Miller
Assistant Controller

ARTICLES OF AMENDMENT

TO

ARTICLES OF INCORPORATION

OF

PANENERGY FIELD SERVICES, INC.

1997 JUN 24 PM 2 57
SECRETARY OF STATE
STATE OF COLORADO

PanEnergy Field Services, Inc., a corporation organized and existing under and by virtue of the Colorado Business Corporation Act (the "Corporation"), DOES HEREBY CERTIFY:

First. That the Board of Directors of the Corporation, by a unanimous written consent in conformance with Section 7-108-202 of the Colorado Business Corporation Act, adopted resolutions proposing and declaring advisable that the Article of Incorporation of the Corporation be amended so that Article I shall be and read as follows:

"ARTICLE I

The name of the corporation is Duke Energy Field Services, Inc."

Second. That thereafter the sole stockholder of the Corporation entitled to vote in respect of such Amendment, acting pursuant to Section 7-107-104 of the Colorado Business Corporation Act, has given its written consent to such amendment.

Third. That such amendment was duly adopted in accordance with the applicable provisions of the Colorado Business Corporation Act. The number of shares voted for the amendment was sufficient for approval.

IN WITNESS WHEREOF, PanEnergy Field Services, Inc., has caused this certificate to be signed in its corporate name by James T. Hackett, its Chairman, and Robert W. Reed, its Secretary, this 18th day of June, 1997.

PANENERGY FIELD SERVICES, INC.

BY: James T. Hackett
James T. Hackett
Chairman

(SEAL)
ATTEST:

By: Robert W. Reed
Robert W. Reed
Secretary

ARTICLES OF AMENDMENT

RECEIVED
1997 JUN 24 AM 11:50
SECRETARY OF STATE
STATE OF COLORADO

ARTICLES OF INCORPORATION

OF

PANENERGY TRANSPORT AND TRADING COMPANY

PanEnergy Transport and Trading Company, a corporation organized and existing under and by virtue of the Colorado Business Corporation Act (the "Corporation"), DOES HEREBY CERTIFY:

First. That the Board of Directors of the Corporation, by a unanimous written consent in conformance with Section 7-108-202 of the Colorado Business Corporation Act, adopted resolutions proposing and declaring advisable that the Article of Incorporation of the Corporation be amended so that Article I shall be and read as follows:

"ARTICLE I

The name of the corporation is Duke Energy Transport and Trading Company."

Second. That thereafter the sole stockholder of the Corporation entitled to vote in respect of such Amendment, acting pursuant to Section 7-107-104 of the Colorado Business Corporation Act, has given its written consent to such amendment.

Third. That such amendment was duly adopted in accordance with the applicable provisions of the Colorado Business Corporation Act. The number of shares voted for the amendment was sufficient for approval.

IN WITNESS WHEREOF, PanEnergy Transport and Trading Company, has caused this certificate to be signed in its corporate name by James T. Hackett, its Chairman, and Robert W. Reed, its Secretary, this 18th day of June, 1997.

PANENERGY TRANSPORT AND TRADING COMPANY

BY: James T. Hackett
James T. Hackett
Chairman

(SEAL)
ATTEST:

By: Robert W. Reed
Robert W. Reed
Secretary

4-5-96 PANENERGY | PECOS DIAMOND

Dave Gordon

- S. SIDE INLET SCRUBBER

new equipment

ENGINE ROOM -

has floor drains that all accumulate drip into a collection sump single contain then gets pumped to slop tank clean ground

UST - SW side of Engine room was used to collect spillage from the coolant systems during work overs. The liquids would immediately be pumped to slop tanks

Want to take out of service

LIQUIDS STORAGE

Methanol in saddle tank inside berm
lube oil drums on rack in berm
lube storage tank on liner inside berm
Coolant saddle tank in berm
Berm adequate

AMINE REGEN SKID

sets on a concrete pad w/out containment. Drips off east side of pad. Very small amt.

Plunger drip off pistons drain off to a below grade sump on east side of pad then pumped to tanks.

Amine Makeup AREA - termed proper. has sump on S. side pumped to tanks

environmental SERVICES inc.

January 30, 1996

Mr. Roger Anderson
Oil Conservation Division
Energy, Minerals, and Natural Resources Department
2040 S. Pacheco
Santa Fe, New Mexico 87505

Subject: Groundwater Discharge Plan Application—Pecos Diamond Plant

Dear Mr. Anderson

On behalf of PanEnergy Field Services, we are submitting two copies of the discharge plan application for Pecos Diamond Plant. The plan has been prepared in accordance with the "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95), and with the Water Quality Control Commission (WQCC) Regulations 3104 and 3106.

Enclosed is a money order for $50 in filing fees, as specified in WQCC 3114. If you have any questions or comments please call Susan Boyle of ESI at 505-266-6611 or Bob Pearson of PanEnergy at 303-595-3331.

Sincerely

Claudette Bonham

Claudette Bonham

4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110
PHO 505 266 6611
FAX 505 266 7738

The Santa Fe New Mexican
Since 1849. We Read You.

NM OIL CONSERVATION
ATTN: SALLY MARTINEZ
P O BOX 6429
SANTA FE, NM 87505-6429

AD NUMBER: 470545 ACCOUNT: 56689
LEGAL NO: 59119 P.O. #: 96-199-002997

369	LINES	once	at $ 147.60
Affidavits:			5.25
Tax:			9.55
Total:			$ 162.40

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 59119 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 21 day of February 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 21 day of February A.D., 1996

OFFICIAL SEAL
LAURA E. HARDING
NOTARY PUBLIC -- STATE OF NEW MEXICO
MY COMMISSION EXPIRES 11/23/99
Laura E Harding

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

Energy, Minerals and Natural Resources Department
Oil Conservation Division

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(GW-237) - PanEnergy Field Services, Robert Pearson, Manager of Environmental Affairs, 900 Republic Plaza, 370 17th St., Denver, Colorado, 80202, has submitted a Discharge Plan Application for the Pecos Diamond Gas Plant located in the SW/4 SW/4 Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Approximately 15 gallons per day of process wastewater with a total dissolved solids concentration of approximately 13, 600 mg/l is stored in above ground, closed top steel tanks prior to transportation to an OCD approved offsite disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of 10,000 mg/l. THe discharge plan addresses how spills, leaks, and other accidental discharges will be managed.

(GW-071-1) - El Paso Field Services, David Bays, Environmental Specialist, P.O. Box 99234, El Paso, Texas, 79999-9234, has submitted a Discharge Plan Application for the Ballard Hydrocarbon Recovery Facility located in the SW/4 Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2336 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5000 mg/l is stored in above ground, closed top steel tanks prior to being discharged into two evaporation ponds, that are double lined with a leak detection system, for evaporation. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 220 feet with a total dissolved solids concentration of 560 mg/l. The discharge plan addresses, how spills, leaks, and other accidental discharges will be managed.

(GW-67) - Bull Dog Tool Company, Inc., Barry Antwell, Manager, 2807 W. County Road, Hobbs, New Mexico 88240, has submitted a Discharge Plan Renewal Application for their Hobbs, service facility located in the NE/4 SW/4 of Section 20, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 50 gallons per day of wastewater from washing operations are stored in an above ground, closed top storage tank prior to disposal at an offsite OCD approved disposal facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 700 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-3) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #1 Gas Plant located in the NW/4 SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 46,000 gallons per day of process wastewater with a total dissolved solids concentration of 7000 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-4) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #2 Gas Plant located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 46,000 gallons per day of process wastewater with a total dissolved solids concentration of 7100 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the Director determines there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the director will approve the plan based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of February, 1996.
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Legal #59119
Pub. February 21, 1996

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, New Mexico 87113
Phone: (505) 761-4525 Fax: (505) 761-4542

March 13, 1996

William J. Lemay, Director
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Lemay:

This responds to the Energy, Minerals, and Natural Resources Department Oil Conservation Division's public notices dated February 13, 1996, and February 23, 1996, regarding the State of New Mexico's proposal to approve the ground water discharge plans for the applicants listed below.

Permit #	Applicant	County / Location NMPM
GW- 237	PanEnergy Field Services	Eddy / Section 3, T18S, R27E
GW-71-1	El Paso Field Services	San Juan / Section 16, T26N, R12W
GW- 67	Bull Dog Tool Company, Inc.	Lea / Section 20, T18S, R38E
GW- 3	Texaco Exploration and Production, Inc.	Lea / Section 27, T22S, R37E
GW- 4	Texaco Exploration and Production, Inc.	Lea / Section 28, T21S, R37E
GW- 78	Williams Field Services	San Juan / Section 8, T25N, R.W.
GW- 79	Williams Field Services	San Juan / Section 34, T26N, R4W
GW-49-1	El Paso Field Services	San Juan / Section 15, T26N, R11W

The U.S. Fish and Wildlife Service (Service) has no objection to the Oil Conservation Division (Division) approving discharge plans that utilize bermed, closed top tanks. The use of berms may help prevent migration of hydrocarbon-contaminated water into a surface water of New Mexico during accidental breach, and the use of closed top tanks prevents wildlife access to potentially toxic chemicals.

The Service has the following recommendations for discharge plans that use lined or unlined evaporation ponds. During flight, migratory birds may not distinguish between an evaporation pond and a natural waterbody. Therefore, rather than allow migratory birds access to a waterbody that may act as an attractive nuisance, the Service recommends that the applicant or the Division demonstrate that the evaporation ponds are "bird-safe" (e.g., can meet New Mexico general water quality standards 1102B, 1102F, and 3101K or 3101L), or that the evaporation ponds be constructed in a manner that prevents bird access (e.g., netted, fenced, closed top tanks, forced-air evaporation systems).

Migratory birds that land on waterbodies with an oil sheen (or pesticide residue) have the potential to contaminate their eggs during nesting season. Hydrocarbon pollutants carried to the nest on breast feathers, feet, or nesting materials can cause reduced hatchability of contaminated eggs. As little as 1 to 10 microliters of crude or refined oil topically applied to eggs of various bird species can be embryotoxic or teratogenic. We recommend that the Division or the applicant demonstrate that the pond will have no oil sheen and continue periodic testing to characterize the water quality and determine if any bioaccumulation or ecological risks seem imminent.

Our intent is to inform and intercede before any migratory bird deaths occur as migratory birds are beneficial (e.g., they hold pest populations in check) and are protected by law. The Migratory Bird Treaty Act (MBTA) makes it unlawful for anyone at anytime or in any manner to take (i.e., pursue, hunt, take, capture, kill, transport, or possess) any migratory bird unless authorized by a permit issued by the Department of the Interior. The courts have interpreted "illegal take" to include accidental poisoning or accumulation of harmful concentrations of contaminants by migratory birds, even if the contamination event was accidental or the perpetrator was unaware of the fact that his/her actions (or failure to take action) could ultimately prove harmful to migratory birds. The liability provisions of the MBTA preclude the necessity of proving intent and permits criminal prosecution of persons, associations, partnerships, or corporations that inadvertently or intentionally kill or illegally take one or more migratory birds. Therefore, if the creation and operation of an evaporation pond results in migratory bird deaths and the problem is not addressed, the operators may be held liable under the enforcement provisions of the MBTA.

If you have any questions, please contact Joel D. Lusk at (505) 761-4525.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Chief, Surface Water Quality Bureau, New Mexico Environment Department, Santa Fe, New Mexico
Chief, Ground Water Quality Bureau, New Mexico Environment Department, Santa Fe, New Mexico
Geographic Manager, New Mexico Ecosystems, U.S. Fish and Wildlife Service, Albuquerque, New Mexico

Affidavit of Publication

No. 15368

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 days consecutive weeks on the same day as follows:

First Publication February 22, 1996

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 22nd day of February 19 96

Barbara Ann Beans

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1999

LEGAL NOTICE

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the oil Conservation Division, 2040 S. Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-237) - PanEnergy Field Services, Robert Pearson, Manager of Environmental Affairs, 900 Republic Plaza, 370 17th St., Denver, Colorado, 80202, has submitted a Discharge Plan Application for the Pecos Diamond Gas Plant located in the SW/4 SW/4 Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. Approximately 15 gallons per day of process wastewater with a total dissolved solids concentration of approximately 13,600 mg/l is stored in above ground, closed top steel tanks prior to transportation to an OCD approved offsite disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of 10,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges will be managed.

(GW-071-1) - El Paso Field Services, David Bays, Environmental Specialist, P.O. Box 99234, El Paso, Texas, 79999-9234, has submitted a Discharge Plan Application for the Ballard Hydrocarbon Recovery Facility located in the SW/4 Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 2336 gallons per day of process wastewater with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-3) - Texaco Exploration and Production, Inc., Rodney Bailey,, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #1 Gas Plant located in the NW/4 SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 46,000 gallons per day of process wastewater with a total dissolved solids concentration of 7000 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

(GW-4) - Texaco Exploration and Production, Inc., Rodney Bailey, Environmental Health and Safety Coordinator, P.O. Box 1929, Eunice, New Mexico, 88231-1929, has submitted a Discharge Plan Renewal Application for their Eunice #2 Gas Plant located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Aproximately 46,000 gallons per day of process wastewater with a total dissolved solids concentration of 7100 mg/l is discharged to a lined pond for storage prior to final disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks and accidental discharges will be managed.

February, 1996.
STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY,
Director

SEAL

Published in the Artesia Daily Press, Artesia, N.M. February 22, 1996.

Legal 15368

tal dissolved solids concentration of approximately 5000 mg/l is stored in above ground, closed top steel tanks prior to being discharged into two evaporation ponds, that are double lined with a leak detection system, for evaporation. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 220 feet with a total dissolved solids concentration of 560 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges will be managed.

(GW-67) Bull Dog Tool Company, Inc., Barry Antwell, Manager, 2807 W. County Road, Hobbs, New Mexico 88240, has submitted a Discharge Plan Renewal Application for their Hobbs service facility located in the NE/4 SW/4 of Section 20, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 50 gallons per day of wastewater from washing operations are stored in an above ground, closed top storeage tank prior to disposal at an offsite OCD approved disposal facility. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 65 feet with a total dissolved solids concentration of approximately 700

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public heaing shall set forth the reasons why a hearing shall be held. A hearing will ~~be held~~ if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the discharge plan application and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico on this 13th day of

AFFIDAVIT OF PUBLICATION

No. 35935

STATE OF NEW MEXICO
County of San Juan:

ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):

Wednesday, February 21, 1996

and the cost of publication is: $119.50

Robert Lovett

On 2/23/96 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Mary G Snead

My Commission Expires March 21, 1998

STATE OF NEW MEXICO

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the discharge plan application and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 13th day of February, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

/s/William J. LeMay
WILLIAM J. LEMAY, Director

SEAL

Legal No. 35935 published in The Daily Times, Farmington, New Mexico on Wednesday, February 21, 1996.

NOTICE OF PUBLICATION

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 13th day of February, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

environmental SERVICES inc.

esi

January 30, 1996

Mr. Roger Anderson
Oil Conservation Division
Energy, Minerals, and Natural Resources Department
2040 S. Pacheco
Santa Fe, New Mexico 87505

Subject: Groundwater Discharge Plan Application—Pecos Diamond Plant

Dear Mr. Anderson

On behalf of PanEnergy Field Services, we are submitting two copies of the discharge plan application for Pecos Diamond Plant. The plan has been prepared in accordance with the "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95), and with the Water Quality Control Commission (WQCC) Regulations 3104 and 3106.

Enclosed is a money order for $50 in filing fees, as specified in WQCC 3114. If you have any questions or comments please call Susan Boyle of ESI at 505-266-6611 or Bob Pearson of PanEnergy at 303-595-3331.

Sincerely

Claudette Bonham

Claudette Bonham

4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110
PHO 505 266 6611
FAX 505 266 7738

Application for Ground Water Discharge Plan

Pecos Diamond Plant

prepared for

PanEnergy Field Services
900 Republic Plaza
Denver, CO 80202

January 1996

5/92

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS, OIL REFINERIES AND GAS COMPRESSOR STATIONS

(Refer to OCD Guidelines for assistance in completing the application.)

I. TYPE: Natural Gas Processing Plant

II. OPERATOR: PanEnergy Field Services

ADDRESS: 900 Republic Plaza, 370 17th St., Denver, CO 80202

CONTACT PERSON: Robert L. Pearson PHONE: 303-595-3331

III. LOCATION: SW /4 SW /4 Section 3 Township 18S Range 27E
Submit large scale topographic map showing exact location.

IV. Attach the name and address of the landowner(s) of the disposal facility site.

V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

VI. Attach a description of sources, quantities and quality of effluent and waste solids.

VII. Attach a description of current liquid and solid waste transfer and storage procedures.

VIII. Attach a description of current liquid and solid waste disposal procedures.

IX. Attach a routine inspection and maintenance plan to ensure permit compliance.

X. Attach a contingency plan for reporting and clean-up of spills or releases.

XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.

XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XIII. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Robert L. Pearson Title: Manager of Environmental Affairs

Signature: Robert L. Pearson Date: 1-29-96

Table of Contents

Pecos Diamond Plant

Discharge Plan

This document constitutes a first-time application for a Groundwater Discharge Plan for the Pecos Diamond Plant. This Discharge Plan application has been prepared in accordance with the New Mexico Oil Conservation Division's (NMOCD) "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95) and New Mexico Water Quality Control Commission (WQCC) regulations 3-104 and 3-106.

1 Type of Operation

The plant utilizes two post-boost cryogenic skids and two 1800-horsepower compressor engines to remove liquids from an inlet natural gas stream. An amine processing unit, using diethanolamine (DEA) and water, is utilized to remove carbon dioxide from the Y-Grade (natural gas liquids) removed from the inlet gas in the cryogenic units. Dry natural gas and Y-Grade are transported for sale off-site via pipeline. Pecos Diamond is capable of processing 20,000 MMscf/day of natural gas per compressor engine.

2 Operator/Legally Responsible Party

Operator

PanEnergy Field Services
900 Republic Plaza
370 17th Street
Denver, CO 80202
303-595-3331
Contact: Robert L. Pearson

Legally Responsible Party

PanEnergy Field Services
900 Republic Plaza
370 17th Street
Denver, CO 80202
303-595-3331
Contact: Robert L. Pearson

3 Location of Discharge/Facility

Eddy County, NM
T 18S, R 27E, Sec. 3, SW1/4 SW 1/4
(appendix 1 contains a map of the site location)

4 Landowner

US Department of the Interior, Bureau of Land Management

5 Facility Description

Appendix 1 contains a simplified process flow diagram and a site layout diagram.

6 Materials Stored or Used

Table 1 identifies materials and storage containments for substances used and stored at the plant. The first column corresponds to the identification labels on the site and process flow diagrams. Appendix 2 contains Material Safety Data Sheets (MSDS) for on-site materials.

table 1
Materials Used and Stored

Id	*Name*	*Composition*	*Type*	*Container*	*Capacity*	*Location*
TK-1	Water	100% water	Liquid	AGT	1000 gal	S of amine processing
TK-2	Amine	100% DEA	Liquid	AGT	1000 gal	S of amine processing
TK-3	Condensate	Out of service	n/a	AGT	8820 gal	SW corner
TK-4	Wastewater	Water, DEA, lube oil, and Y-Grade	Liquid	AGT	8820 gal	SW corner
TK-5	Y-Grade	100% natural gas liquids	Liquid	AGT	31,500 gal	E of amine processing
TK-6	Lube oil	100% lube oil	Liquid	AGT	3350 gal	W of compressor building
TK-7	Lube oil	100% lube oil	Liquid	AGT	600 gal	Inside of compressor building
TK-8	Lube oil	100% lube oil	Liquid	AGT	250 gal	W of compressor building
TK-9	Coolant	50% ethylene glycol, 50% water	Liquid	AGT	500 gal	W of compressor building
TK-10	Detergent	100% detergent	Liquid	AGT	50 gal	W of compressor building
TK-11	Methanol	100% methanol	Liquid	AGT	500 gal	W of compressor building
S-1	Amine sump	Water and DEA	Liquid	Sump	500 gal	S of amine processing
S-2	Wastewater sump	Water, detergent, solvent, and trace amounts of lube oil and coolant	Liquid	Sump	500 gal	Outside NW corner of compressor building
S-3	Coolant sump	50% ethylene glycol, 50% water	Liquid	Sump	500 gal	Outside SW corner of compressor building
S-4	Process area 2 sump	Waste oil, rainwater and Y-Grade	Liquid	Sump	unknown	NW corner of process area
S-5	Amine skid sump	Waste oil, rainwater, Y-Grade, and DEA	Liquid	Sump	16 gal	E of amine skid, near north end

7 Sources and Quantities of Effluent and Waste Solids

Table 2 summarizes the effluent and solid wastes generated at the plant. The major sources of liquid and solid waste are described in the sections following table 2.

table 2
Effluent and Solid Waste Sources, Quantity, Quality and Disposition

Source	*Waste/Quality*	*Quantity*	*Disposition*
Engine, fuel gas scrubbers	Water with NGL	100 gal/mo	TK-4 Wastewater tank
Engine wash down	Water with detergent, solvent, lube oil and coolant	300 gal/mo	S-2 Wastewater sump
Y-Grade pumps	Waste oil and possibly rainwater and Y-Grade	2 gal/mo	TK-4 Wastewater tank
DEA pumps	Waste oil and possibly rainwater, Y-Grade, and DEA	2 gal/mo	TK-4 Wastewater tank
Amine reboiler/surge tank	Spent amine, water and trace amounts of Y-Grade	varies	TK-4 Wastewater tank
Filters	Waste oil	16/yr	Closed container

Separators/Scrubbers

Each of the two compressor engines and the fuel gas system are equipped with scrubbers. Water with some natural gas liquids (NGL) is discharged from these scrubbers to the wastewater tank TK-4 via underground piping. The amount of liquids accumulated by the scrubbers varies and is dependent upon the moisture content of the inlet gas stream.

An inlet scrubber is connected to the condensate tank TK-3 via an underground line. Neither of these pieces of equipment have ever been in service. PanEnergy will notify the OCD if they are placed into service.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers/fans located at Pecos Diamond.

Process and Storage Equipment Wash Down

Oily waste water is generated during wash down of the compressor engines. Engine wash water contains water, detergent, and solvent with trace amounts of lube oil and coolant. The compressor engines are washed down once per month. A maximum of 300

gallons of wash water is generated during each washing. The compressor building is equipped with a 6-inch steel drain line which transports wash water to the wastewater sump S-2. No RCRA-listed hazardous wastes are contained in the wash water.

Drums, tanks, and trucks are not washed at Pecos Diamond.

Solvents/Degreasers

Approximately 10-15 gallons per month of detergent is used for compressor engine wash down. A non-chlorinated solvent manufactured by Safety Kleen is provided to the site in a self-contained storage unit, is maintained on the site in the vehicle storage building. Spent solvent is removed routinely from the site by the supplier. Detergent is stored in an above-ground storage tank, TK-10. Used detergent is disposed of with wash water. Wash water collection and storage is discussed above in Process and Storage Equipment Wash Down.

Spent Acids/Caustics

There are no spent acids or caustics at Pecos Diamond.

Used Engine Coolants

A fifty-fifty composition of coolant and water is used to cool the compressor engines at the plant. Approximately 20 gallons per month of coolant is used. Prior to use, coolant is stored in tank TK-9. No waste coolant is generated as engine use causes the coolant to evaporate. During engine maintenance, coolant is drained from the engines to the coolant sump S-3. When maintenance is complete the coolant is pumped from the sump back to the engines.

Since the compressor building is equipped with a drain line, leaks and spills of coolant will be contained in the compressor building drain system described above in Process and Storage Equipment Wash Down.

Waste Lubrication and Motor Oils

The compressor engines at Pecos Diamond do not generate waste oil. The engines use approximately 875 gallons per month of oil with no waste generated. Since the compressor building is equipped with a drain line, leaks and spills of oil will be contained in the compressor building drain system described above in Process and Storage Equipment Wash Down.

Waste oil generated by drips and leaks from the Y-Grade pumps in the cryogenic process areas are contained within each pump case. The pump cases located in process area 2 are drained to the process area 2 sump S-4. Effluent accumulated in the process area 2 sump is dumped into the wastewater tank via underground piping. The pump

cases in process area 3 are pumped to the process area 2 sump S-4. The amount of waste oil generated by the pumps varies daily and may contain rainwater and trace amounts of Y-Grade

The DEA pumps are also sources of waste oil. Drain pans are located below each pump and drain accumulated effluent to the amine skid sump which drains into the amine sump S-1. The amount of waste oil generated by the DEA pumps varies daily and may contain rainwater and trace amounts of Y-Grade. Effluent collected in the amine sump is manually pumped to the wastewater tank. The maximum amount of effluent pumped out of the amine sump is usually 1000 gallons per month.

Used Filters
Approximately sixteen filters are used in the compressor engines per year. After removal from the engines, the oil filters are placed on a drain table over the compressor building drain line to the waste water sump. The filters are stored in a closed container for removal from the site. Used filters are removed from the plant bimonthly.

Solids and Sludges
No solids or sludges are generated at Pecos Diamond.

Painting Wastes
No painting wastes are generated at Pecos Diamond.

Sewage
The plant has a septic system for receiving non-hazardous sewage waste. Sewage effluent is completely separate form other effluents with no commingling. The sanitary wastewater is discharged into a septic tank with leach line.

Lab Wastes
Pecos Diamond is not equipped with a lab.

Other Liquid and Solid Wastes
Spent amine with water and Y-Grade generated in the amine processing area is discharged from the reboiler/surge tank to the amine sump S-1 via underground piping. The operation of the amine sump is described above in Waste Lubrication and Motor Oils.

Paper and other solid waste, excluding filters, are removed from the site weekly by Waste Management.

This section provides a general description of the collection, storage, and disposal systems used for effluents and solid wastes generated at the plant. Section 7 identifies the specific collection, storage, and disposal method utilized for each of the effluents generated at the plant.

Collection

Effluent materials are transported to appropriate sumps and tanks via underground piping which is pressurized only to force drainage. Underground effluent piping was installed in 1982 when the plant was constructed. Hydrostatic testing of underground effluent pipelines has not been conducted at Pecos Diamond. Hydrostatic testing will take place within the 5-year duration of the approved discharge plan. PanEnergy will submit a plan and timetable for hydrostatic testing of the underground effluent pipelines within one year of approval of this discharge plan application.

All sumps were installed at the facility in 1982 prior to issuance of the "Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks (10/91)." The waste water sump S-2 is lined with a steel tank. The coolant, amine, and process area 2 sumps (S-1, S-3, and S-4) are each lined with fiberglass tanks.

Storage

All storage tanks located at Pecos Diamond are constructed of steel except for the detergent tank which is plastic. They are all situated on gravel. The condensate and wastewater tanks (TK-3 and TK-4) are surrounded by a gravel berm which was constructed to contain a minimum of 1.33 times the volume of the largest tank within the berm. The methanol, detergent, coolant, and two lube oil tanks (TK-6 and TK-8 through TK-11) are also surrounded by an earthen berm. The berm was designed to contain a minimum of 1.33 times the volume of the largest tank stored within the bermed area. A 600-gal lube oil tank TK-7 is located in the compressor building which is equipped with the drainage system discussed in section 7.

There are currently no drums stored at the facility. If any drums are to be stored at Pecos Diamond, they will be kept in the compressor building where any spills and leaks will be contained in the drainage system described in section 7.

On-Site Disposal

There are no on-site disposal facilities at Pecos Diamond.

Off-site Disposal

All effluent and waste is removed and disposed of as identified on table 3.

table 3
Off Site Disposal Contractors and Disposal Facilities

Waste	*Removal Contractor*	*Disposal Facility*
Wastewater (TK-4)	OK Hot Oil Service Lovington Hwy, Loco Hills, NM 88255 505-677-2262	Loco Hills Water Disposal Co. OCD Permit #R6811A for surface disposal Lovington Hwy, Loco Hills, NM 88255 505-677-2118
Filters	Waste Management 2608 Lovington Hwy., Hobbs, NM 505-392-6571	Hobbs-Lea County Landfill 2608 Lovington Hwy., Hobbs, NM 505-392-6571

9 Proposed Modifications

The amine tank TK-2 does not currently have secondary containment. Containment to hold 1.33 times the volume of the tank will be installed within the first year of discharge plan effectiveness.

10 Inspection, Maintenance, and Reporting

The facility is attended during the day. The site will be inspected daily by the operator according to the guidelines set forth in the plant SPCC plan. In addition, the storage tanks and sumps will be inspected as recommended by the "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants, Oil Refineries, and Gas Compressor Stations (5-92). The sumps at Pecos Diamond will be cleaned out and visually inspected on an annual basis. The storage tanks will be cleaned out and visually inspected every five years.

11 Spill/Leak Prevention and Reporting (Contingency Plans)

The process area of the plant is graveled to allow for early leak detection and quick response by facility personnel in the event of a leak of process fluids. PanEnergy will handle all spills as required by the SPCC Plan (see appendix 5) and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and WQCC Section 1203. Copies of these regulations are in appendix 3.

12 Site Characteristics

The Pecos Diamond Gas Plant is located on the rolling plains and low hills of the southeastern portion of the Roswell Basin within the Pecos River Basin.

Scoggin Draw and Login Draw are intermittent streams located within one mile of the perimeter of the facility. Runoff from the facility will flow downhill into Scoggin Draw. There are no ground water discharge sites within the perimeter of the facility. Flooding

potential at the site is low, as the facility is sited on a small nose of a hilltop.

No record of any water wells within one-quarter mile of the perimeter of the facility are on file (1/96) with the New Mexico State Engineer Office. Other local water wells are used for domestic/stock purposes. The depth to water about one-half mile from the facility at the closest well (RA-3917) on record at the State Engineer Office was approximately 50 feet in 1958. Using this value and assuming the water table is a subdued version of the topography, the depth to ground water at the facility is estimated to be 70 feet.

The chloride ion-concentration of the ground water is at or greater than 10,000 milligrams/liter (Hiss, W.L., 1975, Chloride-Ion Concentration in Ground Water in Permian Guadalupian Rocks, Southeast New Mexico and West Texas: New Mexico Bureau of Mines & Mineral Resources, Resource Map 4). Groundwater in this area is highly mineralized and may contain high concentrations of sulfates (Hendrickson, G.E., and Jones, R.S., 1952, Geology and Ground-Water Resources of Eddy County, New Mexico: New Mexico Bureau of Mines and Mineral Resources, Ground-Water Report 3).

The facility is located on the shallow to moderately deep soil developed on the bedrock Chalk Bluff Formation (Hendrickson, G.E., and Jones, R.S., 1952, Geology and Ground-Water Resources of Eddy County, New Mexico: New Mexico Bureau of Mines and Mineral Resources, Ground-Water Report 3). The soil type at the facility is RG, Reeves-Gypsum, a loamy soil developed shallow to moderately deep over gypsum beds and gypsum land with slopes of 0 to 3 percent (U.S. Department of Agriculture, 1971, Soil Survey, Eddy Area, New Mexico).

The Chalk Bluff Formation and the underlying San Andres Formation are the two aquifers at this site (Hendrickson, G.E., and Jones, R.S., 1952, Geology and Ground-Water Resources of Eddy County, New Mexico: New Mexico Bureau of Mines and Mineral Resources, Ground-Water Report 3). The Chalk Bluff, a shallow aquifer, consists of gypsiferous limestones to redbeds. The San Andres Formation is a dolomitic limestone aquifer with a basal sandstone unit.

13 Additional Information

History of Ownership and Compliance

Constructed by Liquid Energy Corporation, the Pecos Diamond Plant commenced operation in 1982. In November 1993, Liquid Energy shut the plant down. The plant was purchased by Associated Natural Gas, Inc. (now PanEnergy) on January 1, 1996. It is currently undergoing start-up and is expected to be at full capacity by February 1996.

On April 18, 1994 the NMOCD issued a letter to Liquid Energy requesting that an application for a discharge plan be submitted for the facility (copies of all mentioned correspondence are in appendix 4). In subsequent letters, Liquid Energy requested extensions for application submittal. On February 6, 1995, the NMOCD granted an extension, requiring submittal of the application by May 7, 1995. Liquid Energy did not submit an application prior to the sale of the facility to PanEnergy.

On November 27, 1995, Associated Natural Gas, Inc., through its contractor, Environmental Services, Inc., submitted a request to the NMOCD for an additional 120-day extension for submittal of an application to discharge . The NMOCD responded shortly thereafter, requiring that approval to discharge at the Pecos Diamond Plant be received by March 30, 1996. This application seeks such approval.

Closure Plan

All reasonable and necessary measures will be taken to prevent the exceedance of WQCC Section 3103 quality standards should PanEnergy choose to permanently close the Pecos Diamond Plant. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

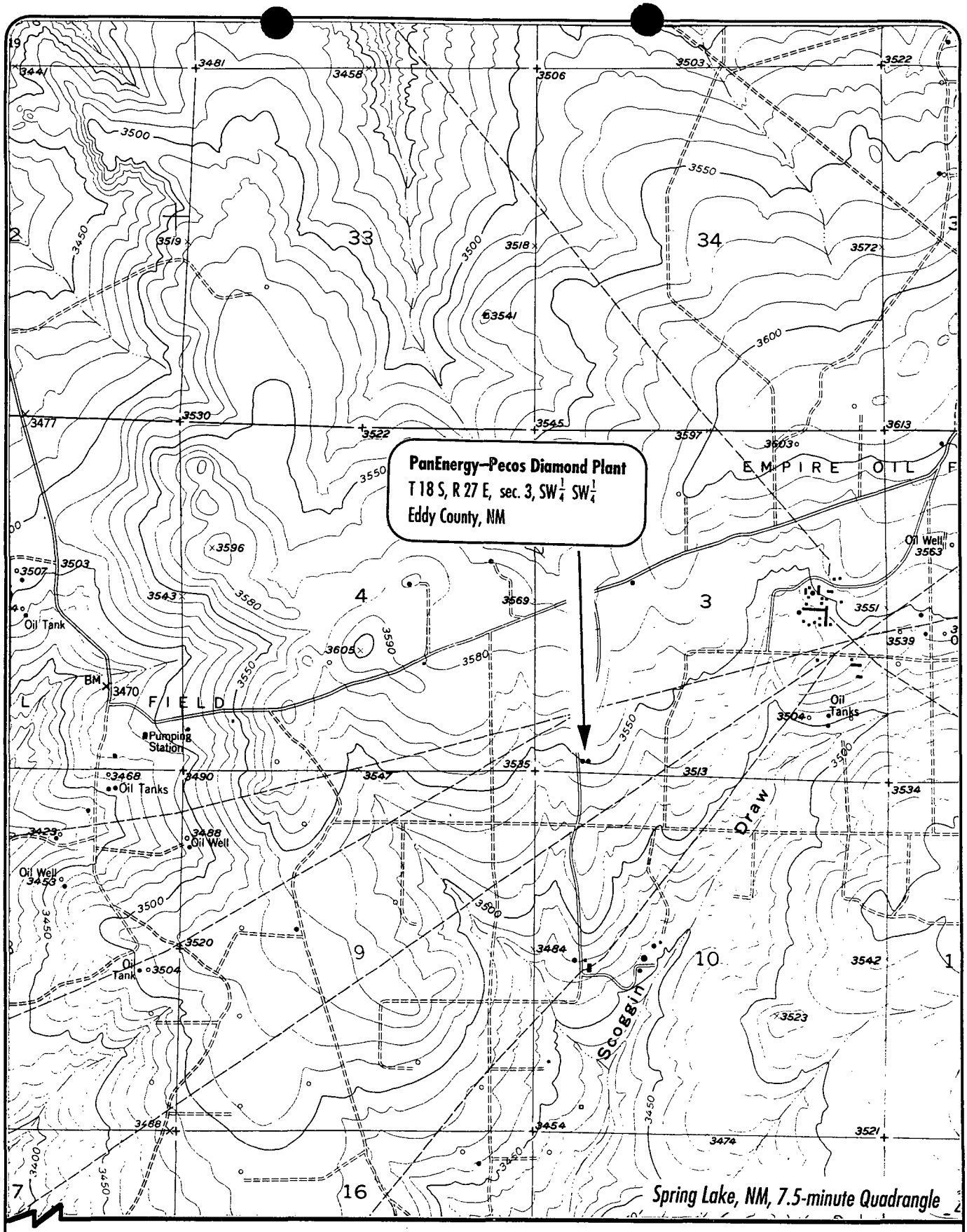
Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the Pecos Diamond Plant and that such information is true, accurate, and complete to the best of my knowledge and belief.

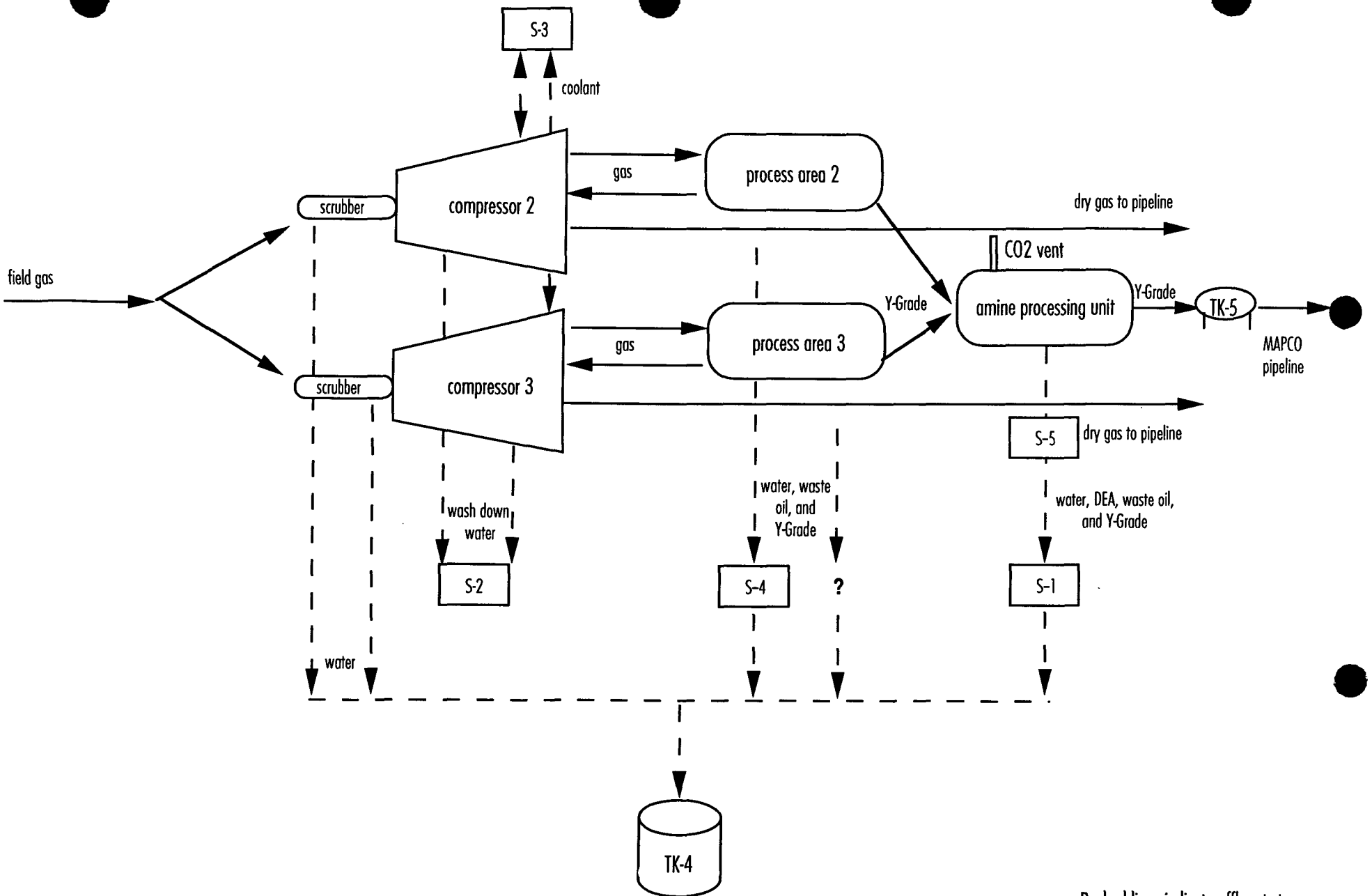
Robert L. Pearson
Manager of Environmental Affairs
PanEnergy Field Services

1-29-96
Date

Appendix 1



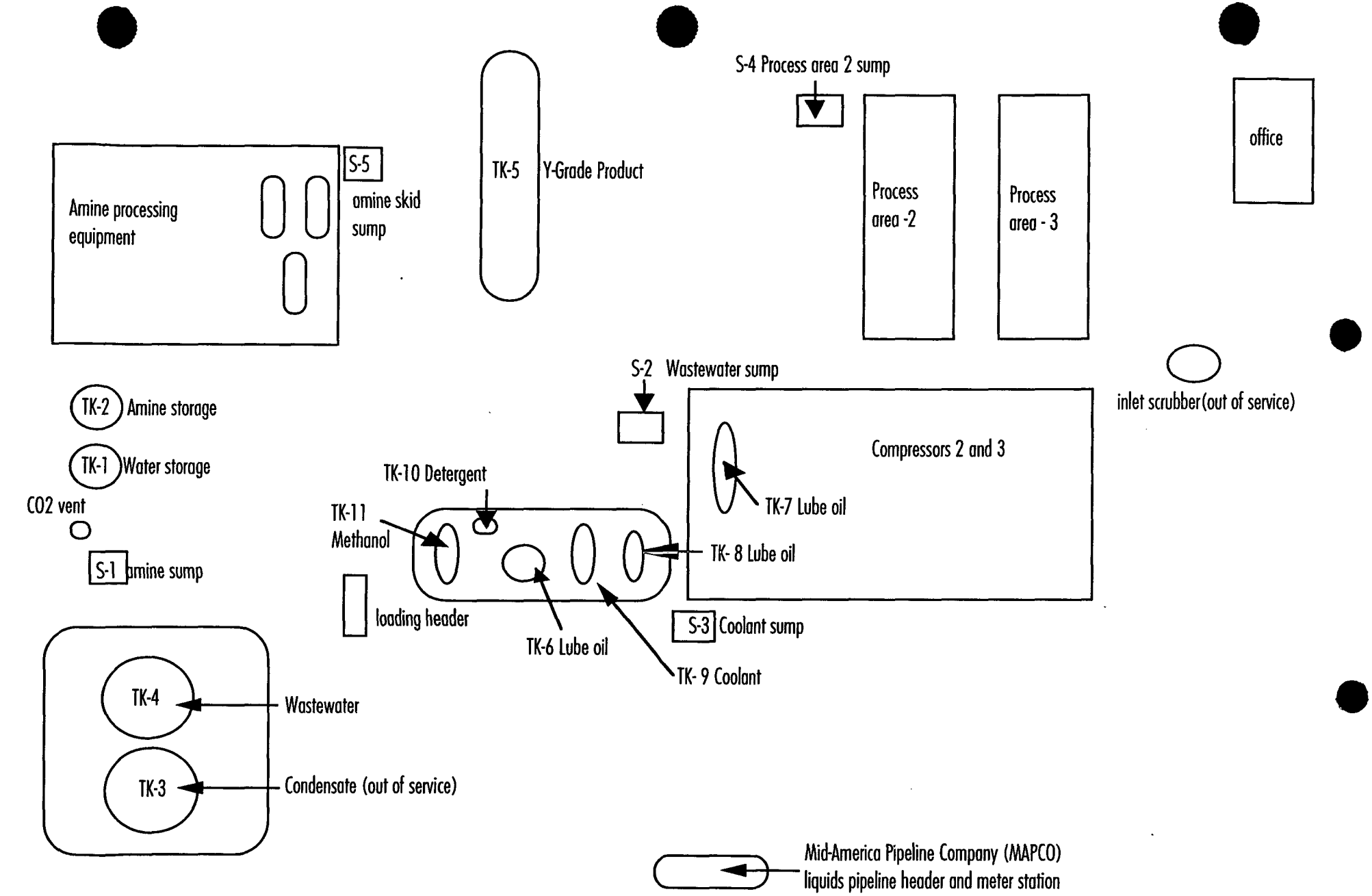
Environmental Services Inc • 4665 Indian School NE • Suite 106 • Albuquerque NM 87110 • 505 266 6611



Dashed lines indicate effluent streams.

PanEnergy—Pecos Diamond Plant

Simplified Process Flow Diagram



PanEnergy—Pecos Diamond Plant

Site Diagram

MATERIAL SAFETY DATA SHEET

NOTE: Read and understand Material Safety Data Sheet before handling or disposing of product.

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

MATERIAL IDENTITY

Product/Code and Name:
75895 DIETHANOLAMINE LFG-85 %

Chemical Name and/or Family or Description:
Alkanolamine

Manufacturer's Name and Address:

HUNTSMAN
P.O. Box 27707
Houston, TX 77227-7707

Telephone Numbers:

Transportation Emergency-Company	:	(409) 727-0831
CHEMTREC	:	(800) 424-9300
Health Emergency -Company	:	(914) 831-3400
General MSDS Assistance	:	(713) 235-6432
Technical Information	:	(512) 459-6543

2. COMPOSITION/INFORMATION ON INGREDIENTS

THE CRITERIA FOR LISTING COMPONENTS IN THE COMPOSITION SECTION IS AS FOLLOWS: CARCINOGENS ARE LISTED WHEN PRESENT AT 0.1 % OR GREATER; COMPONENTS WHICH ARE OTHERWISE HAZARDOUS ACCORDING TO OSHA ARE LISTED WHEN PRESENT AT 1.0 % OR GREATER; NON-HAZARDOUS COMPONENTS ARE LISTED AT 3.0 % OR GREATER. THIS IS NOT INTENDED TO BE A COMPLETE COMPOSITIONAL DISCLOSURE. REFER TO SECTION 14 FOR APPLICABLE STATES' RIGHT TO KNOW AND OTHER REGULATORY INFORMATION.

Product and/or Component(s) Carcinogenic According to:

OSHA	IARC	NTP	OTHER	NONE
-	-	-	-	X

Composition: (Sequence Number and Chemical Name)

Seq.	Chemical Name	CAS Number	Range in %
01 *	Ethanol, 2,2'-iminobis- (Common Name- Diethanolamine)	111-42-2	80.00-94.99
02	Water	7732-18-5	10.00-19.99

PRODUCT IS HAZARDOUS ACCORDING TO OSHA (1910.1200).
* COMPONENT IS HAZARDOUS ACCORDING TO OSHA.

Exposure Limits referenced by Sequence Number in the Composition Section

Seq.	Limit	
01	3.0	ppm TWA-OSHA
01	3.0	ppm TWA-ACGIH

3. HAZARD IDENTIFICATION

EMERGENCY OVERVIEW

Appearance:
Light pale liquid
Odor:
Ammonia-like odor

WARNING STATEMENT

WARNING ! CAUSES EYE IRRITATION
MAY CAUSE SKIN IRRITATION
MAY CAUSE BLOOD EFFECTS, LIVER, AND KIDNEY DAMAGE BASED ON ANIMAL DATA
DO NOT ADD NITRITES - MAY FORM SUSPECTED CANCER CAUSING NITROSAMINES

HMIS			NFPA		
Health:	3	Reactivity: 0	Health:	2	Reactivity: 0
Flammability:	1	Special : -	Flammability:	1	Special : -

N.D. - NOT DETERMINED N.A. - NOT APPLICABLE N.T. - NOT TESTED
< - LESS THAN > - GREATER THAN

3. HAZARD IDENTIFICATION (CONT)

POTENTIAL HEALTH EFFECTS

	EYE	SKIN	INHALATION	INGESTION
Primary Route of Exposure:	X	X	X	-

EFFECTS OF OVEREXPOSURE

Acute:

Eyes:
Causes irritation, experienced as pain, with excess blinking and tear production, and seen as marked excess redness and swelling of the eye with injury to the cornea.

Skin:
May cause irritation with discomfort, and seen as local redness and possible swelling. Prolonged contact, as with clothing wetted with material, may cause more severe irritation and discomfort.

Other than the potential skin irritation effects noted above, acute (short term) adverse effects are not expected from brief skin contact; see other effects, below, and Section 11 for information regarding potential long term effects.

Inhalation:
Vapors or mist, in excess of permissible concentrations, or in unusually high concentrations generated from spraying, heating the material or as from exposure in poorly ventilated areas or confined spaces, may cause irritation of the nose and throat, headache, nausea, and drowsiness.

Prolonged or repeated overexposure may result in the absorption of potentially harmful amounts of material.

Ingestion:
Moderately toxic. May cause abdominal discomfort, nausea, vomiting, and diarrhea.

Sensitization Properties:
Unknown.

Chronic:
Repeated skin contact may cause a persistent irritation or dermatitis.

Medical Conditions Aggravated by Exposure:
Because of its irritating properties, repeated skin contact may aggravate an existing dermatitis (skin condition).

Repeated overexposure may aggravate existing liver or kidney disease.

Other Remarks:
This product contains one or more amines which may produce temporary and reversible hazy or blurred vision. Symptoms disappear when exposure is terminated.

4. FIRST AID MEASURES

Eyes:
Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart while flushing to rinse entire surface of eye and lids with water. Do not attempt to neutralize with chemical agents. Obtain medical attention immediately. Continue flushing for an additional 15 minutes if medical attention is not immediately available.

Skin:
Wash skin with plenty of soap and water until all traces of material are removed. Remove and clean contaminated clothing and shoes. Get medical attention if skin irritation persists or skin contact has been prolonged.

Ingestion:
If patient is conscious and can swallow, give two glasses of water (16 oz.) Induce vomiting as directed by medical personnel. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

N.D. - NOT DETERMINED N.A. - NOT APPLICABLE N.T. - NOT TESTED
< - LESS THAN > - GREATER THAN

4. FIRST AID MEASURES (CONT)

Inhalation:
If irritation, headache, nausea, or drowsiness occurs, remove to fresh air. Get medical attention if breathing becomes difficult or respiratory irritation persists.

Other Instructions:
None

5. FIRE-FIGHTING MEASURES

Ignition Temperature (degrees F):
Not determined.

Flash Point (degrees F):
300 (PMCC)

Flammable Limits (%):
Lower: 1
Upper: 10

Recommended Fire Extinguishing Agents And Special Procedures:
Use water spray, dry chemical, foam, or carbon dioxide to extinguish flames. Use water spray to cool fire-exposed containers. Water or foam may cause frothing.

Unusual or Explosive Hazards:
None

Special Protective Equipment for Firefighters:
Wear full protective clothing and positive pressure breathing apparatus. Approach fire from upwind to avoid hazardous vapors and toxic decomposition products.

6. ACCIDENTAL RELEASE MEASURES (Transportation Spills: CHEMTREC (800)424-9300)

Procedures in Case of Accidental Release, Breakage or Leakage:
Ventilate area. Avoid breathing vapor. Wear appropriate personal protective equipment, including appropriate respiratory protection. Contain spill if possible. Wipe up or absorb on suitable material and shovel up. Prevent entry into sewers and waterways. Avoid contact with skin, eyes or clothing.

If more than 1 pounds of product is spilled, then report spill according to SARA 304 and/or CERCLA 102(a) requirements, unless product qualifies for the petroleum exemption (CERCLA Section 101(14)).

7. HANDLING AND STORAGE

Precautions to be Taken in Handling:
Minimum feasible handling temperatures should be maintained.
Eye wash should be available nearby when this product is handled or used.

Storage:
Periods of exposure to high temperatures should be minimized. Water contamination should be avoided.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Protective Equipment (Type)

Eye/Face Protection:
Avoid eye contact. Chemical type goggles with face shield must be worn. Do not wear contact lenses.

Skin Protection:
Protective clothing such as coveralls or lab coats should be worn. Launder or dry-clean when soiled. Gloves resistant to chemicals and petroleum distillates should be worn. Exposed workers should wash exposed skin several times daily with soap and water.

N.D. - NOT DETERMINED N.A. - NOT APPLICABLE N.T. - NOT TESTED
< - LESS THAN > - GREATER THAN

8. EXPOSURE CONTROLS/PERSONAL PROTECTION (CONT)

Respiratory Protection:
Airborne concentrations should be kept to lowest levels possible. If vapor, mist or dust is generated and the occupational exposure limit of the product, or any component of the product, is exceeded, use appropriate NIOSH or MSHA approved air purifying or air supplied respirator after determining the airborne concentration of the contaminant. Air supplied respirators should always be worn when airborne concentration of the contaminant or oxygen content is unknown.

Ventilation:
Adequate to meet component occupational exposure limits (see Section 2).

Exposure Limit for Total Product:
None established; refer to section 2 for component exposure limits.
For diethanolamine: OSHA PEL-TWA 3 ppm; ACGIH TLV-TWA 0.46 ppm (SKIN)

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance:
Light pale liquid
Odor:
Ammonia-like odor

Boiling Point (degrees F):
Not determined.

Melting/Freezing point (degrees F):
32

Specific Gravity (water=1):
1.09

pH of undiluted product:
11.8

Vapor Pressure:
Not determined.

Viscosity:
Not determined.

VOC Content:
Not determined.

Vapor Density (air=1):
Not determined.

Solubility in Water (%):
> 10

Other: None

10. STABILITY AND REACTIVITY

This Material Reacts Violently With:
(If Others is checked below, see comments for details)

Air	Water	Heat	Strong Oxidizers	Others	None of These
-	-	-	-	X	-

Comments:
This material reacts violently with acids.
Do not add or formulate with nitrites. See Section 16, OTHER INFORMATION.

Products Evolved When Subjected to Heat or Combustion:
Toxic levels of ammonia, combustion products of nitrogen, carbon monoxide, carbon dioxide, irritating aldehydes and ketones may be formed on burning in a limited air supply.

Hazardous Polymerizations: DO NOT OCCUR

11. TOXICOLOGICAL INFORMATION

TOXICOLOGICAL INFORMATION(ANIMAL TOXICITY DATA)

Median Lethal Dose

Oral:
LD50 Similar product 1.41 g/kg (rat) moderately toxic

Inhalation:
Not determined.

Dermal:
LD50 Similar product 3.00 g/kg (rabbit) practically non-toxic

Irritation Index, Estimation of Irritation (Species)

Skin:
(Draize) Believed to be > 3.00 - 5.00 /8.0 (rabbit) moderately irritating

Eyes:
(Draize) Believed to be 50.00 - 80.00 /110 (rabbit) severely irritating

Sensitization:
Not determined.

Other:
Recently conducted National Toxicology Program (NTP) subchronic toxicity studies with diethanolamine (DEA) in rats and mice suggest that the kidney, liver, and blood are potential target systems for DEA toxicity, following both oral and dermal exposures. In addition, effects in the brain and spinal cord of rats, and in the hearts of mice were observed only at extremely high dosages of DEA. Effects on several other tissues were reported, although these occurred only at dose levels which caused severe debilitation of the animals, and were considered secondary effects (not directly caused by DEA) by the NTP peer review pathology group.

Furthermore, most of the effects reported in these studies were observed in only one of the species tested, and clear dose response trends were not always evident in treated groups, making the relevance of these findings across species questionable. NTP has initiated chronic studies in rats and mice by the dermal route of exposure. These studies may clarify the results of the subchronic studies as well as provide information on the potential carcinogenicity of DEA.

Preliminary findings from a developmental toxicity study in the rat with dermal application of diethanolamine has shown that this chemical has a potential to cause developmental delay in the fetus. The effect seen was a general delay in ossification (i.e., bone substance formation) in the skull at doses shown to cause severe maternal toxicity. A definitive developmental study is currently underway to clarify the above findings.

12. DISPOSAL CONSIDERATIONS

Waste Disposal Methods

This product has been evaluated for RCRA characteristics and does not meet the criteria of a hazardous waste if discarded in its purchased form. Under RCRA, it is the responsibility of the user of the product to determine at the time of disposal, whether the product meets RCRA criteria for hazardous waste. This is because product uses, transformations, mixtures, processes, etc. may render the resulting materials hazardous.

Remarks

None

13. TRANSPORT INFORMATION

Transportation

DOT:

Proper Shipping Name:
Not regulated

IMDG:

Proper Shipping Name:
Not evaluated

ICAO:

Proper Shipping Name:
Not evaluated

13. TRANSPORT INFORMATION (CONT)

TDG:
Proper Shipping Name:
Not regulated

14. REGULATORY INFORMATION

Federal Regulations:
SARA Title III:
Section 302/304 Extremely Hazardous Substances

Seq.	Chemical Name	CAS Number	Range in %
None			

Section 302/304 Extremely Hazardous Substances (CONT)

Seq.	TPQ	RQ
None		

Section 311 Hazardous Categorization:

Acute	Chronic	Fire	Pressure	Reactive	N/A
X	X	-	-	-	-

Section 313 Toxic Chemical

Chemical Name	CAS Number	Concentration
Ethanol, 2,2'-iminobis- (Common Name- Diethanolamine)	111-42-2	80.00-94.99

CERCLA 102(a)/DOT Hazardous Substances: (+ indicates DOT Hazardous Substance)

Seq.	Chemical Name	CAS Number	Range in %
01	Ethanol, 2,2'-iminobis- (Common Name- Diethanolamine)	111-42-2	80.00-94.99

CERCLA/DOT Hazardous Substances (Sequence Numbers and RQ's):

Seq.	RQ
01	1

TSCA Inventory Status:
This product is listed on the Toxic Substance Control Act (TSCA) Chemical Substance Inventory.

Other:
None.

State Regulations:
California Proposition 65:
The following detectable components of this product are substances, or belong to classes of substances, known to the State of California to cause cancer and/or reproductive toxicity.

Chemical Name	CAS Number
None	

States Right-to-know Regulations:

Chemical Name	State Right-to-know
Ethanol, 2,2'-iminobis- (Common Name- Diethanolamine)	FL,IL,LA,MA,NJ,PA,RI

State list: CT (Connecticut), FL (Florida), IL (Illinois), MI (Michigan) LA (Louisiana), MA (Massachusetts), NJ (New Jersey), PA (Pennsylvania), RI (Rhode Island).

International Regulations:

WHMIS Classification:
Class D, Div 2, Subdiv B: Irritant

Canada Inventory Status:
All components are listed on the Canadian Domestic Substance List (DSL).

EINECS Inventory Status:
All components are listed on the European Inventory of Existing Chemical Substances (EINECS).

14. REGULATORY INFORMATION (CONT)

Australia Inventory Status:
All components are listed on the Australian Inventory of Chemical Substances (ACIS).

Japan Inventory Status:
All components are listed on the Japanese MITI inventory.

15. ENVIRONMENTAL INFORMATION

Aquatic Toxicity:
Not determined.

Mobility:
Not determined.

Persistence and Biodegradability:
Not determined.

Potential to Bioaccumulate:
Not determined.

Remarks:
None

16. OTHER INFORMATION

A component of this product carries "SKIN" notation in Section 2 as part of its exposure limit. "SKIN" notation indicates possible adverse health effects as a result of absorption through the skin, mucous membranes, and eyes, by contact with vapor, mist, spray, or liquid. Appropriate measures should be taken to minimize contact.

Do not add nitrites. This product contains amines which can combine with nitrites or other nitrosating agents to form nitrosamines. Many nitrosamines have been found to cause cancer in laboratory animals.

THE INFORMATION CONTAINED HEREIN IS BELIEVED TO BE ACCURATE. IT IS PROVIDED INDEPENDENTLY OF ANY SALE OF THE PRODUCT FOR PURPOSE OF HAZARD COMMUNICATION AS PART OF HUNTSMAN'S PRODUCT SAFETY PROGRAM. IT IS NOT INTENDED TO CONSTITUTE PERFORMANCE INFORMATION CONCERNING THE PRODUCT. NO EXPRESS WARRANTY, OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE WITH RESPECT TO THE PRODUCT OR THE INFORMATION CONTAINED HEREIN. DATA SHEETS ARE AVAILABLE FOR ALL HUNTSMAN PRODUCTS. YOU ARE URGED TO OBTAIN DATA SHEETS FOR ALL HUNTSMAN PRODUCTS YOU BUY, PROCESS, USE OR DISTRIBUTE.AND YOU ARE ENCOURAGED AND REQUESTED TO ADVISE THOSE WHO MAY COME IN CONTACT WITH SUCH PRODUCTS OF THE INFORMATION CONTAINED HEREIN.

TO DETERMINE APPLICABILITY OR EFFECT OF ANY LAW OR REGULATION WITH RESPECT TO THE PRODUCT, USER SHOULD CONSULT HIS LEGAL ADVISOR OR THE APPROPRIATE GOVERNMENT AGENCY. HUNTSMAN DOES NOT UNDERTAKE TO FURNISH ADVICE ON SUCH MATTERS.

Date: 01-04-95 New X Revised, Supersedes: 08-02-94
Date printed: 02-08-95

Inquiries regarding MSDS should be directed to:
Huntsman
Coordinator, Product Safety
P.O. Box 27707
Houston, TX 77227-7707

PLEASE SEE NEXT PAGE FOR PRODUCT LABEL

N.D. - NOT DETERMINED N.A. - NOT APPLICABLE N.T. - NOT TESTED
< - LESS THAN > - GREATER THAN

17. PRODUCT LABEL

READ AND UNDERSTAND MATERIAL SAFETY DATA SHEET BEFORE HANDLING OR DISPOSING OF PRODUCT. THIS LABEL COMPLIES WITH THE REQUIREMENTS OF THE OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200) FOR USE IN THE WORKPLACE. THIS LABEL IS NOT INTENDED TO BE USED WITH PACKAGING INTENDED FOR SALE TO CONSUMERS AND MAY NOT CONFORM WITH THE REQUIREMENTS OF THE CONSUMER PRODUCT SAFETY ACT OR OTHER RELATED REGULATORY REQUIREMENTS.

75695 DIETHANOLAMINE LFG-85 %

WARNING STATEMENT

WARNING ! CAUSES EYE IRRITATION
MAY CAUSE SKIN IRRITATION
MAY CAUSE BLOOD EFFECTS, LIVER, AND KIDNEY DAMAGE BASED ON ANIMAL DATA
DO NOT ADD NITRITES - MAY FORM SUSPECTED CANCER CAUSING NITROSAMINES

PRECAUTIONARY MEASURES

-Avoid prolonged breathing of vapor, mist, or gas.
-Avoid contact with eyes, skin, and clothing.
-Keep container closed.
-Wash thoroughly after handling.

FIRST AID

Eye Contact:
Immediately flush eyes with large amounts of running water for at least 15 minutes. Hold eyelids apart while flushing to rinse entire surface of eye and lids with water. Do not attempt to neutralize with chemical agents. Obtain medical attention immediately. Continue flushing for an additional 15 minutes if medical attention is not immediately available.

Skin Contact:
Wash skin with plenty of soap and water until all traces of material are removed. Remove and clean contaminated clothing and shoes. Get medical attention if skin irritation persists or skin contact has been prolonged.

Ingestion:
If patient is conscious and can swallow, give two glasses of water (16 oz.) Induce vomiting as directed by medical personnel. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

Inhalation:
If irritation, headache, nausea, or drowsiness occurs, remove to fresh air. Get medical attention if breathing becomes difficult or respiratory irritation persists.

Note to Physician:
None

FIRE

In case of fire, use water spray, dry chemical, foam or carbon dioxide. Water may cause frothing. Use water spray to cool fire-exposed containers.

If more than 1 pounds of product is spilled, then report spill according to SARA 304 and/or CERCLA 102(a) requirements, unless product qualifies for the petroleum exemption (CERCLA Section 101(14)).

	Chemical Name	CAS Number	Range in %
*	Ethanol, 2,2'-iminobis- (Common Name- Diethanolamine)	111-42-2	80.00-94.99
	Water	7732-18-5	10.00-19.99

PRODUCT IS HAZARDOUS ACCORDING TO OSHA (1910.1200).
* COMPONENT IS HAZARDOUS ACCORDING TO OSHA.

Pennsylvania Special Hazardous Substance(s)	CAS Number	Range in %
None		

HMIS			NFPA		
Health:	3	Reactivity: 0	Health:	2	Reactivity: 0
Flammability:	1	Special : -	Flammability:	1	Special : -

Transportation
DOT:
Proper Shipping Name:
Not regulated

N.D. - NOT DETERMINED N.A. - NOT APPLICABLE N.T. - NOT TESTED
< - LESS THAN > - GREATER THAN

17. PRODUCT LABEL (CONT)

CAUTION: Misuse of empty containers can be hazardous. Empty containers can be hazardous if used to store toxic, flammable, or reactive materials. Cutting or welding of empty containers might cause fire, explosion or toxic fumes from residues. Do not pressurize or expose to open flame or heat. Keep container closed and drum bungs in place.

Manufacturer's Name and Address:
HUNTSMAN
P.O. Box 27707
Houston, TX 77227-7707

TRANSPORTATION EMERGENCY	Company:	(409) 727-0831
	CHEMTREC:	(800) 424-9300
HEALTH EMERGENCY	Company:	(914) 831-3400

MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED:01/24/91

********** I. PRODUCT IDENTIFICATION **********

MOBIL PEGASUS 390

SUPPLIER:
MOBIL OIL CORP.

CHEMICAL NAMES AND SYNONYMS:
PET. HYDROCARBONS AND ADDITIVES

USE OR DESCRIPTION:
GAS ENGINE OIL

HEALTH EMERGENCY TELEPHONE:
(609) 737-4411

TRANSPORT EMERGENCY TELEPHONE:
(800) 424-9300 (CHEMTREC)

PRODUCT TECHNICAL INFORMATION:
(800) 662-4525

********** II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES **********

APPEARANCE: Amber Liquid ODOR: Mild PH: NA
VISCOSITY AT 100 F, SUS: 442.5 AT 40 C, CS: 85.0
VISCOSITY AT 210 F, SUS: 60.2 AT 100 C, CS: 10.0
FLASH POINT F(C): > 425(218) (ASTM D-92)
MELTING POINT F(C): NA POUR POINT F(C): 5(-15)
BOILING POINT F(C): > 600(316)
RELATIVE DENSITY, 15/4 C: 0.882 SOLUBILITY IN WATER: Negligible
VAPOR PRESSURE-mm Hg 20C: < .1

NA=Not Applicable NE=Not Established D=Decomposes

FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

********** III. POTENTIALLY HAZARDOUS INGREDIENTS **********

None

SEE SECTIONS XII AND XIII FOR REGULATORY AND FURTHER COMPOSITIONAL DATA.

SOURCES: A=ACGIH-TLV, A*=Suggested-TLV, M=Mobil, O=OSHA, S=Supplier
NOTE: Limits shown for guidance only. Follow applicable regulations.

********** IV. HEALTH HAZARD DATA **********

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---

THRESHOLD LIMIT VALUE: 5.00 mg/m3 Suggested for Oil Mist
EFFECTS OF OVEREXPOSURE: Slight eye irritation. Slight skin irritation.

********** V. EMERGENCY AND FIRST AID PROCEDURES **********

--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: Flush with water.
SKIN CONTACT: Wash contact areas with soap and water.
INHALATION: Not expected to be a problem.
INGESTION: Not expected to be a problem. However, if greater than 1/2 liter(pint) ingested, immediately give 1 to 2 glasses of water and call a physician, hospital emergency room or poison control center for assistance. Do not induce vomiting or give anything by mouth to an unconscious person.

********** VI. FIRE AND EXPLOSION HAZARD DATA **********

FLASH POINT F(C): > 425(218) (ASTM D-92)
FLAMMABLE LIMITS. LEL: .6 UEL: 7.0
EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.
SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fires in enclosed areas, firefighters must use self-contained breathing apparatus. Prevent runoff from fire control or dilution from entering streams or drinking water supply.
UNUSUAL FIRE AND EXPLOSION HAZARDS: None.
NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

********** VII. REACTIVITY DATA **********

STABILITY (Thermal, Light, etc.): Stable
CONDITIONS TO AVOID: Extreme heat.
INCOMPATIBILITY (Materials to Avoid): Strong oxidizers
HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide.
HAZARDOUS POLYMERIZATION: Will not occur.

********** VIII. SPILL OR LEAK PROCEDURE **********

ENVIRONMENTAL IMPACT: Report spills as required to appropriate authorities. U. S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard toll free number (800) 424-8802. In case of accident or road spill notify CHEMTREC (800) 424-9300.
PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: Adsorb on fire retardant treated sawdust, diatomaceous earth, etc. Shovel up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.
WASTE MANAGEMENT: Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by supervised incineration. Such burning may be limited pursuant to the resource conservation and recovery act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at any government approved waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

********** IX. SPECIAL PROTECTION INFORMATION **********

EYE PROTECTION: Normal industrial eye protection practices should be employed.
SKIN PROTECTION: No special equipment required. However, good personal hygiene practices should always be followed.
RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate ventilation.
VENTILATION: No special requirements under ordinary conditions of use and with adequate ventilation.

********** X. SPECIAL PRECAUTIONS **********

No special precautions required.

********** XI. TOXICOLOGICAL DATA **********

---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): Slightly toxic (estimated) ---Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Slightly toxic (estimated) ---Based on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Not applicable ---Harmful concentrations of mists and/or vapors are unlikely to be encountered through any customary or reasonably foreseeable handling, use, or misuse of this product.

EYE IRRITATION (RABBITS): May cause slight irritation. ---Based on testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): May cause slight irritation on prolonged or repeated contact. ---Based on testing of similar products and/or the components.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

Severely solvent refined and severely hydrotreated mineral base oils have been tested at Mobil Environmental and Health Sciences Laboratory by dermal application to rats 5 days/week for 90 days at doses significantly higher than those expected during normal industrial exposure. Extensive evaluations including microscopic examination of internal organs and clinical chemistry of body fluids, showed no adverse effects.

---CHRONIC TOXICOLOGY (SUMMARY)---

The base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of similar oils showed no evidence of carcinogenic effects.

********** XII. REGULATORY INFORMATION **********

GOVERNMENTAL INVENTORY STATUS: All components registered in accordance with TSCA.

DOT:
Shipping Name: Not applicable
Hazard Class: Not applicable

US OSHA HAZARD COMMUNICATION STANDARD: Product assessed in accordance with OSHA 29 CFR 1910.1200 and determined not to be hazardous.

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D); does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity, and is not formulated with the contaminants listed in the Toxicity Characteristic (TC) Rule as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

U.S. Superfund Amendments and Reauthorization Act (SARA) Title III:
This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".

SARA (302) REPORTABLE HAZARD CATEGORIES: None

This product contains no chemicals reportable under SARA (313) toxic release program.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
FORMALDEHYDE	50-00-0	12
ZINC (ELEMENTAL ANALYSIS) (.03%)	7440-66-6	15

--- KEY TO LIST CITATIONS ---

1 = OSHA Z, 2 = ACGIH, 3 = IARC, 4 = NTP, 5 = NCI,
6 = EPA CARC, 7 = NFPA 49, 8 = NFPA 325M, 9 = DOT HMT, 10 = CA RTK,
11 = IL RTK, 12 = MA RTK, 13 = MN RTK, 14 = NJ RTK, 15 = MI 293,
16 = FL RTK, 17 = PA RTK, 18 = CA P65.

--- NTP, IARC, AND OSHA INCLUDE CARCINOGENIC LISTINGS ---

NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBS.

********** XIII. INGREDIENTS **********

INGREDIENT DESCRIPTION	PERCENT		CAS NUMBER
CONTAINS THE FOLLOWING BASE OILS:	> 90.00		
DISTILLATES (PETROLEUM), HYDROTREATED HEAVY PARAFFINIC			64742-54-7
CONTAINS ONE OR MORE OF THE FOLLOWING ADDITIVE COMPONENTS:			
ALKYL AMIDES	< 5.00	NJT	003066009-5094P
POLYISOBUTENYL BUTANEDIOIC ACID, ZINC SALT	< 5.00		68610-89-9

********** APPENDIX **********

FOR MOBIL USE ONLY: (FILL NO: RN612C2*201) MCN: , MHC: 1* 1* NA 1* 1*, MPPEC: A, PPEC: A, US90-837 APPROVE 01/24/91

****

INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

****

PREPARED BY: MOBIL OIL CORPORATION
ENVIRONMENTAL HEALTH AND SAFETY DEPARTMENT, PRINCETON, NJ
FOR FURTHER INFORMATION, CONTACT:
MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL
3225 GALLOWS ROAD, FAIRFAX, VA 22037 (800) 227-0707 X3265

TO: MARILYN BROWN
DELTA DISTRIBUTORS
11344 PLANO RD.
DALLAS TX 75243 8508

Union Carbide Chemicals and Plastics Company Inc
Industrial Chemicals Division

MATERIAL SAFETY DATA SHEET

EFFECTIVE DATE 07/22/94

Union Carbide urges each customer or recipient of this MSDS to study it carefully to become aware of and understand the hazards associated with the product. The reader should consider consulting reference works or individuals who are experts in ventilation, toxicology, and fire prevention, as necessary or appropriate to use and understand the data contained in this MSDS.

To promote safe handling, each customer or recipient should: (1) notify its employees, agents, contractors and others whom it knows or believes will use this material or the information in this MSDS and any other information regarding hazards or safety; (2) furnish this same information to each of its customers for the product; and (3) request its customers to notify their employees, customers, and other users of the product of this information.

I. IDENTIFICATION

PRODUCT NAME: NORKOOL Dilute SLH 225D

CHEMICAL NAME: Aqueous Inhibited Ethylene Glycol Solution

CHEMICAL FAMILY: Glycols

FORMULA: Not Applicable

MOLECULAR WEIGHT: Not Applicable

SYNONYMS: PM 225

CAS # AND NAME:
See Section III, "Ingredients"

II. PHYSICAL DATA (Determined on typical material)

BOILING POINT, 760 mm Hg: 107.3 C (225.14 F)

SPECIFIC GRAVITY(H2O = 1): 1.079 at 20/20 C

EMERGENCY PHONE NUMBERS: 1-800-UCC-HELP (Number available at all times) OR (304) 744-3487

PRODUCT NAME: NORKOOL Dilute SLH 225D

FREEZING POINT: -38 C (-36 F)

VAPOR PRESSURE AT 20°C: 13.3 mmHg

VAPOR DENSITY (air = 1): 1

EVAPORATION RATE:
(Butyl Acetate = 1): 0.79

SOLUBILITY IN WATER by wt: 100% at 20 C

APPEARANCE: Translucent
Green

ODOR: Mild

PHYSICAL STATE: Liquid

PERCENT VOLATILES (by weight): 98.0

III. INGREDIENTS

%	MATERIAL	CAS#	EXPOSURE LIMIT
45-55	Ethylene Glycol	107-21-1	See Section V
45-55	Water and Processing Additives		Not Applicable

IV. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (test method(s)):
None
Pensky-Martens Closed Cup ASTM D 93

None
Cleveland Open Cup ASTM D 92

FLAMMABLE LIMITS IN AIR, by volume:

LOWER: Not Determined, Aqueous System
UPPER: Not Determined, Aqueous System

EXTINGUISHING MEDIA:
Non-flammable (aqueous solution): After water evaporates, remaining material will burn. Use alcohol-type or all-purpose-type foam, applied by manufacturer's recommended techniques for large fires. Use carbon dioxide or dry chemical media for small fires.

SPECIAL FIRE FIGHTING PROCEDURES:
Use self-contained breathing apparatus and protective clothing.

UNUSUAL FIRE AND EXPLOSION HAZARDS:
During a fire, ammonia and nitrogen-containing compounds may be produced.

V. HEALTH HAZARD DATA

TLV AND SOURCE:
Ethylene Glycol: 50 ppm Ceiling, OSHA & ACGIH

EFFECTS OF SINGLE OVEREXPOSURE:

SWALLOWING:
May cause abdominal discomfort or pain, nausea, vomiting, dizziness, drowsiness, malaise, blurring of vision, irritability, lumbar pain, oliguria, uremia, and central nervous system effects, including irregular eye movements, convulsions and coma. Cardiac failure and pulmonary edema may develop. Severe kidney damage follows the swallowing of large volumes of ethylene glycol. May be fatal. A few reports have been published describing the development of weakness of the facial muscles, diminished hearing, and difficulty with swallowing, during the late stages of severe poisoning.

SKIN ABSORPTION:
No evidence of harmful effects from available information.

INHALATION:
May cause irritation of the nose and throat with headache, particularly from mist. High vapor concentrations caused, for example, by heating the material in an enclosed and poorly ventilated workplace, may produce nausea, vomiting, headache, dizziness, and irregular eye movements.

SKIN CONTACT:
No evidence of harmful effects from available information.

EYE CONTACT:
Injury to the cornea is not expected.
Liquid, vapor, or mist causes irritation, experienced as stinging, excess blinking and tear production, with excess redness of the conjunctiva.

EFFECTS OF REPEATED OVEREXPOSURE:
Repeated inhalation of ethylene glycol mist may produce signs of central nervous system involvement, particularly dizziness and nystagmus.

MEDICAL CONDITIONS AGGRAVATED BY OVEREXPOSURE:
May aggravate an existing kidney disease.

SIGNIFICANT LABORATORY DATA WITH POSSIBLE RELEVANCE TO HUMAN HEALTH HAZARD EVALUATION:
Ethylene glycol has been shown to produce dose-related teratogenic effects in rats and mice when given by gavage or in drinking water at high concentrations or doses. The no-effect doses for developmental toxicity for ethylene glycol given by gavage over the period of organogenesis has been shown to be 150

mg/kg/day for the mouse and 500 mg/kg/day for the rat. Also, in a preliminary study to assess the effects of exposure of pregnant rats and mice to aerosols at concentrations of 150, 1000 and 2500 mg/m3 for 6 hours a day throughout the period of organogenesis, teratogenic effects were produced at the highest concentration, but only in mice. The conditions of these latter experiments did not allow a conclusion as to whether the developmental toxicity was mediated by inhalation of aerosol, percutaneous absorption of ethylene glycol from contaminated skin, or swallowing of ethylene glycol as a result of grooming the wetted coat. In a further study, comparing effects from high aerosol concentration by whole-body or nose-only exposure, it was shown that nose-only exposure resulted in maternal toxicity (1000 and 2500 mg/m3) and developmental toxicity with minimal evidence of teratogenicity (2500 mg/m3). The no-effects concentration (based on maternal toxicity) was 500 mg/m3. In a further study in mice, no teratogenic effects could be produced when ethylene glycol was applied to skin of pregnant mice over the period of organogenesis. The above observations suggest that ethylene glycol is to be regarded as an animal teratogen. There is currently no available information to suggest that ethylene glycol has caused birth defects in humans. Cutaneous application of ethylene glycol is ineffective in producing developmental toxicity. Exposure to high aerosol concentrations is only minimally effective in producing developmental toxicity. The major route for producing developmental toxicity is perorally.

Two chronic feeding studies, using rats and mice, have not produced any evidence that ethylene glycol causes dose-related increases in tumor incidence, or a different pattern of tumors compared with untreated controls. The absence of a carcinogenic potential for ethylene glycol has been supported by numerous in vitro genotoxicity studies showing that it does not produce mutagenic or clastogenic effects.
Contains an inorganic nitrite which may react with amines to form a nitrosamine. Some nitrosamines have been shown to be carcinogenic in laboratory animals.

OTHER EFFECTS OF OVEREXPOSURE:
Repeated skin contact with ethylene glycol may, in a very small proportion of cases, cause sensitization with the development of allergic contact dermatitis. The incidence is significantly less than 1% with the undiluted material.

EMERGENCY AND FIRST AID PROCEDURES:

SWALLOWING:
If patient is fully conscious, give two glasses of water. Induce vomiting. Obtain medical attention without delay. If medical advice is delayed, and if the person has swallowed a moderate volume of material (a few ounces), then give three to four ounces of hard liquor, such as whiskey. For children, give proportionally less liquor, according to weight.

SKIN:
Remove contaminated clothing. Wash skin with soap and water. If irritation persists or if contact has been prolonged, obtain medical attention.

INHALATION:
Remove to fresh air. Obtain medical attention if symptoms persist.

EYES:
Flush eyes thoroughly with water for several minutes.

NOTES TO PHYSICIAN:
It is estimated that the lethal oral dose of ethylene glycol to adults is of the order of 1.0 ml/kg. Ethylene glycol is metabolized by alcohol dehydrogenase to various metabolites including glycoaldehyde, glycolic acid, and oxalic acid, which cause an elevated anion-gap metabolic acidosis and renal tubular injury. The signs and symptoms in ethylene glycol poisoning are those of metabolic acidosis, CNS depression, and kidney injury. Urinalysis may show albuminuria, hematuria and oxaluria. Clinical chemistry may reveal anion-gap metabolic acidosis and uremia.
The currently recommended medical management of ethylene glycol poisoning includes elimination of ethylene glycol and metabolites, correction of metabolic acidosis, and prevention of kidney injury. It is essential to have immediate and follow-up urinalysis and clinical chemistry. There should be particular emphasis on acid-base balance and renal function tests. A continuous infusion of 5% sodium bicarbonate with frequent monitoring of electrolytes and fluid balance is used to achieve correction of metabolic acidosis and forced diuresis.
As a competitive substrate for alcohol dehydrogenase, ethanol is antidotal. Given in the early stages of intoxication, it blocks the formation of nephrotoxic metabolites. A therapeutically effective blood concentration of ethanol is in the range 100-150 mg/dl, and should be achieved by a rapid loading dose and maintained by intravenous infusion.
For severe and/or deteriorating cases, hemodialysis may be required. Dialysis should be considered for patients who are symptomatic, have severe metabolic acidosis, a blood ethylene glycol concentrations greater than 25 mg/dl, or compromise of renal functions.
4-Methylpyrazole, a potent inhibitor of alcohol dehydrogenases, has been effectively used to decrease the metabolic consequences of ethylene glycol poisoning before metabolic acidosis, coma, seizures, and renal failure have occurred.
Additional therapeutic measures may include the administration of cofactors involved in the metabolism of ethylene glycol. Thiamine (100 mg) and pyridoxine (50 mg) should be given every six hours.
Pulmonary edema with hypoxemia has been described in a number of patients following poisoning with ethylene glycol. The mechanism of production has not been elucidated, but it appears to be non-cardiogenic in origin in several cases. Respiratory support with mechanical ventilation and positive end-expiratory pressure may be required.
There may be cranial nerve involvement in the late stages of toxicity from swallowed ethylene glycol. In particular, effects have been reported involving the seventh, eighth and ninth cranial nerves, presenting with bilateral facial paralysis, diminished hearing, and dysphagia.

VI. REACTIVITY DATA

STABILITY: Stable

CONDITIONS TO AVOID:
WARNING: Do not mix this product with amines because nitrosamines may be formed. Nitrosamines may cause cancer.

INCOMPATIBILITY (materials to avoid):
Explosive decomposition may occur if combined with strong acids or strong

bases and subjected to elevated temperatures. Therefore, avoid strong acids

and strong bases at elevated temperatures. Avoid contamination with strong oxidizing agents and materials reactive with hydroxyl compounds.

HAZARDOUS COMBUSTION OR DECOMPOSITION PRODUCTS:
Burning can produce the following products:
Carbon monoxide and/or carbon dioxide.
Ammonia and nitrogen-containing compounds.
Carbon monoxide is highly toxic if inhaled: carbon dioxide in sufficient concentrations can act as an asphyxiant.
Acute overexposure to the products of combustion may result in irritation of the respiratory tract.

HAZARDOUS POLYMERIZATION: Will Not Occur

CONDITIONS TO AVOID:
None known.

VII. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED:
Wear suitable protective equipment. Large spills should be contained and collected. Small spills can be collected or may be absorbed with appropriate liquid absorbing materials. All spill response and disposal should be carried out in accordance with Federal, State, and local requirements.

WASTE DISPOSAL METHOD:
Ethylene glycol from many applications is readily reclaimed: reclamation of ethylene glycol from spent fluids is encouraged where possible.
At low concentrations in water this product is biodegradable in a biological wastewater treatment plant.
Where ethylene glycol reclamation or sewering are not viable, this product may be incinerated where permitted under Federal, State and local regulations.

VIII. SPECIAL PROTECTION

RESPIRATORY PROTECTION (specify type):
If personnel exposure exceeds expsoure limits 50 ppm (aerosol and vapor combined) at any time, select respiratory protection equipment in accordance with 29CFR1910.134. NIOSH-approved atmosphere-supplying respirator or a NIOSH-approved air-purifying respirator with organic vapor cartridge and dust/mist pre-filter is recommended.

VENTILATION:
General (mechanical) room ventilation may be adequate, if handled at ambient temperatures or in covered equipment. If ambient temperatures are exceeded or operations exist which may produce misting, local exhaust ventilation or other engineering controls may be required.

PROTECTIVE GLOVES:
Natural Rubber
Neoprene

Nitrile (NBR)
PVC-coated

Butyl

EYE PROTECTION:
Monogoggles or Faceshield

OTHER PROTECTIVE EQUIPMENT:
Eye Bath, Safety Shower

IX. SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
DANGER!
HARMFUL OR FATAL IF SWALLOWED.
CAUSES EYE AND SKIN IRRITATION.
PROLONGED OR REPEATED BREATHING OF MIST OR VAPOR HARMFUL.
MAY CAUSE KIDNEY AND NERVOUS SYSTEM DAMAGE.
CONTAINS ETHYLENE GLYCOL - CAUSES BIRTH DEFECTS
IN LABORATORY ANIMALS.
Do not swallow.
Avoid contact with eyes, skin and clothing.
Avoid prolonged or repeated breathing of mist or vapor.
Keep container closed.
Use with adequate ventilation.
Wash thoroughly after handling.
Do not mix with amines.
A nitrosamine, which may cause cancer, may be formed.
FOR INDUSTRY USE ONLY

OTHER PRECAUTIONS:
None known.

X. REGULATORY INFORMATION

STATUS ON SUBSTANCE LISTS:
The concentrations shown are maximum or ceiling levels (weight %) to be used for calculations for regulations. Trade Secrets are indicated by "TS".

FEDERAL EPA

Comprehensive Environmental Response Compensation, and Liability Act of 1980 (CERCLA) requires notification of the National Response Center of release of quantities of Hazardous Substances equal to or greater than the reportable quantities (RQs) in 40 CFR 302.4.

Components present in this product at a level which could require reporting under the statute are:

CHEMICAL	CAS NUMBER	UPPER BOUND CONCENTRATION %
Ethylene Glycol	107-21-1	55.0
Sodium Nitrite	7632-00-0	0.2

Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III requires

emergency planning based on Threshold Planning Quantities (TPCs) and release reporting based on Reportable Quantities (RQs) in 40 CFR 355 (used for SARA 302, 311 and 312).

Components present in this product at a level which could require reporting under the statute are:

*** NONE ***

Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III requires submission of annual reports of release of toxic chemicals that appear in 40 CFR 372 (for SARA 313). This information must be included in all MSDSs that are copied and distributed for this material.

Components present in this product at a level which could require reporting under the statute are:

CHEMICAL	CAS NUMBER	UPPER BOUND CONCENTRATION %
Ethylene Glycol	107-21-1	55.0

TSCA INVENTORY STATUS:

The ingredients of this product are on the TSCA inventory.

STATE RIGHT-TO-KNOW

CALIFORNIA Proposition 65
This product contains less than 1 ppm 1,4-DIOXANE which the State of California has found to cause cancer.

MASSACHUSETTS 105 CMR 670.000 Right-To-Know, Substance List (MSL)
Hazardous Substances and Extraordinarily Hazardous Substances on the MSL must be identified when present in products.

Components present in this product at a level which could require reporting under the statute are:

EXTRAORDINARILY HAZARDOUS SUBSTANCES (=> 0.0001%)

CHEMICAL	CAS NUMBER	UPPER BOUND CONCENTRATION %
Dioxane	123-91-1	.0001

HAZARDOUS SUBSTANCES (=> 1%)

CHEMICAL	CAS NUMBER	UPPER BOUND CONCENTRATION %
Ethylene Glycol	107-21-1	55.0

PENNSYLVANIA Right-To-Know, Hazardous Substance List

PRODUCT NAME: NORKOOL Dilute SLH 225D

Hazardous Substances and Special Hazardous Substances on the List must be identified when present in products.

Components present in this product at a level which could require reporting under the statute are:

HAZARDOUS SUBSTANCES (<= 1%)

CHEMICAL	CAS NUMBER	UPPER BOUND CONCENTRATION %
Ethylene Glycol	107-21-1	55.0

CALIFORNIA SCAQMD RULE 443.1 VOC'S:
Vapor Pressure 13.3 mmHg at 20 C
VOC 538 g/L
VOC 1117 g/L less water and less exempted solvents

OTHER REGULATORY INFORMATION:
EPA Hazard Categories: Immediate Health, Delayed Health

NOTE ----
The opinions expressed herein are those of qualified experts within Union Carbide. We believe that the information contained herein is current as of the date of this Material Safety Data Sheet. Since the use of this information and of these opinions and the conditions of the use of the product are not within the control of Union Carbide, it is the user's obligation to determine the conditions of safe use of the product.

Date: 07/22/94
REVISION DATE: 07/27/94 Printed in USA
REVISED SECTIONS
Revisions in this MSDS have occurred in the following sections:
SECTION II - PHYSICAL DATA
SECTION VI - REACTIVITY DATA
SECTION VII - SPILL OR LEAK PROCEDURES
Waste Disposal Method
SECTION X - REGULATORY INFORMATION
PRODUCT: 50225
F NUMBER: N0499E
FROM SCVM37J AWHMCS2

: MRI-00695

MATERIAL SAFETY DATA SHEET
ADAMS SPECIAL NEUTRAL

1	HMIS HEALTH
0	HMIS FLAMMABILITY
0	HMIS REACTIVITY
B	HMIS PERSONAL PROTECTION

SECTION I - IDENTIFICATION

ANUFACTURER'S NAME..... ADAMS CHEMICAL & EQUIPMENT CO., INC.
HONE NUMBER..... 915 337 8942
MERGENCY PHONE NUMBER... 1-800-535-5053
FFECTIVE DATE..... MAY 1991
EVISED DATE..... APRIL 1992
RADE NAME..... ADAMS SPECIAL NEUTRAL
HEMICAL FAMILY..... BIODEGRADABLE INDUSTRIAL DETERGENT
AS NUMBER..... NONE
HEMICAL FORMULA..... BLEND

SECTION II - HAZARDOUS INGREDIENTS

AZARDOUS COMPONENTS	%	TLV (Units)	PROD. CAS #
ODIUM TRIPOLY PHOSPHATE	CONF.	NONE LISTED	7758-29-4
R ODIUM PHOSPHATE	CONF.	NONE LISTED	10361-89-4

OXIC SUBSTANCES CONTROL ACT 40 CFR 710. Sources of the raw materials used in his product assure that all chemical ingredients included are in compliance ith Section 8(b). or are otherwise in compliance with the Toxic Substances ontrol Act.

SECTION III - PHYSICAL DATA

OILING Point(F)..... APPROXIMATELY 212 DEGREES F
REEZING POINT (F)..... NOT DETERMINED
APOR PRESSURE (mm Hg)... NOT DETERMINED
APOR DENSITY (Air=1).... APPROXIMATELY 1
OLUBILITY IN WATER..... COMPLETE
PPEARANCE/ODOR..... GREEN LIQUID
PECIFIC GRAVITY (H2O=1). APPROXIMATELY 1.18
H..... 8.0

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

LASH POINT..... NON FLAMMABLE
OWER FLAME LIMIT..... NOT APPLICABLE
PPER FLAME LIMIT..... NOT APPLICABLE
XTINGUISHING MEDIA..... NOT APPLICABLE
PECIAL FIRE HAZARD..... Containers may explode from internal pressure if confined to fire. Cool with water. Keep unnecessary people away.

MATERIAL SAFETY DATA SHEET
ADAMS SPECIAL NEUTRAL

SECTION V - HEALTH HAZARD DATA

HRESHOLD LIMIT VALUE.... NONE LISTED FOR THIS PRODUCT

OUTES OF ENTRY	INHALATION?	SKIN?	INGESTION?
	NO	IRRITANT	IRRITANT

EALTH HAZARDS..... Acute. Vapors or liquid may be irritating to skin or eyes.

RCINOGENICITY:	NTP?	IARC MONOGRAPHS?	OSHA REGULATED
)	NO	NO	NO

ER EXPOSURE EFFECTS.... Skin irritation develops slowly after contact. Eye irritation develops immediately upon contact.

RST AID PROCEDURES..... In case of eye contact. flush immediately with plenty of water for at least 15 minutes and get medical attention: for skin. wash thoroughly with soap and water. If swallowed. induce vomiting immediately by giving two glasses of water and sticking finger down throat. Never give anything by mouth to an unconscious person.

SECTION VI - REACTIVITY DATA

EMICAL STABILITY..... STABLE
ONDITIONS TO AVOID..... NONE
COMPATIBLE MATERIALS... NONE
COMPOSITION PRODUCTS... From Fire: Smoke. Carbon Dioxide. Carbon Monoxide. & Oxides of Phosphorous.
ZARDOUS POLYMERIZATION. WILL NOT OCCUR
LYMERIZATION AVOID..... NONE KNOWN

SECTION VII - SPILL OR LEAK PROCEDURE

R SPILL..... In case of spillage. absorb with inert material and dispose of in accordance with applicable regulations.

STE DISPOSAL METHOD.... Industrial Waste. Follow State Regulations.

SECTION VIII - SPECIAL PROTECTION

SPIRATORY PROTECTION... NOT NORMALLY REQUIRED
NTILATION..... RECOMMENDED
CHANICAL EXHAUST..... NOT NORMALLY REQUIRED
CAL EXHAUST..... NOT NORMALLY REQUIRED
CTIVE GLOVES..... Wear impervious gloves
E PROTECTION..... GOGGLES OR FACE SHIELD
H PROTECTIVE UIPMENT..... NONE

MATERIAL SAFETY DATA SHEET
ADAMS SPECIAL NEUTRAL

SECTION IX - SPECIAL HANDLING

IANDLING AND STORAGE.....	Wear impervious gloves Use goggles or face shield if spashing is likely
'RECAUTIONARY MEASURES...	Avoid contact with skin. eyes, and clothing. After handling this product, wash hands before eating. drinking, or smoking. If contact occurs, remove contaminated clothing. If needed, take firstaid action shown in Section V.
)OT HAZARD CLASS.....	NOT REGULATED
)OT SHIPPING NAME.....	ADAMS SPECIAL NEUTRAL, NOT REGULATED
)OT REPORTABLE QUANITY RQ).....	NONE
IN NUMBER.....	NOT APPLICABLE
A NUMBER.....	NOT APPLICABLE
'ACKAGING SIZE.....	VARIED
OT LABEL REQUIRED.....	NONE

SECTION X - REGULATORY

PA ACUTE.....	YES
PA CHRONIC.....	NO
P :GNITABILITY.....	NO
P EACTIVITY.....	NO
PA SUDDEN RELEASE OF RESSURE.....	NO
ERCLA RQ VALUE.....	NONE
ARA TPQ.....	NONE
ARA RQ.....	NONE
ARA SECTION 313.....	NOT LISTED
PA HAZARD WASTE #.....	NONE
LEAN AIR ACT.....	NOT LISTED
LEAN WATER ACT.....	LISTED IN SEC 311

)OT NOTES NA - APPLICABLE ND - NOT DETERMINED

REPARED BY:..... S.I.S., FORT WORTH, TEXAS (817) 560-4631

HIS PRODUCT'S SAFETY INFORMATION IS PROVIDED TO ASSIST OUR CUSTOMERS IN SSESSING COMPLIANCE WITH HEALTH, SAFETY AND ENVIRONMENTAL REGULATIONS. THE NFORMATION CONTAINED HEREIN IS BASED ON DATA AVAILABLE TO US AND IS BELIEVED) BE ACCURATE. ALTHOUGH NO GUARANTEE OR WARRANTY IS PROVIDED BY THE COMPANY IN HIS RESPECT, SINCE THE USE OF THIS PRODUCT IS WITHIN THE EXCLUSIVE CONTROL OF T USER, IT IS THE USER'S OBLIGATION TO DETERMINE THE CONDITIONS OF SAFE USE IS PRODUCT. SUCH CONDITIONS SHOULD COMPLY WITH ALL FEDERAL REGULATIONS)NCERNING THE PRODUCT.

Material Safety Data Sheet

SAFETY-KLEEN 105 SOLVENT RECYCLED

Part Number: 6617, 1011662, 1014662

Revision 02/94; Form No. 82310

SAFETY-KLEEN 105 SOLVENT RECYCLED

MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

SECTION 1 -- PRODUCT AND PREPARATION INFORMATION

PRODUCT INFORMATION

IDENTITY (TRADE NAME): SAFETY-KLEEN 105 SOLVENT RECYCLED

SYNONYMS: Parts Washer Solvent; Petroleum Distillates; Petroleum Naphtha; Naphtha, Solvent; Stoddard Solvent; Mineral Spirits

SK PART NUMBER(S): 6617, 1011662, 1014662

FAMILY/CHEMICAL NAME: Petroleum hydrocarbon

PRODUCT USE: Cleaning and degreasing metal parts.
If this product is used in combination with other chemicals, refer to the Material Safety Data Sheets for those chemicals.

24-HOUR EMERGENCY TELEPHONE	***MEDICAL:***	***TRANSPORTATION:***
These numbers are for emergency use only. If you desire non-emergency information about this product, please call a telephone number listed below.	**1-800-752-7869 (U.S.A.)** **1-312-942-5969 (CANADA)** **RUSH POISON CONTROL CENTER CHICAGO, ILLINOIS, U.S.A.**	**1-708-888-4660 (U.S.A.)** **SAFETY-KLEEN ENVIRONMENT, HEALTH AND SAFETY DEPARTMENT** **1-613-996-6666 (CANADA)** **CANUTEC**

MANUFACTURER/SUPPLIER: Safety-Kleen Corp. - 1000 North Randall Road - Elgin, IL, U.S.A. 60123-7857
Telephone number: 1-800-669-5840
Safety-Kleen Canada Inc. - 300 Woolwich Street South - Breslau, ON, Canada N0B 1M0
Telephone number: 1-800-265-2792

PREPARATION INFORMATION

MSDS FORM NO.: 82310 ***REVISION DATE:*** February 2, 1994

ORIGINAL ISSUE DATE: July 20, 1989 ***SUPERSEDES:*** January 15, 1992

PREPARED BY: Product MSDS Coordinator ***APPROVED BY:*** MSDS Task Force

TELEPHONE NUMBER: **For Product Technical Information Call 1-312-694-2700 (U.S.A.); 1-519-648-2291 (Canada)**

SECTION 2 -- HAZARDOUS COMPONENTS

				OSHA PEL		ACGIH TLV		OTHER DATA	
NAME	SYNONYM	CAS NO.	WT%	TWA ppm	STEL ppm	TWA ppm	STEL ppm	LD[a]	LC[b]
Distillates (petroleum) hydrotreated light	Solvent naphtha (petroleum), heavy aliph., hydro-treated	64742-47-8[f,g]	99-100	500[c,d]	N.Av.	100[c]	N.Av.	>5000	>5500[c] mg/m^3/4 hours
Tetrachloroethene	Perchloroethylene; Tetrachloroethylene	127-18-4	0-0.5**	100[e]	N.Av.	25	100	2629	34200 mg/m^3/8 hours

NAME	SYNONYM	CAS NO.	WT%	OSHA PEL TWA ppm	OSHA PEL STEL ppm	ACGIH TLV TWA ppm	ACGIH TLV STEL ppm	OTHER DATA LD[a]	OTHER DATA LC[b]
*1,1,1-Trichloro-ethane	Methyl chloroform	71-55-6	0-0.5**	350	450	350	450	10300	18000 ppm/4 hours

N.Av. = Not Available
*See Section 9-SARA Title III
**Even though the concentration range does not fall under the ranges prescribed by WHMIS, this is the actual range which varies with each batch of the product.
[a]Oral-Rat LD50 (mg/kg)
[b]Inhalation-Rat LC50
[c]For Stoddard Solvent: CAS 8052-41-3
[d]Reference source 1910.1000 29 CFR Ch. XVII (7-1-92 edition): 100 ppm TWA
[e]Reference source 1910.1000 29 CFR Ch. XVII (7-1-92 edition): 25 ppm TWA
[f]For Stoddard Solvent: 29500 mg/m^3 (approximately 5000 ppm) IDLH
[g]For Petroleum Distillates: 10000 ppm IDLH

SECTION 3 -- EMERGENCY AND FIRST AID PROCEDURES

EYES: For direct contact, flush eyes with water for 15 minutes lifting upper and lower lids occasionally. If irritation or redness from exposure to vapor or mist develops, move victim away from exposure into fresh air. Consult physician if irritation or pain persists.

SKIN: Remove contaminated clothing and shoes. Wash skin twice with soap and water. Consult physician if irritation or pain persists.

INHALATION: (Breathing) Remove to fresh air immediately. Use oxygen if there is difficulty breathing or artificial respiration if breathing has stopped. Do not leave victim unattended. Seek immediate medical attention if necessary.

INGESTION: (Swallowing) Seek immediate medical attention. Do NOT induce vomiting. If spontaneous vomiting occurs, keep head below hips to avoid aspiration (breathing) into the lungs.

SPECIAL NOTE TO PHYSICIAN: Treat symptomatically and supportively. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Contact Rush Poison Control center (see Section 1) for additional medical information.

SECTION 4 -- HEALTH HAZARD DATA AND TOXICOLOGICAL PROPERTIES

PRIMARY ROUTES OF EXPOSURE: Eye and skin contact; inhalation, ingestion.

EXPOSURE LIMITS: See Section 2.

SIGNS AND SYMPTOMS OF EXPOSURE

ACUTE: ***Eyes:*** Contact with liquid or exposure to vapors may cause mild to moderate irritation with watering, stinging, or redness.

Skin: Contact with liquid or exposure to vapors may cause mild to severe irritation. Contact with liquid or exposure to vapors may cause redness, dryness, cracking, burning, or dermatitis. No significant skin absorption hazard.

Inhalation (Breathing): High concentrations of vapor or mist may irritate the nose, throat, or respiratory tract. High concentrations of vapor or mist may cause nausea, vomiting, or irregular heartbeat. High concentrations of vapor or mist may cause headaches, dizziness, incoordination, numbness, unconsciousness, and other central nervous system effects. Massive acute exposure may result in rapid central nervous system depression with sudden collapse, deep coma, and death.

Ingestion (Swallowing): Low order of acute oral toxicity. May cause throat irritation, nausea, vomiting, myocardial (muscular tissue of the heart) injury, arrhythmias (irregular heartbeats), and symptoms of central nervous system effects as listed for *ACUTE Inhalation*. Breathing material into the lungs during ingestion or vomiting may cause mild to severe pulmonary (lung) injury and possibly death.

CHRONIC: Prolonged or repeated eye contact may cause conjunctivitis. Prolonged or repeated skin contact may cause drying, cracking, dermatitis, or burns.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Individuals with pre-existing lung, cardiac, central nervous system, or skin disorders may have increased susceptibility to the effects of exposure.

CARCINOGENICITY: IARC classifies chemicals by their carcinogenic risk, including agents that are known, probable, or possible carcinogens. NTP classifies chemicals as either known carcinogens, or for which there is a limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals. ACGIH recognizes several categories of carcinogens, including confirmed human carcinogens, suspected human carcinogens, and animal carcinogens.

Tetrachloroethene is listed by IARC as a possible carcinogen. Tetrachloroethene is classified by NTP as having limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals. Tetrachloroethene is recognized by ACGIH as an animal carcinogen.

OTHER POTENTIAL HEALTH HAZARDS: The following information is required by Canadian WHMIS regulations. Irritancy is covered in Signs and Symptoms of Exposure in Section 4. There is no known human sensitization, toxicologically synergistic product, reproductive toxicity, or mutagenicity associated with this product as a whole. Studies indicate that 1,1,1-trichloroethane is an experimental teratogen.

SECTION 5 -- FIRE AND EXPLOSION HAZARD DATA

EMERGENCY RESPONSE GUIDE NUMBER: 27
Reference *1993 Emergency Response Guidebook* (RSPA P 5800.6)

FIRE AND EXPLOSION HAZARDS: Decomposition and combustion products may be toxic. Heated containers may rupture, explode, or be thrown into the air. Vapors are heavier than air and may travel great distances to ignition source and flash back. Vapor explosion hazard indoors, outdoors, or in sewers. Run-off to sewer may create fire or explosion hazard. Not sensitive to mechanical impact. Material may be sensitive to static discharge, which could result in fire or explosion.

FIRE FIGHTING PROCEDURES: Keep storage containers cool with water spray. Positive-pressure, self-contained breathing apparatus (SCBA) and structural firefighters' protective clothing will provide limited protection.

EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical, or water spray.

CONDITIONS OF FLAMMABILITY: Heat, sparks, or flame.

FLASH POINT: 105°F (40°C) (minimum) Tag Closed Cup

AUTOIGNITION TEMPERATURE: 440°F (227°C) (minimum) (based on similar materials)

FLAMMABLE LIMITS IN AIR: ***LOWER:*** 1.0 Vol.% (based on similar materials)
UPPER: 9.3 Vol.% (based on similar materials)

HAZARDOUS COMBUSTION PRODUCTS: Burning may produce phosgene, chloroacetylenes, chlorides, or carbon monoxide.

SECTION 6 -- REACTIVITY DATA

STABILITY: Stable under normal temperatures and pressures, and not reactive with water.

INCOMPATIBILITY (MATERIALS AND CONDITIONS TO AVOID): Avoid strong acids, bases, or oxidizing agents. Chlorine may cause a violent reaction. Avoid heat, sparks, or flame.

HAZARDOUS POLYMERIZATION: Not known to occur under normal temperatures and pressures.

HAZARDOUS DECOMPOSITION PRODUCTS: None under normal temperatures and pressures.

SECTION 7 -- PREVENTIVE MEASURES

PRECAUTIONS FOR SAFE USE AND HANDLING

HANDLING PRECAUTIONS: Keep away from heat, sparks, or flame. Where explosive mixtures may be present, equipment safe for such locations should be used. When transferring material, metal containers, including tank cars and trucks, should be grounded and bonded. Avoid contact with eyes, skin, clothing, or shoes. Use in well ventilated area and avoid breathing vapor or mist.

PERSONAL HYGIENE: Use good personal hygiene. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco products. Clean contaminated clothing, shoes, and protective equipment before reuse. Discard contaminated clothing, shoes, or protective equipment if they cannot be thoroughly cleaned.

SHIPPING AND STORING PRECAUTIONS: Keep container tightly closed when not in use and during transport. Do not pressurize, drill, cut, heat, weld, braze, grind, or expose containers to flame or other sources of ignition. Empty product containers may contain product residue. See Section 9 for Packing Group information.

SPILL PROCEDURES: Remove all ignition sources. Stop leak if you can do it without risk. Wear protective equipment specified in Section 7, CONTROL MEASURES. Ventilate area and avoid breathing vapor or mist. Water spray may reduce vapor, but it may not prevent ignition in closed spaces. For large spills, isolate area and deny entry; dike far ahead of liquid spill for later disposal. Contain away from surface waters and sewers. If possible, contain as a liquid for possible re-refining or sorb with compatible sorbent material and shovel with a non-sparking tool into closable container for disposal. See *1993 Emergency Response Guidebook* (RSPA P 5800.6) Guide Number 27 for more information.

WASTE DISPOSAL METHODS: Dispose in accordance with federal, state, provincial, and local regulations. Contact Safety-Kleen regarding recycling or proper disposal.

CONTROL MEASURES

EYE PROTECTION: Where there is likelihood of eye contact, wear chemical goggles; do NOT wear contact lenses.

PROTECTIVE GLOVES: Use Nitrile, Viton®, or equivalent gloves to prevent contact with skin. Use of Butyl rubber, natural rubber, or equivalent gloves is not recommended.

RESPIRATORY PROTECTION: Use NIOSH/MSHA-approved respiratory protective equipment when concentration of vapor or mist exceeds applicable exposure limit. A self-contained breathing apparatus (SCBA) and full protective equipment are required for large spills or fire emergencies. Selection and use of respiratory protective equipment should be in accordance in the U.S.A. with OSHA General Industry Standard 29 CFR 1910.134 or in Canada with CSA Standard Z94.4-M1982.

ENGINEERING CONTROLS: Provide process enclosure or local ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where explosive mixtures may be present, equipment safe for such locations should be used.

OTHER PROTECTIVE EQUIPMENT: Where spills and splashes are possible, wear appropriate solvent-resistant boots, apron, or other protective clothing. Clean water should be available in work areas for flushing the eyes and skin.

SECTION 8 -- PHYSICAL DATA

PHYSICAL STATE, APPEARANCE AND ODOR: Liquid, clear, green, with characteristic hydrocarbon odor.

ODOR THRESHOLD:	30 ppm (based on Stoddard Solvent)
SPECIFIC GRAVITY:	0.77 to 0.80 (60°/60°F) (16°/16°C) (water = 1)
DENSITY:	6.4 to 6.7 lb/US gal (770 to 800 g/l)
VAPOR DENSITY:	5.3 to 6.2 (air = 1) (based on similar materials)
VAPOR PRESSURE:	1 to 2 mm Hg at 68°F (20°C)
BOILING POINT:	310° to 400°F (155° to 205°C)
FREEZING POINT:	less than -45°F (-43°C) (based on similar materials)
pH:	Not applicable.
VOLATILE ORGANIC COMPOUNDS: (US EPA DEFINITION)	100 WT%; 6.4 to 6.7 lb/US gal; 770 to 800 g/l
EVAPORATION RATE:	less than 0.1 (butyl acetate = 1) (based on similar materials)
SOLUBILITY IN WATER:	Insoluble. (based on similar materials)
COEFFICIENT OF WATER/OIL DISTRIBUTION:	less than 1 (based on similar materials)
MOLECULAR WEIGHT:	155 to 180 (based on similar materials)

SECTION 9 -- OTHER REGULATORY INFORMATION

TRANSPORTATION INFORMATION

DOT PROPER SHIPPING NAME:	COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA)
DOT CLASS:	Combustible Liquid
DOT ID NUMBER:	NA1993 PG III
TDG CLASSIFICATION:	Naphtha, Petroleum, Class 3.3, UN1255, PG III

SARA TITLE III:

Product contains toxic chemicals subject to requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. Toxic constituents are listed with an asterisk in Section 2 of this Material Safety Data Sheet.

Product poses the following physical and health hazards as defined in 40 CFR Part 370 and is subject to the requirements of sections 311 and 312 of Title III of the Superfund Amendments and Reauthorization Act of 1986:

Immediate (Acute) Health Hazard
Delayed (Chronic) Health Hazard
Fire Hazard

WHMIS CLASSIFICATION:

B3, Flammable and Combustible Material, Combustible Liquids;
D2A, Poisonous and Infectious Material, Materials Causing Other Toxic Effects, Very Toxic Material
D2B, Poisonous and Infectious Material, Materials Causing Other Toxic Effects, Toxic Material

SAFETY-KLEEN 105 SOLVENT RECYCLED

MATERIAL SAFETY DATA SHEET FOR U.S.A. AND CANADA

TSCA:	All of the components for this product are listed on, or are exempted from the requirement to be listed on, the TSCA Inventory.
CALIFORNIA:	This product is not for sale or use in the State of California.

User assumes all risks incident to the use of this product. To the best of our knowledge, the information contained herein is accurate. However, Safety-Kleen assumes no liability whatsoever for the accuracy or completeness of the information contained herein. No representations or warranties, either expressed or implied, or merchantability, fitness for a particular purpose or of any other nature are made hereunder with respect to information or the product to which information refers. The data contained on this sheet apply to the material as supplied to the user.

Appendix 3

RULE 113. - SHOOTING AND CHEMICAL TREATMENT OF WELLS (as of 3-1-91)

If injury results to the producing formation, injection interval, casing or casing seat from shooting, fracturing, or treating a well and which injury may create underground waste or contamination of fresh water, the operator shall give written notice to the Division within five (5) working days and proceed with diligence to use the appropriate method and means for rectifying such damage. If shooting, fracturing, or chemical treating results in irreparable injury to the well the Division may require the operator to properly plug and abandon the well.

RULE 114. - SAFETY REGULATIONS (as of 3-1-91)

A. All oil wells shall be cleaned into a pit or tank, not less than 40 feet from the derrick floor and 150 feet from any fire hazard. All flowing oil wells must be produced through an oil and gas separator of ample capacity and in good working order. No boiler or portable electric lighting generator shall be placed or remain nearer than 150 feet to any producing well or oil tank. Any rubbish or debris that might constitute a fire hazard shall be removed to a distance of at least 150 feet from the vicinity of wells and tanks. All waste shall be burned or disposed of in such manner as to avoid creating a fire hazard.

B. When coming out of the hole with drill pipe, drilling fluid shall be circulated until equalized and subsequently drilling fluid level shall be maintained at a height sufficient to control subsurface pressures. During course of drilling blowout preventers shall be tested at least once each 24-hour period.

RULE 115. - WELL AND LEASE EQUIPMENT (as of 3-1-91)

A. Christmas tree fittings or wellhead connections shall be installed and maintained in first class condition so that all necessary pressure tests may easily be made on flowing wells. On oil wells the Christmas tree fittings shall have a test pressure rating at least equivalent to the calculated or known pressure in the reservoir from which production is expected. On gas wells the Christmas tree fittings shall have a test pressure equivalent to at least 150 percent of the calculated or known pressure in the reservoir from which production is expected.

B. Valves shall be installed and maintained in good working order to permit pressures to be obtained on both casing and tubing. Each flowing well shall be equipped to control properly the flowing of each well, and in case of an oil well, shall be produced into an oil and gas separator of a type generally used in the industry.

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS (Due to be revised - still current 1/96) (as of 3-1-91)

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with

oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be "immediate notification" as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be "subsequent notification" described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.

(7) IMMEDIATE NOTIFICATION. "Immediate Notification" shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report ("Subsequent Notification") of

the incident shall also be submitted in DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

(8) SUBSEQUENT NOTIFICATION. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.

(9) CONTENT OF NOTIFICATION. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.

(10) WATERCOURSE, for the purpose of this rule, is defined as any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

RULE 117. - WELL LOG, COMPLETION AND WORKOVER REPORTS (as of 3-1-91)

Within 20 days after the completion of a well drilled for oil or gas, or the recompletion of a well into a different common source of supply, a completion report shall be filed with the Division on Form C-105. For the purpose of this rule, any hole drilled or cored below fresh water or which penetrates oil- or gas-bearing formations or which is drilled by an "owner" as defined herein shall be presumed to be a well drilled for oil or gas.

RULE 118. - HYDROGEN SULFIDE GAS - PUBLIC SAFETY (as of 3-1-91)

A. The intent of this rule is to provide for the protection of the public's safety in areas where hydrogen sulfide (H_2S) gas in concentrations greater than 100 parts per million (PPM) may be encountered.

B. Producing operations should be conducted with due consideration and guidance from American Petroleum Institute (API) publication "Conducting Oil and Gas Production Operations Involving Hydrogen Sulfide" (RP-55). The operator of a lease producing, or a gas processing plant handling H_2S or any other related facility where H_2S gas is present in concentrations of 100 PPM or more shall take reasonable measures to forewarn and safeguard persons having occasion to be on or near the property. In addition to training operator's employees in H_2S safety such measures may include, but are not necessarily limited to, posting of warning signs, fencing of surface installations, installation of safety devices and wind direction indicators, and maintaining tanks, thief hatches and gaskets, valves and piping in condition so as to prevent avoidable loss of vapors. Where release of hydrogen sulfide is unavoidable, the operator shall burn or vent the gas stream in such a manner as to avoid endangering human life.

C. Wells drilled in known H_2S gas producing areas, or where there is substantial probability of encountering H_2S gas in concentrations of 100 PPM or more, should be planned and drilled with due regard to and guidance from API RP-49 "Recommended Practices for Safe Drilling of Wells Containing Hydrogen Sulfide", latest edition. Wells completed and serviced by well servicing units where there is substantial probability of encountering H_2S gas in concentrations of 100 PPM or more should be worked on with due regard to the latest industry accepted practices. These practices may include, but are not necessarily limited to, the proper training of personnel in H_2S safety and the use of H_2S safety equipment as listed for safe operations by the American Petroleum Institute draft report for "Land, Oil and Gas Well Servicing and Workover Operations Involving Hydrogen Sulfide."*

B. Plans, specifications and reports required by this Section, if related to facilities for the production, refinement and pipeline transmission of oil and gas, or products thereof, shall be filed instead with the Oil Conservation Division. [1-4-68, 12-1-95]

C. Plans and specifications required to be filed under this Section must be filed prior to the commencement of construction. [9-3-72]

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required: [2-17-74, 12-24-87]

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief of the Ground Water Protection and Remediation Bureau of the department, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of the discharge; and

g. any actions taken to mitigate immediate damage from the discharge.
[2-17-74, 2-20-81, 12-24-87, 12-1-95]

2. When in doubt as to which agency to notify, the

person in charge of the facility shall notify the Chief of the Ground Water Protection and Remediation Bureau of the department. If that department does not have authority pursuant to commission delegation, the department shall notify the appropriate constituent agency. [12-24-87, 12-1-95]

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same department official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification. [12-24-87]

4. The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein. [2-17-74, 12-24-87]

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. [2-17-74, 12-24-87]

6. If it is possible to do so without unduly delaying needed corrective actions, the facility owner/operator shall endeavor to contact and consult with the Chief of the Ground Water Protection and Remediation Bureau of the department or appropriate counterpart in a delegated agency, in an effort to determine the department's views as to what further corrective actions may be necessary or appropriate to the discharge in question. In any event, no later than fifteen (15) days after the discharger learns of the discharge, the facility owner/operator shall send to said Bureau Chief a written report describing any corrective actions taken and/or to be taken relative to the discharge. Upon a written request and for good cause shown, the Bureau Chief may extend the time limit beyond fifteen (15) days. [12-24-87, 12-1-95]

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified

time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

8. In the event that the modified corrective action report also is unsatisfactory to the department, the facility owner/operator has five (5) days from the notification by the Bureau Chief that it is unsatisfactory to appeal to the department secretary. The department secretary shall approve or disapprove the modified corrective action report within five (5) days of receipt of the appeal from the Bureau Chief's decision. In the absence of either corrective action consistent with the approved corrective action report or with the decision of the secretary concerning the shortcomings of the modified corrective action report, the department may take whatever enforcement or legal action it deems necessary or appropriate. [12-24-87, 12-1-95]

9. If the secretary determines that the discharge causes or may with reasonable probability cause water pollution in excess of the standards and requirements of Section 4103 of this Part, and the water pollution will not be abated within one hundred and eighty (180) days after notice is required to be given pursuant to Section 1203.A.1 of this Part, the secretary may notify the facility owner/operator that he is a responsible person and that an abatement plan may be required pursuant to Sections 4104 and 4106.A of this Part. [12-1-95]

B. Exempt from the requirements of this Section are continuous or periodic discharges which are made: [2-17-74]

1. in conformance with regulations of the commission and rules, regulations or orders of other state or federal agencies; or [2-17-74]

2. in violation of regulations of the commission, but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies. [2-17-74]

C. As used in this Section and in Sections 4100 through 4115, but not in other Sections of this Part: [2-17-74, 12-1-95]

1. "discharge" means spilling, leaking, pumping, pouring, emitting, emptying, or dumping into water or in a location and manner where there is a reasonable probability that the discharged substance will reach surface or subsurface water; [2-17-74]

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling

stock, or activity of any kind, whether stationary or mobile; [2-17-74]

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes; [2-17-74]

4. "operator" means the person or persons responsible for the overall operations of a facility; and [12-24-87]

5. "owner" means the person or persons who own a facility, or part of a facility. [12-24-87]

D. Notification of discharge received pursuant to this Part or information obtained by the exploitation of such notification shall not be used against any such person in any criminal case, except for perjury or for giving a false statement. [2-17-74]

E. Any person who has any information relating to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, is urged to notify the Chief of the Ground Water Protection and Remediation Bureau of the department. Upon such notification, the secretary may require an owner/operator or a responsible person to perform corrective actions pursuant to Sections 1203.A.5 or 1203.A.9 of this Part. [12-1-95]

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

A. Any person seeking a variance pursuant to Section 74-6-4 (G) NMSA 1978, shall do so by filing a written petition with the commission. The petitioner may submit with his petition any relevant documents or material which the petitioner believes would support his petition. Petitions shall: [7-19-68, 11-27-70, 9-3-72]

1. state the petitioner's name and address; [7-19-68, 11-27-70]

2. state the date of the petition; [7-19-68]

3. describe the facility or activity for which the variance is sought; [7-19-68, 11-27-70]

4. state the address or description of the property upon which the facility is located; [11-27-70]

Appendix 4

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

April 18, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-071

Mr. Greg Lewis
Environmental Coordinator
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, TX 77387-4000

RE: Discharge Plan Requirement
Pecos Diamond Gas Processing Plant
Eddy County, New Mexico

Dear Mr. Lewis,

Under the provision of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan is required for the Pecos Diamond Gas Processing Plant located in Eddy County, New Mexico.

The notification of discharge plan requirement is pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.P of the WQCC regulations should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and\or piping.

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

A copy of the regulations is enclosed for your convenience. Also enclosed is an OCD guideline for the preparation of discharge plans at gas processing plants. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes.

The discharge plan is subject to the WQCC Regulation 3-114

discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of three thousand, three hundred and thirty-five ($3335) dollars for gas processing plants. The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

Please make all checks payable to: **NMED Water Quality Management** and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please feel free to contact Bobby Myers at 827-4080 or Roger Anderson at 827-5812.

Sincerely,

William J. LeMay
Director

WJL/rlm

enclosures

XC: OCD Artesia Office

August 3, 1994

Roger Anderson
Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504

Re : Extension for Discharge Plans
Liquid Energy Corporation (LEC)

Dear Mr. Anderson:

Based on your notification on April 18, LEC will submit discharge plans for the Dagger Draw and Pecos Diamond gas processing plants. While we have been working on these plans, we do not feel that they will be complete by the deadline noted in your letter. Therefore, LEC requests an extension for each of these discharge plans until December 1, 1994. At that time, we will submit complete discharge plans for both of these facilities.

If you have any questions or do not feel that you can grant this extension, please call me at (713)-377-7148.

Yours Truly,

Greg Lewis
Manager, Environmental and Safety
Liquid Energy Corporation

File w/ Rec Plan-156

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

DRUG FREE

February 6, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-107

Mr. Greg Lewis
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, Texas 77387-4000

Re: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Lewis:

The Oil Conservation Division (OCD) has received your request dated January 18, 1995 for a 120 day extension to submit the required discharge plan application at the above referenced facility. The Pecos Diamond Gas Plant is located in Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico.

Pursuant to Section 3-106.A. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, Liquid Energy Corporation (LEC) is hereby granted an extension for submittal of the previously requested discharge plan application until May 7, 1995. Pursuant to Section 3-106.B. of the WQCC regulations LEC is hereby granted an extension to discharge at the Pecos Diamond Gas Plant without an approved discharge plan until September 7, 1995. These extensions are granted to allow LEC time to compile and formulate the discharge plan for the above referenced facility.

Please be advised these extensions do not relieve LEC of liability should their operation result in actual pollution of surface waters, ground waters or the environment actionable under other laws and/or regulations.

Sincerely,

William J. LeMay
Director

WJL/cee
xc: OCD Artesia Office

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals

environmental SERVICES inc.

esi

November 27, 1995

Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
PO Box 6429
Santa Fe, NM 87505-6429

fax transmittal followed by mail

Subject: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Anderson

I am writing this letter on behalf of my client, Associated Natural Gas, Inc. (ANGI). As of December 1, 1995, ANGI will be taking ownership of the Pecos Diamond Gas Plant, located in the southwest quarter of Section 3, Township 18 South, Range 27 East, from Liquid Energy Corporation (LEC).

The plant has been shut down since earlier this year. ANGI expects to start up the plant as soon as possible after taking ownership. The plant, however, does not currently have an approved Groundwater Discharge Plan. Accordingly, ANGI plans on submitting a discharge plan application within 120 days of taking ownership of the facility and hereby requests permission to discharge at the facility without an approved discharge plan until that time.

We will be assisting Mr. Bob Pearson of ANGI with preparation of the application. If you have any questions, please call me at 505-266-6611. Please let me or Mr. Pearson know in writing if this arrangement is acceptable to you.

Sincerely

Susan E. Boyle

Susan E. Boyle
Project Manager

4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110
PHO 505 266 6611
FAX 505 266 7738

W MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe, New Mexico 87505

November 30, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-765-962-597

Mr. Bob Pearson
Associated Natural Gas, Inc.
370 17th Street, Suite 900
Denver, Colorado 80202

Re: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Pearson:

The Oil Conservation Division (OCD) has received Associated Natural Gas, Inc.'s (ANGI) request dated November 27, 1995 for a 120 day authorization to discharge without an approved discharge plan at the Pecos Diamond Gas Plant, located in Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. ANGI requested the 120 day permission to discharge because the facility did not operate or discharge during the prior period requested.

Pursuant to Section 3106.B. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, ANGI is hereby authorized to discharge without an approved discharge plan until March 30, 1996.

Pursuant to Section 3106.B., the Director may allow discharge without an approved discharge plan for a period not to exceed 120 days. This authorization is granted to allow ANGI time to compile, formulate, submit and receive approval for a discharge plan for the above referenced facility. **If a discharge plan is not approved for this facility by March 30, 1996 ANGI will be required to cease all discharges at that time.** WQCC regulations do not allow for extension of the 120 day authorization to discharge without an approved discharge plan.

ANGI should submit the application as soon as possible (preferably no later than January 30, 1996) to allow the review process to be complete and to avoid operating out of compliance and/or being forced to cease discharges.

Please be advised that this authorization does not relieve ANGI of liability should their operation result in pollution of surface waters, ground waters or the environment. In addition, OCD authorization does not releive ANGI of responsibility for compliance with other federal, state or local laws and/or regulations.

Sincerely,

William J. LeMay
Director

WJL/cee
xc: OCD Artesia Office

SPCC Plan

If there has been a spill, refer immediately to the flowcharts following this section for response and clean-up procedures

Facility

Pecos Diamond Plant
PanEnergy Field Services, Inc.

Location of Facility

T 18S, R 27E, sec 3, SW1/4 SW 1/4
Eddy County, NM

Legally Responsible Party

PanEnergy Field Services
900 Republic Plaza
370 17th Street
Denver, CO 80202
303-595-3331
Contact: Robert L. Pearson

Date

DRAFT
January 1996

Prepared by

Environmental Services, Inc.
4665 Indian School Rd. NE Suite 106
Albuquerque, NM 87122
505-266-6611
Contact: Susan Boyle

SPILL RESPONSE PROCEDURES

These procedures should be reviewed on a regular basis by facility personnel. **In the event of a spill, facility personnel should immediately follow the guidelines set forth in this section.**

According to the OSHA Hazardous Communication Program, employers are required to provide Material Safety Data Sheets (MSDS) to employees for chemicals used and stored at facilities. Facility personnel should review the MSDS for the various oils used and stored at the facility in order to familiarize themselves with the chemical properties of the oils. MSDS are an important part of spill response; they provide health and reactivity data on substances. Therefore, it is necessary that facility personnel review the MSDS prior to a spill event to ensure their health and safety while responding to a spill event. MSDS for on site substances should be kept in a location accessible to all facility and emergency response personnel.

Step 1

Stop Spill

- Identify source.
- Stop source.
  Close necessary valves and pumps.
- Seal necessary equipment.

Step 3
Containment and Clean Up

3.1

Contained Spill

- Inspect containment area for seepage and leaks - repair if necessary.

- Small volume of material
  Remove material with shovel.
  or
  Add water to the containment area and pump material into drums or storage tanks for disposal.
  or
  Add water to the containment area and skim oils from the surface of the water. Place recovered material into drums or storage tanks for disposal. Allow water to evaporate.

- Large volume of material
  Remove material with pumps and store in drums or storage tanks for disposal.

3.2

Minor, Controlled Spill

- Stop the flow of material with sorbent materials or construct small earthen berms.

- Recover spilled material with sorbent materials or shovels and place in drums or storage tanks for disposal.

- Remove contaminated soil or other ground surfaces from the spill site and place into appropriate containers for off site disposal. If an OCD-approved land farm is located on site, place contaminated soils there.

3.3

- Stop the flow of material by creating low areas in the terrain ahead of the spill in order to collect the material. Most often, this will require the use of backhoes or other similar equipment. It may be necessary to rent equipment and skilled operators from the nearest town.

- Follow the clean up guidelines established in 3.1 for large volume spills.

- If the spill has contaminated a large amount of soil, excavate the contaminated area. If there is not an on site land farm, follow these procedures.
    - Pile the soil removed from the excavation on site.
    - Line the excavation with an impermeable liner.
    - Place soil back in excavation.
    - Wash the soil using high pressure hoses.
    - Skim oils off the surface of the water.
    - Place recovered material into drums or storage tanks for disposal.
    - Pump remaining water into drums or tanks or allow to evaporate.

1 Introduction

This Spill Prevention Control and Countermeasure (SPCC) Plan was prepared for the Pecos Diamond Plant. Preparation of this plan was performed following Environmental Protection Agency (EPA) regulations found at 40 CFR part 112 and the *SPCC Manual* published by EPA Region VI. For the purposes of the SPCC regulations, the term "oil" includes petroleum, gasoline, diesel fuel, fuel oil, sludge, oil refuse and oil mixed with wastes. Based upon conversations with EPA staff members at Regions 6 and 9, oil also includes the following substances which are typically found at natural gas processing plants and compressor stations: drip/condensate, natural gas liquids, and natural gasoline. Oil does not include hydrocarbon-based substances such as Y-Grade, propane, ethane, methane, and butane which volatilize immediately or shortly after reaching ambient temperature and pressure.

An SPCC Plan is intended to protect the waters of the US from unintentional discharges of large volumes of oil. The facility owner understands that spills which have the potential to reach even the smallest drainage channel also have the potential to end up in a navigable waterway. Therefore, the facility owner will put forth its best effort to protect human health and the environment from any harmful effects which might result from an unintentional discharge of oil from the facility.

A complete and up-to-date copy of the SPCC Plan will be maintained at the plant office. The facility owner will review this plan once every three years. However, in the event of major equipment changes at the facility, the plan will be reviewed and edited according to those changes that affect the SPCC Plan.

Potential discharges of oil and hazardous materials to the waters of New Mexico are regulated at the State level by New Mexico's Oil Conservation Division (OCD). This facility operates under a Ground Water Discharge Plan which is also maintained at the plant.

2 Facility Description

The plant utilizes two post-boost cryogenic skids and two 800-horsepower compressor engines to remove liquids from an inlet natural gas stream. An amine processing unit, using diethanolamine (DEA) and water, is utilized to remove carbon dioxide from the Y-Grade (natural gas liquids) removed from the inlet gas in the cryogenic units. Dry natural gas and Y-Grade are transported for sale off-site via pipeline. Pecos Diamond is capable of processing 20,000 MMscf/day of natural gas per compressor engine.

The facility is located in the southeast portion of New Mexico. The facility is approximately 5 miles south of Artesia, New Mexico. It is located on a gently sloping hillside above Scoggin Draw at 3550 feet above mean sea level (see figure 1).

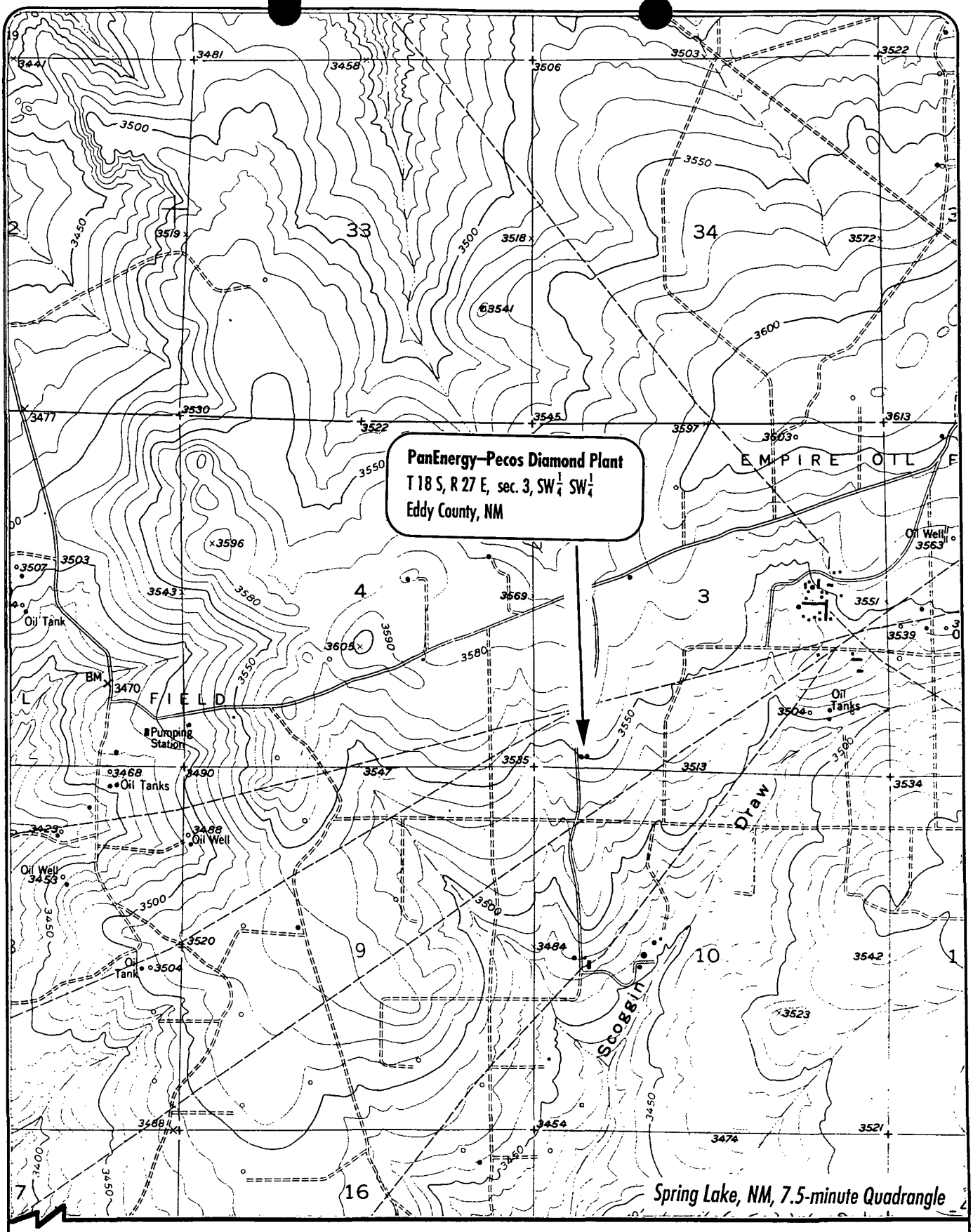


Figure 1 **PanEnergy–Pecos Diamond Plant**

Site Location

This section describes the facility's drainage systems, oil-containing bulk storage tanks and process vessels, internal facility transfer and piping systems, and tank truck transfer operations.

2.1 Facility Drainage

The facility is equipped with an underground wastewater drainage system. Storm water flows over the surface. Run off from the facility flows generally toward the south toward Scoggins Draw. All draws and ditches which receive run off from the facility empty into the Pecos River approximately 2.5 miles west of the facility.

2.2 Bulk Storage Tanks

SPCC regulations define a bulk storage tank as "any container used to store oil... for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce." The facility has a potential above ground oil storage tank capacity totaling over 13,000 gallons. This total does not include facility process vessels which utilize and contain oils. Daily throughput and storage amounts for the process vessels vary according to inlet processes.

Table 1 depicts the tanks present at the facility. This table identifies all tanks at the facility, their capacity, secondary containment devices, direction of flow in the event of a spill, and tank construction material. The tank volumes listed in the table were either taken from the manufacturer's nameplate or calculated from field measurements. The numbers located to the left of the storage tank contents correspond to the tank numbers on the facility site layout, figure 2. The table also identifies which tanks at the facility contain oil as defined above.

2.3 Facility Transfer Operations, Pumping, and In-plant Process Piping

Facility transfer operations involve piping, valves, gauges, regulators, compressors, pumps, and other mechanical devices used to transfer oil from one area to another within the facility. Pipelines transporting gas into and out of the facility are not covered by the SPCC regulations. Any or all of these components could contain oil at any time.

2.4 Tank Truck Transfer Operations

Natural gas is transported to the facility via pipeline. The facility is not served by rail lines or water ports. Any transfer of SPCC-regulated materials to and from the facility is accomplished via tanker truck. The following tanker truck transfer operations typically occur at the facility.

- The lube oil tanks (TK-6 through 8) are filled by local contractors as needed.
- The 8,820-gallon wastewater (TK-4) is emptied by local contractors as needed.

Table 1 PanEnergy—Pecos Diamond Plant
Tank Inventory and Secondary Containment Areas

Secondary Containment Area	Storage Tanks	Tank Cap. (gal)	Secondary Containment Cap.(gal)	Containment Construction	Oil?*	Direction of spill	Tank Const.	OCD** (133 %)	SPCC*** (110 %)	Footnote	Notes
Amine/water	TK-1 Water	1,000			no		steel	na	na		
	TK-2 Amine	1,000	0	-	yes	north	steel	no	na	2, 3	
Condensate/wastewater	TK-3 Drip/condensate****	8,820			OOS		steel	na	na	1	
	TK-4 Wastewater	8,820	44,886	earth berm	yes	north	steel	yes	yes	1, 2	
	TK-5 Y-Grade	31,500	na	na	no	na	steel	na	na		contents not liquid at ambient temperature
West of compressor building	TK-6 Lube oil	3,350			yes		steel				
	TK-8 Lube oil	250			yes		steel				
	TK-9 Coolant	500			no		steel				
	TK-10 Detergent	50			no		fiberglass				
	TK-11 Methanol	500	13,446	earth berm	no	north	steel	yes	yes	1, 2	
Compressor building	TK-7 Lube Oil	600	compressor building drainage system		yes	S-2	steel	yes	yes	2	spills would be contained by building drain system

[1] Volume calculated by field measurement

[2] Manufacturer's labeled volume rating

[3] Secondary containment will be installed per contingency plan requirements of 40 CFR 122.7 and OCD Discharge Plan.

[4] Tanks are interconnected.

na - not applicable OOS - out of service

** This facility operates under an OCD Discharge Plan requiring installation of containment.

*** Tanks which fall under SPCC regulations. These tanks should be equipped with secondary containment capable of containing 1.1 times the volume of the largest tank or combined volume of interconnected tanks for which it is providing containment.

yes = secondary containment currently meets SPCC recommendations

no = secondary containment does not currently meet with SPCC recommendations

na = tanks and secondary containment not addressed by SPCC guidelines

**** The term "drip/condensate" is used to describe miscellaneous hydrocarbon-containing liquids from a variety of sources.

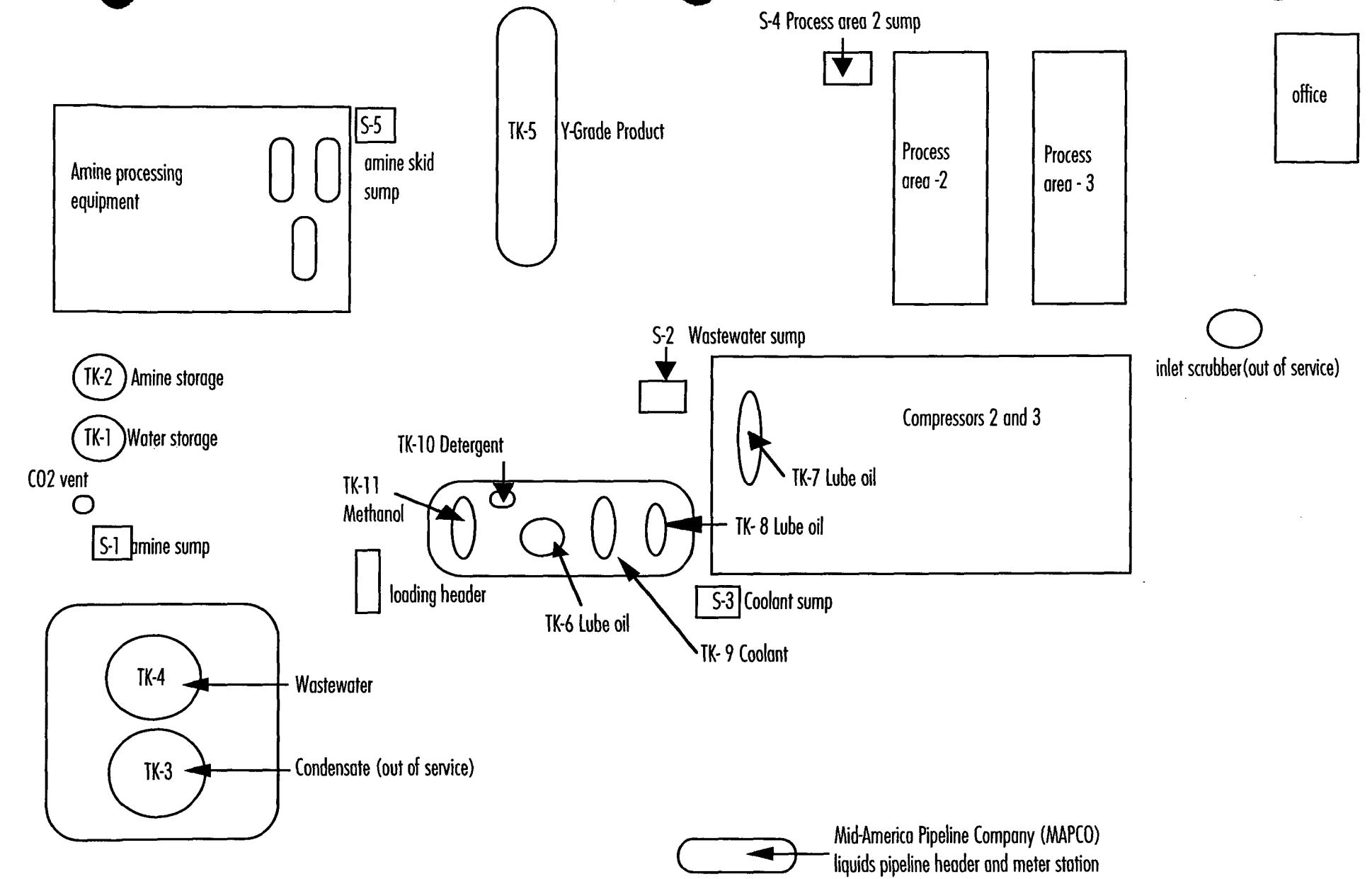


Figure 2 **PanEnergy—Pecos Diamond Plant**

Site Diagram

3 Site Spill Potential

Listed below are the typical categories of potential spill events that could occur at the facility due to equipment failure. They include the worst-case instances of failure for the largest oil container at the facility. However, several other unpredictable factors might occur during a spill event that would cause more than one potential failure to occur at once. Such factors may cause the potential spill volumes or rates to be much higher than the ones listed below. The facility owner is aware of such a possibility, and is prepared to act accordingly. The following table was adapted from an undated EPA sample SPCC Plan. Italicized items were changed to reflect the capacity of the facility.

Potential Event	Volume Released	Spill Rate
Complete failure of a full tank	*Up to 8820 gallons*	Instantaneous
Partial failure of a full tank	*1 to 8819 gallons*	Gradual to instantaneous
Tank overfill	1 to several gallons	Up to 1 gallon per minute
Pipe failure	*Up to 8820 gallons*	4 gallons per second
Leaking pipe or valve packing	Several ounces to several gallons	Up to 1 gallon per minute
Leak during truck loading or unloading	1 to several gallons	Up to 1 gallon per minute

Probable flow directions in the event of spills or leaks from storage tanks are listed in table 1.

Typically in all types of production facilities, connection points between equipment have the highest possibility of unintentionally releasing material. If a spill event were to occur at the facility, it would most likely occur at a connection point. The above table addresses these potential spill sources as pipe failure and leaking pipe or valve failure. In the event of a release from any of this equipment, spilled material would follow natural drainage patterns governed by the location of the spill within the facility.

A worst case spill in the compressor building would release approximately 600 gallons of lube oil. However, this quantity could be increased if a spill event were to occur concurrently with a wash down of the compressors. Wash downs generally take place several times per year unless otherwise needed. Any spills which occur in the compressor building would flow into the building's drainage system and then into the wastewater sump S-2.

No unintentional discharges have been reported at this facility.

4 Security

Security is an important part of preventing spills. Security also assists in preventing acts of vandalism which lead to spills.

Since the facility is completely fenced, is not located in a densely populated region, and

is well lit at night, its exposure to vandalism is low. The facility is attended only during the work-day hours. Gates are kept locked when the facility is unattended.

All valves which permit the direct outward flow of any tank's contents to the ground surface have adequate security measures to ensure that they remain in the closed position when in non-operating or non-standby status.

The starter control on all oil pumps are either kept locked in the "off" position or are located at a site accessible only to authorized personnel when the pumps are in a non-operating or non-standby status.

5 Personnel and Training Procedures

Facility personnel will receive ongoing instruction in the operation and maintenance of equipment to prevent the discharge of oil and degradation of the environment. Facility personnel will also be instructed in the spill response procedures outlined below. The facility supervisor is responsible for oil spill prevention and ensuring that this SPCC Plan is implemented and remains current.

The facility supervisor will report regularly to operating personnel on the status of plan compliance and any issues surrounding oil spills. Briefings will highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Records and attendance sheets for these briefings will be kept on file for a minimum of three years.

The SPCC Plan will be kept accessible to all facility employees.

6 Inspections, Tests, and Records

Inspections are an important part of preventing spills due to equipment or containment system failure. Inspection and maintenance records provide the only real evidence of compliance with the EPA's regulations should this facility be audited.

The facility is inspected daily by facility personnel. In addition to the daily inspections, the following areas of the facility are periodically inspected and/or tested for proper operation and containment. These inspections have been incorporated into the facility's preventative maintenance schedule.

Bulk storage tanks and oil-containing process systems

- above ground tanks - regular visual inspection for deterioration and leaks, other testing according to station standard operating procedures and OCD requirements.
- pipe supports, pipes, valves, and pumps - regular visual inspection.
- ESD and relief valves - tested annually.
- storage tank flow valves, supports, foundations - regular visual inspections.
- storage tank level gauges - regular mechanical function testing/visual inspections.

- underground pipes that are unearthed - inspect for cracks, leaks or rust.

Dikes, berms, secondary containment systems

- containment dike and berm integrity - regular visual inspection.
- earthen berms - rebuilt as necessary.
- rainwater in containment areas - inspection for oil sheen before allowing water to evaporate.
- records of drainage of rainwater from containment areas - recorded whenever areas are drained.

7 Spill Countermeasures

If there is currently a spill event in progress, please refer immediately to the flow diagrams located at the beginning of this document for appropriate spill response procedures.

Various types of spill events may occur at the facility. The flowcharts addresses three specific types of oil spills which are most likely to occur at the facility. Facility personnel have been instructed and trained in response procedures for the three types of spill events. The facility owner is confident that these response procedures can be altered as necessary to address spills which do not specifically fit into one of the three categories.

The facility maintains shovels, drums, brooms, rags, and storage drums either on site or in facility operator vehicles for use in the event of a spill. In anticipation of the possible need for heavy equipment during an uncontrolled spill event, facility personnel will contract local rental companies to provide the facility with necessary heavy equipment and experienced operators.

Reportability of the various spill types depends on the substance and quantity spilled. To determine reporting applicability, facility personnel will refer to the *Ground Water Discharge Plan.*

Certification of the Applicability of the Substantial Harm Criteria

(required by 40 CFR 112.20 (e))

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? **No**

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground oil storage tank area? **No**

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to Part 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **No**

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated the appropriate formula in Attachment C-III to Appendix C to Part 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signed _____

Name _____

Title _____

Company _____

Date _____

Certification by Professional Engineer

(required by 40 CFR 112.3(e))

I hereby certify that the Pecos Diamond Plant located in Eddy County, New Mexico, has been inspected under my supervision and being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices. This certification does not apply to the structural integrity of the containments.

_____ _____

Signature Date

_____, P.E.

New Mexico Registration Number _____

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe, New Mexico 87505

November 30, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-765-962-597

Mr. Bob Pearson
Associated Natural Gas, Inc.
370 17th Street, Suite 900
Denver, Colorado 80202

Re: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Pearson:

The Oil Conservation Division (OCD) has received Associated Natural Gas, Inc.'s (ANGI) request dated November 27, 1995 for a 120 day authorization to discharge without an approved discharge plan at the Pecos Diamond Gas Plant, located in Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico. ANGI requested the 120 day permission to discharge because the facility did not operate or discharge during the prior period requested.

Pursuant to Section 3106.B. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, ANGI is hereby authorized to discharge without an approved discharge plan until March 30, 1996.

Pursuant to Section 3106.B., the Director may allow discharge without an approved discharge plan for a period not to exceed 120 days. This authorization is granted to allow ANGI time to compile, formulate, submit and receive approval for a discharge plan for the above referenced facility. **If a discharge plan is not approved for this facility by March 30, 1996 ANGI will be required to cease all discharges at that time.** WQCC regulations do not allow for extension of the 120 day authorization to discharge without an approved discharge plan.

ANGI should submit the application as soon as possible (preferably no later than January 30, 1996) to allow the review process to be complete and to avoid operating out of compliance and/or being forced to cease discharges.

Please be advised that this authorization does not relieve ANGI of liability should their operation result in pollution of surface waters, ground waters or the environment. In addition, OCD authorization does not releive ANGI of responsibility for compliance with other federal, state or local laws and/or regulations.

Sincerely,

William J. LeMay
Director

WJL/cee
xc: OCD Artesia Office

environmental SERVICES inc.

November 27, 1995

Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
PO Box 6429
Santa Fe, NM 87505-6429

fax transmittal followed by mail

Subject: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Anderson

I am writing this letter on behalf of my client, Associated Natural Gas, Inc. (ANGI). As of December 1, 1995, ANGI will be taking ownership of the Pecos Diamond Gas Plant, located in the southwest quarter of Section 3, Township 18 South, Range 27 East, from Liquid Energy Corporation (LEC).

The plant has been shut down since earlier this year. ANGI expects to start up the plant as soon as possible after taking ownership. The plant, however, does not currently have an approved Groundwater Discharge Plan. Accordingly, ANGI plans on submitting a discharge plan application within 120 days of taking ownership of the facility and hereby requests permission to discharge at the facility without an approved discharge plan until that time.

We will be assisting Mr. Bob Pearson of ANGI with preparation of the application. If you have any questions, please call me at 505-266-6611. Please let me or Mr. Pearson know in writing if this arrangement is acceptable to you.

Sincerely

Susan E. Boyle

Susan E. Boyle
Project Manager

4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110
PHO 505 266 6611
FAX 505 266 7738

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

New Mexico DRUG FREE It's a State of Mind!

February 6, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-107

Mr. Greg Lewis
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, Texas 77387-4000

Re: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Lewis:

The Oil Conservation Division (OCD) has received your request dated January 18, 1995 for a 120 day extension to submit the required discharge plan application at the above referenced facility. The Pecos Diamond Gas Plant is located in Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico.

Pursuant to Section 3-106.A. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, Liquid Energy Corporation (LEC) is hereby granted an extension for submittal of the previously requested discharge plan application until May 7, 1995. Pursuant to Section 3-106.B. of the WQCC regulations LEC is hereby granted an extension to discharge at the Pecos Diamond Gas Plant without an approved discharge plan until September 7, 1995. These extensions are granted to allow LEC time to compile and formulate the discharge plan for the above referenced facility.

Please be advised these extensions do not relieve LEC of liability should their operation result in actual pollution of surface waters, ground waters or the environment actionable under other laws and/or regulations.

Sincerely,

William J. LeMay
Director

WJL/cee
xc: OCD Artesia Office

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970
Oil Conservation
827-7131

January 13, 1995

Roger Anderson
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re : Discharge Plans
Liquid Energy Corporation (LEC)

Dear Mr. Anderson:

Based on our discussion on January 12, 1995, LEC requests an extension for the Pecos Diamond discharge plan for 120 days until May 7, 1995. Since the plant is currently not operating, we feel that this request is reasonable. Please be aware that we realize that a full application will be in your office prior to any restart of this facility.

The discharge plan for the Dagger Draw plant has been submitted. I hope that all of the information you require is in the permit application.

If you have any questions on either facility, please call me at (713)-377-7148.

Yours Truly,

Greg Lewis
Manager, Environmental and Safety
Liquid Energy Corporation

LIQUID ENERGY CORPORATION 2001 TIMBERLOCH PLACE
P.O. BOX 4000, THE WOODLANDS, TEXAS 77387-4000 713/363-5500
A subsidiary of Mitchell Energy & Development Corp.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MEMORANDUM

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

TO: Roger C. Anderson, Environmental Bureau Chief

FROM: William C. Olson, Hydrogeologist

DATE: March 11, 1994

RE: **POSSIBLE ILLEGALLY OPERATING NATURAL GAS PROCESSING AND COMPRESSING FACILITIES**

The OCD has been informed by the NMED Air Quality Bureau that the Liquid Energy Corporation has been issued construction permits for the natural gas plants and compressor stations listed below. The Air Quality Bureau indicated that, with the exception of the Diamond Pecos Gas Plant, all these construction permits were issued within the last two years.

1. Diamond Pecos Gas Plant - 9 miles southeast of Artesia
2. Dagger Draw Amine Plant - Sec 25, T18S, R25E, Eddy County
3. Comanche Compressor Station - Sec 17, T21S, R33E, Lea County
4. McKittrich 30 Federal #1 Compressor Station - Sec 30, T22S, R26E, Eddy County
5. Geronimo Compressor Station - Sec 31, T19S, R33E, Lea County
6. Top Hat Compressor Station - Sec 26, T20S, R33E, Lea County

A review of my records shows that you, myself and Chris Eustice met with Liquid Energy company officials at the Dagger Draw Amine Plant on March 17, 1992 at 1:00 pm for a discharge plan inspection of that facility. At that time, OCD did not inspect the facility because of the hazard of ongoing construction. However, company officials were verbally notified of the WQCC's requirement for submission and approval of a discharge plan prior to operation of a post 1979 facility with an active discharge. Liquid Energy stated that they understood this requirement and would submit a discharge plan to OCD for approval prior to operation. To date, Liquid Energy has not submitted a discharge plan application for this facility.

The OCD has no record of Liquid Energy applying for or receiving approval for a discharge plan for any of these facilities as required under WQCC regulations. OCD should conduct inspections of these facilities to determine compliance with WQCC regulations.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

DRUG FREE

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 7, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-254

Mr. Greg Lewis
Liquid Energy Corporation
P.O. Box 4000
The Woodlands, Texas 77387-4000

Re: Pecos Diamond Gas Plant
Eddy County, New Mexico

Dear Mr. Lewis:

The Oil Conservation Division (OCD) has received your request dated August 3, 1994 for a 120 day extension to submitt the required discharge plan application for the above referenced facility. The Pecos Diamond Gas Plant is located in Section 3, Township 18 South, Range 27 East, NMPM, Eddy County, New Mexico.

Pursuant to Section 3-106.A. of the New Mexico Water Quality Control Commission (WQCC) regulations and for good cause shown, Liquid Energy Corporation (LEC) is hereby granted an extension for submittal of the previously requested discharge plan application until January 7, 1995. Pursuant to Section 3-106.B. of the WQCC regulations LEC is hereby granted an extension to discharge at the Pecos Diamond Gas Plant without an approved discharge plan until May 7, 1995. These extensions are granted to allow LEC time to compile and formulate the discharge plan for the above referenced facility.

Please be advised these extensions do not relieve LEC of liability should their operation result in actual pollution of surface waters, ground waters or the environment actionable under other laws and/or regulations.

Sincerely,

William J. LeMay
Director

WJL/cee
xc: OCD Artesia Office

August 3, 1994

Roger Anderson
Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504

Re : Extension for Discharge Plans
Liquid Energy Corporation (LEC)

Dear Mr. Anderson:

Based on your notification on April 18, LEC will submit discharge plans for the Dagger Draw and Pecos Diamond gas processing plants. While we have been working on these plans, we do not feel that they will be complete by the deadline noted in your letter. Therefore, LEC requests an extension for each of these discharge plans until December 1, 1994. At that time, we will submit complete discharge plans for both of these facilities.

If you have any questions or do not feel that you can grant this extension, please call me at (713)-377-7148.

Yours Truly,

Greg Lewis
Manager, Environmental and Safety
Liquid Energy Corporation

LIQUID ENERGY CORPORATION 2001 TIMBERLOCH PLACE
P.O. BOX 4000, THE WOODLANDS, TEXAS 77387-4000 713/377-5500
A subsidiary of Mitchell Energy & Development Corp.

rev. 9-93

DISCHARGE PLAN INSPECTION

Operator: LIQUID ENERGY

Facility Name: PECOS DIAMOND GP
GW-#:
Type: GAS PLANT

Location:
County: EDDY

BELOW GRADE

Tanks
Product storage for condensate is in above grade tanks that are bermed to 1 1/3 capacity.

Sumps
Slop liquids are contained in two below grade fiberglass tanks that are encased in cement w/no annular space.

Piping
Underground 'slop' lines draining to slop sumps

CONTAINMENT

Berms
OK

Pad & Curb

WASTE STREAMS

Liquid
all goes to sump, below grade, then to below grade vault.

Solids
Oil filters drained into a vat, then to slop oil tank for recycling.

Miscellaneous
No solvents used in shops

GENERAL

Drips

Stains
Some staining from occassional drips.

18 27

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MEMORANDUM

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

TO: Roger C. Anderson, Environmental Bureau Chief

FROM: William C. Olson, Hydrogeologist

DATE: March 11, 1994

RE: **POSSIBLE ILLEGALLY OPERATING NATURAL GAS PROCESSING AND COMPRESSING FACILITIES**

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5. Geronimo Compressor Station - Sec 31, T19S, R33E, Lea County
6. Top Hat Compressor Station - Sec 26, T20S, R33E, Lea County

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