GW - 243

PERMITS, RENEWALS, & MODS Application

Southern Union Gas Services

301 Commerce St., Ste. 700
Fort Worth, TX 76102

Phone: 817.302.9425 Fax:
Fax: 817-302-9351

September 24, 2008

Wayne Price
Environmental Bureau
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Subject: **Discharge Permit – Approval Conditions**
House Compressor Station (GW-243)
Unit O, Section 11, Township 20 South, Range 38 East, NMPM,
Lea County, New Mexico

Dear Mr. Wayne Price:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 – 20.6.2.3114 NMAC, the Oil Conservation (OCD) has approved the discharge permit for Southern Union Gas Services, Ltd. (SUGS) for the above referenced site contingent upon the conditions specified with the permit. SUGS agrees to the conditions as stated and the conditions agreement has been signed by Bruce Williams, VP Gas Operations, with an original copy attached.

We appreciate your efforts in getting this accomplished in an expeditious manner. If there are any questions, please do not hesitate to contact myself at the number above or email karen.ingram@sug.com or Tony Savoie at 585-395-2085 or email tony.savoie@sug.com.

Regards,

Karen Ingram

Karen Ingram
Compliance Specialist, Environmental Health and Safety

C: Dennis Slack
Tony Savoie
Randall Dunn
Alberto Gutierrez w/Geolex

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received both the $100.00 filing and the $1700.00 facility fee. They were both processed on June 24, 2008. The flat fee for a compressor station with horsepower greater than 1001 HP is $1700.00. Submit ONE copy of the permit to the OCD Santa Fe office within 30 days.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on September 10, 2013** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its June 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

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8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD performed an inspection on July 14, 2008. Mr. Tony Savoie guided the inspection. The OCD identified all the modifications referenced within the modified application.

Photos 1, 2, 11: "*Replacement of the former tanks used for condensate and produced water with new tanks, protected by a permanent steel containment structure.*" The new tanks are in place and are in operation. They were properly lined and bermed. A few identification discrepancies were noted within the submitted application and actual hardware. The 2 old tanks were still in place but not operational. OCD request a time line for the removal of these old tanks.

Photo 3, 4, 5: "*Installation of several additional auxiliary tanks for engine oil, antifreeze, and pipeline additives;*" The majority of auxiliary tanks are properly engineered except for one saddle tank identified in **photo 3**. All tanks holding anything other then clean water shall be within a secondary containment. The OCD requests these new auxiliary tanks to be properly placed within a proper secondary containment.

Photo 6 & 12: "*Installation and operation of a new, additional compressor with an additional horsepower of approximately 1200 bhp.*" The new compressor is on site and properly placed over a confirmed skid drainage system. At the time of inspection the ground adjacent to the compressor was in good condition. The old compressor, **photo 12**, appears to have surface ground contamination. This is not allowed under the discharge plan permit conditions and is in violation of this facilities permit. Southern Union Gas shall properly remediate these soils and prevent any future unwarranted discharges to the ground.

Photo 7 – 10: "*Closure of a subgrade waste oil sum, and installation of a new waste oil tank, enclosed in a double walled fiberglass subgrade vault*" The new waste oil tank is placed within a containment that has a secondary contaminant leak detection system, i.e. triple walled. During the inspection there was no way to verify any results of the leak detection system. This is to be monitored monthly and recorded. If fluids are present within this system Southern Union Gas shall immediately investigate the integrity of the tank. The first containment had fluids, **photo 8**, within it. Any containment is not meant to hold fluids indefinitely; Southern Union Gas shall monitor this secondary containment closely and prevent it from overflowing. The OCD requests the monitoring reports for this leak detection system. **Photo 10**, the old below grade tank is still in place. Southern Union Gas shall submit to the OCD a plan to

remove this tank and all related plumbing that is not in use. This tank is not in service and shall not contain or receive fluids. If fluids are present they shall be immediately removed.

Southern Union Gas has **30 days, by October 10, 2008**, from the date of this permit to submit to the OCD, all resolutions/reports to the above stated findings.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

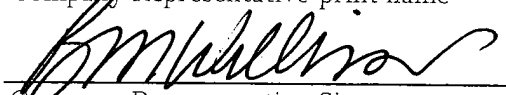
22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Southern Union Gas Services, Ltd
Company Name-print name above

Bruce Williams
Company Representative-print name


Company Representative-Signature

Title: VP, Operations & Information Systems

Date: September 24, 2008

OCD Inspection: Southern Union Gas, House CS GW - 243

Inspectors: Leonard Lowe

Company Rep: Mr. Tony Savoie

Date: 07.14.08 Time: 8:30 – 9:20

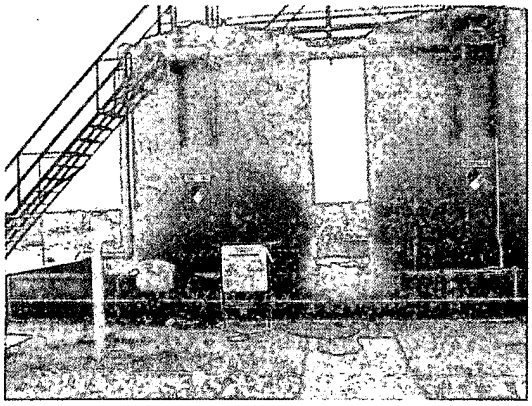


Photo 1: New tanks on east side of location. For condensate and produced water.

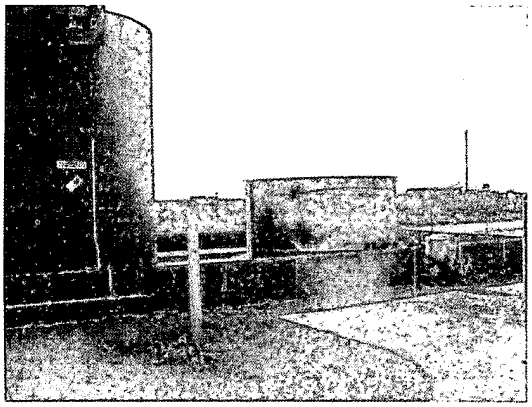


Photo 2: New tanks alongside an open top barrel with netting.

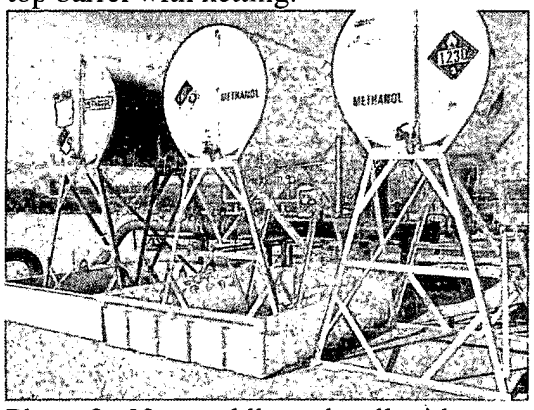


Photo 3: New saddle tanks all with secondary containments except for barrel at far right. Auxiliary tanks, engine oil, antifreeze, pipeline additives.

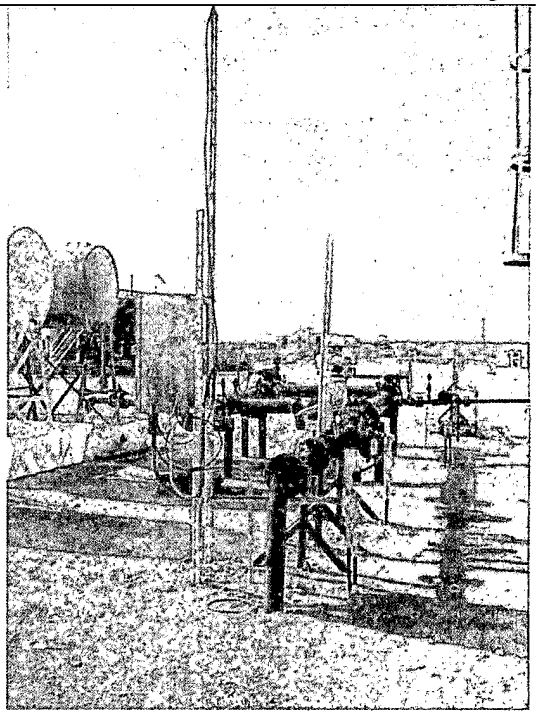


Photo 4: Back view of auxiliary tanks.

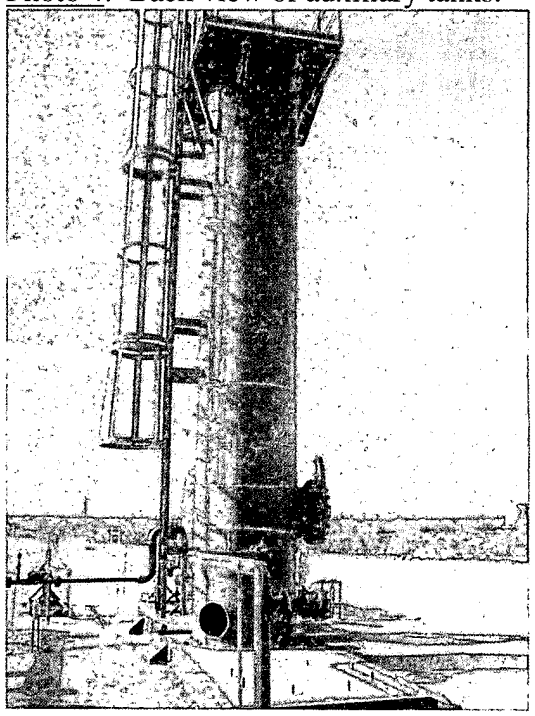


Photo 5: New sulfur treatment.

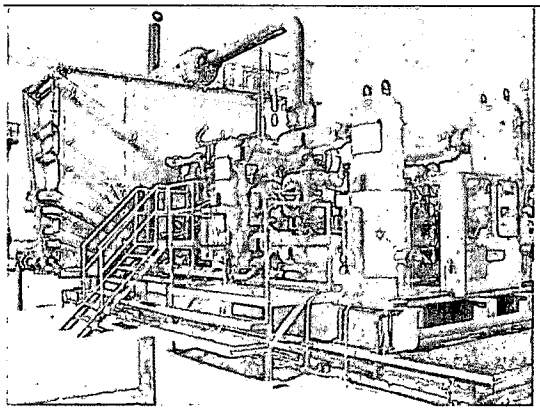


Photo 6: New compressor.

Photo 7: New double wall below ground container.

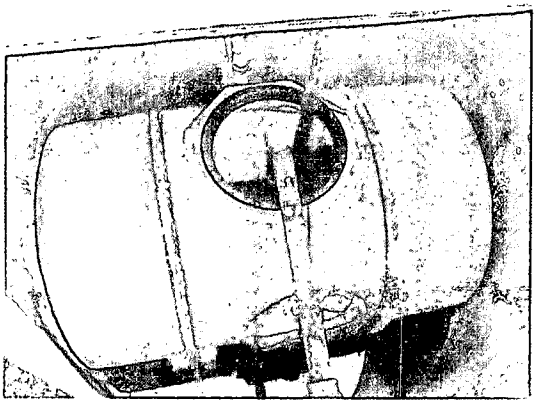


Photo 8: Inside of new container, view of overflowed saddle tank.

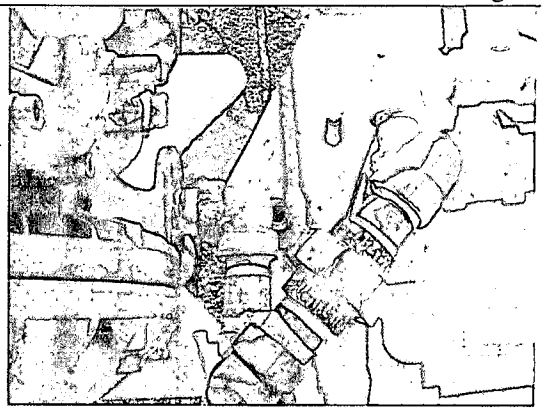


Photo 9: Leak detection of new below ground container. Leak detection is verified with a "dip stick". Plumbing is configured to be blocking access of port.

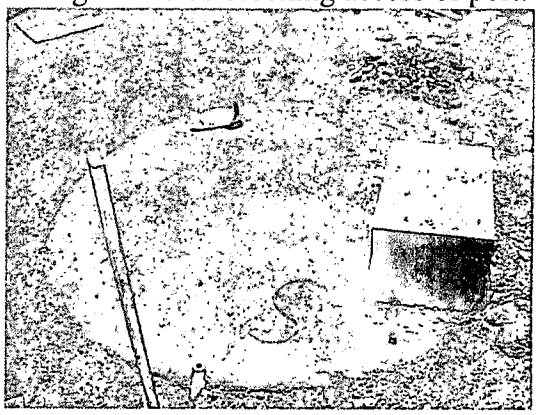


Photo 10: Old sump is still on site. Two ports exposed.

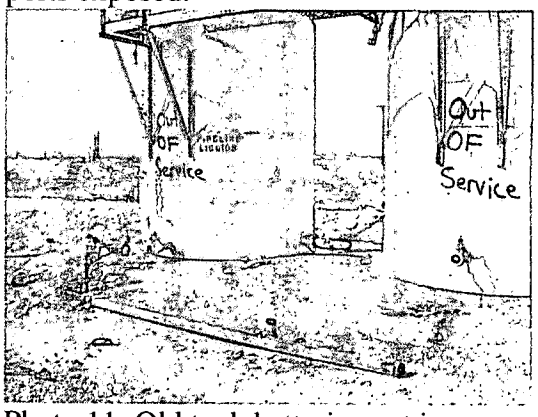


Photo 11: Old tank batteries not in service, in process of removing.

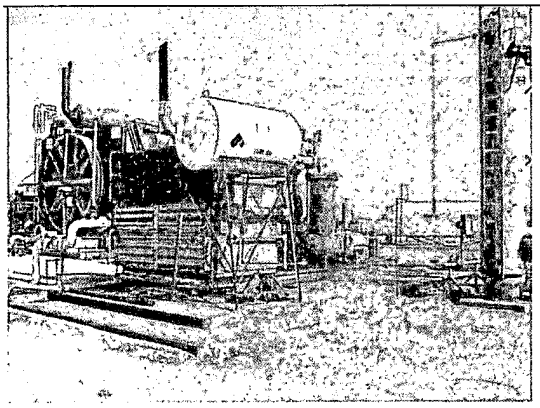


Photo 12: Compressor with soil staining around padded area.

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

September 10, 2008

Mr. Bruce Williams
Southern Union Gas Services Ltd.
301 Commerce Street, Suite 700
Fort Worth, TX 76102

Re: Discharge Permit of modified discharge plan facility
House compressor station (GW-243)
Unit O, Section 11, Township 20 South, Range 38 East, NMPM,
Lea County, New Mexico

Dear Mr. Williams:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the modified discharge permit for the **Southern Union Gas Services, Ltd.,** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief
Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

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C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD performed an inspection on July 14, 2008. Mr. Tony Savoie guided the inspection. The OCD identified all the modifications referenced within the modified application.

Photos 1, 2, 11: "*Replacement of the former tanks used for condensate and produced water with new tanks, protected by a permanent steel containment structure.*" The new tanks are in place and are in operation. They were properly lined and bermed. A few identification discrepancies were noted within the submitted application and actual hardware. The 2 old tanks were still in place but not operational. OCD request a time line for the removal of these old tanks.

Photo 3, 4, 5: "*Installation of several additional auxiliary tanks for engine oil, antifreeze, and pipeline additives*;" The majority of auxiliary tanks are properly engineered except for one saddle tank identified in **photo 3**. All tanks holding anything other then clean water shall be within a secondary containment. The OCD requests these new auxiliary tanks to be properly placed within a proper secondary containment.

Photo 6 & 12: "*Installation and operation of a new, additional compressor with an additional horsepower of approximately 1200 bhp.*" The new compressor is on site and properly placed over a confirmed skid drainage system. At the time of inspection the ground adjacent to the compressor was in good condition. The old compressor, **photo 12**, appears to have surface ground contamination. This is not allowed under the discharge plan permit conditions and is in violation of this facilities permit. Southern Union Gas shall properly remediate these soils and prevent any future unwarranted discharges to the ground.

Photo 7 – 10: "*Closure of a subgrade waste oil sum, and installation of a new waste oil tank, enclosed in a double walled fiberglass subgrade vault*" The new waste oil tank is placed within a containment that has a secondary contaminant leak detection system, i.e. triple walled. During the inspection there was no way to verify any results of the leak detection system. This is to be monitored monthly and recorded. If fluids are present within this system Southern Union Gas shall immediately investigate the integrity of the tank. The first containment had fluids, **photo 8**, within it. Any containment is not meant to hold fluids indefinitely; Southern Union Gas shall monitor this secondary containment closely and prevent it from overflowing. The OCD requests the monitoring reports for this leak detection system. **Photo 10**, the old below grade tank is still in place. Southern Union Gas shall submit to the OCD a plan to

remove this tank and all related plumbing that is not in use. This tank is not in service and shall not contain or receive fluids. If fluids are present they shall be immediately removed.

Southern Union Gas has **30 days, by October 10, 2008**, from the date of this permit to submit to the OCD, all resolutions/reports to the above stated findings.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

OCD Inspection: Southern Union Gas, House CS GW - 243

Inspectors: Leonard Lowe

Company Rep: Mr. Tony Savoie

Date: 07.14.08 Time: 8:30 – 9:20

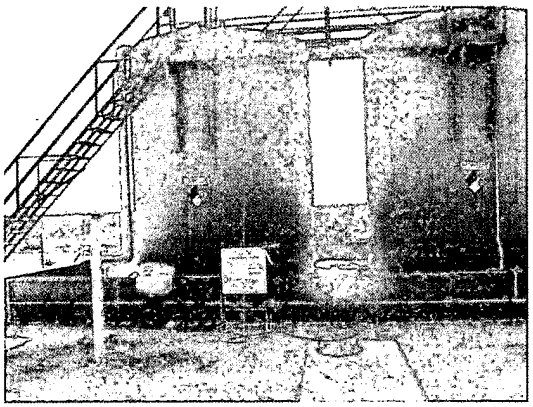


Photo 1: New tanks on east side of location. For condensate and produced water.

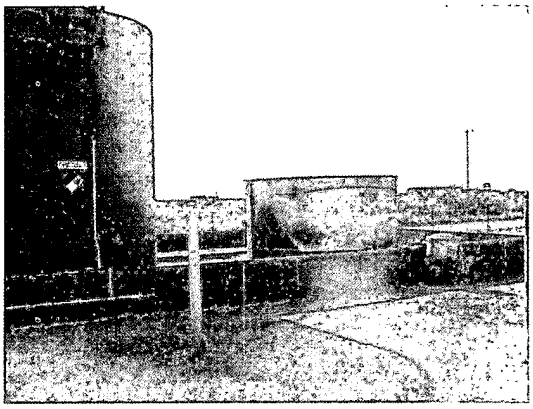


Photo 2: New tanks alongside an open top barrel with netting.

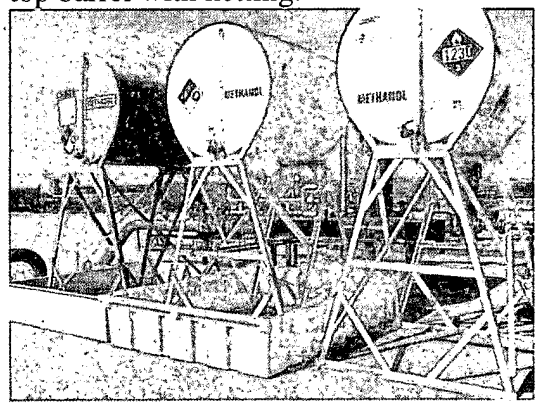


Photo 3: New saddle tanks all with secondary containments except for barrel at far right. Auxiliary tanks, engine oil, antifreeze, pipeline additives.

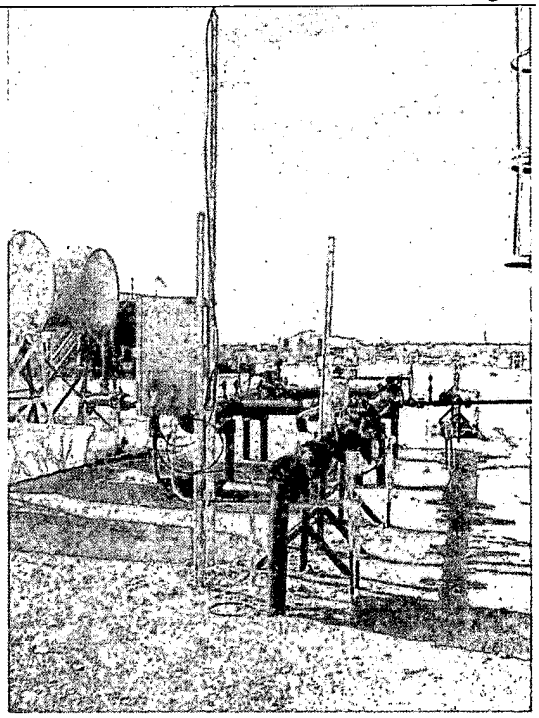


Photo 4: Back view of auxiliary tanks.

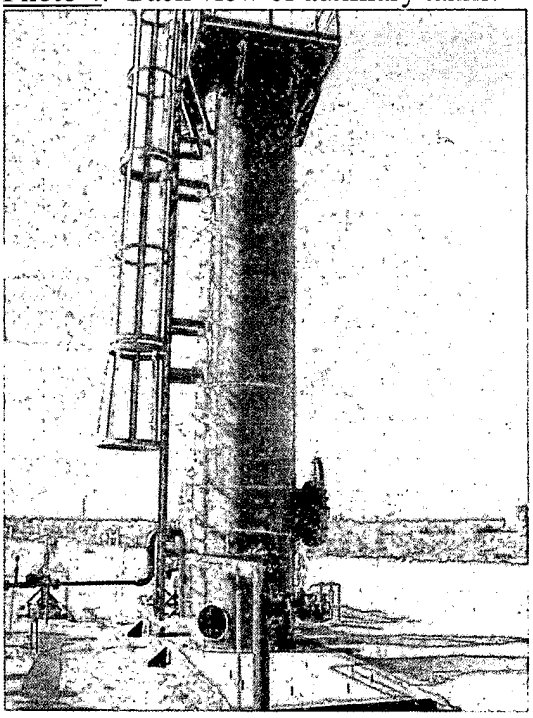


Photo 5: New sulfur treatment.

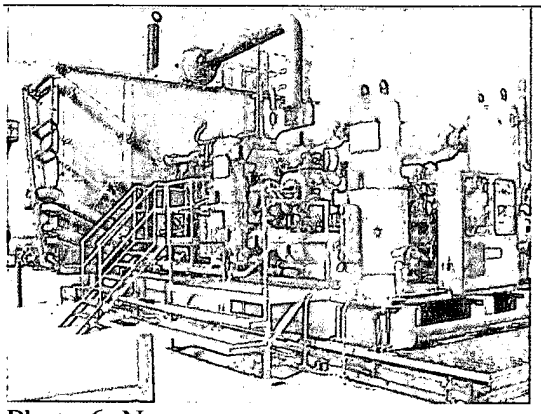


Photo 6: New compressor.

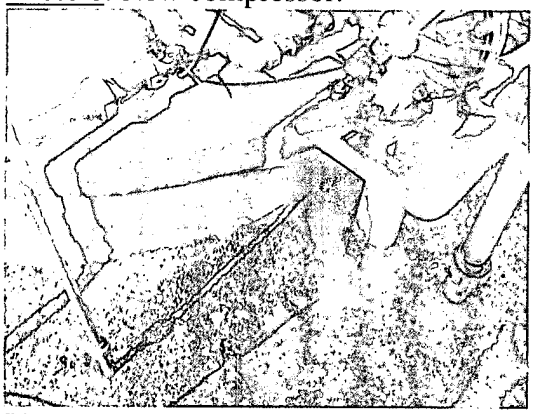


Photo 7: New double wall below ground container.

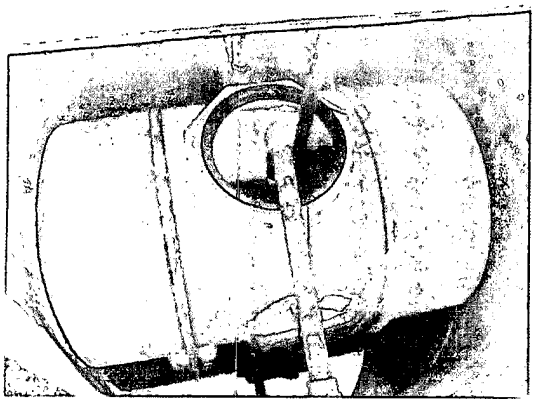


Photo 8: Inside of new container, view of overflowed saddle tank.

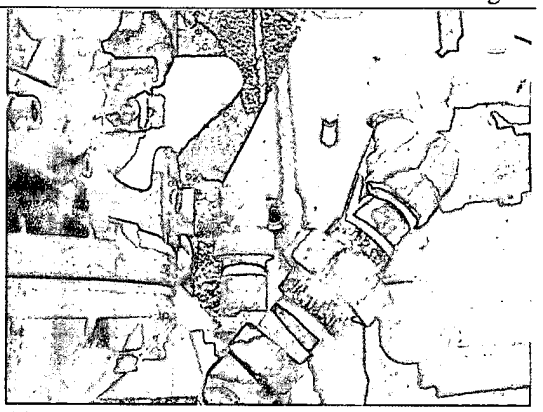


Photo 9: Leak detection of new below ground container. Leak detection is verified with a "dip stick". Plumbing is configured to be blocking access of port.

Photo 10: Old sump is still on site. Two ports exposed.

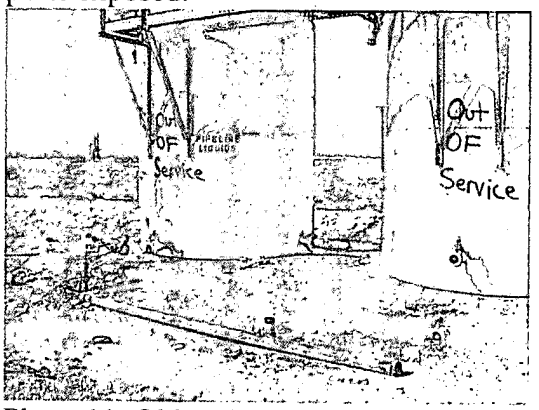


Photo 11: Old tank batteries not in service, in process of removing.

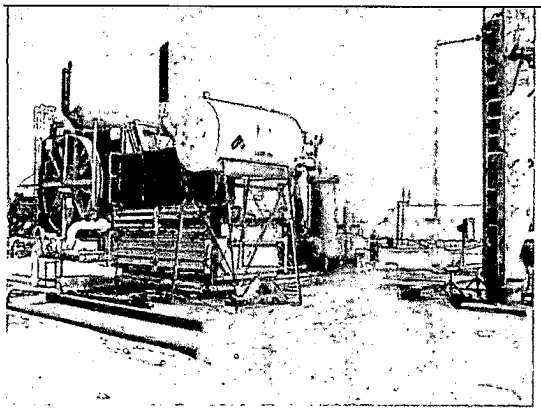


Photo 12: Compressor with soil staining around padded area.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, July 09, 2008 4:10 PM
To: 'James C. Hunter, RG'; 'Savoie, Tony'
Cc: 'bruce.williams@sug.com'
Subject: GW-243, House C.S. Modified DP Admin. Complete
Attachments: GW-243, Modification Admin Complete.pdf; GW-243, Draft Permit.pdf; GW-243 OCD PN.pdf

Mr. Bruce Williams,

The submitted MODIFIED discharge plan application for the **Southern Union Gas Services, Ltd., House Compressor Station, GW-243** has been determined Administratively Complete per WQCC requirements.

Attached are the **Admin Complete Letter**, **Draft Permit** and the OCD's version of **Public Notice** for your records.

Please submit to the NMOCD Santa Fe office another version of your public notice for approval.

I will commence the technical review of the application and set up an inspection of this facility soon.

If you have any questions please call me at my contact information below.

Thank you,

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

July 9, 2008

Mr. Bruce Williams
Southern Union Gas Services, Ltd.
301 Commerce Street, Suite 700
Fort Worth, TX 76102

Re: Discharge plan permit modification, GW-243
House compressor station
Lea County, New Mexico

Dear Mr. Williams:

The New Mexico Oil Conservation Division (NMOCD) has received Southern Union Gas Services, Ltd's notice and initial/facility fee, dated June 23, 2008 for a modification to their discharge plan permit for the House compressor station located in unit O of Section 11, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico. The initial submittal has provided the required information in order to deem the application "administratively" complete.

The submitted public notice has been reviewed and has been found to **not** meet the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC for a modified discharge plan permit. Please resubmit your public notice for review. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard R. Lowe
Environmental Engineer

xc: OCD District I Office, Hobbs

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

July 9, 2008

Mr. Bruce Williams
Southern Union Gas Services Ltd.
301 Commerce Street, Suite 700
Fort Worth, TX 76102

Re: **DRAFT** Discharge Permit for modified discharge plan
House compressor station (GW-243)
Unit O Section 11, Township 20 South, Range 38 East, NMPM,
Lea County, New Mexico

Dear Mr. Williams:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the modified discharge permit for the **Southern Union Gas Services, Ltd.,** (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

The final permit should be issued in approximately 45 days. If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief
Attachments-1
xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received both $100.00 filing and the $1700.00 facility fee. They were both processed on June 24, 2008. The flat fee for a compressor station with horsepower greater than 1001 HP is $1700.00. ***The final permit will be sent within 45 days, upon review please sign and submit ONE copy of the permit to the OCD Santa Fe office.***

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on Month XX, 20XX** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its June 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste

stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and stacked up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g. liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code number system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location; foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines

A. The owner/operator shall test all underground process wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may propose other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections. ***THE OCD HAS SET UP AN INSPECTION FOR MONDAY, JULY 14, 2008.***

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: The submitted application noted the following modifications:

1. Installation and operation of a new, additional compressor with an additional horsepower of approximately 1200 bhp.
2. Closure of a subgrade waste oil sump, and installation of a new waste oil tank, enclosed in a double-wall fiberglass subgrade vault.
3. Replacement of the former tanks used for condensate and produced water with new tanks, protected by a permanent steel containment structure, and
4. Installation of several additional auxiliary tanks for engine oil, antifreeze, and pipeline additives.

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator) I, the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-243) Southern Union Gas Services, Ltd., 301 Commerce Street, Suite 700, Fort Worth TX, 76102, has submitted a modified discharge plan permit application for their House compressor station, located in Unit O of Section 11, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico, 10 miles south of Hobbs, N.M. The modifications are: Installation and operation of a new, additional compressor with an additional horsepower of approximately 1200 bhp, closure of a subgrade waste oil sump, and installation of a new waste oil tank, enclosed in a double-wall fiberglass subgrade vault. Replacement of the former tanks used for condensate and produced water with new tanks, protected by a permanent steel containment structure, and Installation of several additional auxiliary tanks for engine oil, antifreeze, and pipeline additives. The facility compresses field gas, removes excess liquids, measures gas volume and transports the gas to pipelines. Approximately 100 - 200 gal/month of used oil and 75 - 100 gal/month of wash/storm water are generated and stored onsite in sufficiently bermed containers. Product and waste streams are to be properly designated and identified. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 50 feet, with a total dissolved s olids concentration of approximately 400 - 600 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy,

Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of July 2008.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 6/24/08

or cash received on _____ in the amount of $ 100.00

from Southern Union Gas Services

for GW-243

Submitted by: Lawrence Rontero Date: 7/1/08

Submitted to ASD by: [signature] Date: 7/1/08

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

DETACH AND DESTROY THE ADDRESS STUB BEFORE DEPOSITING THE CHECK
(Provided vendor a valid Texas Direct Pay Certificate in lieu of getting billed sales tax)

RECEIVED
2008 JUN 26 PM 3 47

GW-243

NEW MEXICO OIL CONSERVATION DIVISIO
1220 SOUTH ST FRANCIS DR
SANTA FE, NM 87505

Southern Union Gas Services, Ltd.
301 Commerce Street Suite 700
Fort Worth, TX 76102
817-302-9400

Check No: 7100011380

INVOICE NUMBER DESCRIPTION	INVOICE DATE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
062408NMOCD-4 Hse. Compressor Perm GW-243	06/24/2008	$100.00		$100.00

Page 1 of 1

Check Amount: **$100.00**

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 6/24/08

or cash received on _____ in the amount of $ 1700 00

from Southern Union Gas Services

for GW-243

Submitted by: Lawrence Romero Date: 7/1/08

Submitted to ASD by: Lawrence Romero Date: 7/1/08

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

DETACH AND DESTROY THE ADDRESS STUB BEFORE DEPOSITING THE CHECK
(Provided vendor a valid Texas Direct Pay Certificate in lieu of getting billed sales tax)

NEW MEXICO OIL CONSERVATION DIVISIO
1220 SOUTH ST FRANCIS DR
SANTA FE, NM 87505

Southern Union Gas Services, Ltd.
301 Commerce Street Suite 700
Fort Worth, TX 76102
817-302-9400

Check No: 7100011379

INVOICE NUMBER DESCRIPTION	INVOICE DATE	GROSS AMOUNT	DISCOUNT	NET AMOUNT
062408NMOCD-3 Hse. Compressor Perm GW-243	06/24/2008	$1,700.00		$1,700.00

Page 1 of 1

Check Amount: **$1,700.00**

Southern Union Gas Services

301 Commerce St., Ste. 700
Fort Worth, TX 76102

817.302.9400 Fax: 817.302.9350

RECEIVED
2008 JUN 27 PM 2 54

June 23, 2008

Mr. Carl Chavez
Environmental Engineer
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: APPLICATION BY SOUTHERN UNION GAS SERVICES FOR MODIFICATIONS TO A DISCHARGE PLAN FOR HOUSE NATURAL GAS COMPRESSOR STATION (GW-243)

Dear Mr. Chavez:

Southern Union Gas Services, Ltd. (SUGS), hereby submits the enclosed Discharge Plan Modification Application for the House gas compressor station (GW-243), located in Unit O (SW ¼ of the SE ¼) of Section 11, Township 20 South, Range 38 East in Lea County, New Mexico (32°, 35.027' North, 103° 6.933' West). This location is at an elevation of 3560 feet, approximately 10 miles south of Hobbs, New Mexico.

The House Compressor Station has a rated horsepower of approximately 1400 HP. Enclosed are two checks in the amounts of $1700.00 for the permit fee and the filing fee of $100.00, as listed in Table 1, Section 20.6.2.3144 of the NMWQCC regulations.

Also included for your review as Appendix D to the application is a draft of the public notice required in NMWQCC section 20.6.2.3108. Following NMOCD review and acceptance, we propose to post this notice using a 2'x3' sign, in English and Spanish, at the gate of the above-named facility. Identified adjacent landowners will be provided with copies of this notice by mail, and any owners of any lands the proposed discharge site not owned by SUGS will be notified by certified, receipt requested mailing. The notice will also be advertised, in English and in Spanish, in a 3"x4" display advertisement in the Hobbs Sun.

Please contact our consultant in this matter, Mr. James C. Hunter, RG (Geolex, Inc.) at (505) 842-8000, if you have any questions or require additional information regarding this submittal.

Sincerely,
Southern Union Gas Services, Ltd.

Bruce Williams
Vice President – Operations

Enclosures
cc: w/o enclosers
James C. Hunter, RG – Geolex, Inc.
Herb Harless – SUGS – Ft. Worth
Tony Savoie – SUGS – Jal, NM
Randall Dunn – SUGS – Jal, NM

Southern Union Gas Services

301 Commerce St., Ste. 700
Fort Worth, TX 76102

817.302.9425 Fax: 817.302.9350

June 25, 2008

Mr. Carl Chavez
Environmental Engineer
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: APPLICATION BY SOUTHERN UNION GAS SERVICES FOR MODIFICATIONS TO A DISCHARGE PLAN FOR HOUSE NATURAL GAS COMPRESSOR STATION (GW-243)

Dear Mr. Chavez:

This letter is being sent as an explanation of a deviation in our Permit and Filing fee procedure. Our accounting department inadvertently mailed check number *7100011379* in the amount of $1,700.00 (Permit Fee) and check number *7100011380* in the amount of $100.00 (Filing Fee) on June 24, 2008 without including the submittal letter and Discharge Plan Modification Application for the House Natural gas compressor station (GW-243). Attached is a copy of the checks previously mailed. I apologize if this has caused any inconvenience to your department.

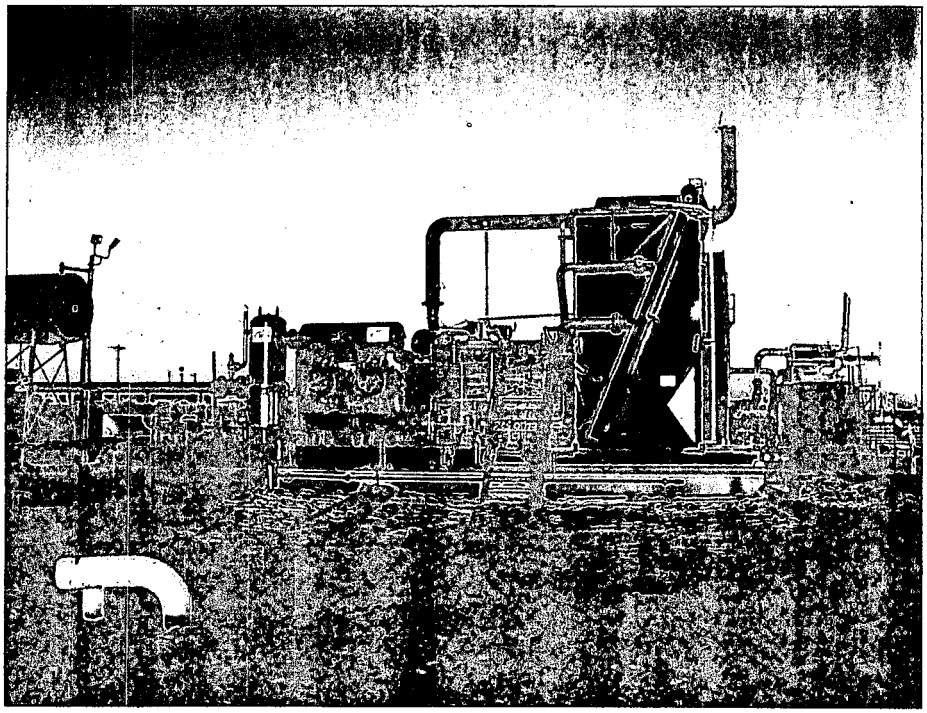
Respectfully,

Karen Ingram

Karen Ingram
EHS Compliance Specialist
817-302-9428
Karen.ingram@sug.com

Southern Union Gas Services

Modification for New Mexico Oil Conservation Division Discharge Plan
HOUSE COMPRESSOR STATION (GW-243)
(Section 11, Township 20 South, Range 38 East)



June 18, 2008

Prepared For:
New Mexico Oil Conservation Division
1200 South Saint Francis Drive
Santa Fe, New Mexico 87505

On Behalf of:
Southern Union Gas Services, Ltd.
301 Commerce Street, Suite 700
Fort Worth, Texas 76102
Telephone: (817)-302-9400

Prepared By:
Geolex, Inc. ®
500 Marquette Avenue, NE, Suite 1350
Albuquerque, New Mexico 87102
Telephone: (505) 842-8000

GEOLEX®
INCORPORATED

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

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

☐ New ☐ Renewal ☒ Modification

1. Type: House Compressor Station (GW-243) (see Section 1.0)
2. Operator: Southern Union Gas Services, L.P. (see Section 2.0)

   Address: P.O. Box 1226, Jal, New Mexico 88252

   Contact Person: Mr. Randall Dunn Phone: (505)-395-2116
3. Location: Unit O, SW 1/4 SE 1/4 Section 11 Township 20S Range 38E
   Submit large scale topographic map showing exact location.
   (see Section 3.0 and Figure 1)
4. Attach the name, telephone number and address of the landowner of the facility site. (see Section 4.0)
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. (see Section 6.0 and Figures 4, 5 and 6)
6. Attach a description of all materials stored or used at the facility. (see Section 7.0 and Appendix A)
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. (see Section 8.0 and Appendix C)
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. (see Section 9.0)
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. N/A
10. Attach a routine inspection and maintenance plan to ensure permit compliance. (see Section 10.0, Appendix B)
11. Attach a contingency plan for reporting and clean-up of spills or releases. (see Sections 10.0 and 11.0)
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. (see Section 5.0 and Figures 1, 2 and 3)
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. (see Section 12.0)

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

Name: Mr. Bruce M. Williams Title: Vice President, Operations

Signature: _____

E-mail Address: bruce.williams@sug.com Date: 6-24-08

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF APPENDICES

1.0 TYPE OF OPERATION

This document describes modifications for Discharge Plan GW-243. The House Compressor Station (House Station) is a natural gas compressor station with three active compressors, with a total horsepower of approximately 1400 BHP. It compresses field gas, removes excess liquids, measures gas volumes, and transports the gas to pipelines.

The significant modifications made since the last (May 2007) renewal include:

- Installation and operation of a new, additional compressor with an additional horsepower of approximately 1200 bhp,
- Closure of a subgrade waste oil sump, and installation of a new waste oil tank, enclosed in a double-wall fiberglass subgrade vault,
- Replacement of the former tanks used for condensate and produced water with new tanks, protected by a permanent steel containment structure, and
- Installation of several additional auxiliary tanks for engine oil, antifreeze, and pipeline additives.

2.0 OPERATOR AND LEGALLY RESPONSIBLE PARTY

The Operator is:

Southern Union Gas Services, Ltd. (SUGS)
Contact: Mr. Randall Dunn
P.O. Box 1226
Jal, New Mexico 88252
Telephone: (505)-395-2116

The Responsible Party is:

Southern Union Gas Services, Ltd.
Contact: Mr. Bruce Williams
301 Commerce St. Suite 700
Fort Worth, Texas 76102
Telephone: (817)-302-9421

3.0 LOCATION OF DISCHARGE/FACILITY

The House Station is located in Unit O (SW ¼ of the SE ¼) of Section 11, Township 20 South, Range 38 East in Lea County, New Mexico (32^0' 35.027' North, 103^0 6.933'West). This location is at an elevation of 3560 feet, approximately 10 miles south of Hobbs, New Mexico (see Figures 1 and 2).

4.0 LANDOWNER

The land is owned by Southern Union Gas Services, Ltd. and inquiries can be addressed to the Responsible Party listed above.

5.0 SITE CHARACTERISTICS

5.1 GEOLOGICAL SETTING

The site lies in the Delaware Basin region of the Permian Basin, a thick and complex sequence of primarily marine carbonates which extends from southeastern New Mexico into west Texas. The stratigraphy of the Delaware Basin includes the basal Leonard series (Bone Springs Formation), the overlying Guadalupe series (Brushy Canyon, Cherry Canyon and Bell Canyon formations), and the uppermost Ochoan series, including the Castile and Salado evaporites and the clastic Rustler Formation.

The most recent Quaternary deposits are soils of the Amarillo-Arvana fine sandy loam series. This unit does not typically host groundwater in this area. The Amarillo-Arvana soils exhibit minor potential for blowing erosion, and good properties for road fill and foundations for lower structures and pipelines (United States Department of Agriculture: *Soil Survey – Lea County, New Mexico*, January 1974, Plate 126, Tables 6, 7 and 8).

5.1.1 Site Area Geology

The House Compressor site is situated on a low, flat and irregular bench. Surficial deposits consist of sandy soils overlying the Tertiary Ogallala Formation that in turn lies unconformably over the Triassic Dockum Group and the Dewey Lake redbeds of the Permian Rustler Formation (Nicholson and Clebsch, 1961, Plate 1). These units are underlain by the Salado and Castile evaporites, containing salt (halite), potash, gypsum and anhydrite.

5.1.2 Uppermost Aquifer

The two sources of potentially potable drinking water in this area are the sandy to silty Dockum and Dewey Lake beds, which overly the relatively impermeable evaporites of the Salado Formation, and the irregular outcrops of the Tertiary Ogallala Formation. Within the Dockum and Dewey Lake units, groundwater occurs in water-table conditions, interspersed with local perched and semi-confined hydrogeological units (Nicholson and Clebsch, 1961, Plate 2).

The deposits of the Ogallala Formation 50 to 100 feet thick in this area, and the contact between the Ogallala and the Triassic beds are commonly obscured by the Quaternary aeolian deposits.

5.1.3 Depth to Water, Direction of Groundwater Flow and Quality

Depth to water in the area of House Station is from approximately 50 feet. According to maps published by Nicholson and Clebsch, (1961), and a more recent map (unpublished 2005 map compiled by Chevron-Texaco, provided courtesy of the Hobbs office of NMOCD) the flow of groundwater in the Ogallala aquifer in the area of House is southerly at a gradient of 0.003 (approximately 15 feet per mile).

Available information on groundwater quality is limited in the immediate area of House Station. There are only two available water quality analyses for wells within this Township. Two wells,

completed in alluvium, show a Total Dissolved Solids of approximately 400 to 600 milligrams per liter (Nicholson and Clebsch, 1961, Table 8, p. 93).

5.1.4 Nearest Potential Groundwater Receptors

According to the New Mexico State Engineer's Office, there are 31 water wells within approximately one mile of the House Compressor Station (Figure 2). The available information on these wells is listed in the Table below.

Water Wells Within Approximately One Mile of House Compressor Station

File No.	Use	AF	Owner	Twsp.	Rng.	Sec.	Completed	Depth	Depth to Water
CL 09503	STK	3	RON ELLISON	20S	38E	10	6/15/1984	100	47
CL 10044	EXP	0	DALLAS MCCASLAND	20S	38E	10	12/13/1988	53	30
CL 03125	DOM	3	D. W. HOUSE	20S	38E	11	na	52	52
CL 07886	DOM	0	ALVIN HOWSE	20S	38E	11	na	na	na
CL 08437	STK	3	ALTON HOWSE	20S	38E	11	3/16/1981	31	na
CL 09359	DOM	3	MIKE MCDONALD	20S	38E	11	10/11/1983		90
CL 09381	DOM	3	V. R. GROGAN	20S	38E	11	11/29/1983	48	na
CL 09560	DOM	0	JOHNNY MONTOYA	20S	38E	11	na	na	na
CL 09701	SAN	0	JIMMIE GRAGAM	20S	38E	11	na	na	na
CL 09721	DOM	3	RAMON ROBLEDO	20S	38E	11	7/20/1985	85	25
CL 09819	DOM	0	DAN HARDIN	20S	38E	11	na	na	na
CL 09985	DOM	0	CARL C. GREENWOOD	20S	38E	11	na	na	na
CL 10106	STK	3	HARLEY DEAN FRALEY	20S	38E	11	1/26/1990	52	35
CL 10318	DOM	3	GROGAN JO	20S	38E	11	5/30/1993	47	31
CL 10656	DOM	3	HAZELWOOD B D	20S	38E	11	4/24/1997	64	41
CL 10708	DOM	3	ADRIAN ZAMORA	20S	38E	11	9/15/1997	67	39
CL 10726	STK	3	JESSE OR MARTHA BAUTISTA	20S	38E	11	10/17/1997	65	47
CL 11168	DOM	0	CAROLINA L. GARCIA	20S	38E	11	na	150	na
CL 02735	STK	3	EARL KORNEGAY	20S	38E	12	12/27/1954	90	65
CL 06693 (E)	PRO	0	KINGS RESOURCES	20S	38E	12	na	na	na
CL 07933	DOM	0	ALVIN HOWSE	20S	38E	12	na	na	na
CL 10049	DOM	3	AYLMER NUTTALL	20S	38E	12	12/30/1988	90	50
CL 10050	STK	0	AYLMER NUTTALL	20S	38E	12	na	na	na
CL 11004	DOM	3	ISAIAS PROVIZO	20S	38E	12	11/10/1999	60	46
CL 08310	STK	3	ALTON HOWSE	20S	38E	13	7/10/1980	65	42
CP 00525	PRO	0	CITIES SERVICE OIL COMPANY	20S	38E	14	10/24/1973	171	140
CL 02239	DOM	3	J. O. COURSEY	20S	38E	14	1/16/1954	90	38
CL 07019	DOM	0	LUCIANO D. GARCIA	20S	38E	14	na	na	na
CL 07402	DOM	0	ALVIN THIGPEN	20S	38E	14	na	na	na
CL 07670	STK	0	A. C. SCHRADER	20S	38E	14	na	na	na
CL 08514	DOM	3	KERRY EVANS	20S	38E	14	8/7/1981	60	na

Potential impacts to groundwater resources are mitigated by the non-discharge design of the facility, and the natural surface flow direction which is away from the nearest water wells (see Section 5.2 below).

5.2 SURFACE WATER

There are no permanent bodies of surface water within one mile of the House Station (Figures 1 and 3). Local drainage from the House site leads into unnamed, ephemeral arroyos, primarily to the northwest. This direction is away from the nearest well locations listed in this area.

6.0 FACILITY DESCRIPTION

The House Station is a self-contained facility. All wastes, including stormwater which may come in contact with the units, are properly contained for off-site recycling or disposal. The design and operation of the facility was developed to ensure that that no solid or liquid industrial wastes or discharges are released to the water of the State of New Mexico. A schematic map of the facility is included as Figure 4. The facility has three compressor, of which one (Compressor A) is inactive, and Compressors B and C are in current service.

Field gas passes through the Inlet Scrubber, a tank which allows liquids (hydrocarbon liquids and produced water) to settle and accumulate. These liquids are carried to storage tanks (tanks TK-1 and TK-2) by internal piping. These liquids are separated by gravity in the tanks, after which the petroleum liquids are removed by tank truck for recycling and the produced water is removed by tank truck for permitted disposal facilities (see Section 7).

From the Inlet Scrubber, the gas is directed by piping to a second separator, the Suction Scrubber, attached to the inlet of the compressor. The Suction Scrubber is employed to remove any liquids which might have passed through the Inlet Scrubber. The liquids from the Suction Scrubber are piped to the same storage tanks as the liquids from the Inlet Scrubber.

After the final scrubbing, the gas is introduced into the compressors to raise its pressure and transport the gas to transmission pipes, which carry the gas either directly to natural gas process plants, or to additional compressor stations.

The compressors are powered by natural-gas fueled reciprocating engines, attached directly to the compressors. The engines and compressors are placed on concrete pads with a curb which contains any leaks and incidental storm water. The natural gas (in the case at the House Station) is obtained from commercial gas pipelines, which supply processed, "sweet" gas from natural gas process plants.

The compressor engines are cooled by a liquid-cycle radiator, filled with a mixture of ethylene glycol antifreeze and water, and is sump-lubricated by conventional motor oil. Supplemental tanks of these fluids, which are automatically replenished as needed, are stored on site.

7.0 MATERIALS STORED AND USED AT FACILITY

The materials used at the facility are listed in Table 7-1 below. Photographs of the tanks are shown in Figures 5 through 8 on the following pages. Although not regularly or permanently stored on the site, other miscellaneous materials are used at the facility for maintenance and pipeline service. These include detergents for equipment cleaning, similar detergents for pipeline cleaning during pigging, and methanol for antifreeze operations in the pipelines during the winter months. Applicable MSDS are included in Appendix A.

Table 7-1: Materials Stored at House Compressor Station

TYPE	ID	MATERIAL	FORM	VOLUME	LOCATION	CONTAINMENT
AGT Steel	TK-1	Scrubber Liquids	Liquid	210 BBL	SE Corner of Site	Steel Basin
AGT Steel	TK-2	Scrubber Liquids	Liquid	210 BBL	SE Corner of Site	Steel Basin
AGT RFG	TK-3	Produced Water	Liquid	120 BBL	SE Corner of Site	Steel Basin
AGT Poly	TK-4	Scrubber Liquids	Liquid	10 Gal	SE Corner of Site	Line Drip Pan
AGT Poly	TK-5	Scrubber Liquids	Liquid	10 Gal	SE Corner of Site	Line Drip Pan
AGT Poly	TK-6	Produced Water	Liquid	10 Gal	SE Corner of Site	Line Drip Pan
AGT Steel	TK-7	Corrosion Inhibitor	Liquid	100 Gal	SE Side of Site	500 Gal Steel Pan
AGT Steel	TK-8	Lube Oil	Liquid	100 Gal	Adj. to Compressor B	On Compressor B Curbed Pad
AGT Steel	TK-9	Antifreeze	Liquid	200 Gal	NW Corner of Site	500 Gal Steel Pan
AGT Steel	TK-10	Compressor Oil	Liquid	200 Gal	Adj. to Compressor B	On Compressor B Curbed Pad
Poly UG	TK-11	Waste Oil (from Compressors B, C and D)	Liquid	350 Gal	N of Compressor B	In fiberglass double walled vault
AGT Steel	TK-12	Lube Oil	Liquid	1000 Gal	NE of Compressor D	1100 Gal Steel Pan
AGT Steel	TK-13	Lube Oil	Liquid	1000 Gal	Adj. to Compressor B	On Compressor B Curbed Pad
AGT Steel	TK-14	Methanol	Liquid	520 Gal	S of Compressor D	Unused
AGT RFG	TK-15	Methanol	Liquid	520 Gal	S of Compressor D	600 Gal Steel Pan
AGT RFG	TK-16	Methanol	Liquid	520 Gal	S of Compressor D	600 Gal Steel Pan
AGT Poly	TK-17	Pipeline Wastes	Liquid	10 Gal	S side of Site	Line Drip Pan

8.0 SOURCES AND QUANTITIES OF EFFLUENT AND WASTE SOLIDS

The sources and quantities of effluents and solid wastes generated from processes at the House Compressor Station are summarized in Table 8-1 below.

Exempt wastes are generated from the production and processing of petroleum hydrocarbons and gasses and are exempted from hazardous waste regulations under Subtitle C. Non-exempt wastes must be characterized, either by chemical analysis or knowledge of process, to determine their status under all applicable and appropriate hazardous waste regulations. The House Compressor Station facility's waste management system is designed to prevent the commingling of exempt and non-exempt wastes.

Table 8-1: Waste Sources, Quantities and Regulatory at House Compressor Station

SOURCE	TYPE OF WASTE	VOLUME	REGULATORY STATUS	STATUS DETERMINATION
Compressor	Used Engine Oil	100-200 gal/month	Non-Exempt	Non-Hazardous per 40 CFR 279.11
	Used Filters	4 per month	Non-Exempt	Non-Hazardous per 40 CFR 261.4
	Wash and storm water from Compressor pad	Washdown 75 to 100 gal/month; stormwater varies	Non-Exempt	Chemical Analysis, knowledge of process
	Sorbent/Rags	Varies	Non-Exempt	Non-Hazardous per 40 CFR 279.11
Scrubbers	Gas Liquids	Varies; 50 to 100 bbl/month	Exempt	EPA Subtitle C
Misc. Trash	Solid Wastes	Varies	Non-Exempt	Knowledge of process

The quality and constituents of the washwater and stormwater from the compressor pad may vary if the types or brands of materials used on the pad (lube oil, antifreeze, and soaps) are changed. For this reason, an initial TCLP analysis of the wastewater has been performed, as a grab sample from the pad sump. The Sampling and Analysis Standard Operating Procedures are included in Appendix B.

The most recent analysis (May 26, 2007) is summarized below in Table 8-2. The complete laboratory analytical report for the May 27, 2006 sample analysis is included in Appendix C. If there are any significant changes in the materials used on the pad, an additional analysis will be performed; using the same collection and analytical methods, prior to the disposal of the wastewater, and the method(s) of disposal will be modified as necessary.

Table 8-2: Wastewater Analyses From House Compressor Station

Date Sampled	3/26/2007
location	House Compressor Station
Report #	7C27011
Matrix	Waste water
Destination: unknown	
Volume transported:	
Date:	

Toxicity	Analytical mg/kg	Reg limit (TCLP) mg/kg	Determination
Benzene	J(0.00693)	0.5	Non-hazardous
Mercury	ND	0.2	Non-hazardous
Arsenic	ND	5.0	Non-hazardous
Barium	0.0187	100.0	Non-hazardous
Cadmium	J(0.00365)	1.0	Non-hazardous
Chromium	0.0187	5.0	Non-hazardous
Lead	ND	5.0	Non-hazardous
Selenium	J(0.0299)	1.0	Non-hazardous
Silver	0.0080	5.0	Non-hazardous
Reactive			
Cyanide	ND	250.0	Non-hazardous
pH	7.58 pH units	<2 or >12.5 pH units	Non-hazardous
Sulfide	ND	500.0	Non-hazardous
Ignitability	>85 deg. C	<60 deg C	Non-hazardous

9.0 LIQUID AND SOLID WASTES COLLECTION, STORAGE AND DISPOSAL

The collection, storage, removal and disposal of wastes generated at the House Station are summarized in Table 9-1 below. As determined in Section 8.0 above, the facility does not generate any RCRA hazardous wastes; therefore all wastes are ultimately recycled or by disposed of, in licensed, permitted non-hazardous waste disposal or recycling facilities.

Table 9-1: Collection, Storage, Removal and Disposal of Wastes at House Compressor Station

TYPE OF WASTE	COLLECTION	STORAGE	REMOVED BY	DISPOSAL
Scrubber Liquids	Piped to TK-1 and TK-2	TK-1 and TK-2 (210 bbl each)	Varies[1]	SUGS Jal #4 for separation and sales.
Used Oils	Drained from Compressor pad or piped to TK-11	Removed as required	Quail Petroleum Services	Available Permitted Recycler
Used Filters/Sorbents	Filters drained to container on pad; rags and sorbents to dumpster.	Dumpster	Quail Petroleum Services	Available Permitted Recycler
Wash Water	Pumped from pads	Removed during Service, Not stored on site	Varies[1]	Nearest Available Permitted Facility
Spent Antifreeze	Disposal Truck	Removed during Service, Not stored on site	Quail Petroleum Services	Available Permitted Recycler
Solid Wastes	Trash Barrel	Trash Barrel	SUGS	Lea County Solid Waste Authority

1: Scrubber liquids are transported by either (depending on availability) Quality Transports, Chaparral Services, Riverside Trucking, FULCO Services, or Rapid Transports.

10.0 INSPECTION, MAINTENANCE AND REPORTING

In accordance with SUGS policy, the House Station and all other active compressor stations are inspected each working day (Monday-Friday) by an appropriately trained technician. This individual visually inspects the waste management systems, including the levels in all tanks and the presence of any liquids in any containment structures.

Based on the knowledge of the operations at the House Station, regular visits are scheduled for removal of wastes. Any apparent problems noted in daily inspections are notified immediately to the SUGS environmental director, who then dispatches the necessary employees, equipment and contractors to address the problem.

The compressor station is also monitored by telemetry (powered by solar batteries) to the SUGS control facility. This telemetry transmits operating parameters including system pressure, temperature, inlet and outlet flows, and other information. This provides an early warning in the event that any equipment is out of its operating parameters, allowing an immediate inspection if warranted.

Due to the non-discharge design of the system, no groundwater monitoring is required or employed at the House Station.

Current TCLP analyses of wastewaters from the compressor pad indicate that the water is non-hazardous. Compressor pad wastewater will be reanalyzed for TCLP parameters if significantly different materials (e.g., oils, antifreeze, soaps) are used on the pad to reestablish the water's status.

11.0 SPILL AND LEAK PREVENTION AND REPORTING

As described in Section 11.0 above, the facility is inspected on a daily basis. Any spills will be addressed in accordance with NMOCD Rule 116 and 20.6.2.1203 NMAC.

12.0 CLOSURE PLAN

Upon removal from service, the House Station facility will be closed by:

- Disconnect and close all pipelines, gas, electrical and other utilities,
- Dismantle and remove all equipment,
- Collect and analyze an appropriate number of soil samples to verify that no contaminated soils exist,
- Regrade and revegetate the site in accordance with any applicable bonds and/or other regulations.

A report will be developed documenting the closure, and will be provided to NMOCD upon request.

FIGURES

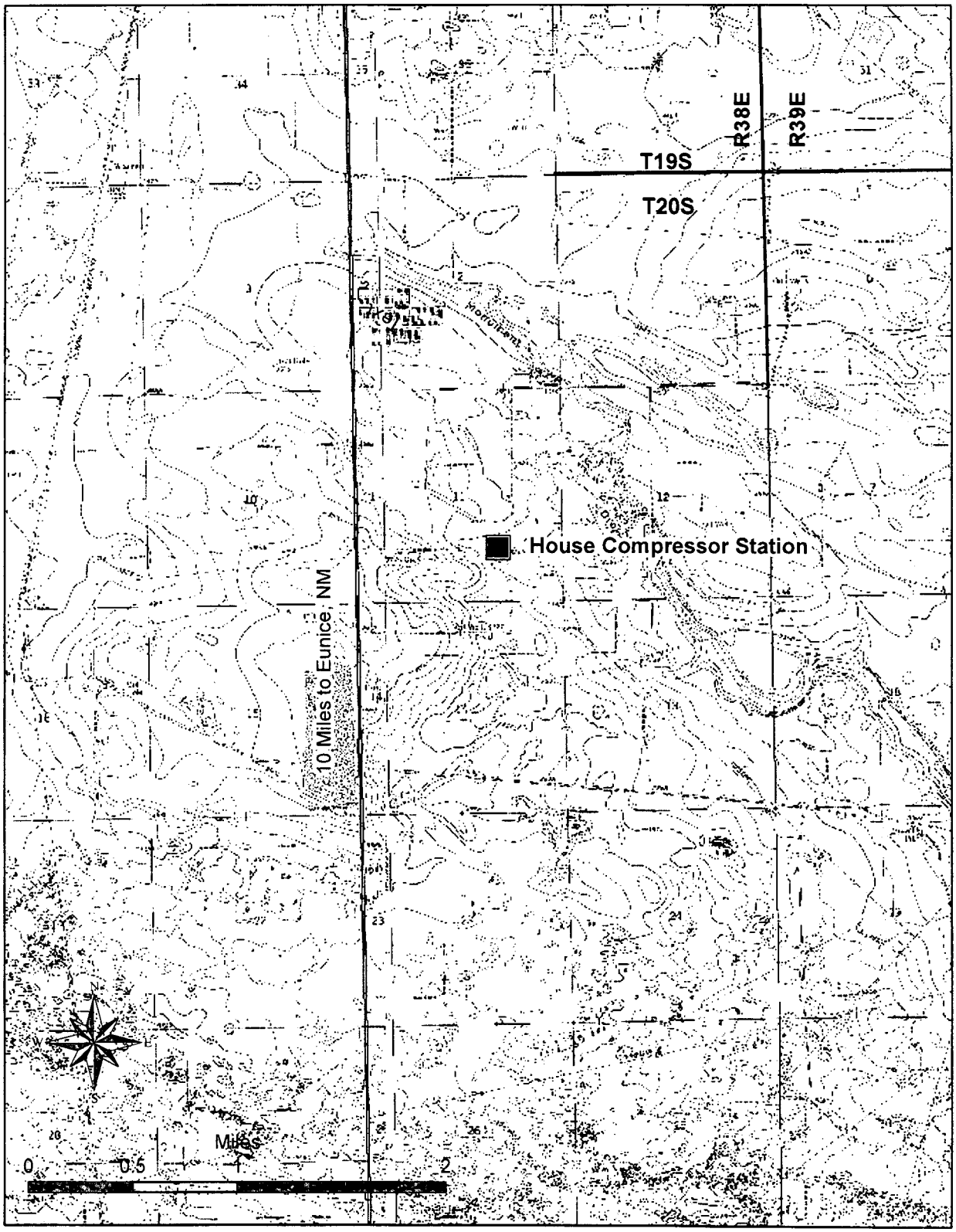


Figure 1: Location of Southern Union Gas Services, Ltd. House Compressor Station

House Compressor Station

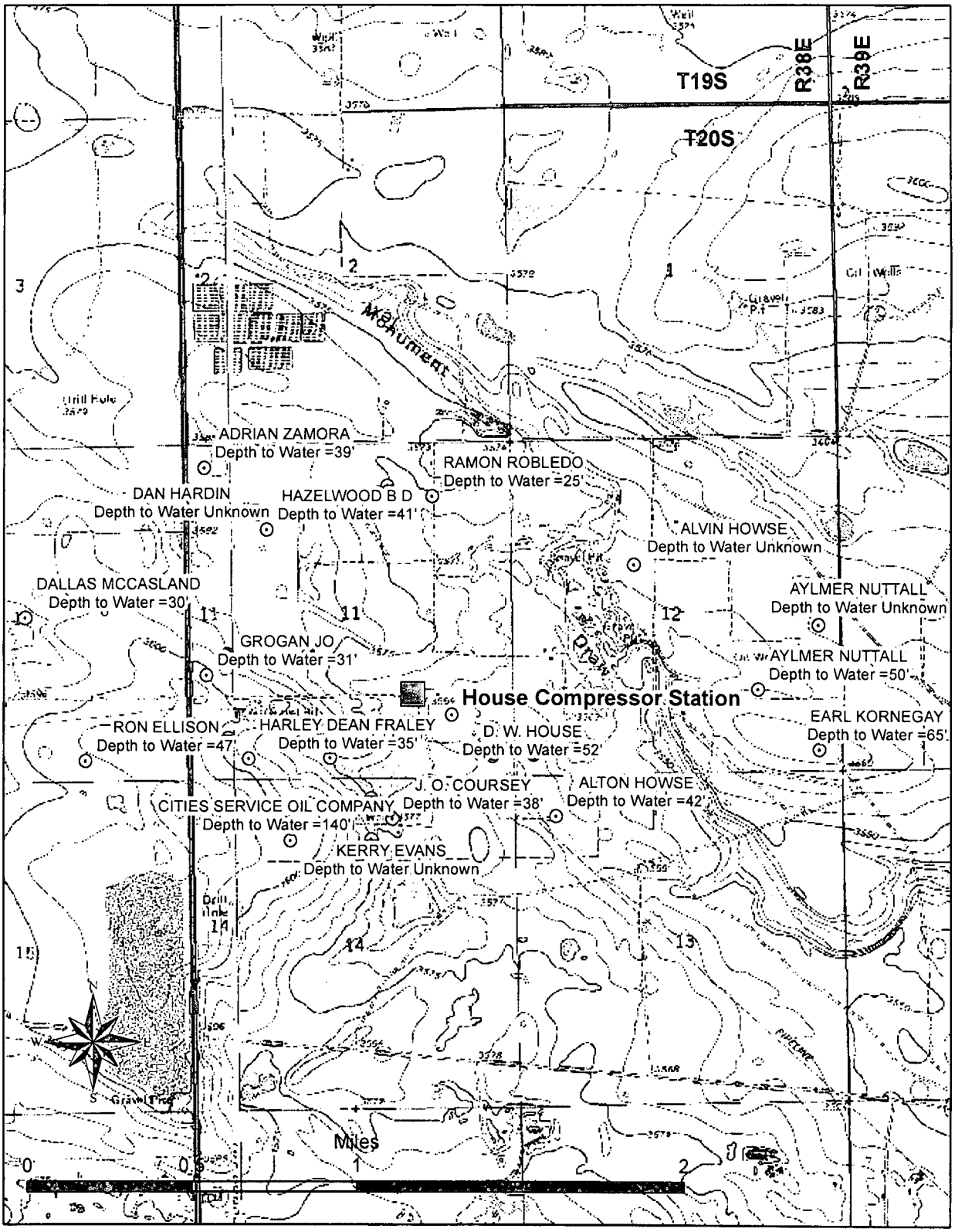


Figure 2: Location of Water Wells Adjacent to House Compressor Station

House Compressor Station

⊙ Water Wells

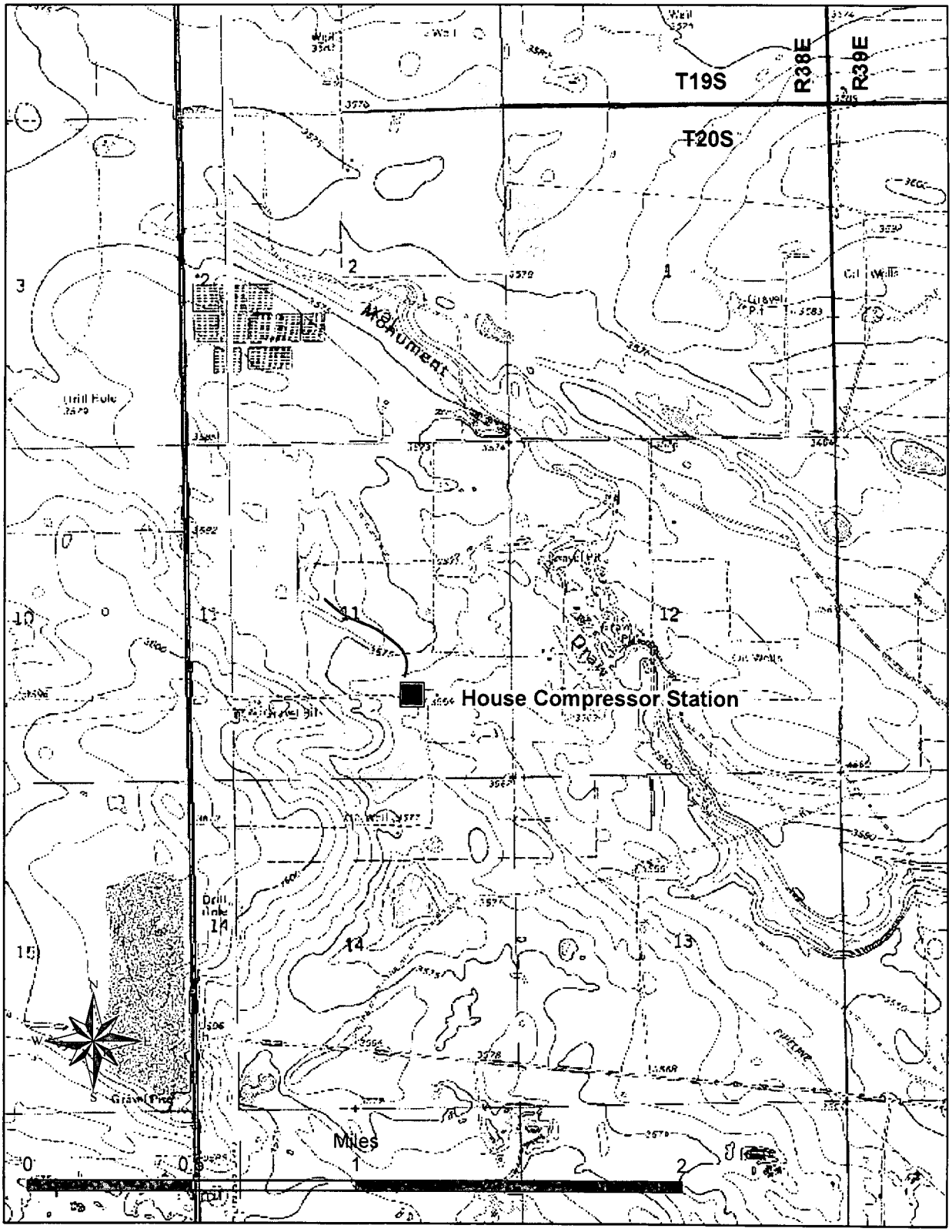


Figure 3: Drainage Pathway From House Compressor Station

Drainage Path

House Compressor Station

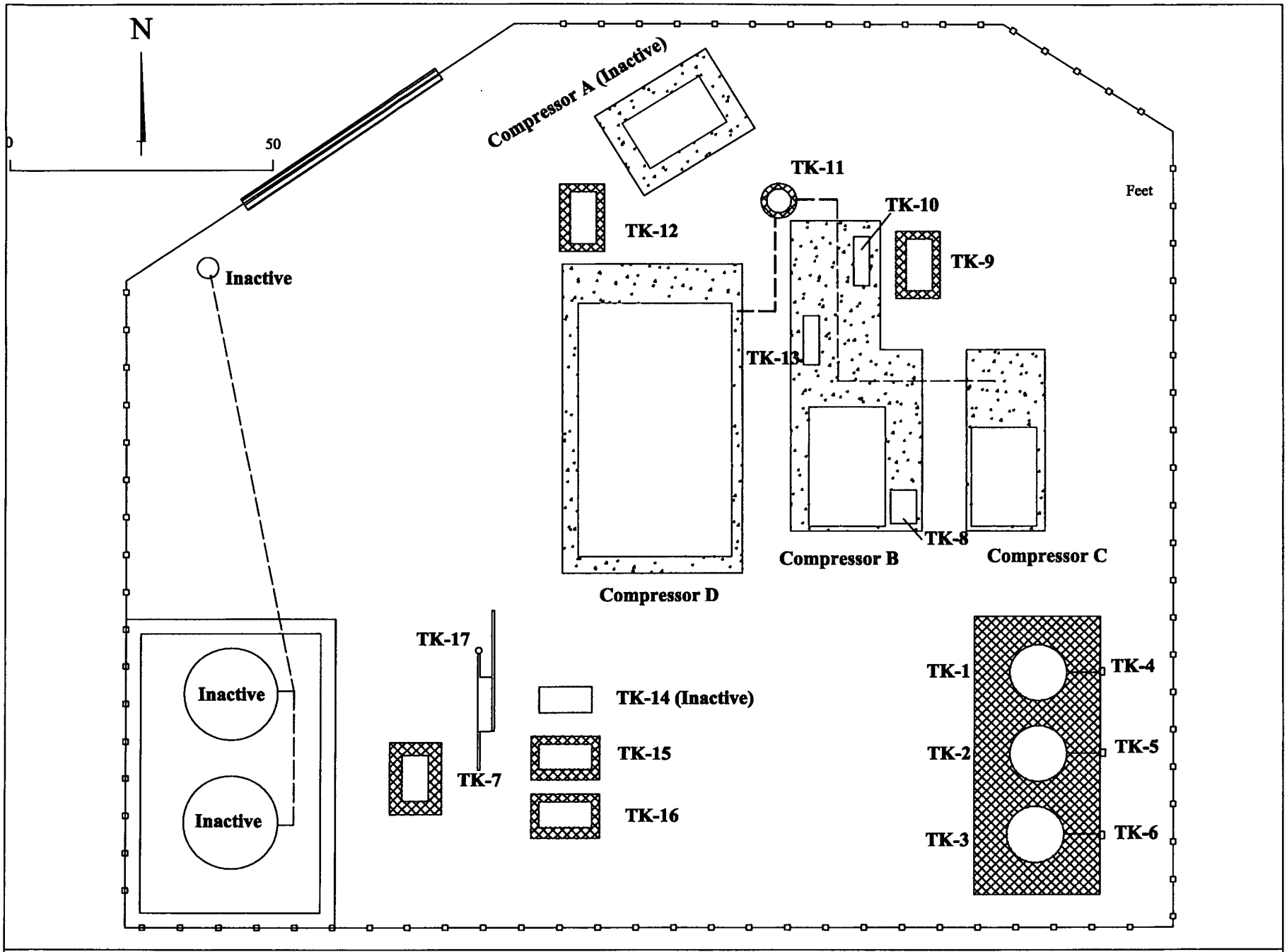


Figure 4: Schematic Map, House Compressor Station

Location: Unit O, Sec. 11, T20S, R38E, Lea County, NM

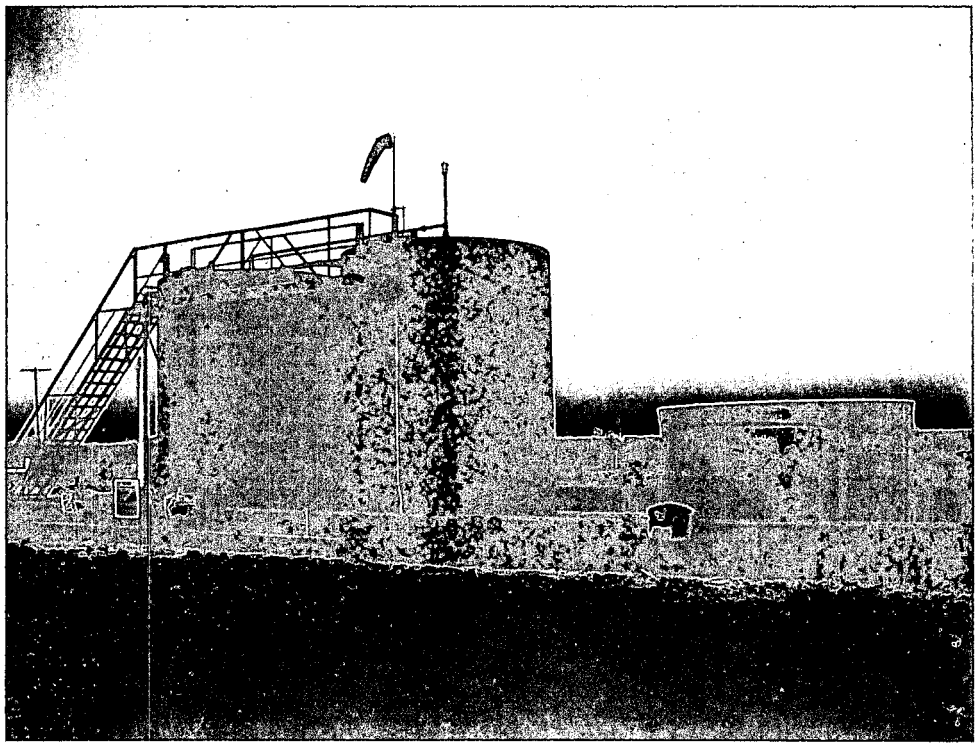


FIGURE 5: Tanks TK-1 through TK-6: Scrubber Condensate Tanks (TK-1 and TK-2), Produced Water Tank (TK-3) and line drip pans (TK-4, 5 and 6)

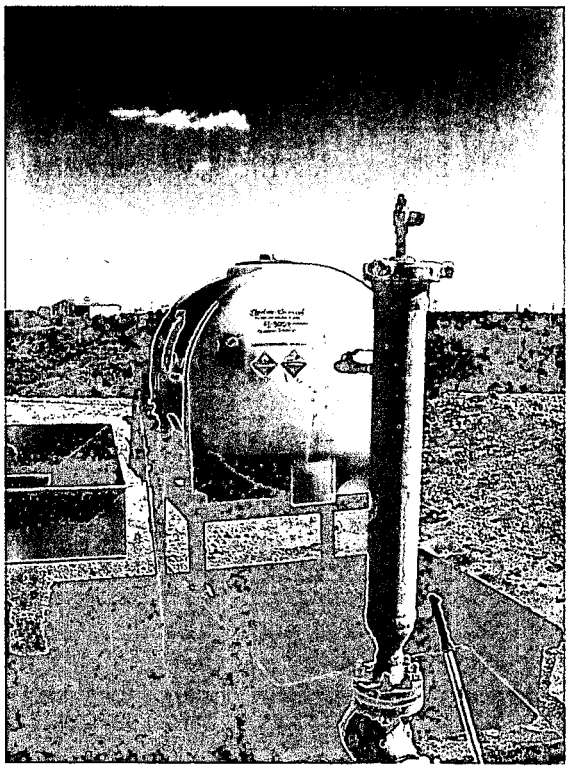


FIGURE 6: TK-7 - Pipeline Corrosion Inhibitor Tank

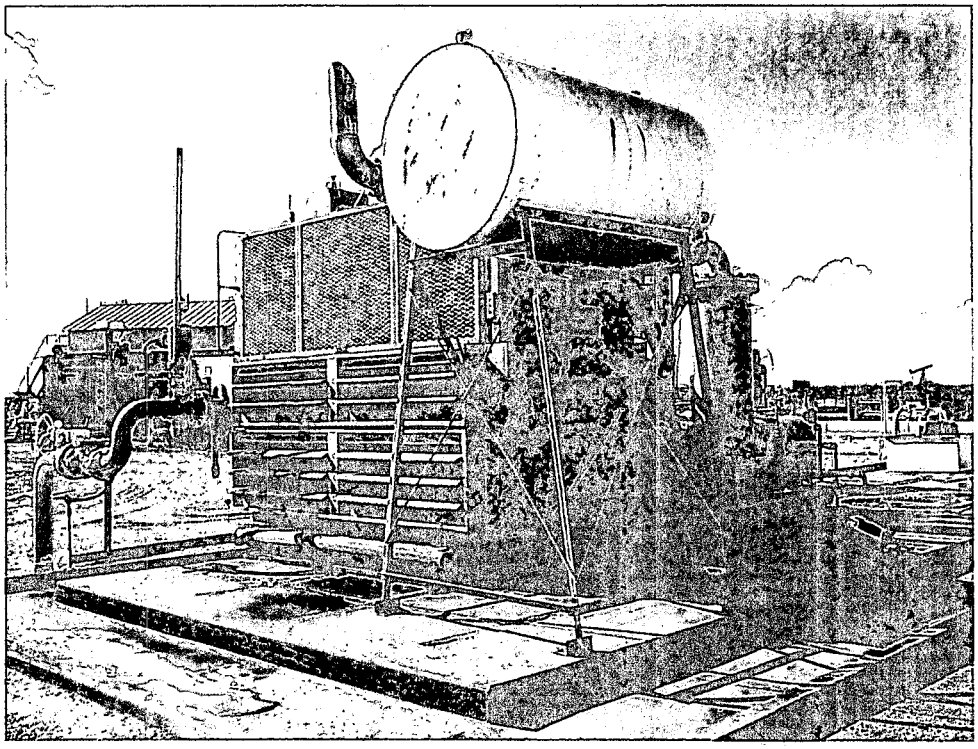


FIGURE 7: TK-8 Lube Oil Tank

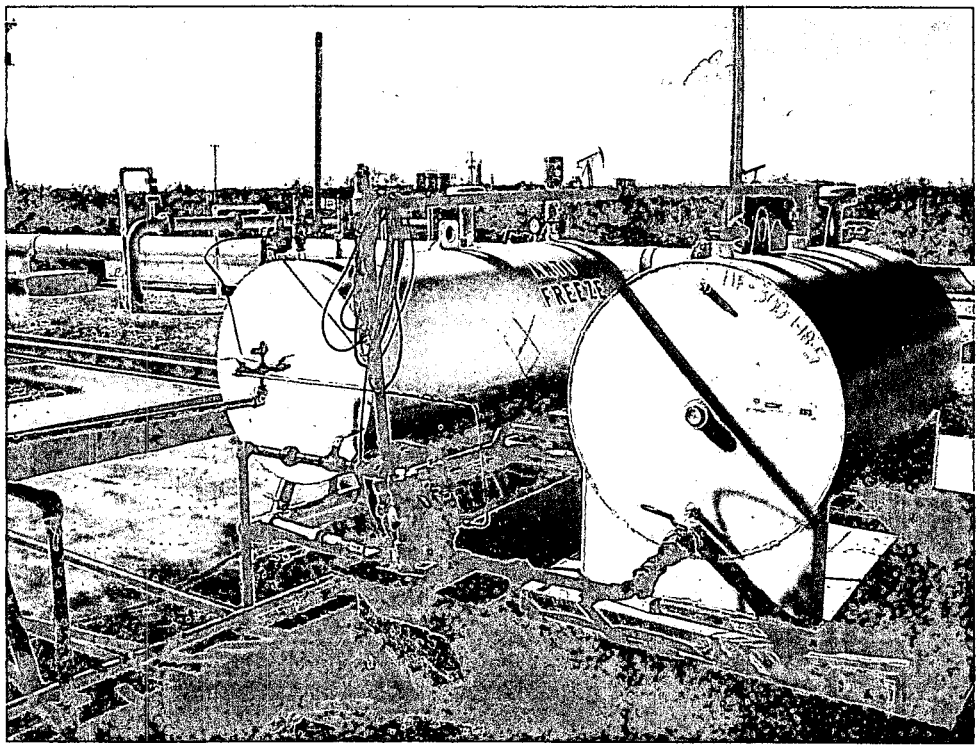


FIGURE 8: TK-9 Antifreeze Tank and TK-10 Compressor Oil Tank

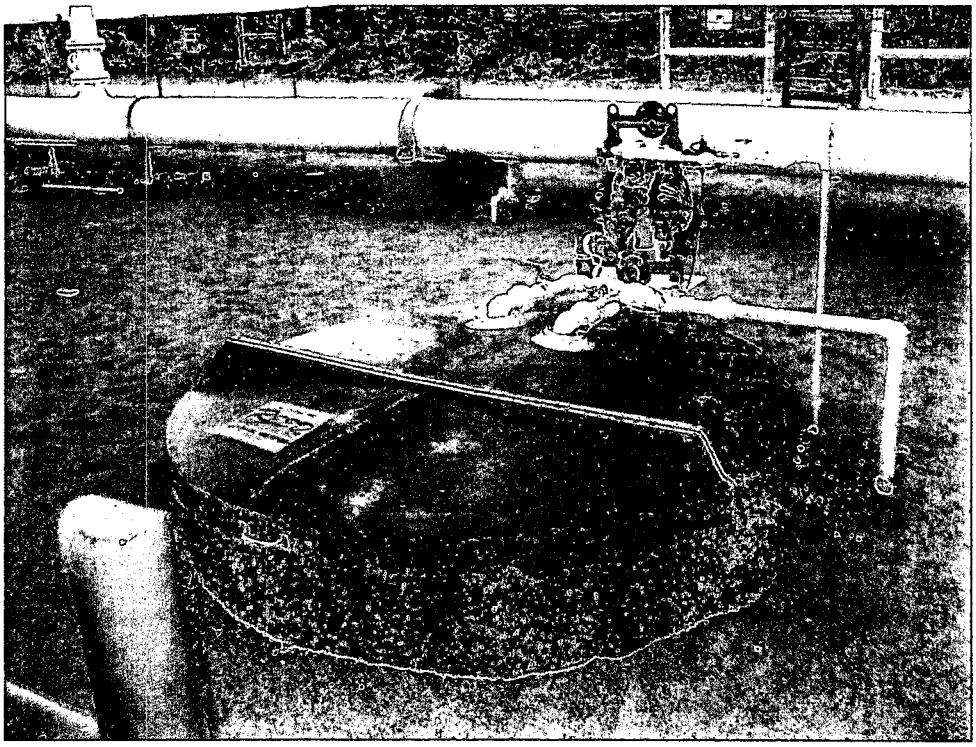


FIGURE 9: TK-11 Drainage Sump Containment

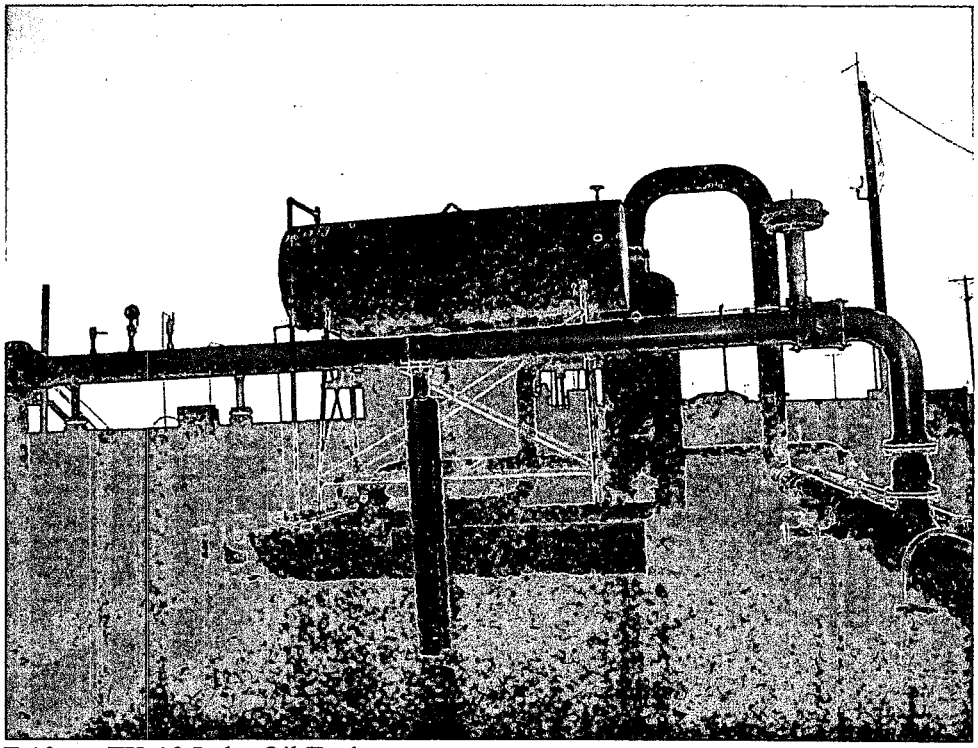


FIGURE 10: TK-12 Lube Oil Tank

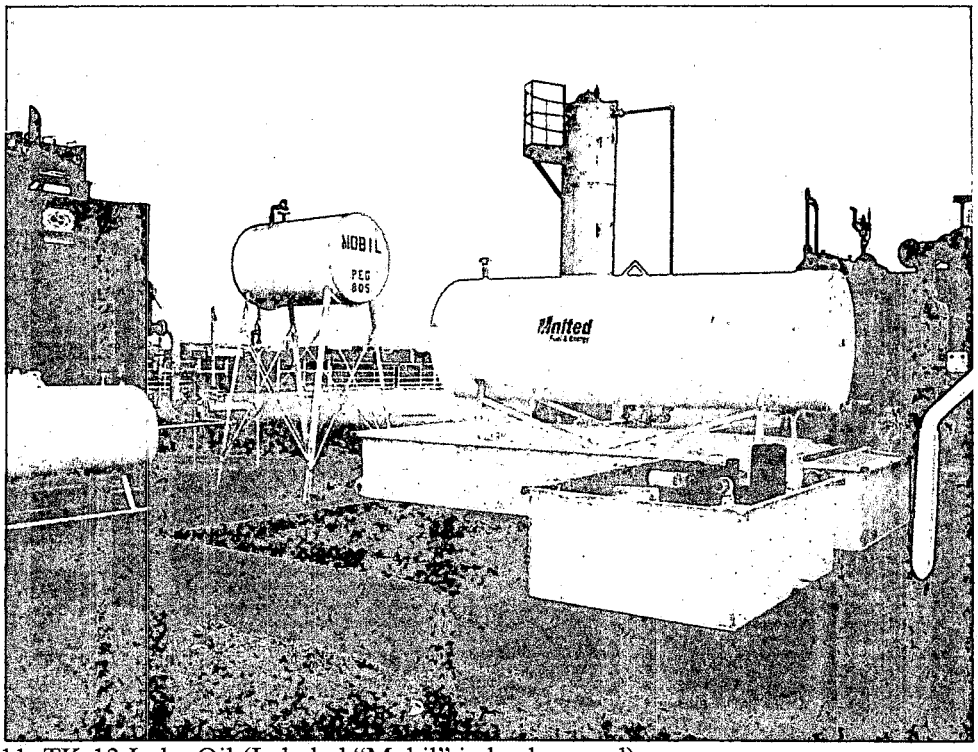


Figure 11: TK-13 Lube Oil (Labeled "Mobil" in background)

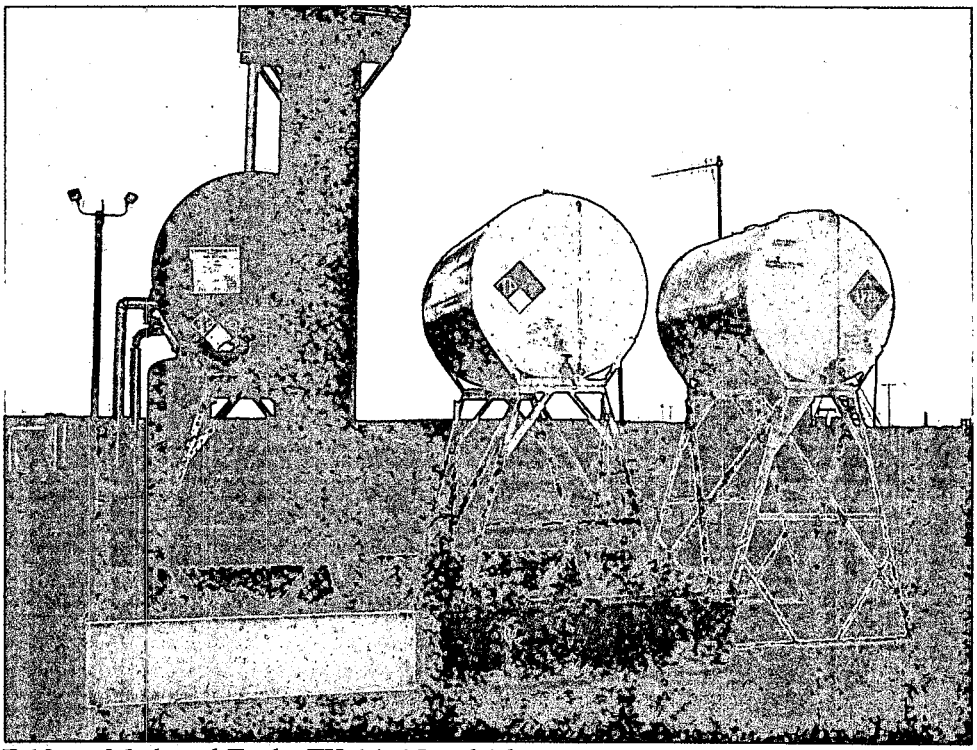


FIGURE 12: Methanol Tanks TK-14, 15 and 16

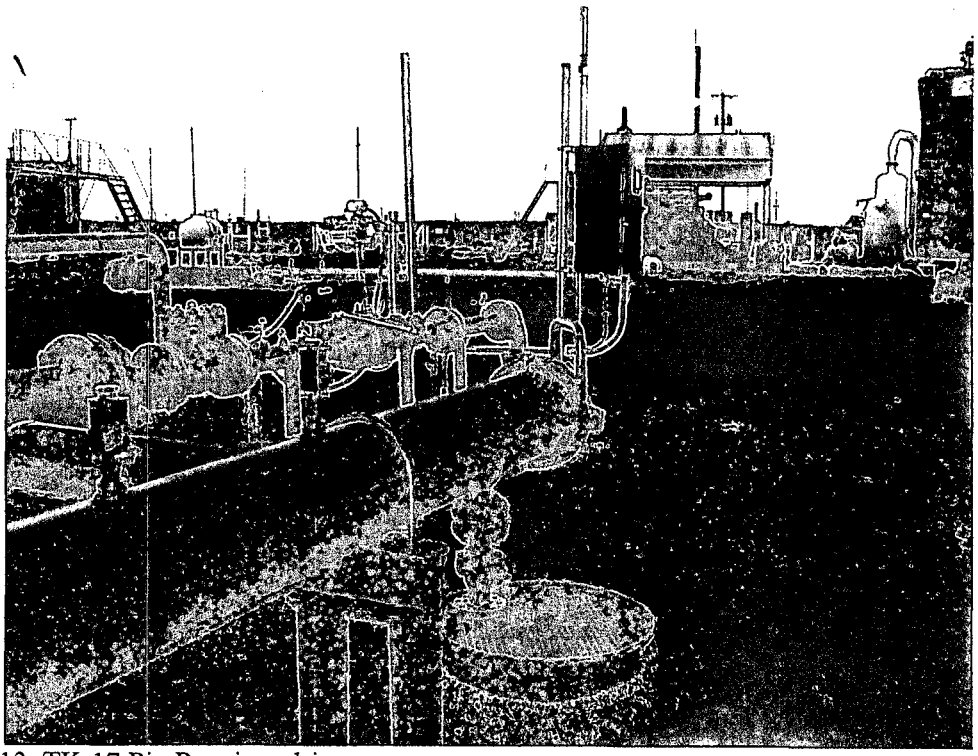


Figure 13: TK-17 Pig Receiver drip pan

APPENDIX A:

MATERIAL SAFETY DATA SHEETS

Praxair Material Safety Data Sheet

1. Chemical Product and Company Identification

Product Name:	Natural gas	**Trade Name:**	Natural gas
Product Use:	Heating fuel.		
Chemical Name:	Natural Gas, compressed	**Synonym:**	Methane natural gas
Chemical Formula:	Mixture of CH4, C2H6, C3H8, & C4H10	**Chemical Family:**	Hydrocarbons
Telephone:	**Emergencies:** * 1-800-363-0042	**Supplier /Manufacture:**	Praxair Canada Inc. 1 City Centre Drive Suite 1200 Mississauga, ON L5B 1M2
		Phone:	905-803-1600
		Fax:	905-803-1682

**Call emergency numbers 24 hours a day only for spills, leaks, fire, exposure, or accidents involving this product. For routine information, contact your supplier or Praxair sales representative.*

2. Composition and Information on Ingredients

INGREDIENTS	% (VOL)	CAS NUMBER	LD_{50} (Species & Routes)	LC_{50} (Rat, 4 hrs.)	TLV-TWA (ACGIH)
Natural gas (predominantly methane)	100	8006-14-2	Not applicable.	Not available.	None established.

3. Hazards Identification

Emergency Overview

DANGER! **Flammable, high-pressure gas. May form explosive mixture with air. Can cause rapid suffocation. May cause dizziness and drowsiness. Self-contained breathing apparatus may be required by rescue workers.**

ROUTES OF EXPOSURE: Inhalation. Eye contact.

THRESHOLD LIMIT VALUE: TLV-TWA Data from 2004 Guide to Occupational Exposure Values (ACGIH). TLV-TWAs should be used as a guide in the control of health hazards and not as fine lines between safe and dangerous concentrations.

EFFECTS OF A SINGLE (ACUTE) OVEREXPOSURE:

INHALATION: Asphyxiant. Effects are due to lack of oxygen. Moderate concentrations may cause headaches, drowsiness, dizziness, excitation, excess salivation, vomiting and unconciousness. Lack of oxygen can kill.

SKIN CONTACT: No harmful effects expected from vapour..

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

SWALLOWING: An unlikely route of exposure. This product is a gas at normal temperature and pressure.

EYE CONTACT:

Vapour may cause irritation.

EFFECTS OF REPEATED (CHRONIC) OVEREXPOSURE:

None.

OTHER EFFECTS OF OVEREXPOSURE:

None known.

MEDICAL CONDITIONS AGGRAVATED BY OVEREXPOSURE:

None known.

SIGNIFICANT LABORATORY DATA WITH POSSIBLE RELEVANCE TO HUMAN HEALTH HAZARD EVALUATION:

None.

CARCINOGENICITY:

Not listed as carcinogen by OSHA, NTP or IARC.

4. First Aid Measures

INHALATION:

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention.

SKIN CONTACT:

Abrasions: clean with soap and water then bandage.
Burns: seek medical attention.

SWALLOWING:

Not applicable (gas).

EYE CONTACT:

Flush with water. If irritation persists, call a physician.

NOTES TO PHYSICIAN:

There is no specific antidote. Treatment of over-exposure should be directed at the control of symptoms and the clinical condition.

5. Fire Fighting Measures

FLAMMABLE :	Yes.	IF YES, UNDER WHAT CONDITIONS?	Forms explosive mixtures with air and oxidizing agents.

FLASH POINT (test method)	Not applicable.	AUTOIGNITION TEMPERATURE	482°C (899.6°F)

FLAMMABLE LIMITS IN AIR, % by volume:	LOWER: 3.8	UPPER: 17

EXTINGUISHING MEDIA:

CO_2, dry chemical, water spray or fog.

SPECIAL FIRE FIGHTING PROCEDURES:

DANGER! Evacuate all personnel from danger area. Immediately cool cylinders with water spray from maximum distance taking care not to extinguish flames. Remove ignition source if without risk. If flames are accidentally extinguished. Explosive re-ignition may occur: therefore, appropriate measures should be taken: e.g., total evacuation. Re-approach with extreme caution. Use self-contained breathing apparatus. Stop flow of gas if without risk while continuing cooling water spray. Remove all containers from area if without risk. Allow fire to burn out.

UNUSUAL FIRE AND EXPLOSION HAZARD:

Extremely flammable gas in presence of open flame and sparks. Slightly flammable in presence of heat.

HAZARDOUS COMBUSTION PRODUCTS:

These products are carbon oxides (CO, CO2).

SENSITIVITY TO IMPACT:

Avoid impact against container.

SENSITIVITY TO STATIC DISCHARGE:

Possible.

6. Accidental Release Measures

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED:

DANGER! Flammable, high-pressure gas. Forms explosive mixtures with air. Immediately evacaute all personnel from danger area. Use self-contained breathing apparatus where needed. Remove all sources of ignition if without risk. Reduce gas with fog or fine water spary. Shut off flow if without risk. Ventilate area or move cylinder to a well-ventilated area. Flammable gas may spread from leak. Before entering area, especially confied areas, check atmosphere with an appropriate device.

WASTE DISPOSAL METHOD:

Prevent waste from contaminating the surrounding environment. Keep personnel away. Discard and product, residue, disposable container, or liner in an environmentally acceptable manner, infull compliance with federal, provincial, and local regulations. If necessary, call your local supplier for assistance.

7. Handling and Storage

PRECAUTIONS TO BE TAKEN IN STORAGE:

Store and use with adequate ventilation. Separate flammable cylinders from oxygen, chlorine, and other oxidizers by at least 6 m or use a barricade of non-combustible material. This barricade should be at least 1.5 m high and have a fire resistance rating of at least ½ hour. Firmly secure cylinders upright to keep them from falling or being knocked over. Screw valve protection cap firmly in place by hand. Post "No Smoking or Open Flames" signs in storage and use areas. There must be no sources of ignition. All electrical equipment in storage areas must be explosion-proof. Storage areas must meet national electric codes for Class 1 hazardous areas. Store only where temperature will not exceed 52 C. Store full and empty cylinders separately. Use a first-in, first-out inventory system to prevent storing full cylinders for long periods.

PRECAUTIONS TO BE TAKEN IN HANDLING:

Protect cylinders from damage. Use a suitable hand truck to move cylinders; do not drag, roll, slide, or drop. Never attempt to lift a cylinder by its cap; the cap is intended solely to protect the valve. Never insert an object (e.g., wrench, screwdriver, pry bar) into cap openings; doing so may damage the valve and cause a leak. Use an adjustable strap wrench to remove over-tight or rusted caps. Open valve slowly. If valve is hard to open, discontinue use and contact your supplier. For other precautions, see Section 16.

For additional information on stroage and handling, refer to Compressed Gas Association (CGA) pamphlet P-1, *Safe Handling of Compressed Gases in Containers*, available from the CGA. Refer to Section 16 for the address and phone number along with a list of other available publications.

OTHER HAZARDOUS CONDITIONS OF HANDLING, STORAGE, AND USE:

Flammable high-pressure gas. Use only in a closed system. Use piping and equipment adequately designed to withstand pressures to be encountered. Use only spark-proof tools and explosion-proof equipment. Keep away from heat, sparks, and open flame. ***May form explosive mixtures with air.*** Ground all equipment. ***Gas can cause rapid suffocation due to oxygen deficiency.*** Store and use with adequate ventilation. Close valve after each use: keep closed even when empty. ***Prevent reverse flow.*** Reverse flow into cylinder may cause rupture. Use a check valve or other protective device in any line or piping from the cylinder. ***When returning cylinder to supplier,*** be sure valve is closed, then install valve outlet plug tightly. ***Never work on a pressurized system.*** If there is a leak, close the cylinder valve. Vent the system down in a safe and environmentally sound manner in compliance with all federal, provincial, and local laws; then repair the leak. ***Never place a compressed gas cylinder where it may become part of an electrical circuit.***

8. Exposure Controls/Personal Protection

VENTILATION/ENGINEERING CONTROLS:

LOCAL EXHAUST: An explosion-proof local exhaust system is acceptable. See SPECIAL.

MECHANICAL (general): Inadequate. See SPECIAL.

SPECIAL: Use only in a closed system.

OTHER: None.

PERSONAL PROTECTION:

RESPIRATORY PROTECTION: Use respirable fume respirator or air supplied respirator when working in confined space or where local exhaust or ventilation does not keep exposure below TLV. Select in accordance with the provincial regulations or guidelines. Selection should also be based on the current CSA standards Z94.4, "Selection, care and use of respirators". Respirators should be approved by NIOSH and MSHA.

SKIN PROTECTION: Wear work gloves when handling cylinders.

EYE PROTECTION: Wear safety glasses when handling cylinders.

Select in accordance with the current CSA standard Z94.3, "Industrial Eye and Face Protection", and any provincial regulations, local bylaws or guidelines.

OTHER PROTECTIVE EQUIPMENT: Metatarsal shoes for cylinder handling. Protective clothing where needed. Cuffless trousers should be worn outside the shoes. Select in accordance with the current CSA standard Z195, "Protective Foot Wear", and any provincial regulations, local bylaws or guidelines.

9. Physical and Chemical Properties

PHYSICAL STATE:	Gas. (Compressed Gas.)	FREEZING POINT:	Not available.	pH:	Not applicable.
BOILING POINT	-164°C (-263.2°F)	VAPOUR PRESSURE	Not applicable.	MOLECULAR WEIGHT:	17.66 g/mole
SPECIFIC GRAVITY: LIQUID (Water = 1)	Not applicable.	SOLUBILITY IN WATER,	Very slightly soluble in cold water.		
SPECIFIC GRAVITY: VAPOUR (air = 1)	0.55	EVAPORATION RATE (Butyl Acetate=1):	Not available.	COEFFICIENT OF WATER/OIL DISTRIBUTION:	Not applicable.
VAPOUR DENSITY:	0.615	% VOLATILES BY VOLUME:	100% (v/v).	ODOUR THRESHOLD:	0.001 ppm

APPEARANCE & ODOUR: Colourless. Odour: Faint, disagreeable. (Slight.)

10. Stability and Reactivity

STABILITY:	The product is stable.
CONDITIONS OF CHEMICAL INSTABILITY:	Not available.
INCOMPATIBILITY (materials to avoid):	Oxidizing agents in the presence of ignition source.
HAZARDOUS DECOMPOSITION PRODUCTS:	Thermal decomposition or burning may produce carbon monoxide/carbon dioxide and possible trace amounts of sulphur dioxide and oxides of nitrogen.
HAZARDOUS POLYMERIZATION:	Will not occur.
CONDITIONS OF REACTIVITY:	None known.

11. Toxicological Information

See section 3.

12. Ecological Information

No adverse ecological effects expected. This product does not contain any Class I or Class II ozone-depleting chemicals. The components of this mixture are not listed as marine pollutants by TDG Regulations.

13. Disposal Considerations

WASTE DISPOSAL METHOD: *Do not attempt to dispose of residual or unused quantities. Return cylinder to supplier.*

14. Transport Information

TDG/IMO SHIPPING NAME: Natural Gas, Compressed

HAZARD CLASS:	IDENTIFICATION #:	PRODUCT RQ:
CLASS 2.1: Flammable gas.	1971	100 L

SHIPPING LABEL(s):	Flammable gas
PLACARD (when required):	Flammable gas

SPECIAL SHIPPING INFORMATION:

Cylinders should be transported in a secure position, in a well-ventilated vehicle. Cylinders transported in an enclosed, nonventilated compartment of vehicle can present serious safety hazards.

15. Regulatory Information

The following selected regulatory requirements may apply to this product. Not all such requirements are identified. Users of this product are solely responsible for compliance with all applicable federal, provincial, and local regulations.

WHMIS (Canada) CLASS A: Compressed gas.
CLASS B-1: Flammable gas.

International Regulations

EINECS Not available.

DSCL (EEC) This product is not classified according to the EU regulations.

International Lists No products were found.

16. Other Information

MIXTURES:

When two or more gases, or liquefied gases are mixed, their hazardous properties may combine to create additional, unexpected hazards. Obtain and evaluate the safety information for each component before you produce the mixture. Consult an Industrial Hygienist, or other trained person when you make your safety evaluation of the end product. Remember, gases and liquids have properties which can cause serious injury or death.

HAZARD RATING SYSTEM:

HMIS RATINGS:

HEALTH	0
FLAMMABILITY	4
PHYSICAL HAZARD	0

STANDARD VALVE CONNECTIONS FOR U.S. AND CANADA:

THREADED:	0 - 3000 psig: CGA-350
PIN-INDEXED YOKE:	Not applicable.
ULTRA-HIGH-INTEGRITY CONNECTION:	Not applicable.

Use the proper CGA connections. DO NOT USE ADAPTERS. Additional limited-standard connections may apply. See CGA pamphlets V-1 and V-7 listed below.

Ask your supplier about free Praxair safety literature as referred to in this MSDS and on the label for this product. Further information about this product can be found in the following pamphlets published by the Compressed Gas Association, Inc. (CGA), 4221 Walney Road, 5th Floor, Chantilly, VA 20151-2923, Telephone (703) 788-2700, Fax (703) 961-1831, website: www.cganet.com.

AV-1	Safe Handling and Storage of Compressed Gas
P-1	Safe Handling of Compressed Gases in Containers
P-14	Accident Prevention in Oxygen-Rich, Oxygen-Deficient Atmospheres
SB-2	Oxygen-Deficient Atmospheres
V-1	Compressed Gas Cylinder Valve Inlet and Outlet Connections
V-7	Standard Method of Determining Cylinder Valve Outlet Connections for Industrial Gas Mixtures
---	Handbook of Compressed Gases, Fourth Edition

PREPARATION INFORMATION:

DATE:	10/15/2004
DEPARTMENT:	Safety and Environmental Services
TELEPHONE:	905-803-1600

The opinions expressed herein are those of qualified experts within Praxair Canada Inc. 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 the conditions of use of the product are not within the control of Praxair Canada Inc., it is the user's obligation to determine the conditions of safe use of the product.

Praxair Canada Inc. requests the users of this product to study this Material Data Sheet (MSDS) and become aware of product hazards and safety information. To promote safe use of this product, a user should (1) notify its employees, agents and contractors of the information on this MSDS and any product hazards and safety information, (2) furnish this same information to each of its customers for the product, and (3) request such customers to notify their employees and customers for the product of the same product hazards and safety information.

PRAXAIR

Praxair Canada Inc.
1 City Centre Drive
Suite 1200
Mississauga, ON L5B 1M2

Material Safety Data Sheet

NATURAL GAS CONDENSATE

April 28, 1995

PHILLIPS PETROLEUM COMPANY
Bartlesville, Oklahoma 74004

PHONE NUMBERS
Emergency: (918) 661-8118
General MSDS Information: (918) 661-8327
For Additional MSDSs: (918) 661-5952

A. Product Identification

Synonyms: Drip; Hydrocarbon gas drip; Gas drip
Chemical Name: Natural gas condensate
Chemical Family: Mixture
Chemical Formula: Mixture
CAS Reg. No.: 68919-39-1
Product No.: Not Established

Product and/or Components Entered on EPA's TSCA Inventory: YES

This product is in U.S. commerce, and is listed in the Toxic Substances Control Act (TSCA) Inventory of Chemicals; hence, it may be subject to applicable TSCA provisions and restrictions.

B. Components

Ingredients	CAS Number	% By Wt.	OSHA PEL	ACGIH TLV
Hydrogen sulfide	7783-06-4	0-20	10 ppm	10 ppm
C2 Hydrocarbons (As ethane) Asphyxiant	Various	0-5	NE	Simple
C3 Hydrocarbons (As propane) Asphyxiant	Various	0-15	1000 ppm	Simple
C4 Hydrocarbons (As butane)	Various	0-45	800 ppm	800 ppm
C5 Hydrocarbons (As pentane)	Various	5-70	600 ppm	600 ppm
C6 Hydrocarbons (As n-hexane)	Various	25-95	50 ppm(1)	50 ppm(1)
may include: Cyclohexane	110-82-7	NE	300 ppm	300 ppm
C7 Hydrocarbons (As heptane)	Various	25-95	400 ppm	400 ppm
C8 Hydrocarbons (As octane)	Various	25-95	300 ppm	300 ppm
Aromatic Hydrocarbons	Various	0-10	NE	NE
may include: Benzene	71-43-2	NE	1 ppm(2)	10 ppm
Toluene	108-88-3	NE	100 ppm	100 ppm
Mixed xylene	1330-20-7	NE	100 ppm	100 ppm
Ethylbenzene	100-41-4	NE	100 ppm	100 ppm

(1) As n-Hexane. As Hexane isomers 500 ppm.
(2) Areas exempted by the Benzene Standard, 29 CFR 1910.1028, will have a 10 ppm 8 hour TWA.

C. Personal Protection Information

Ventilation:	Use adequate ventilation to control exposure below recommended levels.
Respiratory Protection:	For concentrations exceeding the recommended exposure level, use NIOSH/MSHA approved air supplied respirator. In case of spill or leak resulting in unknown concentrations, use NIOSH/MSHA approved supplied air respirator.
Eye Protection:	Use chemical goggles.
Skin Protection:	Use full-body, long-sleeved garments. Use polyvinyl alcohol or Buna-N gloves.

NOTE: Personal protection information shown in Section C is based upon general information as to normal uses and conditions. Where special or unusual uses or conditions exist, it is suggested that the expert assistance of an industrial hygienist or other qualified professional be sought.

D. Handling and Storage Precautions

Do not get in eyes, on skin or on clothing. Do not breathe vapor, mist, fume or dust. May be harmful. Proper personal protective equipment must be used when handling this chemical. Launder contaminated clothing before reuse. Wash thoroughly after handling. Use only with adequate ventilation. Do not swallow. May be aspirated into lungs.

Store in a well-ventilated area. Store in tightly closed container. Keep away from heat, sparks, and flames. Bond and ground during transfer.

E. Reactivity Data

Stability:	Stable
Conditions to Avoid:	Not Applicable
Incompatibility (Materials to Avoid):	Oxygen and strong oxidizing materials
Hazardous Polymerization:	Will Not Occur
Conditions to Avoid:	Not Applicable
Hazardous Decomposition Products:	Carbon oxides and various hydrocarbons formed when burned. Sulfur oxides may be formed if hydrogen sulfide is present.

F. Health Hazard Data

Recommended Exposure Limits:

See Section B.

Acute Effects of Overexposure:

Eye: May cause irritation including pain, blurred vision.

redness, tearing and superficial corneal turbidity.

Skin: May cause slight irritation. Extreme exposure may produce discoloration, muscle weakness, breathing difficulties and other central nervous system effects.

Inhalation: Toxic by this route of exposure. May cause nausea, diarrhea, loss of appetite, dizziness, disorientation, headache, excitation, rapid respiration, drowsiness, labored breathing, anesthesia and other central nervous system effects. Hydrogen sulfide may cause lung paralysis and asphyxiation. Extreme overexposure may cause rapid unconsciousness and respiratory arrest.

Ingestion: May be mildly irritating to intestines. If swallowed, may be aspirated resulting in inflammation and possible fluid accumulation in the lungs.

Subchronic and Chronic Effects of Overexposure:

Benzene has been designated as a carcinogen by the National Toxicology Program (NTP), the International Agency for Research on Cancer (IARC), and the Occupational Safety and Health Administration (OSHA). Benzene may produce blood changes which include reduced platelets, reduced red blood cells, reduced white blood cells, aplastic anemia, and acute nonlymphocytic leukemia. Benzene has produced fetal death in laboratory animals and caused chromosome changes in humans and mutation changes in cells of other organisms.

Chronic high level n-hexane exposure damages the nervous system initially producing a lack of feeling in the extremities and possibly progressing to a more severe nerve damage.

Inhalation of high levels (1000 and 5000 ppm) of n-hexane has produced testicular damage in rats. Mice exposed to the same dose levels showed no testicular effects.

Other Health Effects:

The odor of hydrogen sulfide may not be recognized after prolonged inhalation due to paralysis of the sense of smell. Effects from inhaling the fume may lead to chronic bronchitis, respiratory irritation, increased loss of pulmonary function, and tearing of the eyes.

Some isoparaffins have produced kidney damage in male rats only. No comparable kidney disease is known to occur in humans.

Health Hazard Categories:

	Animal	Human		Animal	Human
Known Carcinogen	_X_	_X_	Toxic	_X_	___
Suspect Carcinogen	___	___	Corrosive	___	___
Mutagen	_X_	___	Irritant	___	___
Teratogen	___	___	Target Organ Toxin	_X_	_X_
Allergic Sensitizer	___	___	Specify - Nerve Toxin; Liver and Kidney		
Highly Toxic	___	___	Toxin; Lung-Aspiration Hazard		

First Aid and Emergency Procedures:

Eye: Flush eyes with running water for at least fifteen minutes. If irritation or adverse symptoms develop, seek medical attention.

Skin: Wash skin with soap and water for at least fifteen minutes. If irritation or adverse symptoms develop, seek medical attention.

Inhalation: Immediately remove from exposure. If breathing is difficult, give oxygen. If breathing ceases, administer artificial respiration followed by oxygen. Seek immediate medical attention.

Ingestion: Do not induce vomiting. Seek immediate medical attention.

Note to Physician: Gastric lavage using a cuffed endotracheal tube may be performed at your discretion.

G. Physical Data

Appearance:	Colorless to dark liquid
Odor:	Rotten egg odor if hydrogen sulfide is present.
Boiling Point:	Not Established
Vapor Pressure:	< 40 psia @ 70F (21C) (Estimated)
Vapor Density (Air = 1):	>1
Solubility in Water:	Negligible
Specific Gravity (H2O = 1):	0.5-0.7 (Estimated)
Percent Volatile by Volume:	100
Evaporation Rate (Butyl Acetate = 1):	>1
Viscosity:	< 40 SUS @ 68F (20C)

H. Fire and Explosion Data

Flash Point (Method Used):	<-100F (<-73C)(Estimated)
Flammable Limits (% by Volume in Air):	LEL - Not Established UEL - Not Established
Fire Extinguishing Media:	Dry chemical, foam or carbon dioxide (CO2)
Special Fire Fighting Procedures:	Evacuate area of all unnecessary personnel. Use NIOSH/MSHA approved self-contained breathing apparatus and other protective equipment and/or garments described in Section C if conditions warrant. Shut off source, if possible. Water fog or spray may be used to cool exposed equipment and containers Allow fire to burn until gas flow is shut off, if possible.
Fire and Explosion Hazards:	Carbon oxides and possibly sulfur oxides formed when burned. Highly flammable vapors which are heavier than air may accumulate in low areas and/or spread along ground away from handling site.

Prior to disposal, consult your environmental contact to determine if TCLP (Toxicity Characteristic Leaching Procedure, EPA Test Method 1311) is required. Reference 40 CFR Part 261.

L. Protection Required for Work on Contaminated Equipment

Contact immediate supervisor for specific instructions before work is initiated. Wear protective equipment and/or garments described in Section C if exposure conditions warrant.

M. Hazard Classification

_X_ This product meets the following hazard definition(s) as defined by the Occupational Safety and Health Hazard Communication Standard (29 CFR Section 1910.1200):

___ Combustible Liquid	___ Flammable Aerosol	___ Oxidizer
___ Compressed Gas	___ Explosive	___ Pyrophoric
___ Flammable Gas	_X_ Health Hazard (Section F)	___ Unstable
_X_ Flammable Liquid	___ Organic Peroxide	___ Water Reactive
___ Flammable Solid		

___ Based on information presently available, this product does not meet any of the hazard definitions of 29 CFR Section 1910.1200.

N. Additional Comments

SARA 313

This product contains the following chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. (See Section B).

Hexane
Benzene
Toluene
Mixed xylene
Ethylbenzene
Cyclohexane

MATERIAL SAFETY DATA SHEET

SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

PRODUCT

Product Name: ESSOLUBE XDI 5W-30 PROPANE/CNG ENGINE OIL
Product Description: Base Oil and Additives
Product Code: 15036
Intended Use: Engine oil

COMPANY IDENTIFICATION

Supplier: Canada Imperial Oil Limited, An Affiliate of Exxon Mobil Corporation
P.O. Box 4029, Station A
Calgary, ALBERTA. T2P 3M9 Canada

24 Hour Health Emergency	519-339-2145
Transportation Emergency Phone	519-339-2145
Supplier General Contact	1-800-567-3776

SECTION 2 COMPOSITION / INFORMATION ON INGREDIENTS

No Reportable Hazardous Substance(s) or Complex Substance(s).

SECTION 3 HAZARDS IDENTIFICATION

This material is not considered to be hazardous according to regulatory guidelines (see (M)SDS Section 15).

POTENTIAL HEALTH EFFECTS

Low order of toxicity. Excessive exposure may result in eye, skin, or respiratory irritation. High-pressure injection under skin may cause serious damage.

NFPA Hazard ID:	Health:	0	Flammability: 1	Reactivity:	0
HMIS Hazard ID:	Health:	0	Flammability: 1	Reactivity:	0

NOTE: This material should not be used for any other purpose than the intended use in Section 1 without expert advice. Health studies have shown that chemical exposure may cause potential human health risks which may vary from person to person.

SECTION 4 FIRST AID MEASURES

INHALATION

Remove from further exposure. For those providing assistance, avoid exposure to yourself or others. Use adequate respiratory protection. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or use mouth-to-mouth resuscitation.

SKIN CONTACT

Wash contact areas with soap and water. If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency. Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

EYE CONTACT

Flush thoroughly with water. If irritation occurs, get medical assistance.

INGESTION

First aid is normally not required. Seek medical attention if discomfort occurs.

SECTION 5 FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA

Appropriate Extinguishing Media: Use water fog, foam, dry chemical or carbon dioxide (CO2) to extinguish flames.

Inappropriate Extinguishing Media: Straight Streams of Water

FIRE FIGHTING

Fire Fighting Instructions: Evacuate area. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply. Firefighters should use standard protective equipment and in enclosed spaces, self-contained breathing apparatus (SCBA). Use water spray to cool fire exposed surfaces and to protect personnel.

Hazardous Combustion Products: Sulfur oxides, Incomplete combustion products, Oxides of carbon, Aldehydes, Smoke, Fume

FLAMMABILITY PROPERTIES

Flash Point [Method]: 200C (392F) [ASTM D-92]
Flammable Limits (Approximate volume % in air): LEL: 0.9 UEL: 7.0
Autoignition Temperature: 315°C (599°F)

SECTION 6 ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES

In the event of a spill or accidental release, notify relevant authorities in accordance with all applicable regulations. U.S. regulations require reporting releases of this material to the environment which exceed the reportable quantity or oil spills which could reach any waterway including intermittent dry creeks. The National Response Center can be reached at (800)424-8802.

SPILL MANAGEMENT

Land Spill: Stop leak if you can do it without risk. Recover by pumping or with suitable absorbent.

Water Spill: Stop leak if you can do it without risk. Confine the spill immediately with booms. Warn other

shipping. Remove from the surface by skimming or with suitable absorbents. Seek the advice of a specialist before using dispersants.

Water spill and land spill recommendations are based on the most likely spill scenario for this material; however, geographic conditions, wind, temperature, (and in the case of a water spill) wave and current direction and speed may greatly influence the appropriate action to be taken. For this reason, local experts should be consulted. Note: Local regulations may prescribe or limit action to be taken.

ENVIRONMENTAL PRECAUTIONS

Large Spills: Dike far ahead of liquid spill for later recovery and disposal. Prevent entry into waterways, sewers, basements or confined areas.

SECTION 7 HANDLING AND STORAGE

HANDLING

Avoid contact with used product. Prevent small spills and leakage to avoid slip hazard.

Static Accumulator: This material is a static accumulator.

STORAGE

Do not store in open or unlabelled containers.

SECTION 8 EXPOSURE CONTROLS / PERSONAL PROTECTION

Exposure limits/standards for materials that can be formed when handling this product: When mists / aerosols can occur, the following are recommended: 5 mg/m³ - ACGIH TLV, 10 mg/m³ - ACGIH STEL, 5 mg/m³ - OSHA PEL.

NOTE: Limits/standards shown for guidance only. Follow applicable regulations.

ENGINEERING CONTROLS

The level of protection and types of controls necessary will vary depending upon potential exposure conditions. Control measures to consider:

No special requirements under ordinary conditions of use and with adequate ventilation.

PERSONAL PROTECTION

Personal protective equipment selections vary based on potential exposure conditions such as applications, handling practices, concentration and ventilation. Information on the selection of protective equipment for use with this material, as provided below, is based upon intended, normal usage.

Respiratory Protection: If engineering controls do not maintain airborne contaminant concentrations at a level which is adequate to protect worker health, an approved respirator may be appropriate. Respirator selection, use, and maintenance must be in accordance with regulatory requirements, if applicable. Types of respirators to be considered for this material include:

No special requirements under ordinary conditions of use and with adequate ventilation.

For high airborne concentrations, use an approved supplied-air respirator, operated in positive pressure mode. Supplied air respirators with an escape bottle may be appropriate when oxygen levels are inadequate, gas/vapor warning properties are poor, or if air purifying filter capacity/rating may be exceeded.

Hand Protection: Any specific glove information provided is based on published literature and glove manufacturer data. Work conditions can greatly effect glove durability; inspect and replace worn or damaged gloves. The types of gloves to be considered for this material include:
No protection is ordinarily required under normal conditions of use.

Eye Protection: If contact is likely, safety glasses with side shields are recommended.

Skin and Body Protection: Any specific clothing information provided is based on published literature or manufacturer data. The types of clothing to be considered for this material include:
No skin protection is ordinarily required under normal conditions of use. In accordance with good industrial hygiene practices, precautions should be taken to avoid skin contact.

Specific Hygiene Measures: Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants. Discard contaminated clothing and footwear that cannot be cleaned. Practice good housekeeping.

ENVIRONMENTAL CONTROLS
See Sections 6, 7, 12, 13.

SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

Typical physical and chemical properties are given below. Consult the Supplier in Section 1 for additional data.

GENERAL INFORMATION
Physical State: Liquid
Form: Clear
Color: Amber
Odor: Characteristic
Odor Threshold: N/D

IMPORTANT HEALTH, SAFETY, AND ENVIRONMENTAL INFORMATION
Relative Density (at 15 C): 0.86
Flash Point [Method]: 200C (392F) [ASTM D-92]
Flammable Limits (Approximate volume % in air): LEL: 0.9 UEL: 7.0
Autoignition Temperature: 315°C (599°F)
Boiling Point / Range: 340C (644F) - 600C (1112F)
Vapor Density (Air = 1): > 2 at 101 kPa
Vapor Pressure: [N/D at 20 °C] ; < 1 kPa (7.5 mm Hg) at 38C
Evaporation Rate (n-butyl acetate = 1): < 0.1
pH: N/A
Log Pow (n-Octanol/Water Partition Coefficient): > 3.5
Solubility in Water: Negligible
Viscosity: >20 cSt (20 mm2/sec) at 40 C ; 10.7 cSt (10.7 mm2/sec) at 100C
Oxidizing Properties: See Sections 3, 15, 16.

OTHER INFORMATION

Freezing Point: N/D
Melting Point: N/A
Pour Point: -30°C (-22°F)
DMSO Extract (mineral oil only), IP-346: < 3 %wt

SECTION 10 STABILITY AND REACTIVITY

STABILITY: Material is stable under normal conditions.

CONDITIONS TO AVOID: Excessive heat. High energy sources of ignition.

MATERIALS TO AVOID: Strong oxidizers

HAZARDOUS DECOMPOSITION PRODUCTS: Material does not decompose at ambient temperatures.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION 11 TOXICOLOGICAL INFORMATION

ACUTE TOXICITY

Route of Exposure	Conclusion / Remarks
Inhalation	
Toxicity (Rat): LC50 > 5000 mg/m3	Minimally Toxic. Based on test data for structurally similar materials.
Irritation: No end point data.	Negligible hazard at ambient/normal handling temperatures. Based on assessment of the components.
Ingestion	
Toxicity (Rat): LD50 > 2000 mg/kg	Minimally Toxic. Based on test data for structurally similar materials.
Skin	
Toxicity (Rabbit): LD50 > 2000 mg/kg	Minimally Toxic. Based on test data for structurally similar materials.
Irritation (Rabbit): Data available.	Negligible irritation to skin at ambient temperatures. Based on test data for structurally similar materials.
Eye	
Irritation (Rabbit): Data available.	May cause mild, short-lasting discomfort to eyes. Based on test data for structurally similar materials.

CHRONIC/OTHER EFFECTS

For the product itself:

Diesel engine oils: Not carcinogenic in animals tests. Used and unused diesel engine oils did not produce any carcinogenic effects in chronic mouse skin painting studies.
Oils that are used in gasoline engines may become hazardous and display the following properties: Carcinogenic in animal tests. Caused mutations in vitro. Possible allergen and photoallergen. Contains polycyclic aromatic compounds (PAC) from combustion products of gasoline and/or thermal degradation products.

Contains:

Base oil severely refined: Not carcinogenic in animal studies. Representative material passes IP-346. Modified Ames test, and/or other screening tests. Dermal and inhalation studies showed minimal effects; lung non-specific infiltration of immune cells, oil deposition and minimal granuloma formation. Not sensitizing in test animals.

Additional information is available by request.

The following ingredients are cited on the lists below: None.

--REGULATORY LISTS SEARCHED--

1 = NTP CARC	3 = IARC 1	5 = IARC 2B
2 = NTP SUS	4 = IARC 2A	6 = OSHA CARC

SECTION 12 ECOLOGICAL INFORMATION

The information given is based on data available for the material, the components of the material, and similar materials.

ECOTOXICITY

Material – Not expected to be harmful to aquatic organisms.

MOBILITY

Base oil component -- Low solubility and floats and is expected to migrate from water to the land. Expected to partition to sediment and wastewater solids.

PERSISTENCE AND DEGRADABILITY

Biodegradation:

Base oil component -- Expected to be inherently biodegradable

BIOACCUMULATION POTENTIAL

Base oil component -- Has the potential to bioaccumulate, however metabolism or physical properties may reduce the bioconcentration or limit bioavailability.

SECTION 13 DISPOSAL CONSIDERATIONS

Disposal recommendations based on material as supplied. Disposal must be in accordance with current applicable laws and regulations, and material characteristics at time of disposal.

DISPOSAL RECOMMENDATIONS

Dispose of waste at an appropriate treatment & disposal facility in accordance with applicable laws and regulations, and product characteristics at time of disposal. Product is suitable for burning in an enclosed controlled burner for fuel value or disposal by supervised incineration at very high temperatures to prevent formation of undesirable combustion products. Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by supervised incineration.

REGULATORY DISPOSAL INFORMATION

RCRA Information: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous

4 = OSHA Z	9 = TSCA 12b	14 = LA RTK	19 = RI RTK
5 = TSCA 4	10 = CA P65 CARC	15 = MI 293	

Code key: CARC=Carcinogen; REPRO=Reproductive

SECTION 16 OTHER INFORMATION

N/D = Not determined, N/A = Not applicable

THIS SAFETY DATA SHEET CONTAINS THE FOLLOWING REVISIONS:
No revision information is available.

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Internal Use Only
MHC: 0, 0, 0, 0, 0, 0 PPEC: A

DGN: 5013285 (1002629)

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DGN: 5013285 (1002629)

USED OIL

MATERIAL SAFETY INFORMATION SHEET

safety-kleen.

SECTION 1: PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: USED OIL

SYNONYMS: Waste oil; Used lubricating oil; Oil and water mixture

PRODUCT PART NUMBER(S): Not applicable.

PRODUCT USE: Oil or water mixture for re-refining or reprocessing.
If this product is used in combination with other products, refer to the Material Safety Data Sheets for those products.

These numbers are for emergency use only. If you desire non-emergency product information, please call a phone number listed below.

24-HOUR EMERGENCY PHONE NUMBERS

MEDICAL:	TRANSPORTATION (SPILL):
1-800-752-7869	1-800-468-1760

MANUFACTURER/ SUPPLIER: Safety-Kleen Systems, Inc.
5400 Legacy Drive
Cluster II, Building 3
Plano, Texas 75024
USA
1-800-669-5740
www.Safety-Kleen.com

TECHNICAL INFORMATION: **1-800-669-5740 Press 1 then 1 then Extension 7500**

MSDS FORM NUMBER: 81451 **ISSUE:** May 12, 2004

ORIGINAL ISSUE: January 15, 1990 **SUPERSEDES:** February 6, 2003

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

SECTION 2: COMPOSITION/INFORMATION ON INGREDIENTS

WT%	NAME	SYNONYM	CAS NO.	OSHA PEL TWA	OSHA PEL STEL	ACGIH TLV® TWA	ACGIH TLV® STEL	LD[a]	LC[b]
80 to 100	Lubricating oils, used	Used oil	70514-12-4	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.
0 to 20*	Water/solids	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.
0 to 10*	Hydrocarbon solvents. May include gasoline, diesel fuel, jet fuel, mineral spirits, etc.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.
0 to 1.5*	Metals. May include lead, iron, zinc, copper, chromium, arsenic, nickel, and others: each below 1.0 WT%.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.
0 to 1.0*	Polynuclear aromatics. May include naphthalene, fluoranthene, phenanthrene, pyrene, and others: each below 0.3 WT%.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.
0 to 0.5*	Chlorinated solvents.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.	N. Av.

N.Av. = Not Available

*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 LD_{50} (mg/kg)

[b]Inhalation-Rat LC_{50}

SECTION 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE

Liquid, black and viscous (thick), petroleum odor.

WARNING!

PHYSICAL HAZARDS

Combustible liquid.

HEALTH HAZARDS

May be harmful if inhaled.
May be harmful if absorbed through skin.
May be harmful or fatal if swallowed.
May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin.
Suspect cancer hazard. Contains material which can cause cancer. Risk of cancer depends on duration and level of exposure.
Contains material which can cause birth defects.
Contains material which can cause lung, liver, kidney, skin, and/or central nervous system damage.

ENVIRONMENTAL HAZARDS

Product may be toxic to fish, plants, wildlife, and/or domestic animals.

POTENTIAL HEALTH EFFECTS

Effects may vary depending on material composition. Typical effects may include:

INHALATION (BREATHING): High concentrations of vapor or mist may be harmful if inhaled. High concentrations of vapor or mist may irritate the respiratory tract (nose, throat, and lungs). High concentrations of vapor or mist may cause nausea, vomiting, headaches, dizziness, loss of coordination, numbness, and other central nervous system effects. Massive acute overexposure may cause rapid central nervous system depression, sudden collapse, coma, and/or death.

EYES: May cause irritation.

SKIN: May cause irritation. Product may be absorbed through the skin and cause harm as noted under **INHALATION (BREATHING)**.

INGESTION (SWALLOWING): May be harmful or fatal if swallowed. May cause throat irritation, nausea, vomiting, and central nervous system effects as noted under **INHALATION (BREATHING)**. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Individuals with pre-existing cardiovascular, liver, kidney, respiratory tract (nose, throat, and lungs), central nervous system, eye, and/or skin disorders may have increased susceptibility to the effects of exposure.

CHRONIC: Prolonged or repeated inhalation may cause oil pneumonia, lung tissue inflammation, fibrous tissue formation, and/or toxic effects as noted under **INHALATION (BREATHING)**. Prolonged or repeated eye contact may cause inflammation of the membrane lining the eyelids and covering the eyeball (conjunctivitis). Prolonged or repeated skin contact may cause drying, cracking, redness, itching, and/or swelling (dermatitis).

CANCER INFORMATION: This product contains mineral oils, untreated or mildly treated, which can cause cancer. This product may contain hydrocarbon and chlorinated solvents; metals, and polynuclear aromatics which can cause cancer. Risk of cancer depends on duration and level of exposure. For more information, see **SECTION 11: CARCINOGENICITY**.

POTENTIAL ENVIRONMENTAL EFFECTS

Product may be toxic to fish, plants, wildlife, and/or domestic animals.
Also see **SECTION 12: ECOLOGICAL INFORMATION**.

SECTION 4: FIRST AID MEASURES

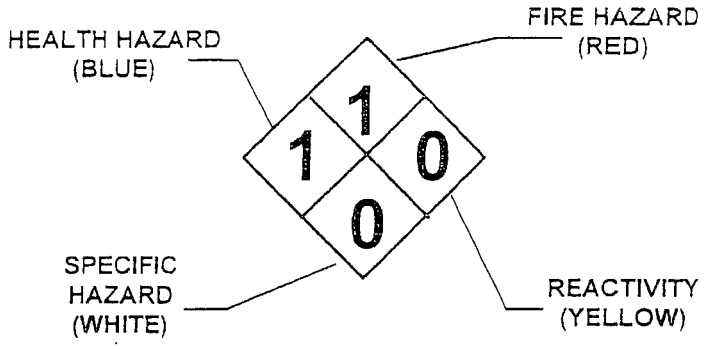
INHALATION: (BREATHING)	Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Oxygen should only be administered by qualified personnel. Someone should stay with victim. Get medical attention if breathing difficulty persists.
EYES:	If irritation or redness from exposure to vapor develops, move away from exposure into fresh air. Upon contact, immediately flush eyes with plenty of lukewarm water, holding eyelids apart, for 15 minutes. Get medical attention.
SKIN:	Remove affected clothing and shoes. Wash skin thoroughly with soap and water. Get medical attention if irritation or pain develops or persists.
INGESTION: (SWALLOWING)	Do NOT induce vomiting. Immediately get medical attention. Call 1-800-752-7869 for additional information. If spontaneous vomiting occurs, keep head below hips to avoid breathing the product into the lungs. Never give anything to an unconscious person by mouth.
NOTE TO PHYSICIANS:	Treat symptomatically and supportively. Treatment may vary with condition of victim and specifics of incident. Call 1-800-752-7869 for additional information.

SECTION 5: FIRE FIGHTING MEASURES

FLASH POINT:	>200°F (93°C) (minimum) Pensky-Martens Closed Cup
FLAMMABLE LIMITS IN AIR:	Not available.
AUTOIGNITION TEMPERATURE:	Not available.
HAZARDOUS COMBUSTION PRODUCTS:	Decomposition and combustion materials may be toxic. Burning may produce phosgene gas, nitrogen oxides, carbon monoxide, and unidentified organic compounds.
CONDITIONS OF FLAMMABILITY:	Heat, sparks, or flame. Product may burn but does not ignite readily.
EXTINGUISHING MEDIA:	Use carbon dioxide, regular foam, dry chemical, water spray, or water fog.

NFPA 704
HAZARD
IDENTIFICATION:

This information is intended solely for the use by individuals trained in this system.



FIRE FIGHTING INSTRUCTIONS:

Keep storage containers cool with water spray. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.

FIRE AND EXPLOSION HAZARDS:

Heated containers may rupture. "Empty" containers may retain residue and can be dangerous. Product is not sensitive to mechanical impact. Product may be sensitive to static discharge, which could result in fire or explosion.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION**. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface waters and sewers. Contain spill as a liquid for possible recovery, or sorb with compatible sorbent material and shovel with a clean, sparkproof tool into a sealable container for disposal.

Additionally, for large spills. Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

There may be specific federal regulatory reporting requirements associated with spills, leaks, or releases of this product. Also see **SECTION 15: REGULATORY INFORMATION.**

SECTION 7: HANDLING AND STORAGE

HANDLING: Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. Use clean, sparkproof tools and explosion-proof equipment. When transferring product, storage tanks, tanker trucks, and rail tank cars should be grounded and bonded. Do not breathe vapor or mist. Use in a well ventilated area. Avoid contact with eyes, skin, clothing, and shoes. Do not smoke while using this product.

SHIPPING AND STORING: Keep container tightly closed when not in use and during transport. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Empty product containers may retain product residue and can be dangerous. See **SECTION 14: TRANSPORT INFORMATION** for Packing Group information.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Use general ventilation, process enclosures, local exhaust ventilation, or other engineering controls to control air-borne levels. Where explosive mixtures may be present, equipment safe for such locations should be used.

PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION: A respiratory protection program which meets USA's OSHA General Industry Standard 29 CFR 1910.134 or Canada's CSA Standard Z94.4-M1982 requirements must be followed whenever workplace conditions warrant a respirator's use. Consult a qualified Industrial Hygienist or Safety Professional for respirator selection guidance.

EYE PROTECTION: Wearing chemical goggles is recommended.
Contact lens may be worn with eye protection.

SKIN PROTECTION: Where prolonged or repeated skin contact is likely, wear neoprene, nitrile (4 mil minimum), PVC (polyvinyl chloride), or equivalent protective gloves; wearing natural rubber or equivalent gloves is not recommended.

When product is heated and skin contact is likely, wear heat-insulating gloves, boots, and other protective clothing.

To avoid prolonged or repeated contact with product where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, whole body suits, or other protective clothing.

PERSONAL HYGIENE:	Wash thoroughly with soap and water after handling product and before eating, drinking, or using tobacco products. Clean affected clothing, shoes, and protective equipment before reuse. Discard affected clothing, shoes, and/or protective equipment if they cannot be thoroughly cleaned. Discard leather articles, such as shoes, saturated with the product.
OTHER PROTECTIVE EQUIPMENT:	Where spills and splashes are likely, facilities storing or using this product should be equipped with an emergency eyewash and shower, both equipped with clean water, in the immediate work area.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE, APPEARANCE, AND ODOR:	Liquid, black and viscous (thick), petroleum odor.
ODOR THRESHOLD:	Not available.
MOLECULAR WEIGHT:	Not applicable.
SPECIFIC GRAVITY:	0.8 to 1.0 at 60°F (15.6°C) (water = 1)
DENSITY:	6.7 to 8.3 LB/US gal (800 to 1000 g/l) (approximately)
VAPOR DENSITY:	greater than 1 (air = 1) (based on kerosene)
VAPOR PRESSURE:	Not available.
BOILING POINT:	Not available.
FREEZING/MELTING POINT:	Not available.
pH:	Not applicable.
EVAPORATION RATE:	less than 1 (butyl acetate = 1)
SOLUBILITY IN WATER:	Slight.
FLASH POINT:	>200°F (93°C) (minimum) Pensky-Martens Closed Cup
FLAMMABLE LIMITS IN AIR:	Not available.
AUTOIGNITION TEMPERATURE:	Not available.

SECTION 10: STABILITY AND REACTIVITY

STABILITY: Stable under normal temperatures and pressures. Avoid heat, sparks, or flame.

INCOMPATIBILITY: Avoid acids, alkalies, oxidizing agents, reducing agents, reactive halogens, or reactive metals.

REACTIVITY: Polymerization is not known to occur under normal temperatures and pressures. Not reactive with water.

HAZARDOUS DECOMPOSITION PRODUCTS: None under normal temperatures and pressures. Also see **SECTION 5: HAZARDOUS COMBUSTION PRODUCTS.**

SECTION 11: TOXICOLOGICAL INFORMATION

SENSITIZATION: Based on best current information, there may be known human sensitization associated with this product.

MUTAGENICITY: Based on best current information, there may be mutagenicity associated with this product.

CARCINOGENICITY: Mineral oils, untreated or mildly treated are listed by IARC as a known carcinogen. Mineral oils, untreated or mildly treated are classified by NTP as having limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals.

There may be hydrocarbon and chlorinated solvents; metals, and polynuclear aromatics present in this product which are listed by OSHA as known carcinogens. There may be hydrocarbon and chlorinated solvents; metals, and polynuclear aromatics present in this product which are listed by IARC as known, probable, or possible carcinogens. There may be hydrocarbon and chlorinated solvents; metals, and polynuclear aromatics present in this product which are classified by NTP as known carcinogens or as having limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals. There may be hydrocarbon and chlorinated solvents; metals, and polynuclear aromatics present in this product which are recognized by ACGIH as confirmed or suspected human carcinogens.

Also see **SECTION 3: CANCER INFORMATION.**

REPRODUCTIVE TOXICITY:	Based on best current information, there may be reproductive toxicity associated with this product.
TERATOGENICITY:	Based on best current information, there may be teratogenicity associated with this product.
TOXICOLOGICALLY SYNERGISTIC PRODUCT(S):	Based on best current information, there may be toxicologically synergistic products associated with this product.

SECTION 12: ECOLOGICAL INFORMATION

ECOTOXICITY:	Not available.
OCTANOL/WATER PARTITION COEFFICIENT:	Not available.
VOLATILE ORGANIC COMPOUNDS:	Not available. As per 40 CFR Part 51.100(s).

SECTION 13: DISPOSAL CONSIDERATIONS

Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding proper recycling or disposal.

SECTION 14: TRANSPORT INFORMATION

DOT:	Not regulated.
TDG:	Not regulated.
EMERGENCY RESPONSE GUIDE NUMBER:	Not applicable. Reference *North American Emergency Response Guidebook*

SECTION 15: REGULATORY INFORMATION

USA REGULATIONS SARA SECTIONS 302 AND 304:	Based on the ingredient(s) listed in **SECTION 2**, this product does not contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.
SARA SECTIONS	This product poses the following physical and health hazards as

311 AND 312:	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 (SARA): Immediate (Acute) Health Hazard Delayed (Chronic) Health Hazard
SARA SECTION 313:	This product may contain "toxic" chemicals subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.
CERCLA:	This product may contain "hazardous substances" listed pursuant to Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4.
TSCA:	Not available.
CALIFORNIA:	This product is not for sale or use in the State of California.

CANADIAN REGULATIONS

WHMIS: Not regulated

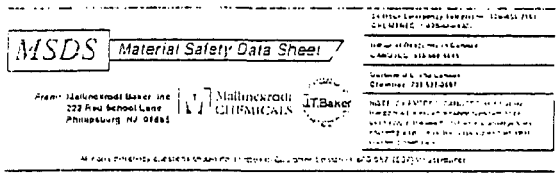
CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA): Not available.

SECTION 16: OTHER INFORMATION

REVISION INFORMATION: Update to Section 2.

LABEL/OTHER INFORMATION: Not available.

MSDS Number: E5125 * * * * * Effective Date: 11/09/96 * * * * * Supercedes: 03/15/04



ETHYLENE GLYCOL

1. Product Identification

Synonyms: 1,2-Ethanediol; glycol; 1,2-Dihydroxyethane; Ethylene Alcohol; Ethulene Dihydrate
CAS No.: 107-21-1
Molecular Weight: 62.07
Chemical Formula: CH2OHCH2OH
Product Codes:
J.T. Baker: 5387, 5845, 9140, 9298, 9300, 9346, 9356, L715
Mallinckrodt: 5001, 5037

2. Composition/Information on Ingredients

Ingredient	CAS No	Percent	Hazardous
Ethylene Glycol	107-21-1	99 - 100%	Yes

3. Hazards Identification

Emergency Overview

WARNING! HARMFUL OR FATAL IF SWALLOWED. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN. MAY CAUSE ALLERGIC SKIN REACTION. MAY CAUSE IRRITATION TO SKIN, EYES, AND RESPIRATORY TRACT. AFFECTS CENTRAL NERVOUS SYSTEM.

SAF-T-DATA(tm) Ratings (Provided here for your convenience)

Health Rating: 2 - Moderate (Life)
Flammability Rating: 1 - Slight
Reactivity Rating: 1 - Slight
Contact Rating: 3 - Severe (Life)
Lab Protective Equip: GOGGLES & SHIELD; LAB COAT & APRON; VENT HOOD; PROPER GLOVES
Storage Color Code: Green (General Storage)

Potential Health Effects

Inhalation:
Vapor inhalation is generally not a problem unless heated or misted. Exposure to vapors over an extended time period has caused throat irritation and headache. May cause nausea, vomiting, dizziness and drowsiness. Pulmonary edema and central nervous system depression may also develop. When heated or misted, has produced rapid, involuntary eye movement and coma.
Ingestion:
Initial symptoms in massive dosage parallel alcohol intoxication, progressing to CNS depression, vomiting, headache, rapid respiratory and heart rate, lowered blood pressure, stupor, collapse, and unconsciousness with convulsions. Death from respiratory arrest or cardiovascular collapse may follow. Lethal dose in humans: 100 ml (3-4 ounces).
Skin Contact:
Minor skin irritation and penetration may occur.
Eye Contact:
Splashes may cause irritation, pain, eye damage.
Chronic Exposure:
Repeated small exposures by any route can cause severe kidney problems. Brain damage may also occur. Skin allergy can develop. May damage the developing fetus.
Aggravation of Pre-existing Conditions:
Persons with pre-existing skin disorders, eye problems, or impaired liver, kidney, or respiratory function may be more susceptible to the effects of this substance

4. First Aid Measures

Inhalation:
Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.
Ingestion:
Induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person. Get medical attention.
Skin Contact:
Remove any contaminated clothing. Wash skin with soap and water for at least 15 minutes. Get medical attention if irritation develops or persists.
Eye Contact:
Immediately flush eyes with plenty of water for at least 15 minutes, lifting lower and upper eyelids occasionally. Get medical attention immediately.

Note to Physician:

Give sodium bicarbonate intravenously to treat acidosis. Urinalysis may show low specific gravity, proteinuria, pyuria, cylindruria, hematuria, calcium oxide, and hippuric acid crystals. Ethanol can be used in antidotal treatment but monitor blood glucose when administering ethanol because it can cause hypoglycemia. Consider infusion of a diuretic such as mannitol to help prevent or control brain edema and hemodialysis to remove ethylene glycol from circulation.

5. Fire Fighting Measures

Fire:
Flash point: 111C (232F) CC
Autoignition temperature: 398C (748F)
Flammable limits in air % by volume:
lel: 3.2; uel: 15.3
Slight to moderate fire hazard when exposed to heat or flame.
Explosion:
Above flash point, vapor-air mixtures are explosive within flammable limits noted above. Containers may explode when involved in a fire.
Fire Extinguishing Media:
Dry chemical, foam or carbon dioxide. Water or foam may cause frothing. Water spray may be used to extinguish surrounding fire and cool exposed containers. Water spray will also reduce fume and irritant gases.
Special Information:
In the event of a fire, wear full protective clothing and NIOSH-approved self-contained breathing apparatus with full facepiece operated in the pressure demand or other positive pressure mode. Toxic gases and vapors may be released if involved in a fire.

6. Accidental Release Measures

Ventilate area of leak or spill. Remove all sources of ignition. Wear appropriate personal protective equipment as specified in Section 8. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Contain and recover liquid when possible. Use non-sparking tools and equipment. Collect liquid in an appropriate container or absorb with an inert material (e. g., vermiculite, dry sand, earth), and place in a chemical waste container. Do not use combustible materials, such as saw dust. Do not flush to sewer! US Regulations (CERCLA) require reporting spills and releases to soil, water and air in excess of reportable quantities. The toll free number for the US Coast Guard National Response Center is (800) 424-8802.

7. Handling and Storage

Keep in a tightly closed container, stored in a cool, dry, ventilated area. Protect against physical damage. Separate from acids and oxidizing materials. Containers of this material may be hazardous when empty since they retain product residues (vapors, liquid); observe all warnings and precautions listed for the product.

8. Exposure Controls/Personal Protection

Airborne Exposure Limits:
-OSHA Permissible Exposure Limit (PEL):
50 ppm Ceiling

-ACGIH Threshold Limit Value (TLV):
50 ppm Ceiling (vapor)
Ventilation System:
A system of local and/or general exhaust is recommended to keep employee exposures below the Airborne Exposure Limits. Local exhaust ventilation is generally preferred because it can control the emissions of the contaminant at its source, preventing dispersion of it into the general work area. Please refer to the ACGIH document, *Industrial Ventilation, A Manual of Recommended Practices*, most recent edition, for details.
Personal Respirators (NIOSH Approved):
If the exposure limit is exceeded, a half-face respirator with an organic vapor cartridge and particulate filter (NIOSH type P95 or R95 filter) may be worn for up to ten times the exposure limit or the maximum use concentration specified by the appropriate regulatory agency or respirator supplier, whichever is lowest. A full-face piece respirator with an organic vapor cartridge and particulate filter (NIOSH P100 or R100 filter) may be worn up to 50 times the exposure limit, or the maximum use concentration specified by the appropriate regulatory agency or respirator supplier, whichever is lowest. Please note that N series filters are not recommended for this material. For emergencies or instances where the exposure levels are not known, use a full-face piece positive-pressure, air-supplied respirator. WARNING: Air-purifying respirators do not protect workers in oxygen-deficient atmospheres.
Skin Protection:
Wear protective gloves and clean body-covering clothing.
Eye Protection:
Use chemical safety goggles. Maintain eye wash fountain and quick-drench facilities in work area.

9. Physical and Chemical Properties

Appearance:
Clear oily liquid.
Odor:
Odorless.
Solubility:
Miscible in water.
Specific Gravity:
1.1 @20C/4C
pH:
No information found.
% Volatiles by volume @ 21C (70F):
100
Boiling Point:
197.6C (388F)
Melting Point:
-13C (9F)
Vapor Density (Air=1):
2.14
Vapor Pressure (mm Hg):
0.06 @ 20C (68F)
Evaporation Rate (BuAc=1):
No information found.

10. Stability and Reactivity

Stability:
Stable under ordinary conditions of use and storage.
Hazardous Decomposition Products:
Carbon dioxide and carbon monoxide may form when heated to decomposition. May produce acrid smoke and irritating fumes when heated to decomposition
Hazardous Polymerization:
Will not occur.
Incompatibilities:
Strong oxidizing agents. Reacts violently with chlorosulfonic acid, oleum, sulfuric acid, perchloric acid. Causes ignition at room temperature with chromium trioxide, potassium permanganate and sodium peroxide, causes ignition at 212F(100C) with ammonium dichromate, silver chlorate, sodium chloride and uranyl nitrate.
Conditions to Avoid:
Heat, flames, ignition sources, water (absorbs readily) and incompatibles.

11. Toxicological Information

Toxicological Data:
Oral rat LD50: 4700 mg/kg; skin rabbit LD50: 9530 mg/kg.
Irritation - skin rabbit: 555mg(open), mild; eye rabbit: 500mg/24H, mild.
Investigated as a tumorigen, mutagen, reproductive effector.
Reproductive Toxicity:
Has shown teratogenic effects in laboratory animals.

--------\Cancer Lists\----------

Ingredient	---NTP Carcinogen--- Known	Anticipated	IARC Category
Ethylene Glycol (107-21-1)	No	No	None

12. Ecological Information

Environmental Fate:
When released into the soil, this material is expected to readily biodegrade. When released into the soil, this material is expected to leach into groundwater. When released into the soil, this material is not expected to evaporate significantly. When released into water, this material is expected to readily biodegrade. When released into the water, this material is expected to have a half-life between 1 and 10 days. This material is not expected to significantly bioaccumulate. This material has a log octanol-water partition coefficient of less than 3.0. When released into water, this material is not expected to evaporate significantly. When released into the air, this material is expected to be readily degraded by reaction with photochemically produced hydroxyl radicals. When released into the air, this material is expected to have a half-life between 1 and 10 days.
Environmental Toxicity:
The LC50/96-hour values for fish are over 100 mg/l.

13. Disposal Considerations

Whatever cannot be saved for recovery or recycling should be managed in an appropriate and approved waste disposal facility. Processing, use or contamination of this product may change the waste management options. State and local disposal regulations may differ from federal disposal regulations. Dispose of container and unused contents in accordance with federal, state and local requirements.

14. Transport Information

Not regulated.

15. Regulatory Information

--------\Chemical Inventory Status - Part 1\----------

Ingredient	TSCA	EC	Japan	Australia
Ethylene Glycol (107-21-1)	Yes	Yes	Yes	Yes

--------\Chemical Inventory Status - Part 2\----------

Ingredient	Korea	--Canada-- DSL	NDSL	Phil.
Ethylene Glycol (107-21-1)	Yes	Yes	No	Yes

--------\Federal, State & International Regulations - Part 1\----------

Ingredient	-SARA 302- RQ	TPQ	------SARA 313------ List	Chemical Catg.
Ethylene Glycol (107-21-1)	No	No	Yes	No

--------\Federal, State & International Regulations - Part 2\----------

Ingredient	CERCLA	-RCRA- 261.33	-TSCA- 8(d)
Ethylene Glycol (107-21-1)	5000	No	No

Chemical Weapons Convention: No TSCA 12(b): No CDTA: No
SARA 311/312: Acute: Yes Chronic: Yes Fire: No Pressure: No
Reactivity: No (Pure / Liquid)

Australian Hazchem Code: None allocated.
Poison Schedule: None allocated.
WHMIS:
This MSDS has been prepared according to the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all of the information required by the CPR.

16. Other Information

NFPA Ratings: Health: 1 Flammability: 1 Reactivity: 0
Label Hazard Warning:
WARNING! HARMFUL OR FATAL IF SWALLOWED. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN. MAY CAUSE ALLERGIC SKIN REACTION. MAY CAUSE IRRITATION TO SKIN, EYES, AND RESPIRATORY TRACT. AFFECTS CENTRAL NERVOUS SYSTEM.
Label Precautions:
Do not breathe vapor or mist.
Use only with adequate ventilation.
Keep container closed.
Avoid contact with eyes, skin and clothing.
Wash thoroughly after handling.
Label First Aid:
If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. In case of contact, immediately flush skin or eyes with plenty of water for at least 15 minutes. Call a physician if irritation develops or persists. If swallowed, give water or milk to drink and induce vomiting. Never give anything by mouth to an unconscious person. In all cases call a physician.
Product Use:
Laboratory Reagent.
Revision Information:
No Information Found.
Disclaimer:

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Prepared by: Environmental Health & Safety
Phone Number: (314) 654-1600 (U.S.A.)

USED ANTIFREEZE
MATERIAL SAFETY INFORMATION SHEET FOR USA AND CANADA

safety-kleen

SECTION 1: PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: USED ANTIFREEZE

SYNONYMS: 1,2-Ethanediol; 1,2-Ethylene glycol; 2-Hydroxyethanol; Ethylene alcohol

PRODUCT CODE: Prefix 95P

PRODUCT USE: Used automotive coolant.
If this product is used in combination with other products, refer to the Material Safety Data Sheet for those products.

	24-HOUR EMERGENCY PHONE NUMBERS	
These numbers are for emergency use only. If you desire non-emergency product information, please call a phone number listed below.	**MEDICAL:**	**TRANSPORTATION (SPILL):**
	1-800-752-7869	**1-800-468-1760**

SUPPLIER: Safety-Kleen
5400 Legacy Drive
Cluster II, Building 3
Plano, Texas 75024
USA
1-800-669-5740

TECHNICAL INFORMATION: 1-800-669-5740 Press 1 then Enter 7500

MSDS FORM NUMBER: 82912 **ISSUE:** February 20, 2003

ORIGINAL ISSUE: February 20, 2003 **SUPERSEDES:** Not applicable.

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

SECTION 2: COMPOSITION/INFORMATION ON INGREDIENTS

				OSHA PEL**		ACGIH TLV®			
WT%	NAME	SYNONYM	CAS NO.	TWA	STEL	TWA	STEL	LD[a]	LC[b]
30-87	Water	N.Av.	7732-18-5	N.Av.	N.Av.	N.Av.	N.Av.	N.Av.	N.Av.
2-68	Ethylene glycol	1,2-Ethanediol; 1,2-Dihydroxyethane	107-21-1	N.Av.	N.Av.	N.Av.	N.Av.	4700 mg/kg (9530 uL/kg)[c]	10876 mg/kg
4-44	1,2-Propylene glycol	N.Av.	57-55-6	N.Av.[d]	N.Av.	N.Av.	N.Av.	20 gm/kg (20800 mg/kg)[c]	N.Av.
1-2	Diethylene glycol	2,2'-oxybis-ethanol	111-46-6	N.Av.[e]	N.Av.	N.Av.	N.Av.	12565 mg/kg (11890 mg/kg)[c]	N.Av.

**OSHA Final PEL value (enforceable). Some States have adopted more stringent values.
N.Av. = Not Available
[a]Oral-Rat LD_{50}
[b]Inhalation-Rat LC_{50}
[c]Skin-Rabbit LD_{50}
[d]AIHA recommended TWA 50 ppm
[e]AIHA recommended TWA 10mg/m[3]

SECTION 3: HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE
Liquid, green, sweet odor. Syrupy.

DANGER!

HEALTH HAZARDS
May be harmful if inhaled.
May be fatal if swallowed.
May irritate the respiratory tract (nose, throat, and lungs), eyes, and skin. Contains material which may cause birth defects. Contains material which may cause lung, kidney, liver, central nervous system, and eye damage.

POTENTIAL HEALTH EFFECTS

INHALATION (BREATHING): This product is not likely to present an inhalation hazard at normal temperatures and pressures. However, when aerosolizing, misting, or heating this product, high concentrations of generated vapor or mist may irritate the respiratory tract (nose, throat, and lungs). High concentrations of vapor or mist may be harmful if inhaled. High concentrations of vapor or mist may cause liver, lung, and kidney damage. High concentrations of vapor or mist may cause nausea, vomiting, headaches, dizziness, loss of coordination, numbness, and other central nervous system effects. Massive acute overexposure may cause rapid central nervous system depression, sudden collapse, coma, and/or death.

EYES: May cause irritation. May cause inflammation of the iris, ciliary body, and the membrane lining the eyelids and covering the eyeball (conjunctivitis). May cause corneal damage.

SKIN: May cause irritation. Not likely to be absorbed through the skin in harmful amounts.

INGESTION (SWALLOWING): May be fatal if swallowed. The estimated lethal dose is 100 ml (3.4 ounces). May damage lung, liver, and kidneys. May cause throat irritation, nausea, vomiting, central nervous system effects as noted under **INHALATION (BREATHING)**, unconsciousness, coma, and death. Breathing product into the lungs during ingestion or vomiting may cause lung injury and possible death.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Individuals with pre-existing liver, kidney, respiratory tract (nose, throat, and lungs), central nervous system, eye, and/or skin disorders may have increased susceptibility to the effects of exposure.

CHRONIC: Prolonged or repeated inhalation may cause toxic effects as noted under **INHALATION (BREATHING)**. Prolonged or repeated eye contact may cause blindness. Prolonged or repeated skin contact may cause drying, cracking, redness, itching, and/or swelling (dermatitis). Prolonged or repeated exposure may have reproductive toxicity, teratogenic, or mutagenic effects.

CANCER INFORMATION: No known carcinogenicity. For more information, see **SECTION 11: CARCINOGENICITY**.

POTENTIAL ENVIRONMENTAL EFFECTS
Not available. Also see **SECTION 12: ECOLOGICAL INFORMATION**.

SECTION 4: FIRST AID MEASURES

INHALATION (BREATHING): Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Oxygen should only be administered by qualified personnel. Someone should stay with victim. Get medical attention if breathing difficulty persists.

EYES: If irritation or redness from exposure to vapor develops, move away from exposure into fresh air. Upon contact, immediately flush eyes with plenty of lukewarm water, holding eyelids apart, for 15 minutes. Get medical attention.

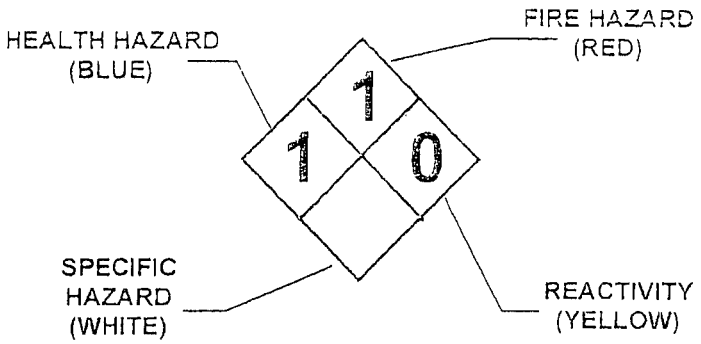
SKIN: Remove affected clothing and shoes. Wash skin thoroughly with soap and water. Get medical attention if irritation or pain develops or persists.

INGESTION (SWALLOWING): Do NOT induce vomiting. Immediately get medical attention. Call 1-800-752-7869 for additional information. If spontaneous vomiting occurs, keep head below hips to avoid breathing the product into the lungs. Never give anything to an unconscious person by mouth.

NOTE TO PHYSICIANS:	Treat symptomatically and supportively. Administration of gastric lavage, if warranted, should be performed by qualified medical personnel. Treatment may vary with condition of victim and specifics of incident. Call 1-800-752-7869 for additional information. Ethylene glycol is metabolized by alcohol dehydrogenase to various metabolites including glycoaldehyde, glycolic acid, and oxalic acid. The signs and symptoms in ethylene glycol poisoning are those of metabolic acidosis, central nervous system depression, and kidney damage. 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. As a competitive substrate for alcohol dehydrogenase, ethanol is antidotal when given in the early stages of intoxication because it blocks the formation of nephrotoxic metabolites. A more effective intravenous antidote is 4-methylpyrazole, a potent inhibitor of alcohol dehydrogenase, which effectively blocks the formation of toxic metabolites. Pulmonary edema with hypoxia has been described in a number of patients following ethylene glycol poisoning. Respiratory support with mechanical ventilation and positive end expiratory pressure may be required. There may be cranial nerve involvement in the later stages of toxicity from swallowing ethylene glycol. Effects have been reported presenting bilateral facial paralysis, diminished hearing, and dysphagia.

SECTION 5: FIRE FIGHTING MEASURES

FLASH POINT:	>200°F (>93.3°C)	
FLAMMABLE LIMITS IN AIR:	**LOWER:** 3.2 VOL% (ethylene glycol)	**UPPER:** 15.3 VOL% (ethylene glycol)
AUTOIGNITION TEMPERATURE:	748°F (398°C) (ethylene glycol)	
HAZARDOUS COMBUSTION PRODUCTS:	Decomposition and combustion materials may be toxic. Burning may produce carbon monoxide and unidentified organic compounds.	
CONDITIONS OF FLAMMABILITY:	Heat, sparks, or flame. Products may burn, but do not ignite readily.	
EXTINGUISHING MEDIA:	Carbon dioxide, alcohol-resistant foam, dry chemical, water spray, or water fog. Water or foam may cause frothing.	
NFPA 704 HAZARD IDENTIFICATION:	This information is intended solely for the use by individuals trained in this system.	



FIRE FIGHTING INSTRUCTIONS: Keep storage containers cool with water spray. A positive-pressure, self-contained breathing apparatus (SCBA) and full-body protective equipment are required for fire emergencies.

FIRE AND EXPLOSION HAZARDS: Vapors will spread along the ground and collect in low or confined areas. Heated containers may rupture or be thrown into the air. "Empty" containers may retain residue and can be dangerous. Product is not sensitive to mechanical impact or static discharge.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Remove all ignition sources. Do not touch or walk through spilled product. Stop leak if you can do it without risk. Wear protective equipment and provide engineering controls as specified in **SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION.** Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Ventilate area and avoid breathing vapor or mist. A vapor suppressing foam may be used to reduce vapors. Contain spill away from surface water and sewers. Contain spill as a liquid for possible recovery, or sorb with compatible sorbent material and shovel with a clean tool into a sealable container for disposal.

Additionally, for large spills: Water spray may reduce vapor, but may not prevent ignition in closed spaces. Dike far ahead of liquid spill for collection and later disposal.

SECTION 7: HANDLING AND STORAGE

HANDLING: Keep away from heat, sparks, or flame. Where flammable mixtures may be present, equipment safe for such locations should be used. Use clean tools and explosion-proof equipment. When transferring large volumes of product, metal containers, including trucks and tank cars, should be grounded and bonded. Do not breathe vapor or mist. Use in a well ventilated area. Avoid contact with eyes, skin, clothing, and shoes.

SHIPPING AND STORING: Keep container tightly closed when not in use and during transport. Do not pressurize, cut, weld, braze, solder, drill, or grind containers. Keep containers away from heat, flame, sparks, static electricity, or other sources of ignition. Empty product containers may retain product residue and can be

dangerous. See SECTION 14: TRANSPORTATION INFORMATION for Packing Group information.

SECTION 8: EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Provide general ventilation needed to maintain concentration of vapor or mist below applicable exposure limits. Where adequate general ventilation is unavailable, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below applicable exposure limits.

PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION: Use NIOSH-certified, full-face, air-purifying respirators with P- or R- series particulate filter and organic vapor cartridges when concentration of vapor or mist exceeds applicable exposure limits. Selection and use of respiratory protective equipment should be in accordance in the USA with OSHA General Industry Standard 29 CFR 1920.134; or in Canada with CSA Standard Z94.4.

EYE PROTECTION: Where eye contact is likely, wear chemical goggles; contact lens use is not recommended.

SKIN PROTECTION: Where skin contact is likely, wear Polyvinyl Chloride (PVC), neoprene, butyl rubber, nitrile, or equivalent protective gloves; use of polyvinyl alcohol (PVA) or equivalent gloves is not recommended. To avoid prolonged or repeated contact where spills and splashes are likely, wear appropriate chemical-resistant faceshield, boots, apron, whole body suits, or other protective clothing.

PERSONAL HYGIENE: Use good personal hygiene. Wash thoroughly with soap and water after handling product and before eating, drinking, or using tobacco products. Clean affected clothing, shoes, and protective equipment before reuse. Discard affected clothing, shoes, and/or protective equipment if they cannot be thoroughly cleaned. Discard leather articles, such as shoes, saturated with this product.

OTHER PROTECTIVE EQUIPMENT: Where spills and splashes are likely, facilities storing or using this product should be equipped with an emergency eyewash and shower, both equipped with clean water, in the immediate work area.

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE, APPEARANCE, AND ODOR:	Liquid, green, sweet odor. Syrupy.
ODOR THRESHOLD:	Not available.
MOLECULAR WEIGHT:	106.
SPECIFIC GRAVITY:	>1 (water = 1)
DENSITY:	Not available.
VAPOR DENSITY:	>1 (air = 1)
VAPOR PRESSURE:	<0.1 mmHg at 68°F (20°C)
BOILING POINT:	>300°F (148.9°C)
FREEZING/MELTING POINT:	Not available.
pH:	6-10
EVAPORATION RATE:	Not available.
SOLUBILITY IN WATER:	Complete
FLASH POINT:	>200°F (>93.3°C)
FLAMMABLE LIMITS IN AIR:	LOWER: 3.2 VOL% (ethylene glycol) UPPER: 15.3 VOL% (ethylene glycol)
AUTOIGNITION TEMPERATURE:	748°F (398°C) (ethylene glycol)

SECTION 10: STABILITY AND REACTIVITY

STABILITY:	Stable under normal temperatures and pressures. Avoid heat, sparks, or flame.
INCOMPATIBILITY:	Avoid acids, alkalies, oxidizing agents, or reactive metals.
REACTIVITY:	Polymerization is not known to occur under normal temperature and pressures. Not reactive with water.
HAZARDOUS DECOMPOSITION PRODUCTS:	None under normal temperatures and pressures. See also SECTION 5: HAZARDOUS COMBUSTION PRODUCTS.

SECTION 11: TOXICOLOGICAL INFORMATION

SENSITIZATION: Ethylene glycol has demonstrated human effects of skin sensitization.

Based on best current information, the other components listed in **SECTION 2** are not sensitizers.

MUTAGENICITY: Ethylene glycol and diethylene glycol have demonstrated human effects of mutagenicity.

CARCINOGENICITY: Based on best current information, there is no known carcinogenicity as categorized by ACGIH A1 or A2 substances; as categorized by IARC Group 1, Group 2A, or Group 2B agents; or as listed by NTP as either known carcinogens or substances for which there is limited evidence of carcinogenicity in humans or sufficient evidence of carcinogenicity in experimental animals.

REPRODUCTIVE TOXICITY: Ethylene glycol and diethylene glycol have demonstrated animal effects of reproductive toxicity.

TERATOGENICITY: Ethylene glycol and diethylene glycol have demonstrated animal effects of teratogenicity.

TOXICOLOGICALLY SYNERGISTIC PRODUCT(S): Based on best current information, there are no known toxicologically synergistic products associated with this product.

SECTION 12: ECOLOGICAL INFORMATION

ECOTOXICITY:

Ethylene glycol (107-21-1)

Test & Species		Conditions
96 Hr LC50 rainbow trout	41000 mg/L	
96 Hr LC50 bluegill	27500 mg/L	
96 Hr LC50 goldfish	27500 mg/L	

1,2-Propylene glycol (57-55-6)

24 Hr LC50 goldfish	5000 mg/L	
48 Hr LC50 guppy	10000 mg/L	

Diethylene glycol (111-46-6)

96 Hr LC50 fathead minnow	75200 mg/L	flow-through

OCTANOL/WATER PARTITION COEFFICIENT:	Not available.
VOLATILE ORGANIC COMPOUNDS:	Not available.

SECTION 13: DISPOSAL CONSIDERATIONS

DISPOSAL: Dispose in accordance with federal, state, provincial, and local regulations. Regulations may also apply to empty containers. The responsibility for proper waste disposal lies with the owner of the waste. Contact Safety-Kleen regarding proper recycling or disposal.

USEPA WASTE CODES(S): This product, if discarded, is not expected to be a characteristic or listed hazardous waste. Processing, use, or contamination by the user may change the waste code(s) applicable to the disposal of this product.

SECTION 14: TRANSPORT INFORMATION

DOT: **Shipping Name:** Not regulated as a hazardous material for transportation.

TDG: **Shipping Name:** Not regulated as a dangerous good for transportation.

EMERGENCY RESPONSE GUIDE NUMBER: Not applicable.
Reference *North American Emergency Response Guidebook*

SECTION 15: REGULATORY INFORMATION

USA REGULATIONS

SARA SECTIONS 302 AND 304: Based on the ingredient(s) listed in **SECTION 2**, this product does not contain any "extremely hazardous substances" listed pursuant to Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 302 or Section 304 as identified in 40 CFR Part 355, Appendix A and B.

SARA SECTIONS 311 AND 312: This product poses the following health hazard(s) 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 (SARA):

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

SARA SECTION 313: The following component is subject to the requirements of section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 372.

Ethylene glycol (107-21-1) 1.0 percent de minimis concentration

CERCLA: Based on the ingredient(s) listed in SECTION 2, this product contains the following "hazardous substance(s)" listed under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) in 40 CFR Part 302, Table 302.4 with the following reportable quantities (RQ):

Ethylene glycol (107-21-1) 5000 lb final RQ; 2270 kg final RQ

TSCA: All the components of this product are listed on, or are automatically included as "naturally occurring chemical substances" on, or are exempted from the requirement to be listed on, the TSCA Inventory.

CALIFORNIA: This product does not contain detectable amounts of any chemical known to the State of California to cause cancer.

This product does not contain detectable amounts of any chemical known to the State of California to cause birth defects or other reproductive harm.

CANADIAN REGULATIONS

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all information required by the CPR.

WHMIS: Class D2A - Contains component that may cause cancer.
Class D2B - Irritating to eyes and skin.

CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA): All the components of this product are listed on, or are automatically included as "substance occurring in nature" on, or are exempted from the requirements to be listed on, the Canadian Domestic Substances List (DSL).

SECTION 16. OTHER INFORMATION

REVISION INFORMATION: New product.

LABEL/OTHER INFORMATION: Not available.

APPENDIX B:

STANDARD OPERATING PROCEDURES FOR WASTEWATER SAMPLING AT COMPRESSOR STATIONS

APPENDIX B

SOUTHERN UNION GAS SERVICES
STANDARD OPERATING PROCEEDURE

WASTEWATER SAMPLING AND ANALYSIS FOR SE NM GAS COMPRESSOR STATIONS

1.0 Scope

This procedure is designed to direct the sampling and analytical methods used to determine the applicable RCRA characteristics of wastewater (wash water and/or storm water) collected at Southern Union Gas Services (SUGS) compressor stations located in SE New Mexico. These procedures are to be used when changes in materials and/or processes at compressor stations are modified to any degree which might significantly alter the chemical or physical characteristics of wastewaters generated at the facility.

2.0 Equipment

Sampling of wastewater will require:

1. Sample containers (prepreserved, from laboratory)
2. Chain of Custody forms
3. Shipping Cooler
4. Shipping labels
5. Packing Tape
6. Ice or "blue ice"
7. Poly or latex gloves
8. Small plastic sheet or tarp
9. Site-specific safety equipment (e.g., hard hat, coveralls, safety glasses)
10. Paper towels
11. Ziplock bags
12. Hand washer or towelettes
13. Trash bags
14. Notebook
15. Camera

3.0 Laboratory

The selected laboratory is:

Environmental Laboratory of Texas
12600 W. I-20 E
Odessa, Texas 79765
(432) 563-1800

Contact the laboratory at least 24 hours before the sampling date and arrange to have shipped the appropriate sample containers (pre-preserved), chain of custody forms, sample labels, and shipping labels shipped to the appropriate location.

4.0 Analytes, Containers and Preservatives

The analytes and their containers, preservatives, and handling are summarized in Table 1 below.

Toxicity	Regulatory Limit (TCLP) mg/kg	Analytical Method	Container	Preservation	Holding Time
Benzene	0.5	8240A (GC/MS)	2x 40 ml VOA	Cool to 4° C.	14 Days
Mercury	0.2	7471 (Cold Vapor)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Arsenic	5.0	7060 (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Barium	100.0	7080 (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Cadmium	1.0	7130 (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Chromium	5.0	7190 (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Lead	5.0	7420 (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Selenium	1.0	7740 (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Silver	5.0	7760A (AA)	1 L HDPE	Nitric Acid to pH < 2, Cool to 4° C.	6 Months
Reactive					
Cyanide	250.0	9010A	1 L HDPE	Cool to 4° C.	14 Days
pH	<2 or >12.5 pH units	9040	250 ml HDPE	Cool to 4° C.	24 Hours
Sulfide	500.0	9031	250 ml HDPE	Cool to 4° C.	6 Months
Ignitability	<60 deg C	1010	250 ml Glass	Cool to 4° C.	6 Months

VOA - Volatile Organic Analysis vial
HDPE – High Density Polyethylene

Two identical samples are collected for Benzene in the two 40 milliliter VOAs. One 1-liter HDPE container is used for all of the metals (mercury, arsenic, barium, cadmium, chromium, lead, selenium and silver). Individual containers are used for cyanide, pH and sulfide.

5.0 Methods

After obtaining the sample materials from the laboratory and the field equipment listed in Section 2.0, schedule the site visit and proceed to the facility.

Upon reaching the site, document the location, date, time, personnel involved and the purpose of the sampling visit. Also note any environmental conditions (weather, condition of equipment, adjacent activities) which might influence the sampling. Photograph the site and areas where samples will be taken.

Unpack and review the completeness and condition of the sampling equipment.

After selecting the points for sample collection, proceed as follows:

1. Put on a clean pair of gloves
2. Spread the plastic sheet on a flat, level surface near the sampling point and lay out the cooler and containers
3. Fill out the appropriate labels, and place then in a location secure from weather
4. If two phases (e.g., oil and water) are present, collect separate containers (VOAs) of each phase for each organic analysis sample.
5. Begin by filling the VOAs, making sure that the vials are completely full and that no air bubbles are present.
6. Then collect the other parameters, filling them to within ¼" of the top and securely closing the containers.
7. Clean the containers with paper towels and apply the labels
8. Place the labeled containers in zipped bags and place in the cooler with bagged ice or "blue ice"
9. Clean up the area to remove paper trash and towels, etc.
10. Remove your gloves, wash your hands, and put the gloves in the trash bag
11. Complete the information required on the Chain of Custody form, sign the form, and remove the sampler's copy.
12. Place the Chain of Custody form in a sealed plastic bag and place it in the cooler
13. Fill and attach the shipping label, and secure the cooler with packing tape
14. Keep the cooler in your custody until it is shipped to the laboratory
15. Contact the laboratory to notify them that the samples are en route, and request that you be notified when the samples are received. Arrange for e-mail notification directly from the shipper (i.e., Federal Express) to the laboratory contact and the sampler.
16. After returning from the sampling site, appropriately file your notes, photographs and Chain of Custody forms.
17. Copy all notes, photographs and chain of custody forms and attach to results when received and forward to:

    Mr. Tony Savoie
    Southern Union Gas Services, LLP
    160 Commerce Street
    Jal NM 88252

APPENDIX C:

ANALYTICAL DATA AND DOCUMENTATION

ENVIRONMENTAL LAB OF

12600 West I-20 East - Odessa, Texas 79765

A Xenco Laboratories Company

Analytical Report

Prepared for:

Tony Savoie

Southern Union Gas Services- Jal

P.O. Box 1226

Jal, NM 88252

Project: House Compressor

Project Number: None Given

Location: South of Hobbs

Lab Order Number: 7C27011

Report Date: 04/06/07

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
House	7C27011-01	Water	03/26/07 09:50	03-27-2007 10:30

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

General Chemistry Parameters by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
House (7C27011-01) Water									
Ignitability by Flashpoint	[>85.0]		°C	1	ED70613	04/05/07	04/05/07	EPA 1010A / ASTM D93-80	
pH	**7.58**		pH Units	"	EC72904	03/28/07	03/28/07	EPA 150.1	O-04

12600 West I-20 East - Odessa, Texas 79705 - (432) 563-1800 - Fax (432) 563-1713

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

TCLP Metals 1311 by EPA / Standard Methods

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Extracted	Prepared	Analyzed	Method	Notes
House (7C27011-01) Water										
Mercury	ND	0.000250	mg/L	1	EC73019	tclp 3-28-07	03/29/07	03/30/07	EPA 7470A	
Chromium	**0.0187**	0.00975	"	10	EC73020	"	03/29/07	03/30/07	EPA 6020A	
Arsenic	**ND**	0.0170	"	"	"	"	"	"	"	
Selenium	**J [0.0299]**	0.0300	"	"	"	"	"	"	"	J
Silver	**0.00799**	0.00405	"	"	"	"	"	"	"	
Cadmium	**J [0.00365]**	0.00692	"	"	"	"	"	"	"	J
Barium	**0.0187**	0.00489	"	"	"	"	"	"	"	
Lead	**ND**	0.00296	"	"	"	"	"	"	"	

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

TCLP Volatile Halocarbons by EPA Method 1311/8021B

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Extracted	Prepared	Analyzed	Method	Notes
House (7C27011-01) Water										
Benzene	**J [0.00693]**	0.0100	mg/L	10	EC73101	03/28/07 TCLP	03/31/07	04/02/07	EPA 8021B	J
Toluene	**0.0103**	0.0100	"	"	"	"	"	"	"	
Ethylbenzene	**J [0.00486]**	0.0100	"	"	"	"	"	"	"	J
Xylene (p/m)	**J [0.00810]**	0.0100	"	"	"	"	"	"	"	J
Xylene (o)	**J [0.00330]**	0.0100	"	"	"	"	"	"	"	J
Surrogate: a,a,a-Trifluorotoluene		*97.8 %*		*80-120*	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		*82.6 %*		*80-120*	"	"	"	"	"	

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

General Chemistry Parameters by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC72904 - General Preparation (WetChem)										
Calibration Check (EC72904-CCV1)				Prepared & Analyzed: 03/28/07						
pH	9.96		pH Units	10.00		99.6	97.5-102.5			
Calibration Check (EC72904-CCV2)				Prepared & Analyzed: 03/28/07						
pH	6.98		pH Units	7.00		99.7	97.5-102.5			
Duplicate (EC72904-DUP1)		Source: 7C26010-01		Prepared & Analyzed: 03/28/07						
pH	8.12		pH Units		8.08			0.494	20	
Duplicate (EC72904-DUP2)		Source: 7C27011-01		Prepared & Analyzed: 03/28/07						
pH	7.59		pH Units		7.58			0.132	20	
Batch ED70613 - General Preparation (WetChem)										
LCS (ED70613-BS1)				Prepared & Analyzed: 04/05/07						
Ignitability by Flashpoint	29.0		°C	29.0		100	96-104			
Duplicate (ED70613-DUP1)		Source: 7C27007-01		Prepared & Analyzed: 04/05/07						
Ignitability by Flashpoint	[>85.0]		°C		0.00				20	

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

TCLP Metals 1311 by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC73019 - EPA 1311/7470A										
Blank (EC73019-BLK1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Mercury	ND	0.000250	mg/L							
LCS (EC73019-BS1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Mercury	0.000850	0.000250	mg/L	0.00100		85.0	85-115			
LCS Dup (EC73019-BSD1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Mercury	0.000980	0.000250	mg/L	0.00100		98.0	85-115	14.2	20	
Calibration Check (EC73019-CCV1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Mercury	0.000900		mg/L	0.00100		90.0	90-110			
Matrix Spike (EC73019-MS1)		**Source: 7C22001-02**		Prepared: 03/29/07 Analyzed: 03/30/07						
Mercury	0.00106	0.000250	mg/L	0.00100	ND	106	75-125			
Batch EC73020 - EPA 1311/3005										
Blank (EC73020-BLK1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Chromium	ND	0.000975	mg/L							
Arsenic	ND	0.00170	"							
Selenium	ND	0.00300	"							
Silver	ND	0.000405	"							
Cadmium	ND	0.000692	"							
Barium	ND	0.000489	"							
Lead	ND	0.000296	"							
LCS (EC73020-BS1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Chromium	0.190	0.000975	mg/L	0.200		95.0	85-115			
Arsenic	0.737	0.00170	"	0.800		92.1	85-115			
Selenium	0.396	0.00300	"	0.400		99.0	85-115			
Silver	0.104	0.000405	"	0.100		104	85-115			
Cadmium	0.198	0.000692	"	0.200		99.0	85-115			
Barium	0.200	0.000489	"	0.200		100	85-115			
Lead	1.05	0.000296	"	1.10		95.5	85-115			

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

TCLP Metals 1311 by EPA / Standard Methods - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC73020 - EPA 1311/3005										
LCS Dup (EC73020-BSD1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Chromium	0.189	0.000975	mg/L	0.200		94.5	85-115	0.528	20	
Arsenic	0.732	0.00170	"	0.800		91.5	85-115	0.681	20	
Selenium	0.394	0.00300	"	0.400		98.5	85-115	0.506	20	
Silver	0.103	0.000405	"	0.100		103	85-115	0.966	20	
Cadmium	0.200	0.000692	"	0.200		100	85-115	1.01	20	
Barium	0.207	0.000489	"	0.200		104	85-115	3.44	20	
Lead	1.06	0.000296	"	1.10		96.4	85-115	0.948	20	
Calibration Check (EC73020-CCV1)				Prepared: 03/29/07 Analyzed: 03/30/07						
Chromium	0.0498		mg/L	0.0500		99.6	90-110			
Arsenic	0.0491		"	0.0500		98.2	90-110			
Selenium	0.0489		"	0.0500		97.8	90-110			
Silver	0.0495		"	0.0500		99.0	90-110			
Cadmium	0.0509		"	0.0500		102	90-110			
Barium	0.0488		"	0.0500		97.6	90-110			
Lead	0.0480		"	0.0500		96.0	90-110			
Matrix Spike (EC73020-MS1)		**Source: 7C22001-02**		Prepared: 03/29/07 Analyzed: 03/30/07						
Chromium	0.176	0.00975	mg/L	0.200	ND	88.0	75-125			
Arsenic	0.748	0.0170	"	0.800	ND	93.5	75-125			
Selenium	0.368	0.0300	"	0.400	0.0282	85.0	75-125			
Silver	0.0979	0.00405	"	0.100	0.00110	96.8	75-125			
Cadmium	0.190	0.00692	"	0.200	ND	95.0	75-125			
Barium	0.253	0.00489	"	0.200	0.0804	86.3	75-125			
Lead	0.830	0.00296	"	1.10	ND	75.5	75-125			
Matrix Spike Dup (EC73020-MSD1)		**Source: 7C22001-02**		Prepared: 03/29/07 Analyzed: 03/30/07						
Chromium	0.177	0.00975	mg/L	0.200	ND	88.5	75-125	0.567	20	
Arsenic	0.743	0.0170	"	0.800	ND	92.9	75-125	0.671	20	
Selenium	0.375	0.0300	"	0.400	0.0282	86.7	75-125	1.88	20	
Silver	0.0802	0.00405	"	0.100	0.00110	79.1	75-125	19.9	20	
Cadmium	0.191	0.00692	"	0.200	ND	95.5	75-125	0.525	20	
Barium	0.253	0.00489	"	0.200	0.0804	86.3	75-125	0.00	20	
Lead	0.835	0.00296	"	1.10	ND	75.9	75-125	0.601	20	

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

TCLP Volatile Halocarbons by EPA Method 1311/8021B - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC73101 - EPA GC 1311										
Blank (EC73101-BLK1)				Prepared & Analyzed: 03/31/07						
Benzene	ND	0.00100	mg/L							
Toluene	ND	0.00100	"							
Ethylbenzene	ND	0.00100	"							
Xylene (p/m)	ND	0.00100	"							
Xylene (o)	ND	0.00100	"							
Surrogate: a,a,a-Trifluorotoluene	*43.1*		*ug/l*	*50.0*		*86.2*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*43.2*		*"*	*50.0*		*86.4*	*80-120*			
LCS (EC73101-BS1)				Prepared & Analyzed: 03/31/07						
Benzene	0.0452	0.00100	mg/L	0.0500		90.4	80-120			
Toluene	0.0435	0.00100	"	0.0500		87.0	80-120			
Ethylbenzene	0.0452	0.00100	"	0.0500		90.4	80-120			
Xylene (p/m)	0.0861	0.00100	"	0.100		86.1	80-120			
Xylene (o)	0.0458	0.00100	"	0.0500		91.6	80-120			
Surrogate: a,a,a-Trifluorotoluene	*45.1*		*ug/l*	*50.0*		*90.2*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*41.2*		*"*	*50.0*		*82.4*	*80-120*			
Calibration Check (EC73101-CCV1)				Prepared: 03/31/07 Analyzed: 04/02/07						
Benzene	50.6		ug/l	50.0		101	80-120			
Toluene	47.8		"	50.0		95.6	80-120			
Ethylbenzene	48.0		"	50.0		96.0	80-120			
Xylene (p/m)	91.0		"	100		91.0	80-120			
Xylene (o)	49.0		"	50.0		98.0	80-120			
Surrogate: a,a,a-Trifluorotoluene	*52.0*		*"*	*50.0*		*104*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*45.0*		*"*	*50.0*		*90.0*	*80-120*			
Duplicate (EC73101-DUP1)	**Source: 7C26001-01**			Prepared: 03/31/07 Analyzed: 04/02/07						
Benzene	0.000631	0.00100	mg/L		0.000608			3.71	20	J
Toluene	ND	0.00100	"		ND				20	
Ethylbenzene	ND	0.00100	"		ND				20	
Xylene (p/m)	0.00138	0.00100	"		0.00143			3.56	20	
Xylene (o)	ND	0.00100	"		ND				20	
Surrogate: a,a,a-Trifluorotoluene	*59.2*		*ug/l*	*50.0*		*118*	*80-120*			
Surrogate: 4-Bromofluorobenzene	*42.8*		*"*	*50.0*		*85.6*	*80-120*			

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

TCLP Volatile Halocarbons by EPA Method 1311/8021B - Quality Control

Environmental Lab of Texas

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch EC73101 - EPA GC 1311										
Matrix Spike (EC73101-MS1)	**Source: 7C26001-01**			Prepared: 03/31/07 Analyzed: 04/02/07						
Benzene	0.0509	0.00100	mg/L	0.0500	0.000608	101	80-120			
Toluene	0.0490	0.00100	"	0.0500	ND	98.0	80-120			
Ethylbenzene	0.0495	0.00100	"	0.0500	ND	99.0	80-120			
Xylene (p/m)	0.0957	0.00100	"	0.100	0.00143	94.3	80-120			
Xylene (o)	0.0514	0.00100	"	0.0500	ND	103	80-120			
Surrogate: a,a,a-Trifluorotoluene	*63.0*		*ug/l*	*50.0*		*126*	*80-120*			*S-04*
Surrogate: 4-Bromofluorobenzene	*47.5*		*"*	*50.0*		*95.0*	*80-120*			

Southern Union Gas Services- Jal	Project: House Compressor	Fax: 505-395-2326
P.O. Box 1226	Project Number: None Given	
Jal NM, 88252	Project Manager: Tony Savoie	

Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
O-04	This sample was analyzed outside the EPA recommended holding time.
J	Detected but below the Reporting Limit; therefore, result is an estimated concentration (CLP J-Flag).
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
LCS	Laboratory Control Spike
MS	Matrix Spike
Dup	Duplicate

Report Approved By: _____ Date: 4/6/2007

Brent Barron, Laboratory Director/Corp. Technical Director
Celey D. Keene, Org. Tech Director
Raland K. Tuttle, Laboratory Consultant

James Mathis, QA/QC Officer
Jeanne Mc Murrey, Inorg. Tech Director

Analytical Report 279741

for

Southern Union Gas Services-Jal

Project Manager: Tony Savoie

South Jal Compressor

04-APR-07

12600 West I-20 East Odessa, Texas 79765

NELAC certification numbers:
Houston, TX E87603 - Miami, FL E86678 - Tampa, FL E86675

Houston - Dallas - San Antonio - Austin - Tampa - Miami - Latin America

04-APR-07

Project Manager: **Tony Savoie**
Southern Union Gas Services-Jal
610 Commerce
Jal, NM 88252

Reference: XENCO Report No: **279741**
South Jal Compressor
Project Address: South of Jal, NM

Tony Savoie:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number 279741. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. Estimation of data uncertainty for this report is found in the quality control section of this report unless otherwise noted. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 279741 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Brent Barron
Odessa Laboratory Director

Certificate of Analysis Summary 279741

Southern Union Gas Services-Jal, Jal, NM

Project Name: South Jal Compressor

Project Id:

Contact: Tony Savoie

Project Location: South of Jal, NM

Date Received in Lab: Tue Mar-27-07 10:30 am

Report Date: 04-APR-07

Project Manager: Brent Barron, II

Analysis Requested							
	Lab Id:	279741-001					
	Field Id:	South Jal					
	Depth:						
	Matrix:	WATER					
	Sampled:	Mar-27-07 07:25					
Reactive Cyanide by EPA 9010	*Extracted:*						
	Analyzed:	Mar-29-07 17:22					
	Units/RL:	mg/L RL					
Cyanide		ND 0.200					
Reactive Sulfide by SW 9030B	*Extracted:*						
	Analyzed:	Mar-27-07 17:50					
	Units/RL:	mg/L RL					
Sulfide		ND 50.0					

Brent Barron
Odessa Laboratory Director

Flagging Criteria

X In our quality control review of the data a QC deficiency was observed and flagged as noted. MS/MSD recoveries were found to be outside of the laboratory control limits due to possible matrix /chemical interference, or a concentration of target analyte high enough to effect the recovery of the spike concentration. This condition could also effect the relative percent difference in the MS/MSD.

B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.

D The sample(s) were diluted due to targets detected over the highest point of the calibration curve, or due to matrix interference. Dilution factors are included in the final results. The result is from a diluted sample.

E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.

F RPD exceeded lab control limits.

J The target analyte was positively identified below the MQL and above the SQL.

U Analyte was not detected.

L The LCS data for this analytical batch was reported below the laboratory control limits for this analyte. The department supervisor and QA Director reviewed data. The samples were either reanalyzed or flagged as estimated concentrations.

H The LCS data for this analytical batch was reported above the laboratory control limits. Supporting QC Data were reviewed by the Department Supervisor and QA Director. Data were determined to be valid for reporting.

K Sample analyzed outside of recommended hold time.

Blank Spike Recovery

Project Name: South Jal Compressor

Work Order #: 279741 **Project ID:**

Lab Batch #: 694179 **Sample:** 694179-1-BKS **Matrix:** Water

Date Analyzed: 03/29/2007 **Date Prepared:** 03/29/2007 **Analyst:** MAB

Reporting Units: mg/L **Batch #:** 1

Reactive Cyanide by EPA 9010 Analytes	Blank Result [A]	BLANK /BLANK SPIKE RECOVERY STUDY Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Control Limits %R	Flags
Cyanide	ND	0.400	0.342	86	80-120	

Blank Spike Recovery [D] = 100*[C]/[B]
All results are based on MDL and validated for QC purposes.

BS / BSD Recoveries

Project Name: South Jal Compressor

Work Order #: 279741 **Project ID:**

Analyst: MAB **Date Prepared:** 03/27/2007 **Date Analyzed:** 03/27/2007

Lab Batch ID: 694181 **Sample:** 694181-1-BKS **Batch #:** 1 **Matrix:** Water

Units: mg/L

Reactive Sulfide by SW 9030B	BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY										
Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Sulfide	ND	7910	7770	98	7910.0	7370	93	5	60-120	20	

Relative Percent Difference RPD = 200*|(D-F)/(D+F)|
Blank Spike Recovery [D] = 100*(C)/[B]
Blank Spike Duplicate Recovery [G] = 100*(F)/[E]
All results are based on MDL and Validated for QC Purposes

Sample Duplicate Recovery

Project Name: South Jal Compressor

Work Order # 279741

Lab Batch #: 694179 **Project ID:**

Date Analyzed: 03/29/2007 **Date Prepared:** 03/29/2007 **Analyst:** MAB

QC- Sample ID: 279744-001 D **Batch #:** 1 **Matrix:** Water

Reporting Units: mg/L

Reactive Cyanide by EPA 9010	SAMPLE / SAMPLE DUPLICATE RECOVERY				
Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Cyanide	ND	ND	NC	20	

Lab Batch #: 694181

Date Analyzed: 03/27/2007 **Date Prepared:** 03/27/2007 **Analyst:** MAB

QC- Sample ID: 279744-001 D **Batch #:** 1 **Matrix:** Water

Reporting Units: mg/L

Reactive Sulfide by SW 9030B	SAMPLE / SAMPLE DUPLICATE RECOVERY				
Analyte	Parent Sample Result [A]	Sample Duplicate Result [B]	RPD	Control Limits %RPD	Flag
Sulfide	56.0	ND	NC	20	

Spike Relative Difference RPD 200 * | (B-A)/(B+A) |
All Results are based on MDL and validated for QC purposes.

Environmental Lab of Texas

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

12600 West I-20 East
Odessa, Texas 79765

Phone: 432-563-1800
Fax: 432-563-1713

Project Manager: Tony Savoie
Company Name: Southern Union Gas Services
Company Address: 610 Commerce, P.O. Box 1226
City/State/Zip: Jal, New Mexico 88252
Telephone No: 505-631-9376 Fax No:
Sampler Signature: Tony Savoie e-mail: tony.savoie@suu.com

Project Name: House Compressor
Project #:
Project Loc: South of Hobbs
PO #:
Report Format: [X] Standard [ ] TRRP [ ] NPDES

(lab use only)
ORDER #: 7127011

LAB # (lab use only)	FIELD CODE	Beginning Depth	Ending Depth	Date Sampled	Time Sampled	No. of Containers	Preservation & # of Containers: Ice	HNO3	HCl (2) 40mL vials	H2SO4	NaOH	Na2S2O3	None 500mL HDPE	Other (Specify)	Matrix: DW=Drinking Water SL=Sludge; GW=Groundwater S=Soil/Solid; NPW=Non-Potable Specify Other	Analyze For: TCLP ✓ ✓ ✓ / TOTAL: TPH 418.1 / 8015M 1005 1006	Cations (Ca, Mg, Na, K)	Anions (Cl, SO4, CO3, HCO3)	SAR / ESP / CEC	Metals: As Ag Ba Cd Cr Pb Hg Se	Volatiles	Semivolatiles	BTEX 8021B/5030 or BTEX 8260	RCI	N O R M	RUSH TAT (Pre-Schedule) 24, 48, 72 hrs	Standard TAT
01	House RCI			3/26/07	0950	1	✓						—		WASTE WATER									✓		✓
	House metals			"	"	1	✓						—							✓						✓
	House VOA's			"	"	2	✓		✓													✓				✓

Special Instructions:

Relinquished by	Date	Time	Received by	Date	Time
Tony Savoie	3/27/07	1030			
Relinquished by	Date	Time	Received by	Date	Time
Relinquished by	Date	Time	Received by ELOT: Jeanne McMurry	Date 03 27 07	Time 1030

Laboratory Comments:

Sample Containers Intact?	(Y)	N
VOCs Free of Headspace?	(Y)	N
Custody seals on container(s)	Y	(N)
Custody seals on cooler(s)	Y	(N)
Sample Hand Delivered by Sampler/Client Rep ?	(Y)	N
by Courier? UPS DHL FedEx Lone Star	Y	N

Temperature Upon Receipt: -3.0 °C

Environmental Lab of Texas

Variance/ Corrective Action Report- Sample Log-In

Client: Southern Union Gas

Date/ Time: 03-27-07 @ 1030

Lab ID #: 727011

Initials: JMM

Sample Receipt Checklist

				not frozen Client Initials
#1 Temperature of container/ cooler?	(Yes)	No	-3.0 °C	
#2 Shipping container in good condition?	(Yes)	No		
#3 Custody Seals intact on shipping container/ cooler?	Yes	No	(Not Present)	
#4 Custody Seals intact on sample bottles/ container?	Yes	No	(Not Present)	
#5 Chain of Custody present?	(Yes)	No		
#6 Sample instructions complete of Chain of Custody?	(Yes)	No		
#7 Chain of Custody signed when relinquished/ received?	(Yes)	No		
#8 Chain of Custody agrees with sample label(s)?	Yes	No	(ID written on Cont / Lid)	
#9 Container label(s) legible and intact?	Yes	No	(Not Applicable)	
#10 Sample matrix/ properties agree with Chain of Custody?	(Yes)	No		
#11 Containers supplied by ELOT?	(Yes)	No		
#12 Samples in proper container/ bottle?	Yes	No	* See Below	
#13 Samples properly preserved?	Yes	No	* See Below	
#14 Sample bottles intact?	(Yes)	No		
#15 Preservations documented on Chain of Custody?	(Yes)	No		
#16 Containers documented on Chain of Custody?	(Yes)	No		
#17 Sufficient sample amount for indicated test(s)?	(Yes)	No	See Below	
#18 All samples received within sufficient hold time?	(Yes)	No	See Below	
#19 Subcontract of sample(s)?	Yes	No	(Not Applicable)	
#20 VOC samples have zero headspace?	(Yes)	No	Not Applicable	

Variance Documentation

Contact: Tony Savoie Contacted by: Jeanne McMurrey Date/ Time: 03-27-07

Regarding: TCLP BTEX preservation (should be neat and not w/HCl)

Corrective Action Taken:

Check all that Apply:

- ☐ See attached e-mail/ fax
- ☒ Client understands and would like to proceed with analysis
- ☐ Cooling process had begun shortly after sampling event

June 18, 2008

Mr. Carl Chavez
Environmental Engineer
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: APPLICATION BY SOUTHERN UNION GAS SERVICES FOR MODIFICATIONS TO A DISCHARGE PLAN FOR HOUSE NATURAL GAS COMPRESSOR STATION (GW-243)

Dear Mr. Chavez:

On the behalf of Southern Union Gas Services, Ltd. (SUGS), Geolex, Inc. is submitting the enclosed Discharge Plan Modification Application for the House gas compressor station (GW-243), located in Unit O (SW ¼ of the SE ¼) of Section 11, Township 20 South, Range 38 East in Lea County, New Mexico (32^0' 35.027' North, 103^0 6.933'West). This location is at an elevation of 3560 feet, approximately 10 miles south of Hobbs, New Mexico.

The House Compressor Station has a rated horsepower of approximately 1400 HP. Enclosed is a check in the amount of $1800.00 for the permit fee of $1700.00 and the filing fee of $100.00, as listed in Table 1, Section 20.6.2.3144 of the NMWQCC regulations.

Also included for your review is a draft of the public notice required in NMWQCC section 20.6.2.3108. Following NMOCD review and acceptance, we propose to post this notice using a 2'x3' sign, in English and Spanish, at the gate of the above-named facility. Identified adjacent land owners will by provided with copies of this notice by mail. SUGS owns the proposed discharge site. The notice will also be advertised, in English and Spanish, in a 3" by 4" display advertisement in the Hobbs Sun.

Please contact me at (505) 842-8000 if you have any questions or require additional information regarding this submittal. I will call you in about one week to make sure that you have received all of these materials and to see if you have any questions.

Sincerely,
Geolex, Inc.

James C. Hunter, R.G.

Attachments
G:\06-012\CompressorStationDischargePlans\House\Reports\HouseDraftOCDCover.doc

APPENDIX D:

DRAFT NOTICE OF APPLICATION, LOCATIONS AND NEWSPAPER FOR PUBLICATION

Notice of Application by Southern Union Gas Services for Approval of Modifications to a Discharge Plan (GW-243) for House Natural Gas Compressor Station: Southern Union Gas Services, whose offices are located at 301 N. Commerce St., Suite 700, Fort Worth, Texas (76102) seeks approval from the New Mexico Oil Conservation for modifications for a Discharge Plan for the House Compressor Station, located in the Unit O (SW ¼ of the SE ¼) of Section 11, Township 20 South, Range 38 East in Lea County, New Mexico (32°' 35.027' North, 103° 6.933'West). This location is at an elevation of 3560 feet, approximately 10 miles south of Hobbs, New Mexico. House compressor station is designed to have no intentional liquid discharges. The shallowest groundwater potentially impacted by this facility is at a depth of approximately 50 feet and has a total dissolved solids content of approximately 400 to 600 milligrams per liter. Additional information, comments or statements should be addressed Mr. James C. Hunter, R.G. of Geolex, Inc., 500 Marquette NW, Suite 1350, Albuquerque, NM 87102, Tel. (505-842-8000).

Aviso de Aplicación por parte de Southern Union Gas Services para la aprobación de un plan de la descarga para la estación del compresor del gas natural de House: Southern Union Gas Services, con oficinas que están situadas en 301 N. Commerce St., Suite 700, Fort Worth, Texas (76102) busca la aprobación de New México Oil Conservation Division para un plan de la descarga para la estación del compresor de House, situada en la unidad O del cuarto suroeste del cuarto sureste de la sección 11, Township 20 South, Range 38 East en el condado de Lea, Nuevo México (32°' 35.027' North, 103° 6.933'West). Esta localización está a una elevación de 3560 pies, aproximadamente 10 millas al sur de Hobbs, Nuevo México. La estación House fue diseñada para no tener ninguna descarga líquida intencional. El agua subterránea menos profunda potencialmente afectada por esta facilidad está a una profundidad de aproximadamente 50 pies y tiene un contenido de sólidos disuelto total de aproximadamente 400 a 600 miligramos por litro. Cualquier información, comentario o declaración adicional deben ser dirigidos al Sr. James C. Hunter, R.G. de Geolex, Inc., 500 Marquette Av. NW, Suite 1350, Albuquerque, NM 87102, tel. (505-842-8000).

ATTACHMENT TO THE DISCHARGE PERMIT

Southern Union Gas Services, LTD, House COMPRESSOR STATION (GW-243) DISCHARGE PERMIT APPROVAL CONDITIONS May 8, 2007

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee and the $400 permit fee for a gas compressor station less than 1000 horsepower.

2. **Permit Expiration and Renewal:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on May 30, 2011** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its January 04, 2007 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit

renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and

approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure: The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: Southern Union Gas Services, LTD, (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Southern Union Gas Services, LTD.
Company Name-print name above

Bruce M. Williams
Company Representative- print name

Bruce M. Williams
Company Representative- signature

Title VP Gas Operations

Date: 6/1/07

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 1/11/07

or cash received on _____ in the amount of $ 400.00

from: Southern Union Gas Services

for GW-243

Submitted by: Lawrence Romero Date: 1/19/07

Submitted to ASD by: Lawrence Romero Date: 1/19/07

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

Southern Union
Gas Services

2007 JUN 4 AM 9 31

301 Commerce Street, Ste. 700
Fort Worth, TX 76102

817.302.9400 Fax: 817.302.9350

Via Fedex

Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Signed Copies of Discharge Permits

Dear Mr. Price,

Please find attached signed copies of Discharge Permits for the following facilities:

Facility	**Permit Number**
Boyd Compressor Station	GW-269
C-1 Compressor Station	GW-259
C-2 Compressor Station	GW-260
C-3 Compressor Station	GW-261
C-4 Compressor Station	GW-262
House Compressor Station	GW-243

If you have any questions or need further information, please contact me at 817-302-9425.

Sincerely,

Herb Harless
0207

Cc: Randall Dunn w/attachments
Tony Savoie w/attachments
Molly Smitherman

ATTACHMENT TO THE DISCHARGE PLAN GW-243
SID RICHARDSON GASOLINE CO.
HOUSE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(September 6, 2001)

1. Payment of Discharge Plan Fees: The $100.00 filing fee has been received by the OCD. There is a flat fee assessed for natural gas compressor stations with horsepower ratiing greater than 1001 horsepower equal to $1700.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. Sid Richardson Gasoline Co. Commitments: Sid Richardson Gasoline Co. will abide by all commitments submitted in the discharge plan renewal application dated February 23, 2001 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the House Compressor Station are discontinued for a period in excess of six months. Prior to closure of the House Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Certification: Sid Richardson Gasoline Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Sid Richardson Gasoline Co. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

SID RICHARDSON GASOLINE CO.

by Wayne Farley
Title

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 6, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0791

Mr. Wayne J. Farley
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, Texas 76102

RE: Discharge Plan Renewal Approval GW-243
Sid Richardson Gasoline Co.
House Compressor Station
Lea County, New Mexico

Dear Mr. Farley:

The ground water discharge plan renewal GW-087 for the Sid Richardson Gasoline Co. House Compressor Station located in the NW/4 SE/4 of Section 11, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 days of receipt of this letter.**

The original discharge plan application was submitted on March 28, 1996 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan renewal application was submitted February 23, 2001 pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Sid Richardson Gasoline Co. of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Sid Richardson Gasoline Co. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **May 30, 2006**, and Sid Richardson Gasoline Co. should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

Sid Richardson Gasoline Co. will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the House Compressor Station.

The discharge plan application for the Sid Richardson Gasoline Co. House Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of $100. There is a flat fee assessed for natural gas compressor stations with horsepower rating greater than 1001 horsepower equal to $1700.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505.

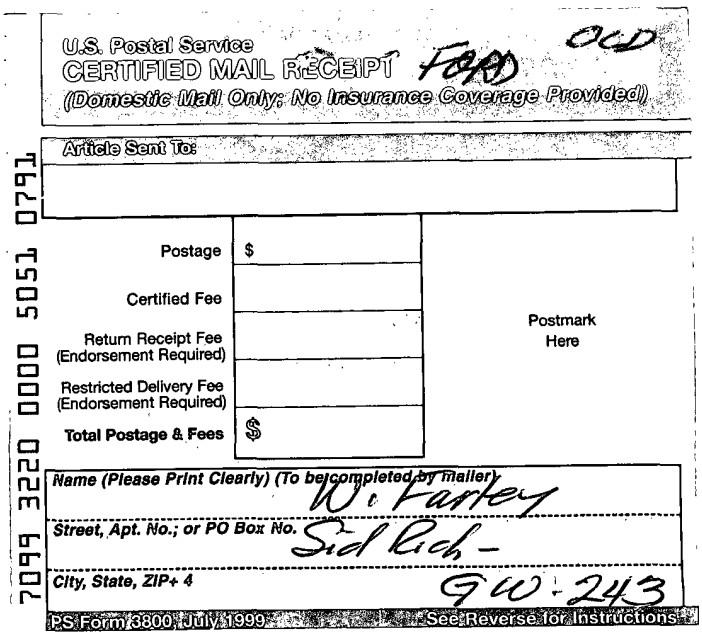
If you have any questions please contact Mr. W. Jack Ford at (505) 476-3489. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office


U.S. Postal Service
CERTIFIED MAIL RECEIPT FORD OCD
(Domestic Mail Only; No Insurance Coverage Provided)
Article Sent To:
Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees $
Postmark Here
Name (Please Print Clearly) (To be completed by mailer) W. Farley
Street, Apt. No.; or PO Box No. Sid Rich -
City, State, ZIP+ 4 GW-243
PS Form 3800, July 1999 See Reverse for Instructions
7099 3220 0000 5051 0791

ATTACHMENT TO THE DISCHARGE PLAN GW-243
SID RICHARDSON GASOLINE CO.
HOUSE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(September 6, 2001)

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Accepted:

SID RICHARDSON GASOLINE CO.

by_____
Title