GW - 261

GENERAL CORRESPONDENCE

YEAR(S): 2007-1995

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:

Southern Union Gas Services, LTD, Wayne Farley, Vice President, Gas Operations, 301 Commerence Street, Suite 700, Fort Worth, Texas 76102, telephone 817-302-9400, has submitted renewal applications for the previously approved discharge plans for the following facilities: GW-259 C-1 Compressor Station SE/4 NE/4 Section 13-Township 23S-Range 36E; GW-260 C-2 Compressor Station NW/4 NE/4 Section 11-Township 23S-Range 36E; GW-261 C-3 Compressor Station NE/4 SW/4 Section 3-Township 23S-Range 36E; GW-262 C-4 Compressor Station SW/4 SE/4 Section 9-Township 23S-Range 36E; GW-269 Boyd Compressor Station SE/4 SE/4 Section 11-Township 20S-Range 38E; GW-243 House Compressor Station NE/4 SE/4 Section 26-Township 22S-Range 37E; NMPM Lea County, New Mexico: These facilities are located between Eunice and Jal, New Mexico with groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth ranging from of 30 to 50 feet, with a total dissolved solids concentration generally less than 1000 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 espan_ol, 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 25th day of January 2007.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

S E A L

Mark Fesmire,
Director

Legal #80344
Pub. Feb. 1, 2007

THE SANTA FE
NEW MEXICAN
Founded 1849

2007 FEB 7 AM 10:49

NM EMNRD OIL CONSERV
ATTN: Wayne Price
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00201512 ACCOUNT: 00002212
LEGAL NO: 80344 P.O. #: 52100-00044

327 LINES 1 TIME(S)	183.12
AFFIDAVIT:	6.00
TAX:	14.42
TOTAL:	203.54

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, R. Lara, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 80344 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/01/2007 and 02/01/2007 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 1st day of February, 2007 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/_____
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 1st day of February, 2007

Notary Laura A. Harding

Commission Expires: 11/23/07

OK TO PAY
LWI

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 1/23/07

or cash received on _____ in the amount of $ 100 00

from Southern Union Gas Services

for GW-261

Submitted by: Lawrence Romero Date: 1/26/07

Submitted to ASD by: Lawrence Romero Date: 1/26/07

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 _____

NOTICE OF PUBLICATION

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

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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 25th day of January 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

January 26, 2007

Wayne J. Farley
Southern Union Gas Services, LTD
301 Commerce Street, Suite 700
Forth Worth, Texas 76102

Re: Discharge Plan Renewals Permit GW-259, 260, 261, 262, 269 and 243

Dear Mr. Farley:

The New Mexico Oil Conservation Division (NMOCD) has received Southern Union's request and initial and flat fees, dated January 04 2007, to renew the above Compressor Stations. The initial submittal provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. 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) 476-3490 or wayne.price@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,

Wayne Price
Environmental Bureau Chief

xc: OCD District I Office, Hobbs

GW261

VonGonten, Glenn, EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Thursday, December 28, 2006 1:10 PM
To: 'robert.gawlik@sug.com'
Subject: Expired Discharge Plans for 5 Former Sid Richardson Compressor Stations
Attachments: Renewal WQCC Notice Regs.pdf; Discharge Plan App Form.pdf; Guidelines For Discharge Plans.pdf; PN Flow Chart.20.6.2renewal.pdf

Robert,

Oil Conservation Division (OCD) records indicate that five of your discharge plans for five former Sid Richardson compressor stations have expired:
GW259 (SID RICHARDSON C-1 CS), GW260 (SID RICHARDSON C-2 CS), GW261 (SID RICHARDSON C-3 CS, GW262 (SID RICHARDSON C-4 CS), and GW269 (SID RICHARDSON BOYD CS). New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that 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. You may be operating without a permit. Please submit a permit renewal application with a filing fee (20.6.2.3114 NMAC) of $100.00 for each facility **separately** by January 12, 2007. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. Application forms and guidance documents are attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Please contact me by phone at 505-476-3488 or email glenn.vongonten@state.nm.us if you have any questions regarding this matter.

Glenn von Gonten
Senior Hydrologist

12/28/2006

SID RICHARDSON
ENERGY SERVICES CO.

201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102-3131
817 / 390-8685
FAX 817/339-7394
EMAIL: rlgawlik@sidrich.com

ROBERT L. GAWLIK
Manager, Environmental
Health & Safety

CERTIFIED MAIL – Return Receipt
7000 0520 0024 3418 7232

May 29, 2002
RLG-43-02

New Mexico Oil Conservation Division
Environmental Bureau
Attn: Roger Anderson
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Storm Water Run-Off Plan
C-3 Compressor Station GW-261

Dear Mr. Anderson:

This letter is in response to the Discharge Plan Renewal Approval GW-261. In the letter of approval the Oil Conservation Division (OCD) requested that Sid Richardson Energy Services Co. submit a storm water run-off plan for approval by OCD.

Oil and gas exploration and production facilities are exempt from the Clean Water Act (CWA) Storm Water Phase I regulations under most conditions. Specifically this facility is exempt from these regulations and as such has determined that it is not necessary to apply to the Environmental Protection Agency for a Multi-Sector General Permit nor is it necessary to develop a Storm Water Pollution Prevention Plan under the CWA.

At this facility storm water does not come into contact with any sources that may contaminate the storm water runoff except for the rain that falls onto the compressor engines. Storm water that falls on the compressor engines is collected either on the compressor skids or is contained within the curbed concrete compressor pads and does not run-off from the facility.

If you have any questions about this application please contact me at (817) 390-8685.

Sincerely,

Robert L. Gawlik

cc: MRR/WJF/CPO/HH
Randall Dunn

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 29, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0906

Mr. Wayne J. Farley
Sid Richardson Energy Services, Ltd.
201 North Main St.
Fort Worth, Texas 76102

RE: Discharge Plan Renewal Approval GW-261
Sid Richardson Energy Services, Ltd.
C-3 Compressor Station
Lea County, New Mexico

Dear Mr. Farley:

The ground water discharge plan renewal GW-261 for the Sid Richardson Energy Services, Ltd. C-3 Compressor Station located in the NE/4 SW/4 of Section 3, Township 23 South, Range 36 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 July 23, 1996 and approved September 18, 1996. The discharge plan renewal application, dated September 14, 2001, was submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. 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 Energy Services, Ltd. 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 Energy Services, Ltd. 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 **September 18, 2006**, and Sid Richardson Energy Services, Ltd. 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 Energy Services, Ltd. 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 C-3 Compressor Station.

The discharge plan application for the Sid Richardson Energy Services, Ltd. C-3 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 less than 1000 horsepower equal to $400.00. 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

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-261
SID RICHARDSON ENERGY SERVICES, LTD.
C-3 COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(October 29, 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 rating less than 1000 horsepower equal to $400.00. 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 Energy Services, Ltd. Commitments: Sid Richardson Energy Services, Ltd. will abide by all commitments submitted in the discharge plan renewal application dated September 14, 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 by a Sid Richardson Energy Services, Ltd.'s representative on a regular basis and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained 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 C-3 Compressor Station are discontinued for a period in excess of six months. Prior to closure of the C-3 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 Energy Services, Ltd., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Sid Richardson Energy Services, Ltd. 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 ENERGY SERVICES, LTD.

by_____
Title

THE SANTA FE
NEW MEXICAN
Founded 1849

Janet

NM OIL CONSERVATION DIVISION
ATTN: ED MARTIN

AD NUMBER: 228591 ACCOUNT: 56689
LEGAL NO: 70097 P.O.#: 02199000249
358 LINES 1 time(s) at $ 157.81
AFFIDAVITS: 5.25
TAX: 10.19
TOTAL: 173.25

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, MM Weideman being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #70097 a copy of which is hereto attached was published in said newspaper 1 day(s) between 09/26/2001 and 09/26/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 26 day of September, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ MM Weideman
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
26 day of September A.D., 2001

Notary Janet L. Montoya

Commission Expires 12/30/03

OFFICIAL SEAL
Janet L. Montoya
NOTARY PUBLIC - STATE OF NEW MEXICO
MY COMMISSION EXPIRES 12/30/03

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(GW-259) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-1 Compressor Station located in the SE/4 NE/4, Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 3 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 132 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-260) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-2 Compressor Station located in the NW/4 NE/4, Section 11, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being trasported to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 70 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-261) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-3 Compressor Station located in the NE/4 SW/4, Section 3, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be spearated prior to waste water being transported to an OCD approved offsite disposal Facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 140 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-262) - Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-4 Compressor Station located in the SW/4 SE/4, Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 171 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 20th day of September, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director
Legal #70097
Pub. September 26, 2001

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1

weeks.

Beginning with the issue dated

September 27 2001

and ending with the issue dated

September 27 2001

Kathi Bearden

Publisher

Sworn and subscribed to before me this 27th day of September 2001

Jodi Henson

Notary Public.

My Commission expires
October 18, 2004
(Seal)

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-259) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-1 Compressor Station located in the SE/4 NE/4, Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 3 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 132 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-260) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-2 Compressor Station located in the NW/4 NE/4, Section 11, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 70 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-261) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-3 Compressor Station located in the NE/4 SW/4, Section 3, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 140 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-262) – Sid Richardson Gasoline Co., Mr. Wayne J. Farley, 201 Main Street, Suite 3000, Fort Worth, Texas 76102-3131, has submitted a discharge plan renewal application for their C-4 Compressor Station located in the SW/4 SE/4, Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water will be stored on site in closed top bermed tanks. Fluids will be processed and hydrocarbons will be separated prior to waste water being transported to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at e depth of 171 feet with a total dissolved solids concentrations of approximately 1100 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

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

0 S 1 S

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information pre-

Ford, Jack

From: Martin, Ed
Sent: Thursday, September 20, 2001 10:41 AM
To: Santa Fe New Mexican (E-mail); Hobbs News-Sun Attn: Brenda Tison (E-mail)
Cc: Ford, Jack; Anaya, Mary
Subject: Legal Notices

Please publish the attached legal notice, one time only, by Thursday, September 27, 2001.

Upon publication, please forward to this office:

1. Publisher's affidavit.
2. Invoice. Our purchase order numbers are:
   Santa Fe New Mexican **02199000249**
   Hobbs News Sun **02199000223**

If you have any questions, please e-mail me or phone (505) 476-3492.

Thank you.

Publ. Notice
GW-259,260,261,26...

Ford, Jack

From: Ford, Jack
Sent: Thursday, September 20, 2001 10:29 AM
To: Martin, Ed
Subject: Public Notice for GW-259, GW-260, GW-261, & GW-262

259PUB.DOC

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 20th day of September, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 9-17-01

or cash received on _____ in the amount of $ 400.00

from Environmental Services for Sid Richardson Energy Service

for C-1, C-2, C-3, & C-4 C.S. GW-259, 260, 261, & 26
(Facility Name) (OP No.)

Submitted by: _____ Date: 9-20-01

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

ENVIRONMENTAL SERVICES, INC. 04-96
PH. 505-266-6611
4665 INDIAN SCHOOL RD. NE, SUITE 106
ALBUQUERQUE, NM 87110

[redacted]

Date Sep 17, 2001

95-32/1070 NM
2260

Pay to the order of NMOCD $ 400.00

Four Hundred and 00/100 Dollars

Bank of America.

ACH R/T 107000327

For SRC 015 C-1, C-2, C-3, C-4 filing Fee [redacted]

September 17, 2001

Oil Conservation Division
Attn: Roger Anderson
1220 South St. Francis Dr.
Santa Fe, NM 87505

Subject: Sid Richardson Discharge Plan Renewals for C-1, C-2, C-3 and C-4 Compressor Stations

Dear Roger,

Enclosed please find two copies of the Applications for Renewal of Discharge Plans for Sid Richardson's C-1, C-2, C-3, and C-4 Compressor Stations. One copy of each of the applications has also been sent to the District 1 office in Hobbs, NM.

The included signature pages are fax copies of the original signature pages. The original signature pages have been sent to me but due to the situation in New York and the subsequent grounding of airplanes; I have not received the signature pages yet. As soon as I receive the original signature pages I will immediately courier the originals to your office.

Attached to this letter you will also find a check for $400 to cover the $100 filing fee for each of the applications.

If you have any questions regarding this application please feel free to contact me at (505) 266-6611.

Sincerely

Cale E. Swanson

Cale E. Swanson
Environmental Scientist II

cc: OCD District 1 Office

www.enservice.com

Environmental Services Inc.

Application for Renewal
Groundwater Discharge Plan

C-3 Compressor Station

Sid Richardson Energy Services, Ltd.
201 N. Main St.
Fort Worth, TX 76102

September 2001 SRC 015

4665 Indian School NE, Suite 106, Albuquerque, NM 87110
tel 505.266.6611 fax 505.266.7738

September 26, 2001

Oil Conservation Division
Attn: Roger Anderson
1220 South St. Francis Dr.
Santa Fe, NM 87505

Subject: Sid Richardson Discharge Plan Renewal Signature Pages for C-1, C-2, C-3 and C-4 Compressor Stations

Dear Roger,

On September 17, 2001, discharge plan renewals were submitted for Sid Richardson's C-1, C-2, C-3 and C-4 compressor stations. Due to the grounding of airplanes recently we were unable to include the original signature pages with the applications. Instead we included fax copies and in our cover letter indicated that I would send you the original signatures pages when they arrived.

Attached to this letter you will find the original signature pages for the renewals. Thank you for your understanding in this matter.

If you have any questions regarding this application please feel free to contact me at (505) 266-6611.

Sincerely

Cale E. Swanson

Cale E. Swanson
Environmental Scientist II

4665 Indian School NE
Suite 106
Albuquerque, NM 87110
505.266.6611
505.266.7738
www.[illegible].com

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, 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 January 24, 2001

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: **C-3 Compressor Station**
2. Operator: **Sid Richardson Energy Services, Ltd.**

   Address: **201 N. Main Street, Fort Worth, Texas 76102**

   Contact Person: **Wayne Farley** Phone: **(817) 390-8686**
3. Location: **NE** /4 **SW** /4 Section **3** Township **23S** Range **36E**
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

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: **Wayne Farley** Title: **Director of Gas Operations**

Signature: Wayne Farley Date: 9-14-01

AFFIRMATION

I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the C-3 compressor station and that such information is true, accurate, and complete to the best of my knowledge and belief.

Wayne J. Farley

9-14-01
Date

Wayne J. Farley
Director of Gas Operations
Sid Richardson Energy Services, Ltd.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, 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 January 24, 2001

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: C-3 Compressor Station
2. Operator: Sid Richardson Energy Services, Ltd.

   Address: 201 N. Main Street, Fort Worth, Texas 76102

   Contact Person: Wayne Farley Phone: (817) 390-8686
3. Location: NE /4 SW /4 Section 3 Township 23S Range 36E
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
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12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
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: Wayne Farley Title: Director of Gas Operations

Signature: Wayne Farley Date: 9-14-01

Contents

C-3 Compressor Station Discharge Plan

This document constitutes a renewal application for Groundwater Discharge Plan #261 for the C-3 Compressor Station. The C-3 Compressor Station was constructed in 1992 by Excel Gas Company. Sid Richardson Energy Services, Ltd. purchased the facility in September 1995. This Discharge Plan application has been prepared in accordance with the New Mexico Oil Conservation Division's (OCD) *Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations* (revised 3-97) and New Mexico Water Quality Control Commission regulations at 20 New Mexico Administrative Code (NMAC) 6.2.

1 TYPE OF OPERATION

The C-3 Compressor Station is operated to meter, remove liquids, and compress natural gas pipelined through natural gas production lines. An inlet gas scrubber is utilized to remove liquids from the inlet gas to the station. The dried gas is passed through a suction scrubber on the compressor skid for further liquid removal. The gas then enters a 270-horsepower, natural-gas-fired, compressor engine. Most of the discharge gas from the compressor is pipelined off-site for further processing. The discharge gas not transported off-site is utilized for engine fuel. The fuel gas is routed to a fuel sweetener that absorbs hydrogen sulfide (H_2S) from the gas. The fuel gas is then passed through a fuel scrubber for additional liquid removal before engine use.

2 OPERATOR/LEGALLY RESPONSIBLE PARTY

Operator
Sid Richardson Energy Services, Ltd.
Attn: Randall Dunn
Box 1226, Jal, NM 88252
(505) 395-2116

Legally Responsible Party
Sid Richardson Energy Services, Ltd.
Attn: Wayne J. Farley
201 N. Main St., Fort Worth, TX 76102
(817) 390-8686

3 LOCATION OF DISCHARGE/FACILITY

Lea County, NM
Section 3, Township 23 South, Range 36 East

4 LANDOWNER

Sid Richardson Energy Services, Ltd.
201 N Main St., Fort Worth, TX 76102
(817) 390-8686

5 FACILITY DESCRIPTION

Facility and process flow diagrams are located in appendix 1.

6 MATERIAL STORED AND USED

Table 1 identifies materials and storage containments for substances used and stored at C-3. Material Safety Data Sheets (MSDS) for these substances are in Appendix 5.

Table 1
Material Used and Stored

ID	Material	Composition	Type	Container	Quantity	Location
TK-1	Scrubber Liquids	Water w/ hydrocarbon liquids	Liquid	Tank	1270 gal	North of inlet scrubber
TK-2	Lube Oil	See MSDS	Liquid	Tank	300 gal	South of compressor
	Coolant	See MSDS	Liquid	Drum	30 gal	Brought in when needed
	SulfaTreat	See MSDS	Solid	Sack	(3) 2000 lb	May be sotred on-site when needed

7 SOURCES AND QUANTITIES OF EFFLUENT AND WASTE SOLIDS

Figure 1 (Appendix 1) depicts the effluent and solid waste sources at C-3. Table 2 summarizes the effluent and solid wastes generated at the facility. The major sources of liquid and solid waste are described in the sections following Table 2.

Table 2
Effluent and Solid Waste Sources, Quantity and Disposition

Source	Waste/Quality	Quantity	Disposition
Scrubbers	Water w/ hydrocarbon liquids	200 gal/month	TK-1
Compressor pad wash down	Water with soap, lube oil, and coolant	100 gal/month	Removed as generated
Engine	Waste oil	18 gal/month	Removed as generated
	Oil filters	24 filters/yr	Removed as generated
Fuel sweetener	Waste SulfaTreat	2300 lb/month	Road/driveway

Separators/Scrubbers and Slug Catchers

Three scrubbers are utilized at C-3: an inlet scrubber, suction scrubber, and fuel scrubber. Water with hydrocarbon liquids (drip) is discharged from the scrubbers to the drip tank (TK-1). The amount of liquids accumulated by the scrubbers varies and is dependent upon the moisture content of the inlet gas stream. The maximum amount of drip expected to be removed from the site is 2400 gallons per year

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers at C-3

Process and Storage Equipment Wash Down

The compressor skid is washed down once per month using a portable high pressure system. Approximately 100 gallons of water is used for each washing. Occasionally, 2.5 gallons of soap is added to the wash water for cleaning. Equipment wash water may contain soap, lube oil, and coolant. The compressor skid is located on a concrete pad with a four-inch curb around it to contain any effluent.

Solvents/Degreasers

A non-chlorinated soap is used to clean the compressor engine. The soap is not stored on-site. Disposal of spent soap is addressed in Process and Storage Equipment Wash Down.

Spent Acids/Caustics

No acids or caustics are utilized at C-3

Used Engine Coolants

Ambitrol, comprised of 50 percent water and 50 percent ethylene glycol, is utilized as coolant in the compressor engine. Coolant is brought on-site in a 30-gallon drum when needed. Coolant is immediately added to the engine and is not stored at C-3. No waste coolant is generated.

Waste Lubrication and Motor Oils

Waste oil is generated by maintenance of the compressor engine. The engine uses 18 gallons per month of oil. Oil is supplied to the compressor engine by an on-site lube oil tank (TK-2). Waste oil, approximately 18 gallons/month, is drained from the compressor engine into drums for removal from the facility.

Used Filters

The compressor engine operates with four oil filters. These filters are replaced every other month. After removal from the engines, the filters are placed in a 55-gallon drum with a drain rack. Once the filters have drained, they are taken to a central dumpster located at Sid Richardson's West Eunice Tank Battery.

Solids and Sludges

No solids or sludges are generated at C-3.

Painting Wastes

If any equipment at C-3 requires painting, painting supplies will be brought on-site at the time of painting. Wastes will be removed immediately upon completion of the painting.

Sewage

No sewage is generated at C-3.

Lab Wastes

C-3 is not equipped with a lab.

Other Liquids and Solid Wastes

The fuel sweetener removes H_2S from the fuel gas. Seven thousand pounds of SulfaTreat is used in the fuel sweetener to absorb the H_2S. The SulfaTreat utilized in the sweetener is replaced approximately every three months. The spent SulfaTreat is spread on the driveway and road along C-3.

8 LIQUID AND SOLID WASTE COLLECTION/STORAGE/DISPOSAL

This section provides a general description of the collection, storage, and disposal systems used for effluents and solid wastes generated at C-3. Section 7 identifies the specific collection, storage, and disposal method utilized for each of the effluents generated at the site.

Collection

All effluent dumped to TK-1 is transported via aboveground pipelines.

Storage

None of the storage tanks at C-3 are equipped with berms. TK-1 is a partially buried fiberglass tank. TK-2 is located inside the containment of the compressor pad.

On-Site Disposal

Spent SulfaTreat removed from the fuel sweetener is spread on the driveway and road to C-3. This disposal method was approved by the NMOCD on September 9, 1995. Copies of correspondence from Sid Richardson and the NMOCD approval letter are in Appendix 4.

Off-site Disposal

All remaining effluent and waste is removed and disposed of elsewhere as identified on Table 3.

Table 3

Off-Site Disposal	Contractors and Disposal Facilities	Contractor Details
Scrubber liquids	Transported by Chaparral Trucking to West Eunice Tank Battery. Oil portion taken by Petrosource to its oil recycling facility	*Chaparral Trucking* PO Drawer 1769 Eunice, NM 88231 (505) 394-2545 *PetroSource Partners Limited* 129 S. Grimes Hobbs, NM 88240 (505) 397-7212
Washwater	Transported by Sid Richardson to Jal #3 Gas Plant (GW-010)	
Waste oil	Transported by Sid Richardson to Jal #3 Gas Plant (GW-010)	
Filters	Transported by Side Richardson to West Eunice Tank Battery. Removed by Quell Petroleum Services to their incinerator.	*Quell Petroleum Services Incinerator* PO Box 1552 Monohans, TX 79756 (915) 943-8400

9 PROPOSED MODIFICATIONS

Sid Richardson does not propose any modifications at this time.

10 INSPECTION, MAINTENANCE, AND REPORTING

C-3 is unmanned but inspected at least once per day Monday through Friday. The station is equipped with an alarm system that notifies operators in Jal of an emergency or malfunction.

11 SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

The process area of the plant is graveled to allow for early leak detection and quick response by facility personnel in the event of a leak of process fluids. Sid Richardson will handle all spills as required by the spill procedures in Appendix 3 and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and 20 NMAC 6.2.1203. Copies of these regulations are in Appendix 2.

12 SITE CHARACTERISTICS

The C-3 Compressor Station is located on dune sands of the Eunice Plain in the Capitan Basin. The structural setting is on the Permian shelf of the Central Basin Platform, east of the Capitan Reef Complex. The site bedrock is the poorly consolidated sand of the Tertiary Ogallala Formation [Dane and Bachman, 1965, Geologic Map of New Mexico].

There are no groundwater discharge sites, intermittent streams, water bodies, or arroyos within one mile of the perimeter of the facility on either the 1984 East Lake, NM, or the 1969 Rattlesnake Canyon, NM, USGS 7.5' quadrangles. The surrounding slightly undulating topography is in a large area of poorly defined surface drainage with a 1% grade sloping to the southeast.

The soil type at the site is Kermit-Palomas, a dune sand [Soil Conservation Survey, 1974, Soil Survey, Leas County, New Mexico, USDA]. The eolian dune deposits have a depth of 8 to 12 feet.

As of January 1996, no wells were recorded within one-quarter mile of the perimeter of the facility either with the New Mexico State Engineer Office or with the National Water Information System, Version I, Ground Water Site Information, USGS. One well 2500 feet to the northwest, recorded with the State Engineer Office, is used for stock and has a water table depth of 140 feet. One well in the National Water Information System, 3000 feet west, is used for stock and had a reported water table in the Ogallala of 164 to 162 feet from 1979 to 986. In 1991, the reported water table depth was 68.74 feet, possibly misreported or recorded after a period of high recharge. Water wells around the facility would also be used for oil-field industrial purposes.

A piezometric map of the water table shows the elevation of the water table at the site to be about 3350 feet in depth. The elevation of the facility is 3462 feet, placing the depth to the water table from this map at the site at 92 feet. Therefore, the estimated depth to groundwater at the facility is 92 to 140 feet, values between the piezometric map and the depth to the water table at the nearest stock well, in the Ogallala Formation.

The aquifers below the facility are the poorly consolidated sands of the Ogallala Formation, the deeper, Triassic Dockum Group of hematite-cemented slay and sandstones, and the deeper Paleozoic dolomitic limestones [Nicholson and Clebsch, *Ground-Water Report 6: Geology and Ground-Water Conditions in Southern Lea County, New Mexico,* New Mexico Bureau of Mines & Mineral Resources, 1961].

Water in the Ogallala Formation is high in silica (49 to 73 ppm), moderately high in calcium and magnesium, low in sulfates and chlorides, very high in fluoride, and has total dissolved solids of less than 110 ppm [Nicholson and Clebsch].

The lower Dockum Group is low in silica (9 to 41 ppm), very high in fluoride, high in sodium, and has a wide range of concentrations of chlorides, sulfates, calcium, and magnesium. The total dissolved solids in the Dockum Group are higher than that of the Ogallala [Nicholson and Clebsch]. The deeper Paleozoic aquifers do not contain usable water and are brine-injected [Nicholson and Clebsch].

The flood potential at the facility is low, as the facility is on a slight divide that drains west into a depression, north into another small depression, and east and southeast downslope. The area is undulating, with a general sloping direction to the southeast

13 ADDITIONAL INFORMATION

Closure Plan

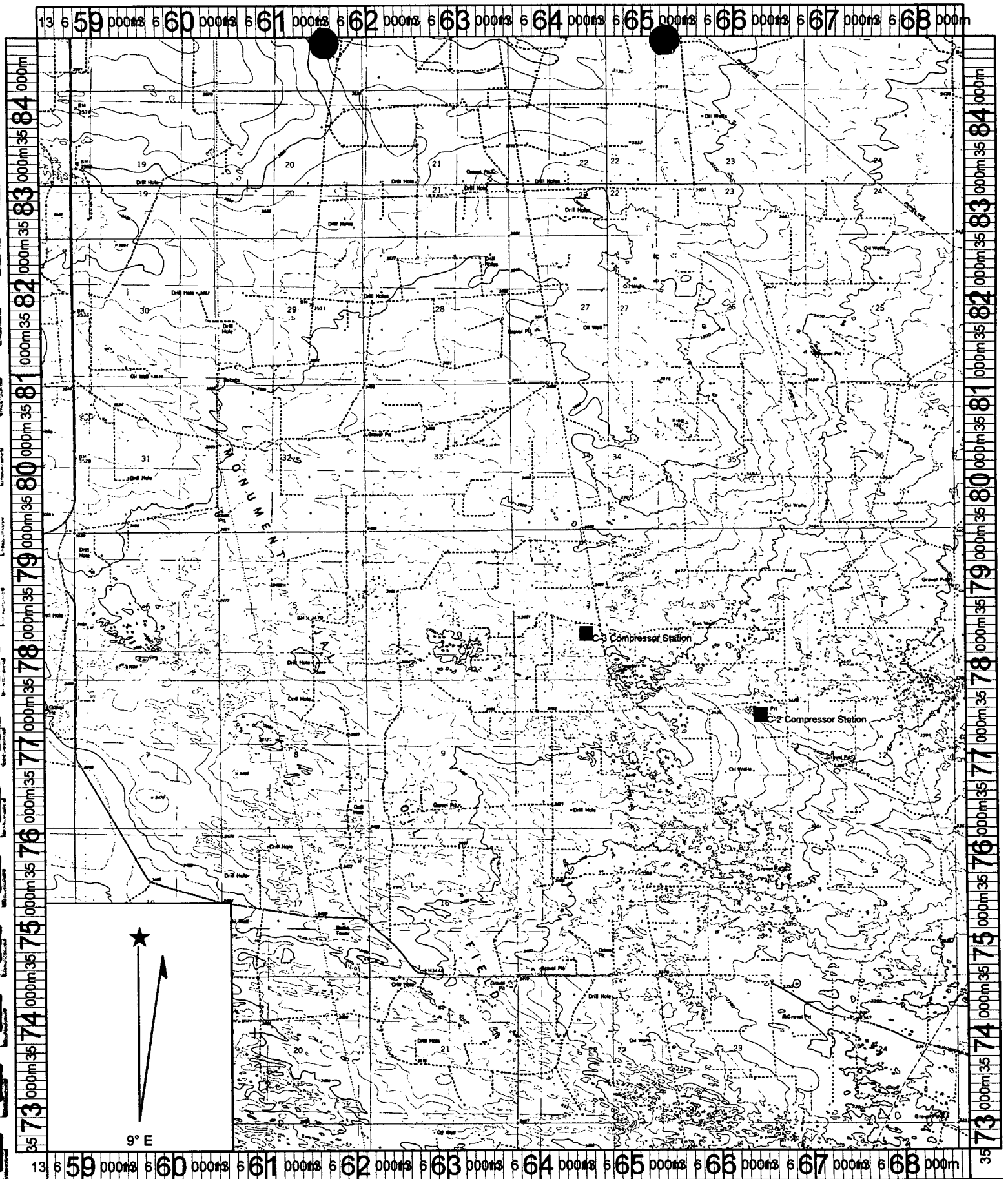
Should Sid Richardson choose to permanently close the C-4 Compressor Station, all reasonable and necessary measures will be taken to prevent the exceedances of 20 NMAC 6.2.3103 quality standards. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 113 and 20 NMAC 3.2.1203 will be made, and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

AFFIRMATION

I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the C-3 compressor station and that such information is true, accurate, and complete to the best of my knowledge and belief.

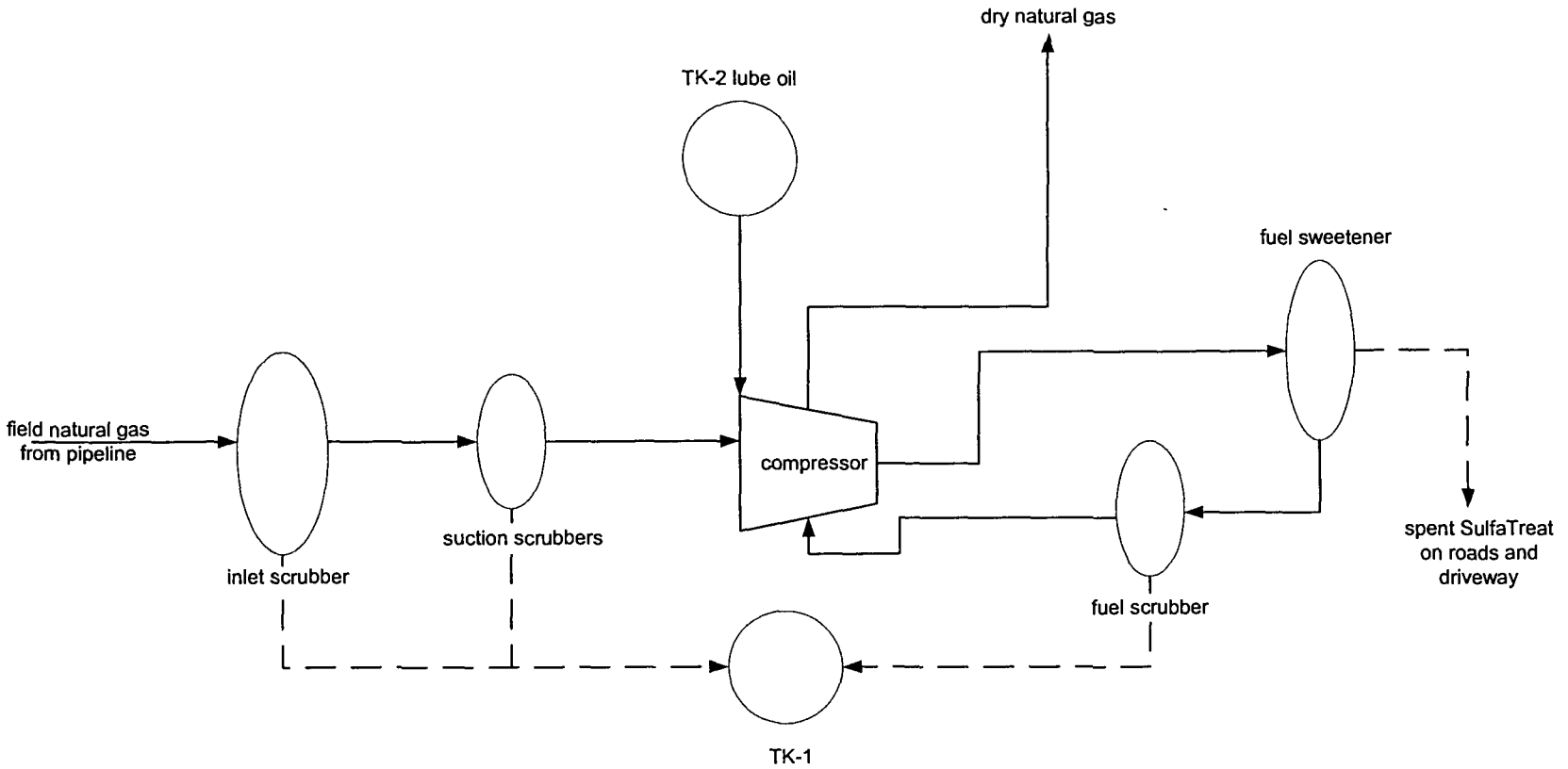
Wayne J. Farley
Director of Gas Operations
Sid Richardson Energy Services, Ltd.

9-14-01
Date



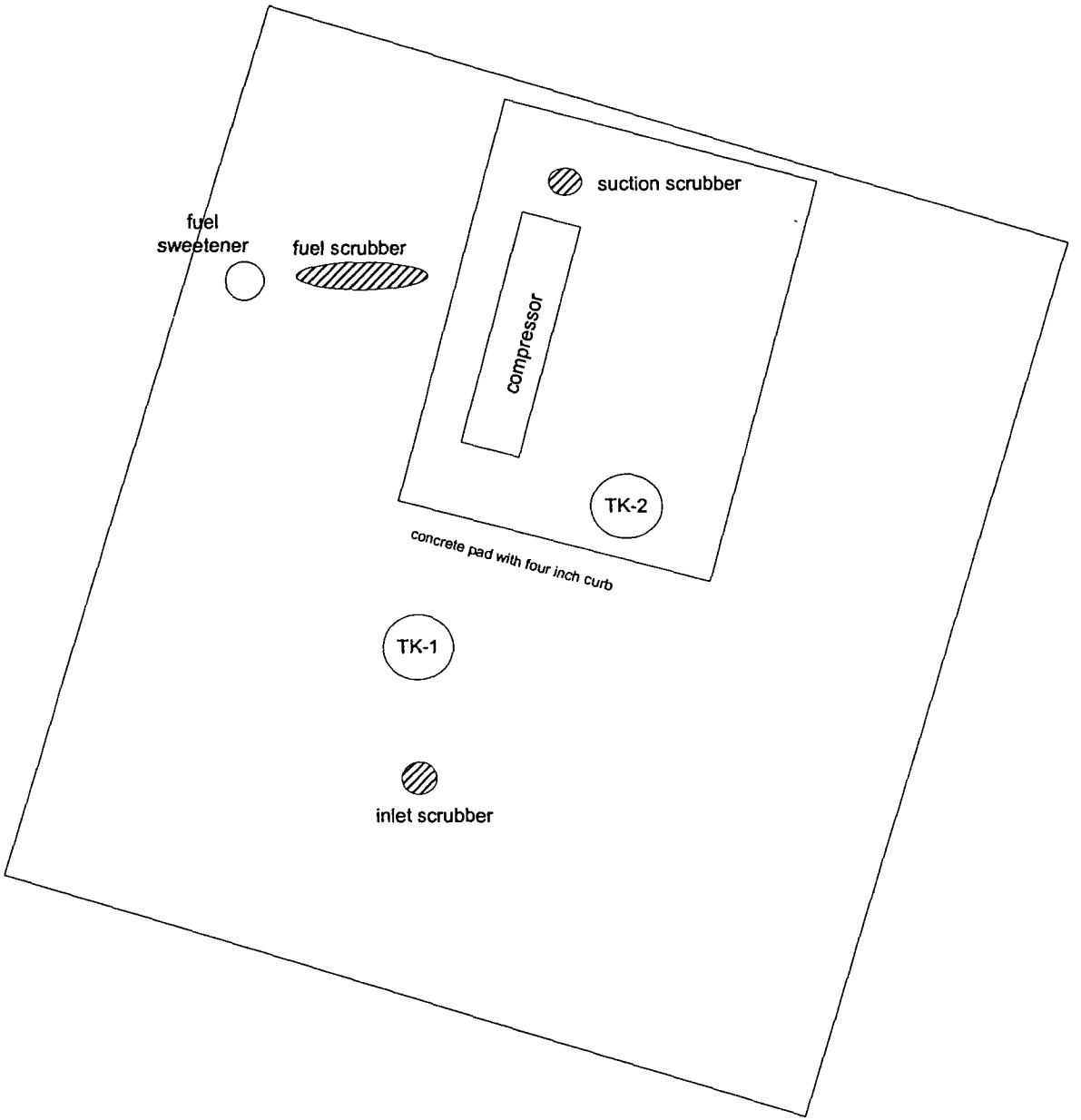
Name: EAST LAKE
Date: 6/25/2001
Scale: 1 inch equals 4444 feet

Location: 13 663550 E 3578685 N
Caption: Appendix 1
Site Location



esc

Figure 1
Block Flow Diagram
Sid Richardson Energy Services, Ltd. - C-3 Compressor Station



N Not to scale

Figure 2
Site Diagram
Sid Richardson Energy Services, Ltd. - C-3 Compressor Station

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

TITLE 19 **NATURAL RESOURCES & WILDLIFE**
CHAPTER 15 **OIL AND GAS**

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION
[1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS:
Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A **Major Release** shall be reported by giving **both** immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

- (a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;
- (b) an unauthorized release of any volume which:
  - (i) results in a fire;
  - (ii) will reach a water course;
  - (iii) may with reasonable probability endanger public health; or
  - (iv) results in substantial damage to property or the environment;
- (c) an unauthorized release of natural gases in excess of 500 mcf; or
- (d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A Minor Release shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

Immediate verbal notification required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, **immediate verbal notification** pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141.

Timely written notification is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification.

[5-22-73...2-1-96; A, 3-15-97]

116.D CORRECTIVE ACTION:

The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A.19). [3-15-97]

GROUND AND SURFACE WATER PROTECTION – 20NMAC 6.2

Statutory Authority: Standards and Regulations are adopted by the commission under the authority of the Water Quality Act, NMSA 1978, Sections 74-6-1 through 74-6-17. [2-18-77, 9-20-82, 12-1-95]

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

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

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

   a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
   b. the name and address of the facility;
   c. the date, time, location, and duration of the discharge;
   d. the source and cause of discharge;
   e. a description of the discharge, including its chemical composition;
   f. the estimated volume of the discharge; and
   g. any actions taken to mitigate immediate damage from the discharge. [2-17-74, 2-20-81, 12-24-87, 12-1-95]

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

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

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

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

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

7. The Bureau Chief shall approve or disapprove in writing the foregoing corrective action report within thirty (30) days of its receipt by the department. In the event that the report is not satisfactory to the department, the Bureau Chief shall specify in writing to the facility owner/operator any shortcomings in the report or in the corrective actions already taken or proposed to be taken relative to the discharge, and shall give the facility owner/operator a reasonable and clearly specified time within which to submit a modified corrective action report. The Bureau Chief shall approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the department. [12-24-87]

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

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

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

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

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

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

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

2. "Facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;[2-17-74]

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

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

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

SI RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

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SCOPE

This procedure provides the guidelines necessary to properly notify the State of New Mexico in the event of a Spill, Leak or Release of Hydrocarbon Liquids, Produced Water or Natural Gas.

RESPONSIBILITY

Each employee involved in field and plant operations and his/her supervisor are responsible for the requirements of this procedure.

DEFINITIONS

Immediate notification - Notification to the State District office by phone or in person as soon as possible but no later than 24 hours of initial discovery. Followed by a written notification within 15 days of initial discovery

Subsequent notification - Notification to the appropriate State District office by written report within 15 days of discovery. The State of New Mexico **Form C-141** (attached) must be used for all written notifications.

Major Release - Requires verbal notification within 24 hours of discovery, followed by a written notification within 15 days of initial discovery.

Minor Release - Requires written notification only within 15 days of initial discovery.

Spill, leak or release - An incident where crude oil, produced water or natural gas is discharged and contaminates either a water, soil, or air.

Hydrocarbon Liquid - Crude oil associated with the exploration and production, including transportation, of oil or gas.

Watercourse - Any lake bed or gully, draw, stream bed, wash, arroyo, or natural or manmade channel through which water flows or has flowed.

Reporting Requirements - The notification of releases shall be made by the person operating or controlling either the release or the location of the release.

SI RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

INITIAL RESPONSE TO A SPILL, LEAK OR RELEASE

STEP 1: Evaluate the potential hazard to the general public. Take appropriate action.

STEP 2: Eliminate or restrict the source of the spill, leak or release by whatever safe and reasonable means available.

STEP 3: Contain the spill, leak or release to minimize the area of exposure. This may be accomplished by the use of dikes, berms or absorbent materials such as tubes, pads, hay, etc..

STEP 4: Remove as much standing liquid (free oil) as possible by any reasonable method.

INTER-COMPANY REPORTING REQUIREMENTS

Any spill, leak or release of hydrocarbon liquid, produced water or natural gas that requires State notification or effects any watercourse will be reported to the Area Manager and/or the Area Safety Coordinator immediately.

NEW MEXICO REPORTING REQUIREMENTS

Immediate Notification (Major release)

Any amount of hydrocarbon liquid into a watercourse.
>25 bbls. of hydrocarbon liquid on the ground.
>25 bbls. of produced water into a watercourse.
>25 bbls. of produced water on the ground.
>500 mcf of natural gas
or an unauthorized release of any volume (oil, water or gas) that :
1) results in a fire;
2) will reach a watercourse;
3) may (w/ reasonable probability) endanger public health
4) results in substantial damage to property or the environment.

Subsequent Notification (Minor release)

>5 bbls. but <25 bbls. of hydrocarbon liquid on the ground.
>5 bbls. but <25 bbls. of produced water on the ground or in a watercourse.
>50 mcf but <500 mcf of natural gas.

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

NEW MEXICO REMEDIATION REQUIREMENTS

Soil must be remediated if :

TPH	>5000 ppm
BTEX	>50 ppm
Benzene	>10 ppm

In circumstances where the contaminated soil is :

<100 ft. above the water table
<1000 ft. from a water well
<1000 ft. from a surface water body

Remediation levels may be lower in these cases and the Area EH&S Coordinator should be consulted as to the extent of remediation required.

REMEDIATION PROCEDURES

STEP 1: Where the spill, leak or release is from a gathering pipeline the pipe should be excavated in a manner that allows for some blending with uncontaminated soil upon backfilling.

STEP 2: Sample the contaminated soil for the required components using a representative composite sample. Depending on the size contaminated area, a typical composite sample would be one with equal parts of soil from the four "corners" and one part from the center of the contaminated area.

STEP 3: Determine the type of remediation to be used i.e., natural remediation, soil blending, land farming, enhanced bio-remediation, thermal disorbtion etc.. For significant spills, leaks or releases contact Area EH&S Coordinator for recommendations or assistance in making this determination.

STEP 4: Monitor the remediation process to see that it is progressing. This could entail further sampling, watering, aerating or tilling.

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

PREVENTIVE MEASURES

Certain steps should be taken to prevent the occurrence of a spill, leak or release:

(1) The integrity of equipment should be monitored and maintained.

(2) Containment's, that would prevent any contact with the soil of liquids that cause contamination, should be used when possible.

(3) Gathering systems should be kept free of liquids where possible at pigging facilities, drips and siphons.

(4) Equipment near watercourses should be of particular concern.

(5) Past experience should be used in determining the need for other preventive measures.

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

Attachment A

Contaminated Soils Ranking Criteria

A) Depth to Ground Water

< 50 feet	20
50-99 feet	10
>100 feet	0

B) Wellhead Protection Area
<1000 feet from a water source, or
<200 feet from a private domestic water source

YES	20
NO	0

C) Distance to Surface Water

<200 horizontal feet	20
200-1000 horizontal feet	10
>1000 horizontal feet	0

A = _____
B = _____
C = _____
Total = _____

Total Ranking is as follows:

	Level I >19	Level II 10-19	Level II 0-9
Benzene (PPM)	10	10	10
BTEX (PPB)	50	50	50
TPH (PPM)	100	1000	5000

SID RICHARDSON GASOLINE CO.
STANDARD OPERATING PROCEDURE

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

Attachment B

Leak, Spill or Release Report

Facility_____ Person Filing Report _____
Report Date ____/____/_____ Time of Filing ___:_____ AM / PM

Responsible Party: Sid Richardson Gasoline Co.
Facility address: _____
City: _____ State: NM ☐ TX ☐ Zip Code: _____
Telephone: ____-_____-_____ Fax: ____-_____-_____

Discharge Date: ___/___/_____ Time: __:____ AM / PM
Duration of Discharge: ___ Hr. ____ Min. Quantity Discharged: _____ Gal. / Lbs.
Source and/or Cause of Discharge: _____
Type of Discharge: ☐ Gas ☐ Crude Oil ☐ Condensate ☐ Saltwater ☐ Other
If other, explain by noting the chemical composition and physical characteristics on the reverse side of this page or attach the MSDS.

Location: ¼ ___ ¼ ___ Section____Township____Range ____Survey____Block ____

Distance from the nearest town, community or landmark: _____

Site characteristics are as follows:

- Precipitation during the release prior to remediation: _____
- Wind Conditions and Direction: _____
- Temperature:_____
- Soil Type: _____
- Depth of Penetration: _____
- Area of Delineation: _____
- Nearest Residence: _____
- Nearest *Fresh Water: _____

*Any water well or watercourse, i.e., river, lake, stream, playa, arroyo, draw, wash, gully, natural or man-made channel.

Attach a copy of the chronological record of all federal, state and local agencies notified in reference to this report. Always indicate the name of the person who receives the call and the time the call was made for each agency.

Subject: Guidelines for Notification of Spills, Leaks, Releases of Hydrocarbon Liquids, Produced Water or Natural Gas

ATTACHMENT C

DEFINITIONS

Unsaturated/Contaminated Soil
Soils, which are not highly contaminated/saturated, but contain Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) and Total Petroleum Hydrocarbons (TPH) or other potential fresh water contaminants.

Saturated/Highly Contaminated
Those soils that contain a free liquid phase or exhibit gross staining.

Watercourse
Any lakebed or gully, draw, streambed, wash, arroyos, or natural or man-made channel through which water flows or has flowed.

Immediate Notification
Shall be as soon as possible after discovery and shall be in person or by telephone to the district office of the Division in which the incident occurred. If incident occurs after normal business hours, notify the District Supervisor, the Oil & Gas Inspector, or the Deputy Oil & Gas Inspector. Follow up with a completed written report within ten (10) days of the incident.

Subsequent Notification
A complete written report of the incident within ten (10) days of the discovery of the incident.

Written Report
Complete written reports will be submitted in DUPLICATE to the district office of the OCD in the district in which the incident occurred within ten (10) days after discovery of the incident.

Content of Notification
Refer to Attachment B.

MATERIAL SAFETY DATA SHEET

I. PRODUCT IDENTIFICATION

TRADE NAME (as labeled)
SulfaTreat

MANUFACTURER'S NAME & ADDRESS
The SulfaTreat Company
900 Roosevelt Pkwy, Suite 610
Chesterfield, Missouri 63017

Phone number for additional information: 1-800-726-7687 (314-532-2189)

Date prepared or revised: 6/21/94

II. HAZARDOUS INGREDIENTS

Chemical Names	CAS Numbers	Percent	Exposure Limits in Air (units) ACGIH TLV	OSHA PEL	Other (specify)
None					
NA					

SulfaTreat contains no hazardous materials as listed by ACGIH (American Conference of Governmental Hygenists).

III. PHYSICAL PROPERTIES

Vapor density (air=1)	NA	Melting point or range, °F	NA
Specific gravity	2.4	Boiling point or range, °F	NA
Solubility in water	0	Evaporation rate (butyl acetate=1)	NA
Vapor pressure, mmHg at 20°C	0		

Appearance and odor: Black, Granular, Odorless

How to detect this substance (warning properties of substance as a gas, vapor, dust, or mist): NA

IV. FIRE AND EXPLOSION

Flash Point, °F (give method) NA

Auto ignition temperature, °F NA

Flammable limits in air, volume %: NA lower (LEL)___ upper (UEL)___

Fire extinguishing materials: NA water spray; NA foam; NA carbon dioxide; NA dry chemical; NA other:

Special firefighting procedures: None

Unusual fire and explosion hazards: None

SID RICHARDSON GASOLINE CO.
WEST TEXAS AREA OFFICE
5030 E. UNIVERSITY
SUITE C-104
ODESSA, TEXAS 79762
TELEPHONE: (915) 367-2867
FAX: (915) 367-2862

September 22, 1995

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Mr. Anderson:

Recently Sid Richardson Gasoline Co. purchased the Xcel Gas Company (Clayton Williams Companies) gas gathering system in southeastern Lea County. This system includes five (5) compressor sites located between Jal and Eunice New Mexico.

Each compressor is natural gas driven and each utilizes a fuel scrubber to make the field gas usable for the operation of these engines. Each scrubber contains approximately 4-7 cu. yds. of a product called Sulfa Treat (MSDS attached). Sulfa Treat contains no hazardous materials as listed by the ACGIH, is non-toxic and stable. Also there are no special procedures for spills or disposal. This material is a solid waste.

Sid Richardson Gasoline Co. request permission to dispose of our Sulfa Treat material on site and on top of the ground. For your convenience, I have also included a copy of your approval letter to Xcel Gas Company (2-5-93).

If there are any further questions or if more information is needed, do not hesitate to call myself or Harold Hicks, Field Mgr. for Sid Richardson Gasoline Co. Lea County gas gathering system at (505)395-2116. Your help and prompt attention to this matter is greatly appreciated.

Sincerely,

Robert Lee Gawlik
WTA Safety Mgr.

Enclosures

cc: Curtis Clark
Harold Hicks
Herb Harless

V. HEALTH HAZARD INFORMATION

SYMPTOMS OF OVEREXPOSURE (for each potential route of exposure)

Inhaled: Over exposure to dust may irritate nasal passage.

Contact with skin or eyes: Contact with skin has no affect; could cause eye irritation similar to dust.

Absorbed through skin: None. Swallowed: None

HEALTH EFFECTS OR RISKS FROM EXPOSURE: Explain in lay terms. Attach extra page if more space is needed.

Acute: No acute effects to health are known. LD50 greater than 3990 mg/kg (highest practical test level). Not toxic.

Chronic: No chronic effects to health are known.

FIRST AID: EMERGENCY PROCEDURES

Eye Contact: Flush with water. Skin Contact: None. Swallowed: None.

Inhaled: Remove to fresh air.

SUSPECTED CANCER AGENT? _X_NO - This product's ingredients are not found in the lists below.

___Federal OSHA ___NTP ___IARC

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: None known.

VI. REACTIVITY DATA

Stability: _X_Stable ___Unstable

Conditions to avoid: NA Incompatibility (materials to avoid): NA

Hazardous decomposition products (including combustion products): None

Hazardous polymerization: ___May occur _X_Will not occur

VII. SPILL, LEAK, AND DISPOSAL PROCEDURES

Spill response procedures (include employee protection measures): No special procedures required.

Preparing wastes for disposal (container types, neutralization, etc.): No special procedures required.

NOTE: Dispose of all wastes in accordance with federal, state and local regulations.

VIII. SPECIAL HANDLING INFORMATION

Ventilation and engineering controls: No special requirements.

Respiratory protection (type): NIOSH/MSHA approved dust mask (TC-21C-132)

Eye protection (type): None required. Gloves (specify material): None required.

Other clothing and equipment: No special requirements.

Work practices, hygienic practices: No special requirements.

Other handling and storage requirements: No special requirements.

Protective measures during maintenance of contaminated equipment: NA

EVALUATION OF THE ENVIRONMENTAL CHARACTERISTICS OF SulfaTreat® AND ITS REACTION PRODUCTS USING EPA GUIDELINES FOR THE "IDENTIFICATION AND LISTING OF HAZARDOUS WASTE" MARCH, 1992

I. SUMMARY

SulfaTreat® is used in a patented process which consists of the use of a proprietary iron compound to remove hydrogen sulfide from natural gas. As a result of the process, a solid residue is produced.

Laboratory evaluations were performed on SulfaTreat® and its air dried reaction products according to U.S. Environmental Protection Agency (EPA) test protocol cited in 40 CFR Subpart C (Section 261.20 through 261.24) of Section 3001 of the Resource Conservation and Recovery Act in the Federal Register, Volume 45, Number 98, on May 19, 1980, revised July 1,1989 and the Toxicity Characteristics Leaching Procedure (TCLP) effective September 2, 1990. Reacted SulfaTreat® was also analyzed according to extractable California title 22 methods using the calwet extraction procedure.

Evaluations included testing of the ignitability, corrosivity, reactivity, and the determination of the presence of heavy metals and pesticides as prescribed in the regulations.

Also the oral and dermal toxicity and the aquatic 96 hour LC_{50} was determined and the agricultural characteristics were studied. All results showed SulfaTreat® and its reaction products to be safe for personnel and non-hazardous to the environment and effective for plant growth.

The work summarized herein was performed for Gas Sweetener Associates dba The SulfaTreat Company by the following companies and individuals:

EPA:

Gulf South Research Institute (GSRI)
Shilstone Testing Laboratories
Tim Sloan, Scientific Consultant
Dr. R. P. Wendt, Professor of Chemistry, Loyola University
Thermo Analytical Inc.
SPL, Inc.

ORAL AND DERMAL TOXICITY:

Scientific Associates, Inc.

CORN GROWTH EXPERIMENTS:

Terry L. Smith, Ph.D., California Polytechnic State University, Soil Science Deparent.

II. EXPERIMENTAL RESULTS

A. Characteristics of Ignitability

The residue is not a liquid. Flash point of wet sludge - Does not flash below 100°C. Flash point of dry sludge - 137°C.

1. Friction Testing

Friction testing was conducted by grinding the sample under standard temperature and pressure in a mortar and pestle and monitoring the temperature. There was neither ignition nor any variation in the temperature or cause of fire during the course of the evaluation.

2. Flame Testing

Flame testing was conducted by 1) directly heating the sample with a Fischer burner flame and 2) indirectly heating the sample in a porcelain crucible. In both cases, the sample did not ignite but merely glowed with red color due to high temperature.

3. Exposure to Moisture Testing

Exposure to moisture testing was conducted by placing small amounts of the sample in water. The sample remained unchanged.

4. Oxidizer

By the definition stated in 49 CFR 173.141, the sample is not an oxidizer.

B. Characteristics of Corrosivity

1. pH Determination

The pH determination was made on a slurried sample in accordance with EPA 600/4.79-020. The initial pH reading was approximately 9.

2. Corrosion Rate Determination

The corrosion rate of the sample on 1020 steel was determined using a potentiodynamic polarization technique (ASTM G-5 specification). The studies were conducted using a Princeton Applied Research computerized Model 350 corrosion measurement system.

The results of the potentiodynamic polarization experiment with SAE 1020 steel showed that the general corrosion rate a 455C (130°F) of 5.8 mils (.15 mm) per year is substantially below the maximum 0.250 inches (6.25 mm) per year specified in the regulation.

C. Characteristics of Reactivity

1. Stability Testing

An aqueous suspension of the reacted SulfaTreat® monitored with a potentiometer from pH 1 to pH 12.5. The pH alterations were accomplished using dilute HCL and dilute NaOH. The material was stable and totally unreactive when exposed to these pH extremes without any evolution of gases, including H_2S and SO_2.

2. Classification as an Explosive

Neither the material nor anything similar to this material is listed as a Forbidden, Class A, or Class B explosive in 49 CFR 173.51, 49 CFR 173.53, or 49 CFR 173.88.

D. Characteristics of EP Toxicity

Laboratory evaluations of the EP toxicity required a leaching step prior to analysis. The leaching step was carried out in accordance with the test methods described within the Federal Register, Volume 45, Number 98 on May 19, 1980 (Appendix III). 100 grams of the ground solid sample were placed in a mechanically stirred extractor with 1600 g of deionized water. The pH was maintained at 5 for a period of 24 hours by the addition of 0.5 N acetic acid at 30 minute intervals as needed. This solution was then filtered using a 0.45 millipore filter. The filtrate was analyzed for the presence of contaminants using the following EPA methods:

Contaminant	EPA Method
Mercury	245.1
Arsenic	206.1
Barium	208.1
Cadmium	213.1
Chromium	218.1
Lead	239.2
Selenium	270.3
Silver	272.1
Mercury	245.1
TCLP	1311

The concentration of contaminants in the extract is far below the maximum allowable limits in all cases.

E. Oral and Dermal Toxicity

1. Unreacted SulfaTreat® (Oral Toxicity)

The acute oral LD50 of SulfaTreat® when administered as a 67% w/w aqueous suspension to male and female SASCO rats weighing 219 to 345 grams, was found to be greater than 39.91 g/kg of body weight.

As the term is defined in the Federal Hazardous Substances Act (FHSA), the product was found not to be a Toxic Substance.

2. Reacted SulfaTreat® (Oral Toxicity)

Undiluted, reacted SulfaTreat® (semisolid phase) was administered orally to ten SASCO-SD rats (five male and five females), weighing 198 to 265 grams at a dosage level of 5.00 grams per kilogram of body weight. All of the animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substance Act (FHSA), the semisolid phase of the test material was found not to be a Toxic Substance.

3. Reacted SulfaTreat® (Dermal Toxicity)

Undiluted, reacted SulfaTreat® (liquid phase) was applied for twenty-four hours to the abraded skin of five male and five female New Zealand White Rabbits, weighing 2.72 to 3.09 kilograms, at a dosage level of 2.00 grams per kilogram of body weight. All ten animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substances Act (FHSA), the liquid phase of the test material was found not to be a Toxic Substance.

4. Reacted SulfaTreat® (Aquatic Toxicity)

Passed the aquatic 96 hour LC50 which was determined to be more than 500 milligrams per liter when measured in soft water with fathead minnows.

F. Other

The material is not listed (as a hazardous waste) in Subpart 261.30-261.33 of "Identification and Listing of Hazardous Wastes, "EPA-8700-12(FR), May 29, 1980.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

February 5, 1993

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

Mr. Rick Boring 684-3849
Xcel Gas Company
6 Desta Drive
Suite 5800
Midland, Texas 79705

Re: Sulfa Treat Waste

Dear Mr. Boring

Based on the Sulfa Treat Material Safety Data Sheet and supplemental information provided, the solid waste generated from the use of Sulfa Treat does not exhibit hazardous waste characteristics and may be disposed of on site pursuant to OCD solid waste disposal requirements or offsite at an OCD approved disposal facility.

If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely:

Roger C. Anderson
Environmental Bureau Chief

xc: Jerry Sexton- OCD Hobbs

OIL CONSERVATION DIVISION

September 25, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-060

Mr. Robert Gawlik
Sid Richardson Gasoline Co.
5030 East University, Suite C-104
Odessa, TX 79762

Re: Disposal Request - Sulfa Treat Waste

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) has received your request letter dated September 22, 1995, for approval to remove and dispose of spent Sulfa Treat from 5 compressor stations located in Lea county, with approximately 7 cubic yards per station. **Based on the information provided, your disposal request is approved.** The spent Sulfa Treat may be disposed of in a the same manner as the February 5, 1993 approval from Mr. Roger Anderson with the NMOCD. (see attached letter)

Please be advised that this approval does not relieve you of liability should your operation result in pollution of surface or groundwater or the environment.

If there are any questions on this matter, please contact me at (505) 827-7156.

Sincerely,

Patricio W. Sanchez,
Petroleum Engineer

Name of Lease Comp?
Legal locations

XC: Mr. Wayne Price and Mr. Jerry Sexton

RECEIVED
SEP 27 1995
WTA Odessa

Material Safety Data Sheet

Chevron HDAX LFG Gas Engine Oil

MSDS: 7046 Revision #: 2 Revision Date: 06/06/00

Click Product Test Data to search database.

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1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON HDAX Low Ash Gas Engine Oil and HDAX LFG

PRODUCT NUMBER(S): CPS232325 CPS232327 CPS232328 CPS232331
SYNONYM: CHEVRON HDAX Low Ash Gas Engine Oil SAE 15W-40
CHEVRON HDAX Low Ash Gas Engine Oil SAE 30
CHEVRON HDAX Low Ash Gas Engine Oil SAE 40
CHEVRON HDAX LFG Gas Engine Oil SAE 40

COMPANY IDENTIFICATION	EMERGENCY TELEPHONE NUMBERS
Chevron Products Company Lubricants and Specialty Products 6001 Bollinger Canyon Rd., T3325/B10 San Ramon, CA 94583 www.chevron-lubricants.com	HEALTH (24 hr): (800)231-0623 or (510)231-0623 (International) TRANSPORTATION (24 hr): CHEMTREC (800)424-9300 or (703)527-3887 Emergency Information Centers are located in U.S.A. Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request:(800)414-6737 email:lubemsds@chevron.com
Environmental, Safety, & Health Info: (925) 842-5535
Product Information: (800) 582-3835

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2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON HDAX Low Ash Gas Engine Oil and HDAX LFG

CONTAINING

COMPONENTS	AMOUNT	LIMIT/QTY	AGENCY/TYPE
LUBRICATING BASE OIL SEVERELY REFINED PETROLEUM DISTILLATE	> 80.00%	5 mg/m3 (mist) 10 mg/m3 (mist) 5 mg/m3 (mist)	ACGIH TWA ACGIH STEL OSHA PEL

The BASE OIL may be a mixture of any of the following: CAS 64741884, CAS 64741895, CAS 64741964, CAS 64741975, CAS 64742014, CAS 64742525, CAS 64742536, CAS 64742547, CAS 64742627, CAS 64742650, or CAS 72623837.

ADDITIVES INCLUDING THE FOLLOWING < 20.00%

ZINC ALKARYL DITHIOPHOSPHATE
Chemical Name: ZINC ALKARYL DITHIOPHOSPHATE
CAS54261675 < 0.50% NONE NA

COMPOSITION COMMENT:
All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

IMMEDIATE HEALTH EFFECTS
EYE:
Not expected to cause prolonged or significant eye irritation.
SKIN:
Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.
INGESTION:
Not expected to be harmful if swallowed.
INHALATION:
Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit.

4. FIRST AID MEASURES

EYE:
No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.
SKIN:
No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse.
INGESTION:
No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person.
INHALATION:
If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:
Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.

FLAMMABLE PROPERTIES:
FLASH POINT: (COC) 399F (204C) min.
AUTOIGNITION: NDA
FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA
EXTINGUISHING MEDIA:
CO2, Dry Chemical, Foam, Water Fog
NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.
FIRE FIGHTING INSTRUCTIONS:
This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.
COMBUSTION PRODUCTS:
Normal combustion forms carbon dioxide and water vapor and may produce oxides of Ca, P, N, S, Mo, Zn. Incomplete combustion can produce carbon monoxide.

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6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887
International Collect Calls Accepted
ACCIDENTAL RELEASE MEASURES:
Stop the source of the leak or release. Clean up releases as soon as possible, observing precautions in Exposure Controls/Personal Protection. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

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7. HANDLING AND STORAGE

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

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8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:
Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS

Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION:
No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice.
SKIN PROTECTION:
No special protective clothing is normally required. Where splashing is possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H>
RESPIRATORY PROTECTION:
No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

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9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:
Dark amber liquid.

pH:	NDA
VAPOR PRESSURE:	NA
VAPOR DENSITY (AIR=1):	NA
BOILING POINT:	NDA
FREEZING POINT:	NDA
MELTING POINT:	NA
SOLUBILITY:	Soluble in hydrocarbon solvents; insoluble in water.
SPECIFIC GRAVITY:	0.87 - 0.88 @ 15.6/15.6C
EVAPORATION RATE:	NA
VISCOSITY:	11.0 - 14.4 cSt @ 100C (min.)
PERCENT VOLATILE (VOL):	NA

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10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:
H_2S may be released at high temperatures.
CHEMICAL STABILITY:
Stable.
CONDITIONS TO AVOID:
No data available.
INCOMPATIBILITY WITH OTHER MATERIALS:
May react with strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.
HAZARDOUS POLYMERIZATION:
Polymerization will not occur.

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11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:

The eye irritation hazard is based on an evaluation of the data for the components.
SKIN EFFECTS:
The skin irritation hazard is based on an evaluation of the data for the components.
ACUTE ORAL EFFECTS:
The acute oral toxicity is based on an evaluation of the data for the components.
ACUTE INHALATION EFFECTS:
The acute respiratory toxicity is based on an evaluation of the data for the components.
ADDITIONAL TOXICOLOGY INFORMATION:
This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

This product contains zinc alkaryl dithiophosphate which is similar in toxicity to zinc alkyl dithiophosphate (ZDDP). Several (ZDDPs) have been reported to have weak mutagenic activity in cultured mammalian cells but only at concentrations that were toxic to the test cells. We do not believe that there is any mutagenic risk to workers exposed to ZDDPs.

During use in engines, contamination of oil with low levels of cancer-causing combustion products occurs. Used motor oils have been shown to cause skin cancer in mice following repeated application and continuous exposure. Brief or intermittent skin contact with used motor oil is not expected to have serious effects in humans if the oil is thoroughly removed by washing with soap and water. See Chevron Material Safety Data Sheet No. 1793 for additional information on used motor oil.

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12. ECOLOGICAL INFORMATION

ECOTOXICITY:
The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.
ENVIRONMENTAL FATE:
This material is not expected to be readily biodegradable.

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13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

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14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations.

Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE
DOT HAZARD CLASS: NONE
DOT IDENTIFICATION NUMBER: NONE
DOT PACKING GROUP: N/A
ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT.
ADR/RID Hazard class - Not applicable.

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15. REGULATORY INFORMATION

SARA 311 CATEGORIES:

1. Immediate (Acute) Health Effects: NO
2. Delayed (Chronic) Health Effects: NO
3. Fire Hazard: NO
4. Sudden Release of Pressure Hazard: NO
5. Reactivity Hazard: NO

REGULATORY LISTS SEARCHED:

01=SARA 313	11=NJ RTK	22=TSCA Sect 5(a)(2)
02=MASS RTK	12=CERCLA 302.4	23=TSCA Sect 6
03=NTP Carcinogen	13=MN RTK	24=TSCA Sect 12(b)
04=CA Prop 65-Carcin	14=ACGIH TWA	25=TSCA Sect 8(a)
05=CA Prop 65-Repro Tox	15=ACGIH STEL	26=TSCA Sect 8(d)
06=IARC Group 1	16=ACGIH Calc TLV	27=TSCA Sect 4(a)
07=IARC Group 2A	17=OSHA PEL	28=Canadian WHMIS
08=IARC Group 2B	18=DOT Marine Pollutant	29=OSHA CEILING
09=SARA 302/304	19=Chevron TWA	30=Chevron STEL
10=PA RTK	20=EPA Carcinogen	

The following components of this material are found on the regulatory lists indicated.

ZINC ALKARYL DITHIOPHOSPHATE
is found on lists: 01,11,
SEVERELY REFINED PETROLEUM DISTILLATE
is found on lists: 14,15,17,

EU RISK AND SAFETY LABEL PHRASES:
R53: May cause long-term adverse effects in the aquatic environment.
NEW JERSEY RTK CLASSIFICATION:
Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34;5A-1 et. seq., the product is to be identified as follows:
PETROLEUM OIL
New Jersey Right-To-Know trade secret registry number 01154100-5031P
New Jersey Right-To-Know trade secret registry number 01154100-5063P
WHMIS CLASSIFICATION:
This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

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16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0;
HMIS RATINGS: Health 1; Flammability 1; Reactivity 0;
(0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or

published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:
This revision updates Sections 1, 2, 5, 9, 12, and 15.

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value	TWA - Time Weighted Average
STEL - Short-term Exposure Limit	TPQ - Threshold Planning Quantity
RQ - Reportable Quantity	PEL - Permissible Exposure Limit
C - Ceiling Limit	CAS - Chemical Abstract Service Number
A1-5 - Appendix A Categories	() - Change Has Been Proposed
NDA - No Data Available	NA - Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

****

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

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THIS IS THE LAST PAGE OF THIS MSDS

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Material Safety Data Sheet

Chevron HDAX NG Screw Compressor Oil

MSDS: 6852 Revision #: 2 Revision Date: 10/17/00

Click Product Test Data to search database.

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1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON HDAX NG Screw Compressor Oil

PRODUCT NUMBER(S): CPS255204 CPS255205
SYNONYM: CHEVRON HDAX NG Screw Compressor Oil ISO 150
CHEVRON HDAX NG Screw Compressor Oil ISO 68

COMPANY IDENTIFICATION	EMERGENCY TELEPHONE NUMBERS
Chevron Products Company Lubricants and Specialty Products 6001 Bollinger Canyon Rd., T3325/B10 San Ramon, CA 94583 www.chevron-lubricants.com	HEALTH (24 hr): (800)231-0623 or (510)231-0623 (International) TRANSPORTATION (24 hr): CHEMTREC (800)424-9300 or (703)527-3887 Emergency Information Centers are located in U.S.A. Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request:(800)414-6737 email:lubemsds@chevron.com
Environmental, Safety, & Health Info: (925) 842-5535
Product Information: (800) 582-3835

---

2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON HDAX NG Screw Compressor Oil

CONTAINING

COMPONENTS	AMOUNT	LIMIT/QTY	AGENCY/TYPE
HYDROTREATED DIST., HVY PARA Chemical Name: DISTILLATES, HYDROTREATED HEAVY PARAFFINIC			
CAS64742547	> 80.00%	5 mg/m3 (mist)	ACGIH TWA
		10 mg/m3 (mist)	ACGIH STEL
		5 mg/m3 (mist)	OSHA PEL
ADDITIVES	< 20.00%		

COMPOSITION COMMENT:
All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

IMMEDIATE HEALTH EFFECTS
EYE:
Not expected to cause prolonged or significant eye irritation.
SKIN:
Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.
INGESTION:
Not expected to be harmful if swallowed.
INHALATION:
Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit.

4. FIRST AID MEASURES

EYE:
No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.
SKIN:
No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse.
INGESTION:
No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person.
INHALATION:
If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:
Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.
FLAMMABLE PROPERTIES:
FLASH POINT: (COC) 419F (215C) Min.
AUTOIGNITION: NDA
FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA
EXTINGUISHING MEDIA:
CO2, Dry Chemical, Foam, Water Fog
NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.
FIRE FIGHTING INSTRUCTIONS:
This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space

without proper protective equipment, including self-contained breathing apparatus.
COMBUSTION PRODUCTS:
Normal combustion forms carbon dioxide and water vapor and may produce oxides of nitrogen and phosphorus. Incomplete combustion can produce carbon monoxide.

6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887
International Collect Calls Accepted
ACCIDENTAL RELEASE MEASURES:
Stop the source of the leak or release. Clean up releases as soon as possible. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

7. HANDLING AND STORAGE

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:
Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS
Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION:
No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice.
SKIN PROTECTION:
No special protective clothing is normally required. Where splashing is

possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H>
RESPIRATORY PROTECTION:
No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:
Liquid.

pH:	NA
VAPOR PRESSURE:	NA
VAPOR DENSITY (AIR=1):	NA
BOILING POINT:	NDA
FREEZING POINT:	NDA
MELTING POINT:	NA
SOLUBILITY:	Soluble in hydrocarbon solvents; insoluble in water.
SPECIFIC GRAVITY:	0.87 - 0.88 @ 15.6/15.6/C
EVAPORATION RATE:	NA
VISCOSITY:	61.2 - 135 cSt @ 40C (Min.)
PERCENT VOLATILE (VOL):	NA

10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:
No data available.
CHEMICAL STABILITY:
Stable.
CONDITIONS TO AVOID:
No data available.
INCOMPATIBILITY WITH OTHER MATERIALS:
May react with strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.
HAZARDOUS POLYMERIZATION:
Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:
The eye irritation hazard is based on data for a similar material.
SKIN EFFECTS:
The skin irritation hazard is based on data for a similar material.
ACUTE ORAL EFFECTS:
The acute oral toxicity is based on data for a similar material.
ACUTE INHALATION EFFECTS:
The acute respiratory toxicity is based on data for a similar material.
ADDITIONAL TOXICOLOGY INFORMATION:
This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under

the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

12. ECOLOGICAL INFORMATION

ECOTOXICITY:
The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.
ENVIRONMENTAL FATE:
This material is not expected to be readily biodegradable.

13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE
DOT HAZARD CLASS: NONE
DOT IDENTIFICATION NUMBER: NONE
DOT PACKING GROUP: N/A
ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT.
ADR/RID Hazard class - Not applicable.

15. REGULATORY INFORMATION

SARA 311 CATEGORIES:

1. Immediate (Acute) Health Effects: NO
2. Delayed (Chronic) Health Effects: NO
3. Fire Hazard: NO
4. Sudden Release of Pressure Hazard: NO
5. Reactivity Hazard: NO

REGULATORY LISTS SEARCHED:

01=SARA 313	11=NJ RTK	22=TSCA Sect 5(a)(2)
02=MASS RTK	12=CERCLA 302.4	23=TSCA Sect 6
03=NTP Carcinogen	13=MN RTK	24=TSCA Sect 12(b)
04=CA Prop 65-Carcin	14=ACGIH TWA	25=TSCA Sect 8(a)
05=CA Prop 65-Repro Tox	15=ACGIH STEL	26=TSCA Sect 8(d)
06=IARC Group 1	16=ACGIH Calc TLV	27=TSCA Sect 4(a)

07=IARC Group 2A
08=IARC Group 2B
09=SARA 302/304
10=PA RTK
17=OSHA PEL
18=DOT Marine Pollutant
19=Chevron TWA
20=EPA Carcinogen
28=Canadian WHMIS
29=OSHA CEILING
30=Chevron STEL

The following components of this material are found on the regulatory lists indicated.

DISTILLATES, HYDROTREATED HEAVY PARAFFINIC
is found on lists: 14,15,17,

EU RISK AND SAFETY LABEL PHRASES:
R53: May cause long-term adverse effects in the aquatic environment.
NEW JERSEY RTK CLASSIFICATION:
Under the New Jersey Right-to-Know Act L. 1983 Chapter 315 N.J.S.A. 34:5A-1 et. seq., the product is to be identified as follows:
PETROLEUM OIL
WHMIS CLASSIFICATION:
This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

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16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0;
HMIS RATINGS: Health 1; Flammability 1; Reactivity 0;
(0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:
This revision updates Sections 1, 5, 8, 9, 12, and 15.

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV - Threshold Limit Value	TWA - Time Weighted Average
STEL - Short-term Exposure Limit	TPQ - Threshold Planning Quantity
RQ - Reportable Quantity	PEL - Permissible Exposure Limit
C - Ceiling Limit	CAS - Chemical Abstract Service Number
A1-5 - Appendix A Categories	() - Change Has Been Proposed
NDA - No Data Available	NA - Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

****

The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

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1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

CHEVRON HDAX NG Screw Compressor Oil

PRODUCT NUMBER(S): CPS255204 CPS255205 CPS259135
SYNONYM: CHEVRON HDAX NG Screw Compressor Oil ISO 100
CHEVRON HDAX NG Screw Compressor Oil ISO 150
CHEVRON HDAX NG Screw Compressor Oil ISO 68

COMPANY IDENTIFICATION

Chevron Products Company
Lubricants and Specialty Products
6001 Bollinger Canyon Rd., T3325/B10
San Ramon, CA 94583
www.chevron-lubricants.com

EMERGENCY TELEPHONE NUMBERS

HEALTH (24 hr): (800)231-0623 or
(510)231-0623 (International)
TRANSPORTATION (24 hr): CHEMTREC
(800)424-9300 or (703)527-3887
Emergency Information Centers
are located in U.S.A.
Int'l collect calls accepted

PRODUCT INFORMATION: MSDS Request:(800)414-6737 email:lubemsds@chevron.com
Environmental, Safety, & Health Info: (925) 842-5535
Product Information: (800) 582-3835

2. COMPOSITION/INFORMATION ON INGREDIENTS

100.0 % CHEVRON HDAX NG Screw Compressor Oil

CONTAINING

COMPONENTS	AMOUNT	LIMIT/QTY	AGENCY/TYPE
HYDROTREATED DIST., HVY PARA			
Chemical Name: DISTILLATES, HYDROTREATED HEAVY PARAFFINIC			
CAS64742547	> 80.00%	5 mg/m3 (mist)	ACGIH TWA
		10 mg/m3 (mist)	ACGIH STEL
		5 mg/m3 (mist)	OSHA PEL
ADDITIVES	< 20.00%		

COMPOSITION COMMENT:
All the components of this material are on the Toxic Substances Control Act Chemical Substances Inventory.

This product fits the ACGIH definition for mineral oil mist. The ACGIH TLV is 5 mg/m3, the OSHA PEL is 5 mg/m3.

3. HAZARDS IDENTIFICATION

IMMEDIATE HEALTH EFFECTS
EYE:
Not expected to cause prolonged or significant eye irritation.
SKIN:

Contact with the skin is not expected to cause prolonged or significant irritation. Not expected to be harmful to internal organs if absorbed through the skin.
INGESTION:
Not expected to be harmful if swallowed.
INHALATION:
Contains a petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit.

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4. FIRST AID MEASURES

EYE:
No specific first aid measures are required because this material is not expected to cause eye irritation. As a precaution remove contact lenses, if worn, and flush eyes with water.
SKIN:
No specific first aid measures are required because this material is not expected to be harmful if it contacts the skin. As a precaution, remove clothing and shoes if contaminated. Use a waterless hand cleaner, mineral oil, or petroleum jelly to remove the material. Then wash skin with soap and water. Wash or clean contaminated clothing and shoes before reuse.
INGESTION:
No specific first aid measures are required because this material is not expected to be harmful if swallowed. Do not induce vomiting. As a precaution, give the person a glass of water or milk to drink and get medical advice. Never give anything by mouth to an unconscious person.
INHALATION:
If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

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5. FIRE FIGHTING MEASURES

FIRE CLASSIFICATION:
Classification (29 CFR 1910.1200): Not classified by OSHA as flammable or combustible.
FLAMMABLE PROPERTIES:
FLASH POINT: (COC) 419F (215C) Min.
AUTOIGNITION: NDA
FLAMMABILITY LIMITS (% by volume in air): Lower: NA Upper: NA
EXTINGUISHING MEDIA:
CO2, Dry Chemical, Foam, Water Fog
NFPA RATINGS: Health 1; Flammability 1; Reactivity 0.
FIRE FIGHTING INSTRUCTIONS:
This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.
COMBUSTION PRODUCTS:
Normal combustion forms carbon dioxide and water vapor and may produce oxides of nitrogen and phosphorus. Incomplete combustion can produce carbon monoxide.

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6. ACCIDENTAL RELEASE MEASURES

CHEMTREC EMERGENCY NUMBER (24 hr): (800)424-9300 or (703)527-3887
International Collect Calls Accepted
ACCIDENTAL RELEASE MEASURES:
Stop the source of the leak or release. Clean up releases as soon as possible. Contain liquid to prevent further contamination of soil, surface water or groundwater. Clean up small spills using appropriate techniques such as sorbent materials or pumping. Where feasible and appropriate, remove contaminated soil. Follow prescribed procedures for reporting and responding to larger releases.

7. HANDLING AND STORAGE

Container is not designed to contain pressure. Do not use pressure to empty container or it may rupture with explosive force. Empty containers retain product residue (solid, liquid, and/or vapor) and can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other sources of ignition. They may explode and cause injury or death. Empty containers should be completely drained, properly closed, and promptly returned to a drum reconditioner, or properly disposed of. Avoid contaminating soil or releasing this material into sewage and drainage systems and bodies of water.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

GENERAL CONSIDERATIONS:
Consider the potential hazards of this material (see Section 3), applicable exposure limits, job activities, and other substances in the work place when designing engineering controls and selecting personal protective equipment. If engineering controls or work practices are not adequate to prevent exposure to harmful levels of this material, the personal protective equipment listed below is recommended. The user should read and understand all instructions and limitations supplied with the equipment since protection is usually provided for a limited time or under certain circumstances.

ENGINEERING CONTROLS
Use in a well-ventilated area. If user operations generate an oil mist, use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below the recommended mineral oil mist exposure limits.

PERSONAL PROTECTIVE EQUIPMENT
EYE/FACE PROTECTION:
No special eye protection is normally required. Where splashing is possible, wear safety glasses with side shields as a good safety practice.
SKIN PROTECTION:
No special protective clothing is normally required. Where splashing is possible, select protective clothing depending on operations conducted, physical requirements and other substances. Suggested materials for protective gloves include: <Viton> <Nitrile> <Silver Shield> <4H>
RESPIRATORY PROTECTION:
No respiratory protection is normally required. If user operations generate an oil mist, determine if airborne concentrations are below the recommended mineral oil mist exposure limits. If not wear a NIOSH approved respirator that provides adequate protection from measured concentrations of this material. Use the following elements for air-purifying respirators: particulate.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL DESCRIPTION:
Liquid.

pH:	NA
VAPOR PRESSURE:	NA
VAPOR DENSITY (AIR=1):	NA
BOILING POINT:	NDA
FREEZING POINT:	NDA
MELTING POINT:	NA
SOLUBILITY:	Soluble in hydrocarbon solvents; insoluble in water.
SPECIFIC GRAVITY:	0.87 - 0.88 @ 15.6/15.6/C
EVAPORATION RATE:	NA
VISCOSITY:	61.2 - 135 cSt @ 40C (Min.)
PERCENT VOLATILE (VOL):	NA

10. STABILITY AND REACTIVITY

HAZARDOUS DECOMPOSITION PRODUCTS:
No data available.
CHEMICAL STABILITY:
Stable.
CONDITIONS TO AVOID:
No data available.
INCOMPATIBILITY WITH OTHER MATERIALS:
May react with strong oxidizing agents, such as chlorates, nitrates, peroxides, etc.
HAZARDOUS POLYMERIZATION:
Polymerization will not occur.

11. TOXICOLOGICAL INFORMATION

EYE EFFECTS:
The eye irritation hazard is based on data for a similar material.
SKIN EFFECTS:
The skin irritation hazard is based on data for a similar material.
ACUTE ORAL EFFECTS:
The acute oral toxicity is based on data for a similar material.
ACUTE INHALATION EFFECTS:
The acute respiratory toxicity is based on data for a similar material.
ADDITIONAL TOXICOLOGY INFORMATION:
This product contains petroleum base oils which may be refined by various processes including severe solvent extraction, severe hydrocracking, or severe hydrotreating. None of the oils requires a cancer warning under the OSHA Hazard Communication Standard (29 CFR 1910.1200). These oils have not been listed in the National Toxicology Program (NTP) Annual Report nor have they been classified by the International Agency for Research on Cancer (IARC) as; carcinogenic to humans (Group 1), probably carcinogenic to humans (Group 2A), or possibly carcinogenic to humans (Group 2B).

12. ECOLOGICAL INFORMATION

ECOTOXICITY:
The toxicity of this material to aquatic organisms has not been evaluated. Consequently, this material should be kept out of sewage and drainage systems and all bodies of water.
ENVIRONMENTAL FATE:
This material is not expected to be readily biodegradable.

13. DISPOSAL CONSIDERATIONS

Oil collection services are available for used oil recycling or disposal. Place contaminated materials in containers and dispose of in a manner consistent with applicable regulations. Contact your sales representative or local environmental or health authorities for approved disposal or recycling methods.

14. TRANSPORT INFORMATION

The description shown may not apply to all shipping situations. Consult 49CFR, or appropriate Dangerous Goods Regulations, for additional description requirements (e.g., technical name) and mode-specific or quantity-specific shipping requirements.

DOT SHIPPING NAME: NONE
DOT HAZARD CLASS: NONE
DOT IDENTIFICATION NUMBER: NONE
DOT PACKING GROUP: N/A
ADDITIONAL INFO: Petroleum Lubricating Oil - Not Hazardous by U.S. DOT.
ADR/RID Hazard class - Not applicable.

15. REGULATORY INFORMATION

SARA 311 CATEGORIES:

1. Immediate (Acute) Health Effects: NO
2. Delayed (Chronic) Health Effects: NO
3. Fire Hazard: NO
4. Sudden Release of Pressure Hazard: NO
5. Reactivity Hazard: NO

REGULATORY LISTS SEARCHED:

01=SARA 313	11=NJ RTK	22=TSCA Sect 5(a)(2)
02=MASS RTK	12=CERCLA 302.4	23=TSCA Sect 6
03=NTP Carcinogen	13=MN RTK	24=TSCA Sect 12(b)
04=CA Prop 65-Carcin	14=ACGIH TWA	25=TSCA Sect 8(a)
05=CA Prop 65-Repro Tox	15=ACGIH STEL	26=TSCA Sect 8(d)
06=IARC Group 1	16=ACGIH Calc TLV	27=TSCA Sect 4(a)
07=IARC Group 2A	17=OSHA PEL	28=Canadian WHMIS
08=IARC Group 2B	18=DOT Marine Pollutant	29=OSHA CEILING
09=SARA 302/304	19=Chevron TWA	30=Chevron STEL
10=PA RTK	20=EPA Carcinogen	

The following components of this material are found on the regulatory lists indicated.

DISTILLATES, HYDROTREATED HEAVY PARAFFINIC
is found on lists: 14,15,17,

EU RISK AND SAFETY LABEL PHRASES:
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PETROLEUM OIL
WHMIS CLASSIFICATION:
This product is not considered a controlled product according to the criteria of the Canadian Controlled Products Regulations.

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16. OTHER INFORMATION

NFPA RATINGS: Health 1; Flammability 1; Reactivity 0;
HMIS RATINGS: Health 1; Flammability 1; Reactivity 0;
(0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme, PPE:- Personal Protection Equipment Index recommendation, *- Chronic Effect Indicator). These values are obtained using the guidelines or published evaluations prepared by the National Fire Protection Association (NFPA) or the National Paint and Coating Association (for HMIS ratings).

REVISION STATEMENT:
Changes have been made in Section 1 (Chemical Product and Company Id.).

ABBREVIATIONS THAT MAY HAVE BEEN USED IN THIS DOCUMENT:

TLV	- Threshold Limit Value	TWA	- Time Weighted Average
STEL	- Short-term Exposure Limit	TPQ	- Threshold Planning Quantity
RQ	- Reportable Quantity	PEL	- Permissible Exposure Limit
C	- Ceiling Limit	CAS	- Chemical Abstract Service Number
A1-5	- Appendix A Categories	()	- Change Has Been Proposed
NDA	- No Data Available	NA	- Not Applicable

Prepared according to the OSHA Hazard Communication Standard (29 CFR 1910.1200) and the ANSI MSDS Standard (Z400.1) by the Toxicology and Health Risk Assessment Unit, CRTC, P.O. Box 1627, Richmond, CA 94804

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The above information is based on the data of which we are aware and is believed to be correct as of the date hereof. Since this information may be applied under conditions beyond our control and with which we may be unfamiliar and since data made available subsequent to the date hereof may suggest modification of the information, we do not assume any responsibility for the results of its use. This information is furnished upon condition that the person receiving it shall make his own determination of the suitability of the material for his particular purpose.

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Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Common Name	Coastalguard 50%
Supplier	COASTAL CHEMICAL CO.,L.L.C. 3520 Veterans Memorial Drive ABBEVILLE, LA 70510 318-893-3862
Synonym	Not available.
Trade name	Not available.
Material Uses	Industrial applications: Coolant and antifreeze.
Manufacturer	Coastal Chemical Co., Inc. 3520 Veterans Memorial Drive Abbeville, La.

Code	37172
MSDS#	Not available.
Validation Date	1/9/97
Print Date	7/13/99

In case of Emergency: Transportation Emergency Call CHEMTREC 800-424-9300
Other Information Call
Joe Hudman
713-477-6675

Section 2. Composition and Information on Ingredients

Name	CAS #	% by Weight	TLV/PEL	LC_{50}/LD_{50}
Ethylene Glycol	107-21-1	50	CEIL: 39.4 (ppm) CEIL: 100 (mg/m^3)	ORAL (LD50): Acute: 4700 mg/kg [Rat]. DERMAL (LD50): Acute: 9530 mg/kg [Rabbit.].

Section 3. Hazards Identification

Emergency Overview

CAUTION!

HARMFUL IF INHALED. HARMFUL IF SWALLOWED. MAY CAUSE EYE IRRITATION. Repeated or prolonged exposure to the substance can produce kidney damage.

Routes of Entry

Ingestion.

Potential Acute Health Effects

Very dangerous in case of ingestion. Very slightly to slightly dangerous in case of skin contact (irritant, sensitizer, permeator), of eye contact (irritant), of inhalation. This product may irritate eyes and skin upon contact.

Potential Chronic Health Effects

CARCINOGENIC EFFECTS: Not available. MUTAGENIC EFFECTS: Not available. TERATOGENIC EFFECTS : Not available. The substance is toxic to kidneys, the nervous system, the reproductive system, liver. Repeated or prolonged exposure to the substance can produce target organs damage.

Section 4. First Aid Measures

Eye Contact

IMMEDIATELY flush eyes with running water for at least 15 minutes, keeping eyelids open. COLD water may be used.

Skin Contact

If the chemical got onto the clothed portion of the body, remove the contaminated clothes as quickly as possible, protecting your own hands and body. Place the victim under a deluge shower. If the chemical touches the victim's exposed skin, such as the hands: Gently and thoroughly wash the contaminated skin with running water and non-abrasive soap. Be particularly careful to clean folds, crevices, creases and groin. COLD water may be used. Cover the irritated skin with an emollient. If irritation persists, seek medical attention. Wash contaminated clothing before reusing.

Hazardous Skin Contact

No additional information.

Inhalation

Allow the victim to rest in a well ventilated area. Seek immediate medical attention.

Hazardous Inhalation

No additional information.

Ingestion

DO NOT induce vomiting. Have conscious person drink several glasses of water or milk. Seek immediate medical attention.

Continued on Next Page

Hazardous Ingestion	DO NOT induce vomiting. Examine the lips and mouth to ascertain whether the tissues are damaged, a possible indication that the toxic material was ingested; the absence of such signs, however, is not conclusive. Loosen tight clothing such as a collar, tie, belt or waistband. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek medical attention.

Section 5. Fire and Explosion Data

Flammability of the Product	Combustible.
Auto-Ignition Temperature	The lowest known value is 398°C (748.4°F) (Ethylene Glycol).
Flash Points	The lowest known value is CLOSED CUP: 116°C (240.8°F) OPEN CUP: 232°C (240.8°F) (Cleveland) (Ethylene Glycol)
Flammable Limits	The greatest known range is LOWER: 3.2% UPPER: 15.3% (Ethylene Glycol)
Products of Combustion	These products are carbon oxides (CO, CO2).
Fire Hazards in Presence of Various Substances	Very slightly to slightly flammable in presence of open flames and sparks, of heat.
Explosion Hazards in Presence of Various Substances	Risks of explosion of the product in presence of mechanical impact: Not available. Risks of explosion of the product in presence of static discharge: Not available. No specific information is available in our database regarding the product's risks of explosion in the presence of various materials.
Fire Fighting Media and Instructions	SMALL FIRE: Use DRY chemicals, CO2, water spray or foam. LARGE FIRE: Use water spray, fog or foam. DO NOT use water jet.
Special Remarks on Fire Hazards	When heated to decomposition, it emits acrid smoke and irritating fumes. (Ethylene Glycol)
Special Remarks on Explosion Hazards	No additional remark.

Section 6. Accidental Release Measures

Small Spill	Dilute with water and mop up, or absorb with an inert DRY material and place in an appropriate waste disposal container. Finish cleaning by spreading water on the contaminated surface and dispose of according to local and regional authority requirements.
Large Spill	Combustible material. Keep away from heat. Keep away from sources of ignition. Stop leak if without risk. Finish cleaning by spreading water on the contaminated surface and allow to evacuate through the sanitary system.

Section 7. Handling and Storage

Handling	Not available.
Storage	Keep container dry. Keep in a cool place. Ground all equipment containing material. Keep container tightly closed. Keep in a cool, well-ventilated place. Combustible materials should be stored away from extreme heat and away from strong oxidizing agents.

Section 8. Exposure Controls/Personal Protection

Engineering Controls	Provide exhaust ventilation or other engeneering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.
Personal Protection	Safety glasses. Lab coat. Gloves (impervious). Wear appropriate respirator when ventilation is inadequate.
Personal Protection in Case of a Large Spill	Splash goggles. Full suit. Boots. Gloves. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Chemical Name or Product Name	CAS #	Exposure Limits
1,2-Ethanediol	107-21-1	CEIL: 39.4 (ppm) CEIL: 100 (mg/m^3)

Continued on Next Page

Section 9. Physical and Chemical Properties

Physical state and appearance	Liquid.
Molecular Weight	Not applicable.
pH (1% soln/water)	Neutral.
Boiling Point	The lowest known value is 198°C (388.4°F) (Ethylene Glycol).
Melting Point/Pour Point	May start to solidify at -13.5°C (7.7°F) based on data for: Ethylene Glycol.
Critical Temperature	Not available.
Specific Gravity	1.06 (Water = 1)
Vapor Pressure	The highest known value is 0.05 mm of Hg (@ 20°C) (Ethylene Glycol).
Vapor Density	The highest known value is 2.1 (Air = 1) (Ethylene Glycol).
Volatility	Not available.
Odor Threshold	Not available.
Evaporation rate	Not available.
Viscosity	Not available.
Water/Oil Dist. Coeff.	The product is much more soluble in water.
Ionicity (in Water)	Not available.
Dispersion Properties	See solubility in water, methanol, diethyl ether.
Solubility	Easily soluble in cold water, hot water, methanol, diethyl ether. Very slightly soluble in n-octanol.
Physical Chemical Comments	Not available.

Odor	Not available.
Taste	Not available.
Color	Not available.

Section 10. Stability and Reactivity Data

Chemical Stability	The product is stable.
Conditions of Instability	No additional remark.
Incompatibility with various substances	Slightly reactive to reactive with oxidizing agents, alkalis.
Hazardous Decomposition Products	Not available.
Hazardous Polymerization	Not available.

Section 11. Toxicological Information

Toxicity to Animals	Acute oral toxicity (LD50): 4700 mg/kg (Rat) Acute dermal toxicity (LD50): > 5000 mg/kg (Rabbit.)
Chronic Effects on Humans	The substance is toxic to kidneys, the nervous system, the reproductive system, liver.
Other Toxic Effects on Humans	Very dangerous in case of ingestion. Very slightly to slightly dangerous in case of skin contact (irritant, sensitizer, permeator), of eye contact (irritant), of inhalation.
Special Remarks on Toxicity to Animals	Toxic for humans or animal life. (Ethylene Glycol)
Special Remarks on Chronic Effects on Humans	No additional remark.
Special Remarks on other Toxic Effects on Humans	Exposure can cause nausea, headache and vomiting. (Ethylene Glycol)

Continued on Next Page

Section 12. Ecological Information

otoxicity	Not available.
BOD5 and COD	Not available.
oducts of Biodegradation	Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.
Toxicity of the Products Biodegradation	The products of degradation are less toxic than the product itself.
ecial Remarks on the Products of Biodegradation	No additional remark.

Section 13. Disposal Considerations

Waste Disposal

Section 14. Transport Information

Proper Shipping Name	Drums - Not Regulated Bulk (> 1000 gals.) - Regulated Other Regulated Substances, liquid, n.o.s. (Ethylene Glycol)
DOT Classification	DOT CLASS 9: Miscellaneous hazardous material.
OT Identification Number	NA3082
Packing Group	III
azardous Substances Reportable Quantity (kg)	4535.9
pecial Provisions for ransport	No additional remark.

Section 15. Regulatory Information

ederal and State Regulations	The following product(s) is (are) listed on SARA 313: , **Ethylene Glycol** The following product(s) is (are) listed by the State of Massachusetts: **Ethylene Glycol** The following product(s) is (are) listed on TSCA: **Ethylene Glycol**	
Other Classifications	WHMIS (Canada)	WHMIS CLASS D-2A: Material causing other toxic effects (VERY TOXIC).
	DSCL (EEC)	Not controlled under DSCL (Europe).

Section 16. Other Information

HMIS (U.S.A.)

Health Hazard	*	2
Fire Hazard		1
Reactivity		0
Personal Protection		B

National Fire Protection Association (U.S.A.)

eferences	Not available.
ther Special Considerations	No additional remark.

alidated by Joe Hudman on 1/9/97.

Verified by Joe Hudman.

Printed 7/13/99.

Continued on Next Page

Transportation Emergency Call
EMTREC 800-424-9300
er Information Call
Hudman
13-477-6675

tice to Reader

e best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained n. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that ... are the only hazards that exist.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

February 9, 2001

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0128

Mr. Robert L. Gawlik
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, Texas 76102

RE: Discharge Plan Renewal Notice for the Sid Richardson Gasoline Co. Facilities

Dear Mr. Gawlik:

Sid Richardson Gasoline Co. has the following discharge plans which expire during the current calendar year.

GW-243 expires 5/30/2001 – House Compressor Station
GW-259 expires 9/18/2001 – C-1 Compressor Station
GW-260 expires 9/18/2001 – C-2 Compressor Station
GW-261 expires 9/18/2001 – C-3 Compressor Station
GW-262 expires 9/18/2001 – C-4 Compressor Station
GW-270 expires 12/18/2001 – West Eunice Compressor Station
GW-269 expires 12/18/2001 – Boyd Compressor Station

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 20NMAC 6.2.3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $100.00. After January 15, 2001 renewal discharge plans require a flat fee equal to the flat fee schedule for gas processing facilities pursuant to revised WQCC Regulations 20NMAC 6.2.3114.

A copy of the revised fee schedule is included for your assistance. The $100.00 filing fee is to be submitted with each discharge plan renewal application and is nonrefundable.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** A complete copy of the regulations is also available on NMED's website at **www.nmenv.state.nm.us**).

If any of the above-sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Sid Richardson Gasoline Co. has any questions, please do not hesitate to contact Mr. Jack Ford at (505) 476-3489.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 8:20 AM	Date 12/16/96

Originating Party	Other Parties
Pat Sanchez - OCD	Ross Boyd - Sid Richardson 915-367-2867

Subject Wash Water Characterization - D.P. Approvals for GW-269, GW-270 (GW-243, 259, 260, 261, 262, 269, 270)

Discussion Mr. Boyd said they had recieved the letter dated December 12, 1996 (VIA FAX) From OCD (Roger Anderson) and were in the process of sampling/characterizing the "wash water" per the OCD letters directio. Also, Mr. Boyd said that upon obtaining the sample analysis of the water, Sid Richardson would submit the analysis and ammend GW-243, 259, 260, 261, and GW-262. I let Mr. Boyd know that the 12/12/96 letter from OCD would be part of the approval for GW-269, & GW-270.

Conclusions or Agreements

Mr. Boyd will submit the information outlined above as soon as possible. OCD will probably issue the discharge plan approvals for GW-269 & GW-270 on. 12/18/96.

Distribution FILE:
GW-243, GW-259, GW-260, GW-261, GW-262, GW-269, GW-270,
WAYNE PRICE - OCD Hobbs.

Signed Patricia W. Sanchez

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 12, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-721

Mr. Herb Harless,CSP
Manager, Environmental Health & Safety
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102

RE: Non-Exempt Compressor Wash Water
Sid Richardson Compressor Stations
Lea County, New Mexico

Dear Mr. Harless:

The Oil Conservation Division (OCD) has received and reviewed the following submittals from Sid Richardson Gasoline Company: the letter dated December 4, 1996, the letter dated December 10, 1996 (via Fax), and the letter dated December 11, 1996 (via Fax) requesting that the OCD allow Sid Richardson Gasoline Inc. to dispose of the "wash water" offsite at an OCD permitted surface disposal facility. The effluent is generated at the following Sid Richardson Gasoline Company discharge plan facilities:

1. GW-243 "House Compressor Sation"
2. GW-259 "C-1 Compressor Station"
3. GW-260 "C-2 Compressor Station"
4. GW-261 "C-3 Compressor Station"
5. GW-262 "C-4 Compressor Station"
6. GW-269 "Boyd Compressor Station"
7. GW-270 "West Eunice Compressor Station"

Sid Richardson Gasoline Company has certified in writing that based on process knowledge and MSD sheets for new lube oil and the detergent, and used lube oil analysis that the wash water generated from these sites would be the same in terms of regulatory status. Sid Richardson Gasoline Company has certified that the waste water does not contain any hazardous constituents or characteristics per 40 CFR Part 261.

The OCD accepts this certification by Sid Richardson Gasoline Company for the seven (7) above listed compressor stations provided that one sample be taken of the "used wash water." The sample will be analyzed for Reactivity, Corrosivity, Ignitability, and TCLP - metals, semi-volatile, and volatile as defined in 40 CFR Part 261, prior to offsite disposal of the first load at an OCD Rule 711 permitted waste management facility.

Note (1): Since this waste is non-exempt the OCD Rule 711 facility will be required to file a form OCD C-138 prior to acceptance of this waste wash water.

Note (2): The OCD Rule 711 facility may upon its own discretion choose to accept or not accept the waste water based on their operating procedures for accepting non-exempt/non-hazardous oil field waste(s).

Note (3.) This approval is only valid for the seven (7) above listed facilities, and is only good for the term of the discharge plan and must be renewed along with the discharge plan upon expiration. Also, should any change in the process occur this approval is invalidated.

OCD approval does not relieve Sid Richardson Gasoline Company liability associated with the generation, collection, transportation, and disposal of this waste. OCD approval does not relieve Sid Richardson Gasoline Inc. of responsibility for compliance with any other federal, state, or other local laws and/or regulations that may apply.

If Sid Richardson Gasoline Inc. has any questions regarding this matter please feel free to call me at (505)-827-7152 or Pat Sanchez at (505)-827-7156.

Sincerely,

Roger C. Anderson
Bureau Chief
Environmental Bureau - OCD

RCA/pws

xc: Mr. Wayne Price - OCD Hobbs Office.
Mr. Ross Boyd, Area Engineer Sid Richardson Gasoline Co.
Cert. Mail No. P-288-258-722

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

September 27, 1996
RLG-58-96

CERTIFIED MAIL - Z 378 134 273

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

Re: Discharge Plans GW-259
GW-260, GW-261 and GW-262

Dear Mr. LeMay:

Attached are signed copies of the conditions of approval for the referenced compressor sites as requested.

If there are any further questions or if more information should be required, please do not hesitate to call.

Sincerely,

Robert L. Gawlik
Environmental Health & Safety Associate

RLG:gad
Attachments

cc: C. P. O'Farrell/H. Harless - w/o atts.
W. J. Farley - w/atts.
K. C. Clark - w/atts.
H. E. Hicks - w/atts.
W. Price (OCD - Hobbs, NM) - w/atts.

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

September 18, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-627

Mr. Robert L. Gawlik
Environmental Health & Safety Associate
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102

RE: Approval of Discharge Plan GW-261
C-3 Compressor Station
Lea County, New Mexico

Dear Mr. Gawlik:

The **discharge plan GW-261 for the Sid Richardson Gasoline Co. C-3 Compressor Station** located in NE/4 SW/4, Section 3, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated July 23, 1996, and this approval letter with conditions of approval from OCD dated September 18, 1996. 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 five working days of receipt of this letter.**

The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve **Sid Richardson Gasoline Co.** of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open top 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 requires that "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.G.4, this plan is for a period of five (5) years. This approval will expire September 18, 2001, and an application for renewal should be submitted in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval.

The discharge plan for the Sid Richardson Gasoline Co. C-3 Compressor Station GW-261 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars ($50). As stated in WQCC 3114 compressor stations below 1,000 horsepower do not require a flat fee.

The $50 filing fee has been received by the OCD.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/pws
Attachment

xc: Mr. Wayne Price

ATTACHMENT TO DISCHARGE PLAN GW-261
Sid Richarson Gasoline Co. C-3 Compressor Station
DISCHARGE PLAN REQUIREMENTS
(September 18, 1996)

1. **Sid Richardson Gasoline Co. Commitments:** Sid Richardson Gasoline Co. will abide by all commitments submitted in the Application dated July 23, 1996, and this Discharge Plan Approval from OCD dated September 18, 1996.

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

3. **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.

4. **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 facilities or modifications to existing facilities must place the tank on an impermeable type pad.

5. **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.

6. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

7. **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 that do not have secondary containment and leak detection 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 /or sumps.

8. **Underground Process/Wastewater Lines**: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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.

9. **Housekeeping**: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

10. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Hobbs OCD District Office at (505)-393-6161.

11. **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.

12. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility 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.

13. **New Mexico Oil Conservation Division Inspections:** Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.

14. **Conditions accepted by**: _____ _____

Company Representative Date

_____

Title

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled Notice Of Publication

and numbered ..... in the ..... Court of Lea County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) day consecutive weeks, beginning with the issue of August 7, 19 96 and ending with the issue of August 7, 19 96

And that the cost of publishing said notice is the sum of $ 80.00 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 15th day of August, 19 96

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 98

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

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

(GW-259)-Sid Richardson Gasoline Company, Mr. Wayne Farley, 210 N. Main Street, Fort Worth, Texas 76102, has submitted a Discharge Plan Application for the C-1 Compressor Station located in the SE/4 NE/4 of Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New MExico. Approximately 3 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental dischage to the surface is at a depth of approximately 132 feet with a total dissolved solids concentration of approximately 1,100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-260)-Sid Richardson Gasoline Company, Mr. Wayne Farley, 210 N. Main Street, Fort Worth, Texas 76102, has submitted a Discharge Plan Application for the C-2 Compressor Station located in the NW/4 NE/4 of Section 11, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 70 feet with a total dissolved solids concentration of approximately 1,100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-261)-Sid Richardson Gasoline Company, Mr. Wayne Farley, 210 N. Main Street, Fort Worth, Texas 76102, has submitted a Discharge Plan Application for the C-3 Compressor Station located in the NE/4 SW/4 of Section 3, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 2 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD aproved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 140 feet with a total dissolved solids concentration of approximately 1,100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-262)-Sid Richardson Gasoline Company, Mr. Wayne Farley, 210 N. Main Street, Fort Worth, Texas 76102, has submitted a Discharge Plan Application for the C-4 Compressor Station located in the SW/4 SE/4 of Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New MExico. Approximately 2 gallons per day of waste water is stored in an above ground bermed closed top tank. All wastes are disposed of offsite at an NMOCD approved facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 171 feet with a total dissolved solids concentration of approximately 1,100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00

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

NEW MEXICO OIL CONSERVATION
ATTN: SALLY MARTINEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 533127 ACCOUNT:56689

LEGAL NO: 60162 P.O. #:96199002997

310 LINES once at $ 124.00

Affidavits: 5.25

Tax: 8.08

Total: $ 137.33

AUG -8 1996

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 60162 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 5th day of AUGUST 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 5th day of AUGUST A.D., 1996

OFFICIAL SEAL
Candace C. Ruiz
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 4/29/99

202 East Marcy Street • P.O. Box 2048 • Santa Fe, New Mexico 87501
505~983~3303 • NEWMEX@NEW MEXICO.COM • http://www.interart.net/zia.connection/

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of July 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
Legal #60162
Pub. August 5, 1996

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of July, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

July 26, 1996

Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

GW-259
260
261
262

Subject: Groundwater Discharge Plan Applications, C-1 Compressor Station, C-2 Compressor Station, C-3 Compressor Station, C-4 Compressor Station, Lea County, New Mexico

Dear Mr. Anderson

On behalf of my client, Sid Richardson Gasoline Company, I am enclosing two copies of the subject discharge plan applications and a check for the application fees. If you have any questions, please don't hesitate to contact me or Ross Boyd at Sid Richardson Gasoline Company at (915) 367-2867.

Sincerely

Robin K. DeLapp

Robin K. DeLapp
Environmental Scientist

cc: Wayne Price
OCD, Hobbs

environmental SERVICES inc.
4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110
PHO 505 266 6611
FAX 505 266 7733

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/24/96

or cash received on _____ in the amount of $ 200.00

from Environmental Services (Jon Sid Richardson)

for C-1 C.S GW 259 C-3 CS GW-261
C-2 C.S GW 260 C-4 CS GW-262
(Facility Names) (DP Nos.)

Submitted by: _____ Date: _____

Submitted to ASD by: [signature] Date: 7/31/96

Received in ASD by: D. Salazar Date: 7-31-96.

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

[redacted]

ENVIRONMENTAL SERVICES, INC.
4665 INDIAN SCHOOL RD. NE, STE. 106 PH. 266-6611
ALBUQUERQUE, NM 87110

DATE 7/24/96

95-32/1070
0109676338

PAY TO THE ORDER OF New Mexico Water Quality Management Fund $ 200.00

Two hundred and no/100 DOLLARS

SUNWEST

SUNWEST BANK OF ALBUQUERQUE, N.A.
ALBUQUERQUE, NEW MEXICO 87125-0500 (505) 765-2600

MEMO Fees-4 Discharge Plans

[redacted]

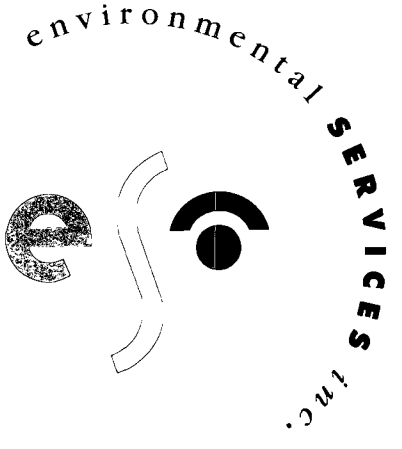
Application for Groundwater Discharge Plan

C-3 Compressor

GW-261

prepared for

Sid Richardson Gasoline Company
July 1996



4665 INDIAN SCHOOL NE
SUITE 106
ALBUQUERQUE
NEW MEXICO
87110

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Revised 12/1/95

Submit Original
Plus 1 Copies
to Santa Fe
1 Copy to appropriate
District Office

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

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

[X] New [ ] Renewal [ ] Modification

1. Type: Compressor Station
2. Operator: Sid Richardson Gasoline Company

   Address: 201 N. Main Street, Fort Worth, Texas 76102

   Contact Person: Wayne Farley Phone: (817) 390-8686
3. Location: NE /4 SW /4 Section 3 Township 23S Range 36E

   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION

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

    NAME: Wayne Farley Title: Manager of Gas Operations

    Signature: Wayne Farley Date: 7-23-96

Table of Contents

C-3 Compressor Station

Discharge Plan

This document constitutes a first time application for a Groundwater Discharge Plan for the C-3 Compressor Station. The C-3 Compressor Station was constructed in 1992 by Excel Gas Company. Sid Richardson Gasoline Company purchased the facility in September 1995. This Discharge Plan application has been prepared in accordance with the New Mexico Oil Conservation Division's (OCD) "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95) and New Mexico Water Quality Control Commission regulations at 20 New Mexico Administrative Code (NMAC) 6.2.

1 Type of Operation

The C-3 Compressor Station is operated to meter, remove liquids, and compress natural gas pipelined through natural gas production lines. An inlet gas scrubber is utilized to remove liquids from the inlet gas to the station. The dried gas is passed through a suction scrubber on the compressor skid for further liquid removal. The gas then enters a 270-horsepower, natural-gas-fired, compressor engine. Most of the discharge gas from the compressor is pipelined off-site for further processing. A corrosion inhibitor is injected into the station discharge line to prevent corrosion of the pipeline. The discharge gas not transported off-site is utilized for engine fuel. The fuel gas is routed to a fuel sweetener which absorbs hydrogen sulfide (H_2S) from the gas. The fuel gas is then passed through a fuel scrubber for additional liquid removal before engine use.

2 Operator/Legally Responsible Party

Operator

Sid Richardson Gasoline Co.
Attn: Harold Hicks
Box 1226, Jal, NM 88252
505-395-2116

Legally Responsible Party

Sid Richardson Gasoline Co.
Attn: Wayne J. Farley
201 N Main St, Forth Worth, TX 76102
817-390-8686

3 Location of Discharge/Facility

Lea County, NM
Section 3, Township 23 South, Range 36 East

4 Landowner

Sid Richardson Gasoline Co.
201 N Main St, Forth Worth, TX 76102
817-390-8686

5 Facility Description

Facility and process flow diagrams are located in appendix 1.

6 Materials Stored or Used

Table 1 identifies materials and storage containments for substances used and stored at C-3. Material Safety Data Sheets (MSDS) for these substances are in appendix 5.

table 1
Materials Used and Stored

ID	*Material*	*Composition*	*Type*	*Container*	*Quantity*	*Location*
TK-1	Scrubber liquids	Water with hydrocarbon liquids	Liquid	Tank	1270 gal	North of inlet scrubber
TK-2	Lube oil	See MSDS	Liquid	Tank	300 gal	South of compressor
TK-3	Corrosion inhibitor		Liquid	Tank	200 gal	North of facility
	Coolant	See MSDS	Liquid	Drum	30 gal	Brought in when needed
	SulfaTreat	See MSDS	Solid	Sack	(3) 2000 lb	May be stored on-site when needed

7 Sources and Quantities of Effluent and Waste Solids

Figure 1 depicts the effluent and solid waste sources at C-3. Table 2 summarizes the effluent and solid wastes generated at the facility. The major sources of liquid and solid waste are described in the sections following table 2.

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

Source	*Waste/Quality*	*Quantity*	*Disposition*
Scrubbers	Water with hydrocarbon liquids	200 gal/mo	TK-1
Compressor pad wash down	Water with soap, lube oil, and and coolant	100 gal/mo	Removed as generated
Engine	Waste oil	18 gal/mo	Removed as generated
	Oil filters	24/yr	Removed as generated
Fuel sweetener	Waste SulfaTreat	2300 lb/mo	Road/driveway

Separators/Scrubbers and Slug Catchers

Three scrubbers are utilized at C-3: an inlet scrubber, suction scrubber, and fuel scrubber. Water with hydrocarbon liquids (drip) is discharged from the scrubbers to the drip tank (TK-1). The amount of liquids accumulated by the scrubbers varies and is dependent upon the moisture content of the inlet gas stream. The maximum amount of drip expected to be removed from the site is 2400 gallons per year.

Boilers and Cooling Towers/Fans

There are no boilers or cooling towers at C-3.

Process and Storage Equipment Wash Down

The compressor skid is washed down once per month using a portable high pressure system. Approximately 100 gallons of water is used for each washing. Occasionally, 2.5 gallons of soap is added to the wash water for cleaning. Equipment wash water may contain soap, lube oil, and coolant. Angle iron containment on skid used to channel wash water to truck holding tank.

Solvents/Degreasers

A non-chlorinated soap is used to clean the compressor engine. The soap is not stored on-site. Disposal of spent soap is addressed in Process and Storage Equipment Wash Down.

Spent Acids/Caustics

No acids or caustics are utilized at C-3.

Used Engine Coolants

Ambitrol, comprised of 50 percent water and 50 percent ethylene glycol, is utilized as coolant in the compressor engine. Coolant is brought on-site in a 30-gallon drum when

needed. Coolant is immediately added to the engine and is not stored at C-3. No waste coolant is generated .

Waste Lubrication and Motor Oils

Waste oil is generated by maintenance of the compressor engine. The engine uses 18 gallons per month of oil. Oil is supplied to the compressor engine by an on-site lube oil tank (TK-2). Waste oil, approximately 18 gallons per month, is drained from the compressor engine into drums for removal from the facility.

Used Filters

The compressor engine operates with four oil filters. These filters are replaced every other month. After removal from the engines, the filters are placed in a 55-gallon drum with drain rack. Once the filters have drained, they are taken to a central dumpster located at Sid Richardson's West Eunice Tank Battery.

Solids and Sludges

No solids or sludges are generated at C-3.

Painting Wastes

If any equipment at C-3 requires painting, painting supplies will be brought on-site at the time of painting. Wastes will be removed immediately upon completion of the painting.

Sewage

No sewage is generated at C-3.

Lab Wastes

C-3 is not equipped with a lab.

Other Liquid and Solid Wastes

The fuel sweetener removes H_2S from the fuel gas. Seven thousand pounds of SulfaTreat is used in the fuel sweetener to absorb the H_2S. The SulfaTreat utilized in the sweetener is replaced approximately every three months. The spent SulfaTreat is spread on the driveway and road along C-3.

8 Liquid and Solid Waste Collection/Storage/Disposal

This section provides a general description of the collection, storage, and disposal systems used for effluents and solid wastes generated at C-3. Section 7 identifies the specific collection, storage, and disposal method utilized for each of the effluents generated at the site.

Collection

All effluent dumped to TK-1 is transported via aboveground pipelines.

Storage

None of the storage tanks at C-3 are equipped with berms. TK-1 is a partially buried fiberglass tank. TK-2 and TK-3 are located on saddle racks which provide full views of tank surfaces.

On-Site Disposal

Spent SulfaTreat removed from the fuel sweetener is spread on the driveway and road to C-3. This disposal method was approved by the NMOCD on September 9, 1995. Copies of correspondence from Sid Richardson and the NMOCD approval letter are in appendix 4.

Off-site Disposal

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

table 3

Off Site Disposal Contractors and Disposal Facilities

Scrubber liquids	Transported by Chaparral Trucking* to West Eunice Tank Battery. Oil portion taken by Petrosource** to its oil recycling facility
Wash water	Transported by Sid Richardson to Jal#3 Gas Plant (GW-010, exp. 11/21/98)
Waste oil	Transported by Sid Richardson to Jal#3 Gas Plant (GW-010, exp. 11/21/98)
Filters	Transported by Sid Richardson to West Eunice Tank Battery. Removed by Quell Petroleum Services *** to their incinerator.

* Chaparral Trucking, PO Drawer 1769, Eunice NM 88231, 505-394-2545

** PetroSource Partners Limited, 129 S. Grimes, Hobbs, NM 88240, 505-397-7212

*** Quell Petroleum Services Incinerator, PO Box 1552, Monahans, TX 79756, 915-943-8400

9 Proposed Modifications

TK-1 will be replaced with, or modified to conform to, a below-grade tank system constructed according to the OCD Guidelines for the Selection and Installation of

Below-Grade Produced Water Tanks (revised 10/91) within one year of plan effectiveness. Sid Richardson will berm TK-2 and TK-3 and construct pad and curb type containment for the drums within one year of plan effectiveness.

10 Inspection, Maintenance, and Reporting

C-3 is unmanned but inspected at least once per day Monday through Friday. The station is equipped with an alarm system which notifies operators in Jal of an emergency or malfunction.

11 Spill/Leak Prevention and Reporting (Contingency Plans)

The process area of the plant is graveled to allow for early leak detection and quick response by facility personnel in the event of a leak of process fluids. Sid Richardson will handle all spills as required by the spill procedures in appendix 3 and report all spills and leaks according to the requirements of the state of New Mexico found in NMOCD Rule 116 and 0 NMAC 6.2.1203. Copies of these regulations are in appendix 2.

12 Site Characteristics

The C-3 Compressor Station is located on dune sands of the Eunice Plain in the Capitan Basin. The structural setting is on the Permian shelf of the Central Basin Platform, east of the Capitan Reef Complex. The site bedrock is the poorly consolidated sand of the Tertiary Ogallala Formation (Dane and Bachman, 1965, Geologic Map of New Mexico).

There are no groundwater discharge sites, intermittent streams, water bodies, or arroyos within one mile of the perimeter of the facility on either the 1984 East Lake, NM, or the 1969 Rattlesnake Canyon, NM, U.S.G.S. 7.5´ quadrangles. The surrounding slightly undulating topography is in a large area of poorly defined surface drainage with a 1% grade sloping to the southeast.

The soil type at the site is Kermit-Palomas, a dune sand (Soil Conservation Survey, 1974, Soil Survey, Lea County, New Mexico: U.S.D.A.). The eolian dune deposits have a depth of 8 to 12 feet.

As of January 1996, no wells within one-quarter mile of the perimeter of the facility were recorded with either the New Mexico State Engineer Office or with the National Water Information System, Version I, Ground Water Site Information, U.S.G.S. One well 2500 feet to the northwest, recorded with the State Engineer Office, is used for stock and has a water table depth of 140 feet. One well in the National Water Information System, 3000 feet west, is used for stock and had a reported water table in the Ogallala of 164 to 162 feet from 1979 to 1986. In 1991, the reported water table depth was 68.74 feet, possibly misrecorded or recorded after a period of high recharge. Water wells around the facility would also be used for oil-field industrial purposes.

A piezometric map (Nicholson and Clebsch,1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report) of the water table shows the elevation of the water table at the site to be about 3350 feet in elevation. The elevation of the facility is 3462 feet, placing the depth to the water table from this map at the site at 92 feet. Therefore, the estimated depth to groundwater at the facility, is 92 to 140 feet, values between the piezometric map and the depth to the water table at the nearest stock well, in the Ogallala Formation.

The aquifers (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6) below the facility are the poorly consolidated sands of the Ogallala Formation, the deeper, Triassic Dockum Group of hematite-cemented clay and sandstones, and the deeper Paleozoic dolomitic limestones.

Water in the Ogallala Formation is high in silica (49 to 73 ppm), moderately high in calcium and magnesium, low in sulfates and chlorides, very high in fluoride, and has total dissolved solids of less than 1100 ppm (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6).

The lower Dockum Group is low in silica (9-41 ppm), very high in fluoride, high in sodium, and has a wide range of concentrations of chlorides, sulfates, calcium, and magnesium. The total dissolved solids in the Dockum Group is higher than that of the Ogallala (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6). The deeper Paleozoic aquifers do not contain usable water and are brine-injected (Nicholson and Clebsch, 1961, Geology and Ground-Water Conditions in Southern Lea County, New Mexico, New Mexico Bureau of Mines & Mineral Resources Ground-Water Report 6).

The flood potential at the facility is low, as the facility is on a slight divide which drains west into a depression, north into a small depression, and east and southeast downslope. The area is undulating, with a general sloping direction to the southeast.

13 Additional Information

Closure Plan

All reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC6.2.3103 quality standards should Sid Richardson choose to permanently close the C-3 compressor station. Closure measures will include removal or closure in place of all

underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will be made, and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

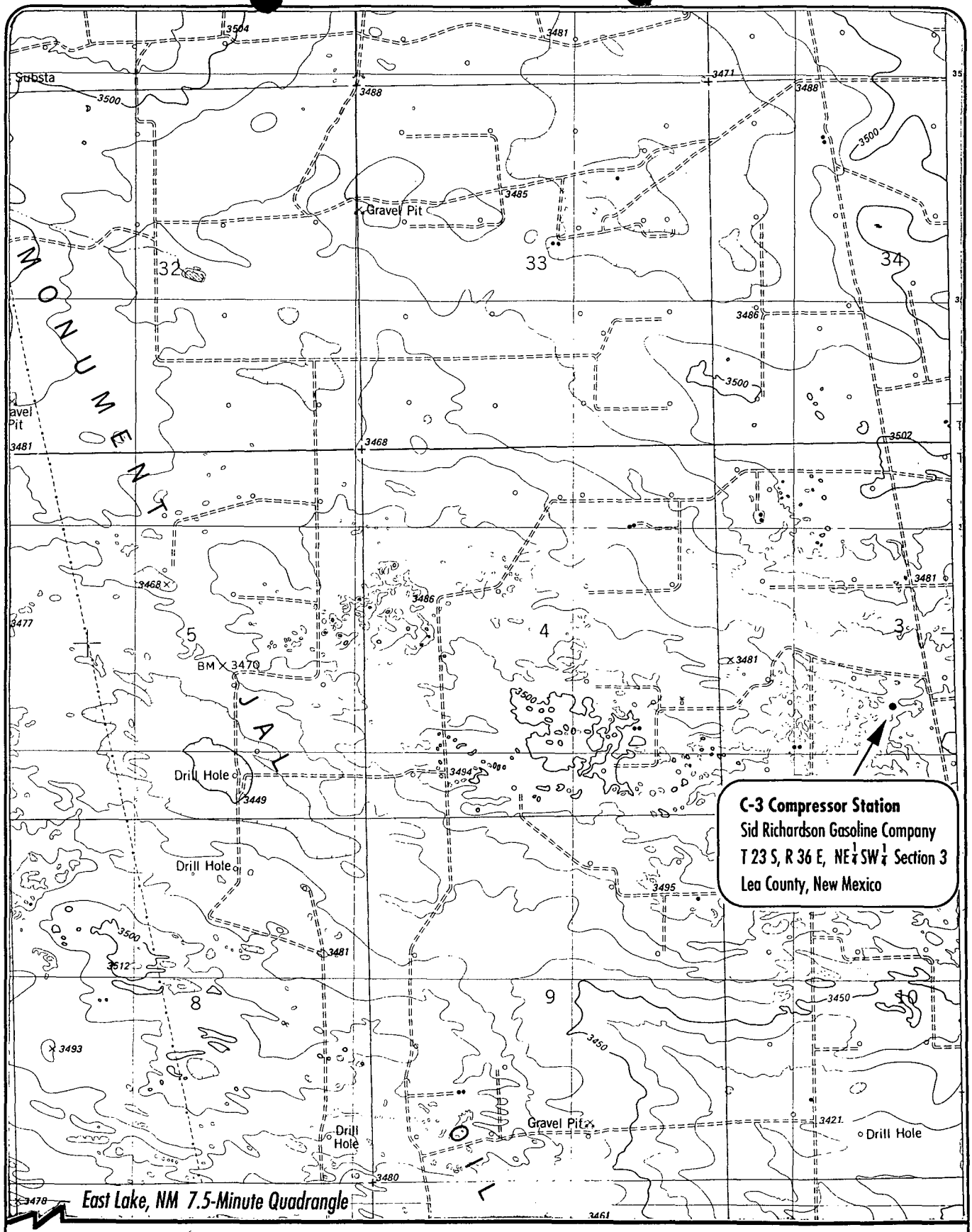
Affirmation

I hereby certify that I am familiar with the information contained in and submitted with this discharge plan for the C-3 compressor station and that such information is true, accurate, and complete to the best of my knowledge and belief.

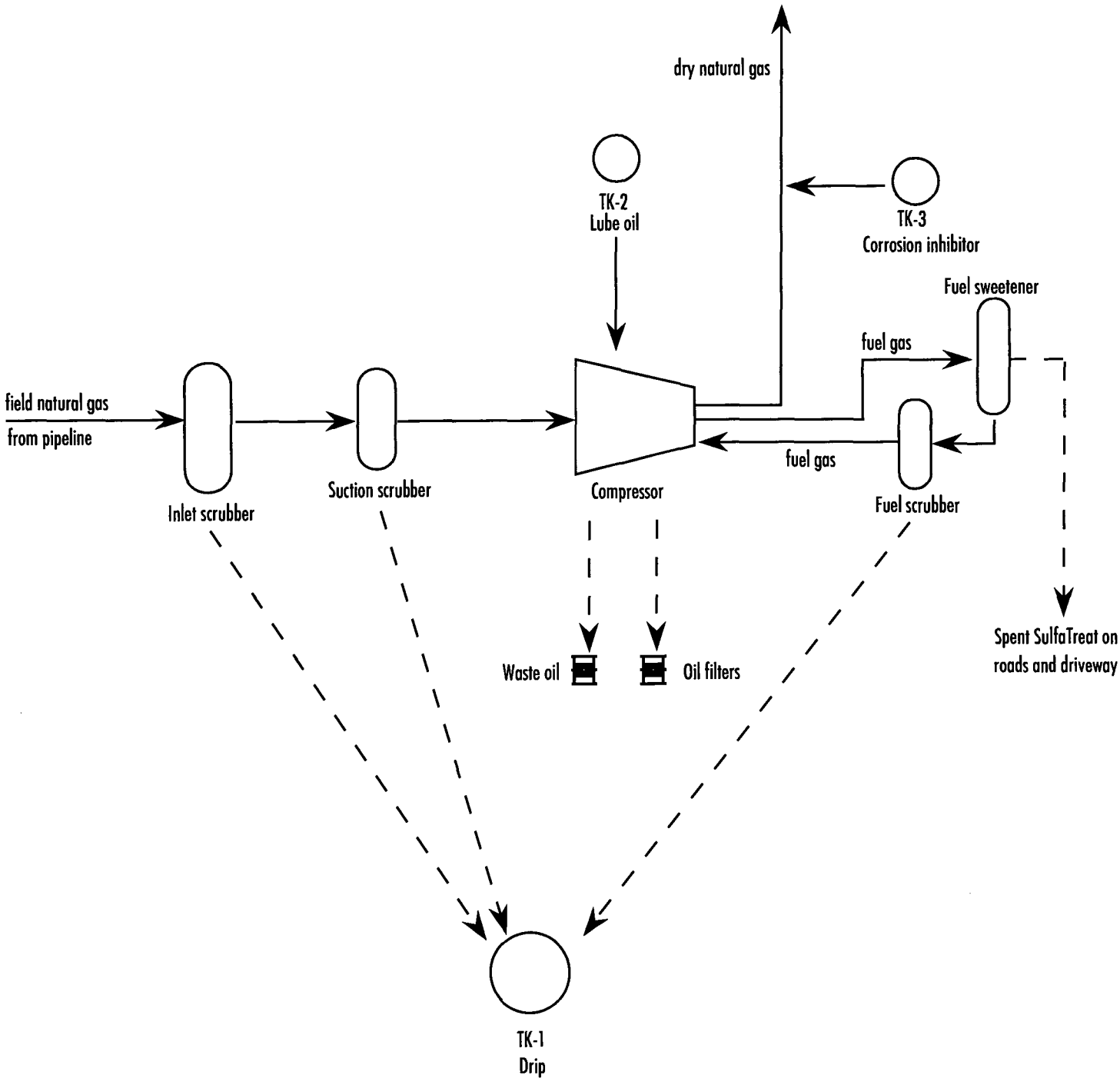
Wayne J. Farley 7-23-96

Wayne J. Farley
Manager of Gas Operations
Sid Richardson Gasoline Co.

Date



Location of C-3 Compressor Station



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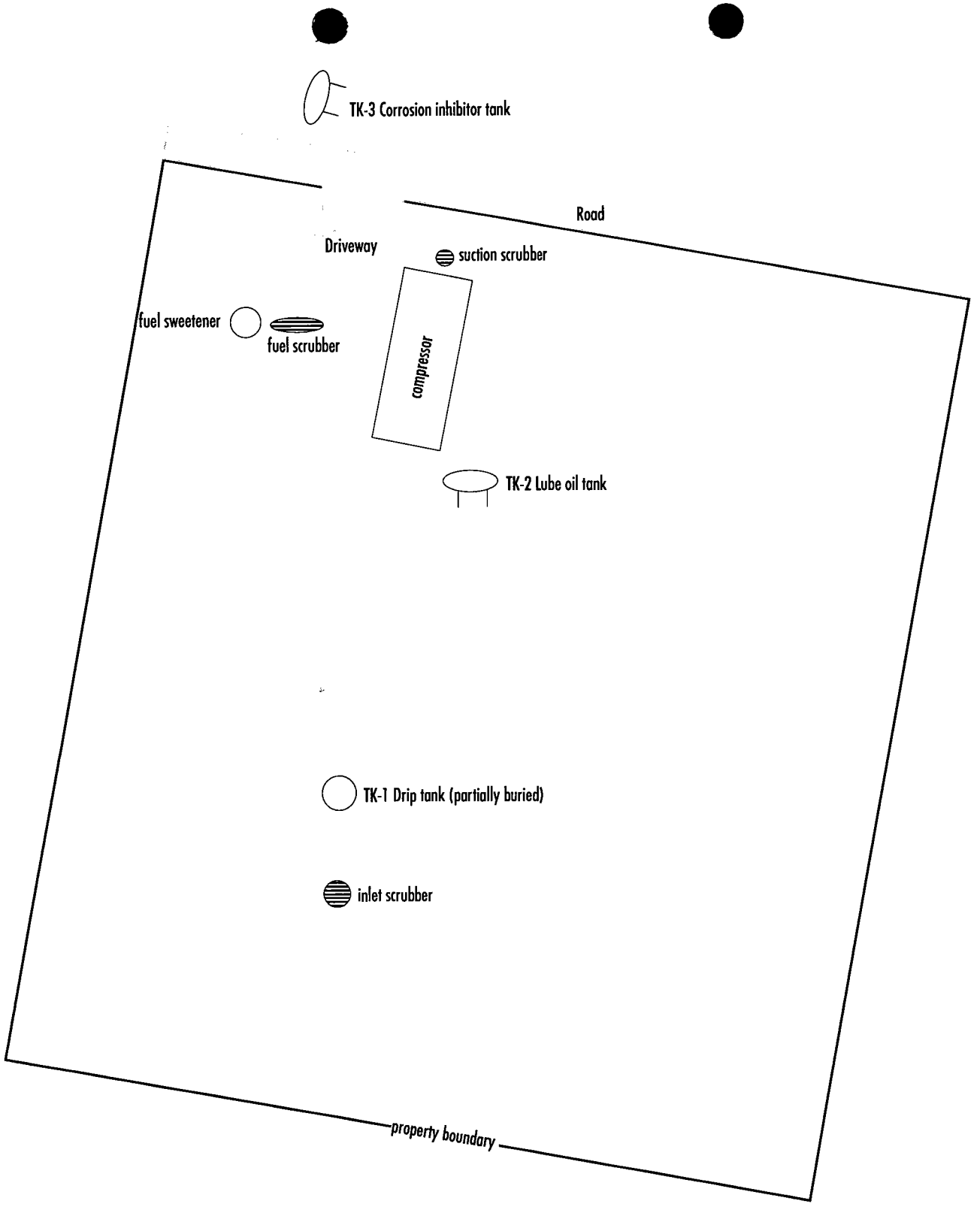
C-3 Compressor Station

Effluent and Solid Waste Production Diagram



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Not to scale

C-3 Compressor Station

Site Diagram

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

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

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

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

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

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

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

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

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS (Due to be revised - still current 7/96) (as of 3-1-91)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1203. NOTIFICATION OF DISCHARGE--REMOVAL.

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

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

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

b. the name and address of the facility;

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

d. the source and cause of discharge;

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

f. the estimated volume of the discharge; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

[1204-1209] Reserved

1210. VARIANCE PETITIONS.

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

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

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

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

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

SID RICHARDSON GASOLINE CO.

INTER-COMPANY CORRESPONDENCE

DATE: July , 1994

TO: Curtis Clark FROM: Robert Gawlik

SUBJECT: New Mexico Leak, Spill, and Release Requirements

It is imperative that the response to any leak, spill, or release of any gas, crude oil, or condensate be immediate. The recognition, notification, containment, recovery of standing liquid and remediation is of the utmost importance. Quick response will mitigate any immediate threats to fresh waters, public health and the environment.

I. Initial Response Actions

When notified of a leak, spill, or reasonable probability to injure or be detrimental to public health, fresh waters, or the environment or unreasonably interfer with the public welfare we must take the following immediate actions:

Note: Take immediate action **unless** that action will create a safety hazard which could result in personnel or public injury.

1) **Source Elimination and Site Security**

Block off supply of material to the leak, spill, or release. Limit access to only necessary and essential personnel and equipment.

2) **Containment**

As soon as it is safe for personnel and equipment to enter the area, we must contain the leak, spill, or release to minimize the possible contamination of resources and to limit the area impacted. Construct berms or dikes, or use absorbent pads or hay.

3) **Site Stabilization**

Remove all standing material or product from within containment.

Note: The disposition of all wastes or products removed from the site must be with the approval of the OCD.

II. Notification of Leak, Spill, or Release

Leaks, spills, or release of any wastes or products from oil field operations are required to be reported pursuant to the following:

1) Oil Conservation Division **(OCD)**
Rule 116 (Attachment D)

2) New Mexico Water Quality Control Commission **(WQCC)**
Regulation 1-203 (Attachment E)

3) Bureau of Land Management **(BLM)**
(Attachment F)

Note: Be prepared to give information required on the reporting form provided (Attachment B).

File NOTIFICATIONS & REPORTS to:

New Mexico Energy, Minerals
and Natural Resources Department
Oil Conservation Division
Environmental Section
P. O. Box 2088
Santa Fe, New Mexico 87504-2088
(505) 827 5800 (8 am - 5 pm) MST

District I - Hobbs (Lea County)
Jerry Sexton
1000 W. Broadway
Hobbs, New Mexico 88240
(505) 393 6161

District II - Artesia (Eddy County)
811 South First Street
P. O. Box "DD"
Artesia, New Mexico 88210
(505) 748 1283

** U. S. Department of Interior
Bureau of Land Management
New Mexico State Office
P. O. Box 27115
Santa Fe, New Mexico 87502-7115
(505) 438 7400

** **Note:** Spill report to the BLM is necessary only when spills occur on BLM owned surface and/or minerals.

Insure that complete records, (i.e. notifications, cleanup, or remediation work) are documented and maintained at the nearest company office.

III. Reportable Quantities (RQ) Overview of Rule 116
(Attachment A)

A)

Material	Quantity (bbl)	Watercourse[1]	Notification
Crude Oil or Condensate	> 25	No	Immediate [2]
	> 5	No	Subsequent [3]
	< 5	No	None
	> 1	Yes	Immediate
Saltwater	> 100	No	Immediate
	> 25	Yes	Immediate
	> 25	No	Subsequent

[1]Watercourse is defined as any lake bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

[2]Immediate Notification shall be as soon as possible, but no later than twenty four (24) hours after discovery. Notification may be made in person or by telephone to the appropriate District office.

[3]Subsequent Notification shall be a complete written report of the incident in duplicate to the appropriate authorities within 10 days of the incident.

B) **Summary - Reporting requirements**

a) Any spill into water would be reported.

b) Any spill of five (5) barrels or less would not be reported, but would have to be remediated.

c) Any spill of more than five (5) barrels but less than twenty five (25) barrels would be reported in writing within ten (10) days of the incident and remediated.

d) Any spill of twenty five (25) barrels or more would be reported as soon as possible in person or by telephone and then followed up by a complete written report within ten (10) days of the incident.

IV. Guidelines for Clean-up of Leak, Spill, or Release

1) Determine remediation level for unsaturated contaminated soil by using the Attachment A chart.

2) All soil having more than .5% total petroleum hydrocarbon (TPH) will be brought to the surface for disposal or remediation.

3) A final clean up of .5% TPH would have to be achieved as soon as feasible.

4) Highly contaminated saturated soils and unsaturated contaminated soils exceeding the standards described in Attachment A should be either:

   a) Excavate from the ground all soil that is above the ranking score level (I, II, III) as indicated in Attachment A or an alternate approved remediation level, or;

   b) Excavated to the maximum depth and horizonal extent practicable. Upon reaching this limit, a sample should be taken from the walls and the bottom of the excavation to determine the remaining levels of soil contaminants, or;

   c) Treated in place until a representative sample is below the contaminant specific remediation level as indicated on Attachment A or an alternate approved remediation level, or;

   d) Managed according to an approved alternate method.

5) <u>All</u> soil management options must be approved by OCD.

   a) Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

b) Soil treatment or remediation:

i) Land farming - One time application on location, spread to 6" lift within a bermed area.

ii) Insitu treatment by vapor venting,bioremediation or other approved treatment.

iii) Alternate methods approved by OCD are but not limited to:

- active soil aeration
- composting
- solidification
- bioremediation
- thermal treatment

Attachment A

Contaminated Soils Ranking Criteria

(circle one)

A) Depth of Ground Water

< 50 feet	20
50 - 99 feet	10
> 100 feet	0

B) Wellhead Protection Area

< 1000 feet from a water source, or;
< 200 feet from a private domestic water source

Yes	20
No	0

C) Distance to Surface Water Body

< 200 horizontal feet	20
200 - 1000 horizontal feet	10
> 1000 horizontal feet	0

A _____
+B _____ = Total _____
+C _____

Total Ranking Score

	Level I	Level II	Level III
	>19	10 - 19	0 - 9
Benzene (ppm)	10	10	10
BTEX (ppb)	50	50	50
TPH (ppm)	100	1000	5000

Attachment B

SID RICHARDSON GASOLINE CO.

Leak, Spill, or Release Report

Facility _____ Person Filing Report _____
Report Date _____ Time _____ AM PM

Responsible Party: Sid Richardson Gasoline Co.

_____

City _____ State __ Zip _____

Telephone _____

Discharge Date_____ Time_____ Duration_____ Quantity_____
Source and/or Cause of Discharge_____
Type of Discharge: Gas Crude Oil Condensate Saltwater

Note: If 'other' give chemical composition and physical characteristics on back of page or attach MSDS.

Quarter-Quarter____Section____Township____Range____Survey____Block____

Distance from nearest town and/or landmark_____

Site Characteristics are as follows:

Precipitation _____
Wind Conditions _____
Temperature _____
Soil Type _____
Depth of Penetration _____
Nearest Residence _____
*Nearest Fresh Water _____

*Any water well or water course, i.e. any river, lake, stream, playa, arroyo, draw, wash, gully, natural or man-made channel.

List all federal, state, and local agencies notified on chronological record form and attach to a copy of this report.

Note: List notification time and who received the call.

Attachment C

Definitions

Unsaturated/Contaminated Soil

Soils which are not highly contaminated/saturated, but contain Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) and Total Petroleum Hydrocarbons (TPH) or other potential fresh water contaminants.

Saturated/Highly Contaminated

Those soils which contain a free liquid phase or exhibit gross staining.

Watercourse

Any lake bed or gully, draw, stream bed, wash, arroyos, or natural or man-made channel through which water flows or has flowed.

Immediate Notification

Shall be as soon as possible after discovery and shall be in person or by telephone to the district office of the Division in which the incident occurred. If incident occurs after normal business hours, notify the District Supervisor, the Oil & Gas Inspector, or the Deputy Oil & Gas Inspector. Follow up with a completed written report within (ten) 10 days of the incident.

Subsequent Notification

A complete written report of the incident within ten (10) days of the discovery of the incident.

Written Report

Complete written reports will be submitted in DUPLICATE to the district office of the OCD in the district in which the incident occurred within 10 days after discovery of the incident.

Content of Notification

Refer to Attachment B

ATTACHMENT D

RULE 116. - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS (as of 3-1-91)

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

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

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

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

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

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

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

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

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

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

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

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

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

NEW MEXICO

WATER QUALITY CONTROL COMMISSION REGULATIONS

AS AMENDED THROUGH NOVEMBER 25, 1988

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

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

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

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

b. the name and address of the facility;

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

d. the source and cause of discharge;

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

f. the estimated volume of discharge; and

g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief,

Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

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

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

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

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

approve or disapprove in writing the modified corrective action report within fifteen (15) days of its receipt by the division.

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

B. Exempt from the requirements of this section are continuous or periodic discharges which are made:

1. in conformance with water quality control commission regulations and rules, regulations or orders of other state or federal agencies; or

2. in violation of water quality control commission regulations but pursuant to an assurance of discontinuance or schedule of compliance approved by the commission or one of its duly authorized constituent agencies.

C. As used in this section:

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

2. "facility" means any structure, installation, operation, storage tank, transmission line, motor vehicle, rolling stock, or activity of any kind, whether stationary or mobile;

3. "oil" means oil of any kind or in any form including petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes.

4. "operator" means the person or persons responsible for the overall operation of a facility; and

5. "owner" means the person or persons who own a facility, or part of a facility.

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

SID RICHARDSON GASOLINE CO.
WEST TEXAS AREA OFFICE
5030 E. UNIVERSITY
SUITE C-104
ODESSA, TEXAS 79762
TELEPHONE: (915) 367-2867
FAX: (915) 367-2862

September 22, 1995

Mr. Roger Anderson
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Mr. Anderson:

Recently Sid Richardson Gasoline Co. purchased the Xcel Gas Company (Clayton Williams Companies) gas gathering system in southeastern Lea County. This system includes five (5) compressor sites located between Jal and Eunice New Mexico.

Each compressor is natural gas driven and each utilizes a fuel scrubber to make the field gas usable for the operation of these engines. Each scrubber contains approximately 4-7 cu. yds. of a product called Sulfa Treat (MSDS attached). Sulfa Treat contains no hazardous materials as listed by the ACGIH, is non-toxic and stable. Also there are no special procedures for spills or disposal. This material is a solid waste.

Sid Richardson Gasoline Co. request permission to dispose of our Sulfa Treat material on site and on top of the ground. For your convenience, I have also included a copy of your approval letter to Xcel Gas Company (2-5-93).

If there are any further questions or if more information is needed, do not hesitate to call myself or Harold Hicks, Field Mgr. for Sid Richardson Gasoline Co. Lea County gas gathering system at (505)395-2116. Your help and prompt attention to this matter is greatly appreciated.

Sincerely,

Robert Lee Gawlik
WTA Safety Mgr.

Enclosures

cc: Curtis Clark
Harold Hicks
Herb Harless

MATERIAL SAFETY DATA SHEET

I. PRODUCT IDENTIFICATION

TRADE NAME (as labeled)
SulfaTreat

MANUFACTURER'S NAME & ADDRESS
The SulfaTreat Company
900 Roosevelt Pkwy, Suite 610
Chesterfield, Missouri 63017

Phone number for additional information: 1-800-726-7687 (314-532-2189)

Date prepared or revised: 6/21/94

II. HAZARDOUS INGREDIENTS

Chemical Names	CAS Numbers	Percent	Exposure Limits in Air (units) ACGIH TLV	OSHA PEL	Other (specify)
None					
NA					

SulfaTreat contains no hazardous materials as listed by ACGIH (American Conference of Governmental Hygenists).

III. PHYSICAL PROPERTIES

Vapor density (air=1)	NA	Melting point or range, °F	NA
Specific gravity	2.4	Boiling point or range, °F	NA
Solubility in water	0	Evaporation rate (butyl acetate=1)	NA
Vapor pressure, mmHg at 20°C	0		

Appearance and odor: Black, Granular, Odorless

How to detect this substance (warning properties of substance as a gas, vapor, dust, or mist): NA

IV. FIRE AND EXPLOSION

Flash Point, °F (give method) NA Auto ignition temperature, °F NA

Flammable limits in air, volume %: NA lower (LEL)___ upper (UEL)___

Fire extinguishing materials: __NA_water spray __NA_carbon dioxide _NA_other:
__NA_foam __NA_dry chemical

Special firefighting procedures: None

Unusual fire and explosion hazards: None

V. HEALTH HAZARD INFORMATION

SYMPTOMS OF OVEREXPOSURE (for each potential route of exposure)

Inhaled: Over exposure to dust may irritate nasal passage.

Contact with skin or eyes: Contact with skin has no affect; could cause eye irritation similar to dust.

Absorbed through skin: None. Swallowed: None

HEALTH EFFECTS OR RISKS FROM EXPOSURE: Explain in lay terms. Attach extra page if more space is needed.

Acute: No acute effects to health are known. LD50 greater than 3990 mg/kg (highest practical test level). Not toxic.

Chronic: No chronic effects to health are known.

FIRST AID: EMERGENCY PROCEDURES

Eye Contact: Flush with water. Skin Contact: None. Swallowed: None.

Inhaled: Remove to fresh air.

SUSPECTED CANCER AGENT? _X_NO - This product's ingredients are not found in the lists below.

___Federal OSHA ___NTP ___IARC

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: None known.

VI. REACTIVITY DATA

Stability: _X_Stable ___Unstable

Conditions to avoid: NA Incompatibility (materials to avoid): NA

Hazardous decomposition products (including combustion products): None

Hazardous polymerization: ___May occur _X_Will not occur

VII. SPILL, LEAK, AND DISPOSAL PROCEDURES

Spill response procedures (include employee protection measures): No special procedures required.

Preparing wastes for disposal (container types, neutralization, etc.): No special procedures required.

NOTE: Dispose of all wastes in accordance with federal, state and local regulations.

VIII. SPECIAL HANDLING INFORMATION

Ventilation and engineering controls: No special requirements.

Respiratory protection (type): NIOSH/MSHA approved dust mask (TC-21C-132)

Eye protection (type): None required. Gloves (specify material): None required.

Other clothing and equipment: No special requirements.

Work practices, hygienic practices: No special requirements.

Other handling and storage requirements: No special requirements.

Protective measures during maintenance of contaminated equipment: NA

EVALUATION OF THE ENVIRONMENTAL CHARACTERISTICS OF SulfaTreat® AND ITS REACTION PRODUCTS USING EPA GUIDELINES FOR THE "IDENTIFICATION AND LISTING OF HAZARDOUS WASTE" MARCH, 1992

I. SUMMARY

SulfaTreat® is used in a patented process which consists of the use of a proprietary iron compound to remove hydrogen sulfide from natural gas. As a result of the process, a solid residue is produced.

Laboratory evaluations were performed on SulfaTreat® and its air dried reaction products according to U.S. Environmental Protection Agency (EPA) test protocol cited in 40 CFR Subpart C (Section 261.20 through 261.24) of Section 3001 of the Resource Conservation and Recovery Act in the Federal Register, Volume 45, Number 98, on May 19, 1980, revised July 1,1989 and the Toxicity Characteristics Leaching Procedure (TCLP) effective September 2, 1990. Reacted SulfaTreat® was also analyzed according to extractable California title 22 methods using the calwet extraction procedure.

Evaluations included testing of the ignitability, corrosivity, reactivity, and the determination of the presence of heavy metals and pesticides as prescribed in the regulations.

Also the oral and dermal toxicity and the aquatic 96 hour LC_{50} was determined and the agricultural characteristics were studied. All results showed SulfaTreat® and its reaction products to be safe for personnel and non-hazardous to the environment and effective for plant growth.

The work summarized herein was performed for Gas Sweetener Associates dba The SulfaTreat Company by the following companies and individuals:

EPA:

Gulf South Research Institute (GSRI)
Shilstone Testing Laboratories
Tim Sloan, Scientific Consultant
Dr. R. P. Wendt, Professor of Chemistry, Loyola University
Thermo Analytical Inc.
SPL, Inc.

ORAL AND DERMAL TOXICITY:

Scientific Associates, Inc.

CORN GROWTH EXPERIMENTS:

Terry L. Smith, Ph.D., California Polytechnic State University, Soil Science Deparent.

II. EXPERIMENTAL RESULTS

A. Characteristics of Ignitability

The residue is not a liquid. Flash point of wet sludge - Does not flash below 100°C. Flash point of dry sludge - 137°C.

1. Friction Testing

Friction testing was conducted by grinding the sample under standard temperature and pressure in a mortar and pestle and monitoring the temperature. There was neither ignition nor any variation in the temperature or cause of fire during the course of the evaluation.

2. Flame Testing

Flame testing was conducted by 1) directly heating the sample with a Fischer burner flame and 2) indirectly heating the sample in a porcelain crucible. In both cases, the sample did not ignite but merely glowed with red color due to high temperature.

3. Exposure to Moisture Testing

Exposure to moisture testing was conducted by placing small amounts of the sample in water. The sample remained unchanged.

4. Oxidizer

By the definition stated in 49 CFR 173.141, the sample is not an oxidizer.

B. Characteristics of Corrosivity

1. pH Determination

The pH determination was made on a slurried sample in accordance with EPA 600/4.79-020. The initial pH reading was approximately 9.

2. Corrosion Rate Determination

The corrosion rate of the sample on 1020 steel was determined using a potentiodynamic polarization technique (ASTM G-5 specification). The studies were conducted using a Princeton Applied Research computerized Model 350 corrosion measurement system.

The results of the potentiodynamic polarization experiment with SAE 1020 steel showed that the general corrosion rate a 455C (130°F) of 5.8 mils (.15 mm) per year is substantially below the maximum 0.250 inches (6.25 mm) per year specified in the regulation.

C. Characteristics of Reactivity

1. Stability Testing
An aqueous suspension of the reacted SulfaTreat® monitored with a potentiometer from pH 1 to pH 12.5. The pH alterations were accomplished using dilute HCL and dilute NaOH. The material was stable and totally unreactive when exposed to these pH extremes without any evolution of gases, including H_2S and SO_2.

2. Classification as an Explosive
Neither the material nor anything similar to this material is listed as a Forbidden, Class A, or Class B explosive in 49 CFR 173.51, 49 CFR 173.53, or 49 CFR 173.88.

D. Characteristics of EP Toxicity

Laboratory evaluations of the EP toxicity required a leaching step prior to analysis. The leaching step was carried out in accordance with the test methods described within the Federal Register, Volume 45, Number 98 on May 19, 1980 (Appendix III). 100 grams of the ground solid sample were placed in a mechanically stirred extractor with 1600 g of deionized water. The pH was maintained at 5 for a period of 24 hours by the addition of 0.5 N acetic acid at 30 minute intervals as needed. This solution was then filtered using a 0.45 millipore filter. The filtrate was analyzed for the presence of contaminants using the following EPA methods:

Contaminant	EPA Method
Mercury	245.1
Arsenic	206.1
Barium	208.1
Cadmium	213.1
Chromium	218.1
Lead	239.2
Selenium	270.3
Silver	272.1
Mercury	245.1
TCLP	1311

The concentration of contaminants in the extract is far below the maximum allowable limits in all cases.

E. Oral and Dermal Toxicity

1. Unreacted SulfaTreat® (Oral Toxicity)
The acute oral LD50 of SulfaTreat® when administered as a 67% w/w aqueous suspension to male and female SASCO rats weighing 219 to 345 grams, was found to be greater than 39.91 g/kg of body weight.

As the term is defined in the Federal Hazardous Substances Act (FHSA), the product was found not to be a Toxic Substance.

2. Reacted SulfaTreat® (Oral Toxicity)
Undiluted, reacted SulfaTreat® (semisolid phase) was administered orally to ten SASCO-SD rats (five male and five females), weighing 198 to 265 grams at a dosage level of 5.00 grams per kilogram of body weight. All of the animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substance Act (FHSA), the semisolid phase of the test material was found not to be a Toxic Substance.

3. Reacted SulfaTreat® (Dermal Toxicity)
Undiluted, reacted SulfaTreat® (liquid phase) was applied for twenty-four hours to the abraded skin of five male and five female New Zealand White Rabbits, weighing 2.72 to 3.09 kilograms, at a dosage level of 2.00 grams per kilogram of body weight. All ten animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substances Act (FHSA), the liquid phase of the test material was found not to be a Toxic Substance.

4. Reacted SulfaTreat® (Aquatic Toxicity)
Passed the aquatic 96 hour LC50 which was determined to be more than 500 milligrams per liter when measured in soft water with fathead minnows.

F. Other

The material is not listed (as a hazardous waste) in Subpart 261.30-261.33 of "Identification and Listing of Hazardous Wastes, "EPA-8700-12(FR), May 29, 1980.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

February 5, 1993

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

Mr. Rick Boring 684-3849
Xcel Gas Company
6 Desta Drive
Suite 5800
Midland, Texas 79705

Re: Sulfa Treat Waste

Dear Mr. Boring

Based on the Sulfa Treat Material Safety Data Sheet and supplemental information provided, the solid waste generated from the use of Sulfa Treat does not exhibit hazardous waste characteristics and may be disposed of on site pursuant to OCD solid waste disposal requirements or offsite at an OCD approved disposal facility.

If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely:

Roger C. Anderson
Environmental Bureau Chief

xc: Jerry Sexton- OCD Hobbs

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

September 25, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-060

Mr. Robert Gawlik
Sid Richardson Gasoline Co.
5030 East University, Suite C-104
Odessa, TX 79762

Re: Disposal Request - Sulfa Treat Waste

Dear Mr. Gawlik:

The Oil Conservation Division (OCD) has received your request letter dated September 22, 1995, for approval to remove and dispose of spent Sulfa Treat from 5 compressor stations located in Lea county, with approximately 7 cubic yards per station. **Based on the information provided, your disposal request is approved.** The spent Sulfa Treat may be disposed of in a the same manner as the February 5, 1993 approval from Mr. Roger Anderson with the NMOCD. (see attached letter)

Please be advised that this approval does not relieve you of liability should your operation result in pollution of surface or groundwater or the environment.

If there are any questions on this matter, please contact me at (505) 827-7156.

Sincerely,

Patricio W. Sanchez,
Petroleum Engineer

Name of leak Comp
Legal locations

XC: Mr. Wayne Price and Mr. Jerry Sexton

RECEIVED
SEP 27 1995
WTA Odessa

DOW

Dow U.S.A.

The Dow Chemical Company
Midland, Michigan 48674

Material Safety Data Sheet

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 07666 Page: 1

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Date Printed: 06/11/92 MSDS:000584

1. INGREDIENTS: (% w/w, unless otherwise noted)

Ethylene Glycol	CAS# 000107-21-1	47-55%
Diethylene Glycol	CAS# 000111-46-6	<3%
Water	CAS# 007732-18-5	<50%
Dipotassium phosphate	CAS# 007758-11-4	<5%

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

2. PHYSICAL DATA:

BOILING POINT: 229F, 109C
VAP. PRESS: Approx. 2.5 mmHg @ 20C
VAP. DENSITY: Not applicable
SOL. IN WATER: Completely miscible
SP. GRAVITY: 1.084 @ 60/60F, 16C
APPEARANCE: Red liquid.
ODOR: Information not available.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: None
METHOD USED: PMCC

FLAMMABLE LIMITS
LFL: Not applicable.
UFL: Not applicable.

EXTINGUISHING MEDIA: Water fog, carbon dioxide, dry chemical.

FIRE & EXPLOSION HAZARDS: After 50% of the initial volume has evaporated, the residual solution will burn at temperatures above 290F when exposed to an ignition source.

FIRE-FIGHTING EQUIPMENT: Wear positive-pressure, self-contained breathing apparatus.

4. REACTIVITY DATA:

(Continued on page 2 , over)
(R) Indicates a Trademark of The Dow Chemical Company

* An Operating Unit of The Dow Chemical Company

4. REACTIVITY DATA: (CONTINUED)

STABILITY: (CONDITIONS TO AVOID) Not considered to be a problem under normal storage conditions.

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Oxidizing material

HAZARDOUS DECOMPOSITION PRODUCTS: After water has volatilized, burning will produce carbon monoxide, carbon dioxide, and water.

HAZARDOUS POLYMERIZATION: Will not occur.

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS: Small spills: Cover with absorbent material, soak up and sweep into drums for disposal. Large spills: Dike around spill and pump into suitable containers for disposal or reprocessing.

DISPOSAL METHOD: Burn in approved incinerator in accordance with local, state, and federal regulations.

6. HEALTH HAZARD DATA:

EYE: Essentially nonirritating to eyes. Vapors or mists may irritate eyes.

SKIN CONTACT: Prolonged or repeated exposure not likely to cause significant skin irritation. May cause more severe response if skin is abraded (scratched or cut).

SKIN ABSORPTION: A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts. The dermal LD50 has not been determined. Repeated skin exposure to large quantities may result in absorption of harmful amounts.

INGESTION: Excessive exposure may cause central nervous system effects, cardiopulmonary effects (metabolic acidosis), and kidney failure. Amounts ingested incidental to industrial handling are not likely to cause injury; however, ingestion of larger amounts could cause serious injury, even death. The oral LD50 for rats is 8200 mg/kg. Single oral dose toxicity is expected to be moderate to humans even though tests with animals show a lower degree of toxicity.

(Continued on page 3)

6. HEALTH HAZARD DATA: (CONTINUED)

INHALATION: At room temperature, exposures to vapors are minimal due to low vapor pressure. If heated or sprayed as an aerosol, concentrations may be attained that are sufficient to cause irritation and other effects.

SYSTEMIC & OTHER EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include formation of bladder stones after repeated oral doses of diethylene glycol. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Based on data from long-term animal studies, diethylene glycol is not believed to pose a carcinogenic risk to man. Ethylene glycol did not cause cancer in long-term animal studies. Based on animal studies, ingestion of very large amounts of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals to prevent ingestion) or skin contact, the primary routes of occupational exposure, had minimal or essentially no effect on the fetus. Birth defects are unlikely from exposure to diethylene glycol. Exposures having no adverse effects on the mother should have no effect on the fetus. Diethylene glycol has not interfered with reproduction in animal studies. In studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of ethylene glycol in large amounts caused a small decrease in the number of litters/pair, live pups/litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests have been negative.

7. FIRST AID:

EYES: Irrigate immediately with water for at least 5 minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything to an unconscious person.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Consult standard literature. Supportive care. Treatment based on judgment of the physician in response to

(Continued on page 4 , over)

7. FIRST AID: (CONTINUED)

reactions of the patient. In the treatment of intoxication by ethylene glycol, the use of ethanol, hemodialysis and intravenous fluids to control acidosis should be considered. N. Eng. J. Med. 304:21 1981. If burn is present, treat as any thermal burn, after decontamination.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): Ethylene glycol: ACGIH TLV and OSHA PEL are 50 ppm Ceiling. Diethylene glycol: AIHA WEEL is 50 ppm, total; 10 mg/m3, aerosol only.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator.

SKIN PROTECTION: Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Avoid skin and eye contact. Avoid ingestion. Avoid breathing vapors or mists.

Trace quantities of ethylene oxide (EO) may be present in this product. While these trace quantities could accumulate in headspace areas of storage and transport vessels, they are not expected to create a condition which will result in EO concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zones of the workplace for appropriate applications. OSHA has established a permissible exposure limit of 1.0 ppm 8 hr TWA for EO. (Code of Federal Regulations Part 1910.1047 of Title 29)

MSDS STATUS: Revised section 8.

For information regarding state/provincial and federal regulations see The Regulatory Information Section.
(R) Indicates a trademark of The Dow Chemical Company

* An Operating Unit of The Dow Chemical Company

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 07666 Page: R-1

Product Name: AMBITROL (R) FL 50 COOLANT

Effective Date: 01/22/91 Date Printed: 06/11/92 MSDS:000584

REGULATORY INFORMATION: (Not meant to be all-inclusive--selected regulations represented.)

NOTICE: The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See MSD Sheet for health and safety information.

U.S. REGULATIONS

SARA 313 INFORMATION: This product contains the following substances 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:

CHEMICAL NAME	CAS NUMBER	CONCENTRATION
ETHYLENE GLYCOL	000107-21-1	47 -55 %

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard
A delayed health hazard

* An Operating Unit of The Dow Chemical Company

Mobil

MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 12/30/92

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

MOBIL PEGASUS 80

SUPPLIER:
MOBIL OIL CORP.
CHEMICAL NAMES AND SYNONYMS:
PET. HYDROCARBONS AND ADDITIVES
USE OR DESCRIPTION:
NATURAL GAS ENGINE OIL

24-HOUR EMERGENCY (CALL COLLECT):
(609) 737-4411
CHEMTREC:
(800) 424-9300
PRODUCT AND MSDS INFORMATION:
(800) 662-4525

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

APPEARANCE: Amber Liquid ODOR: Mild PH: NA
VISCOSITY AT 40 C, CS: 126.2
VISCOSITY AT 100 C, CS: > 12.5
FLASH POINT F(C): > 475(246) (ASTM D-92)
MELTING POINT F(C): NA POUR POINT F(C): 5(-15)
BOILING POINT F(C): 730(388) VOC: < 5.00(Wt. %); 0.371 lbs/gal
RELATIVE DENSITY, 15/4 C: 0.89 SOLUBILITY IN WATER: Negligible
VAPOR PRESSURE-mm Hg 20C: < .1

NA=Not Applicable NE=Not Established D=Decomposes
FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

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

None

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

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

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

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

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

--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: Flush thoroughly with water. If irritation persists, call a physician.
SKIN CONTACT: Wash contact areas with soap and water.
INHALATION: Remove from further exposure. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance and call a physician. If breathing has stopped, use mouth to mouth resuscitation.
INGESTION: Not expected to be a problem. However, if greater than 1/2 liter(pint) ingested, immediately give 1 to 2 glasses of water and call a physician, hospital emergency room or poison control center for assistance. Do not induce vomiting or give anything by mouth to an unconscious person.

Mobil

********** VI. FIRE AND EXPLOSION HAZARD DATA **********
FLASH POINT F(C): > 475(246) (ASTM D-92)
FLAMMABLE LIMITS. LEL: .6% UEL: 7.0%
EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.
SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fires in enclosed areas, firefighters must use self-contained breathing apparatus. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.
UNUSUAL FIRE AND EXPLOSION HAZARDS: None.
NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

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

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

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

********** X. SPECIAL PRECAUTIONS **********
No special precautions required.

Mobil

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

---ACUTE TOXICOLOGY---

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

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

INHALATION TOXICITY (RATS): Not established

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

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

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

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

---CHRONIC TOXICOLOGY (SUMMARY)---

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

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

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

Transport Information:

DOT:

Shipping Name: Not applicable
Hazard Class: Not applicable

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

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

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

SARA (311/312 - FORMERLY 302) REPORTABLE HAZARD CATEGORIES: None

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

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

Mobil

MOBIL PEGASUS 80 605774-00 Page 4 of 4

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
ZINC (ELEMENTAL ANALYSIS) (.04%)	7440-66-6	22
PHOSPHORODITHOIC ACID, O,O-DI C1-14-ALKYL ESTERS, ZINC SALTS (2:1) (ZDDP) (.32%)	68649-42-3	22

--- REGULATORY LISTS SEARCHED ---

1 = ACGIH ALL	6 = IARC 1	11 = TSCA 4	17 = CA P65	22 = MI 293	
2 = ACGIH A1	7 = IARC 2A	12 = TSCA 5a2	18 = CA RTK	23 = MN RTK	
3 = ACGIH A2	8 = IARC 2B	13 = TSCA 5e	19 = FL RTK	24 = NJ RTK	
4 = NTP CARC	9 = OSHA CARC	14 = TSCA 6	20 = IL RTK	25 = PA RTK	
5 = NTP SUS	10 = OSHA Z	15 = TSCA 12b	21 = LA RTK	26 = RI RTK	
		16 = WHMIS			

CARC = CARCINOGEN; SUS = SUSPECTED CARCINOGEN

NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBS.

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

INGREDIENT DESCRIPTION	PERCENT	CAS NUMBER
CONTAINS THE FOLLOWING BASE OIL:	> 90.00	
DISTILLATES (PETROLEUM), HYDROTREATED HEAVY PARAFFINIC		64742-54-7
AMINES, POLYETHYLENEPOLY-, REACTION PRODUCTS WITH SUCCINIC ANHYDRIDE POLYBUTENYL DERIVS.	< 5.72	68439-80-5
ZINC DITHIOPHOSPHATE	0.33 WT	800967-5469P

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

FOR MOBIL USE ONLY: MSC: 1* 1± NE 1* 1*, MPPEC: A, PPEC: , US92-547
APPROVE CCODE:2 11/09/92 REQ: US - MARKETING

****

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

****

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

Mobil

602953-00 Page 1 of 4

MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED:09/19/91

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

MOBIL SHC 630

SUPPLIER:
MOBIL OIL CORP.

CHEMICAL NAMES AND SYNONYMS:
SYN. HYDROCARBONS AND ADDITIVES

USE OR DESCRIPTION:
GEAR LUBRICANT

24-HOUR EMERGENCY (CALL COLLECT):
(609) 737-4411

CHEMTREC:
(800) 424-9300

PRODUCT AND MSDS INFORMATION:
(800) 662-4525

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

APPEARANCE: Lt. Amber Liquid ODOR: Mild PH: NA
VISCOSITY AT 100 F, SUS: 1078.0 AT 40 C, CS: 209.0
VISCOSITY AT 210 F, SUS: 128.0 AT 100 C, CS: 26.0
FLASH POINT F(C): > 480(249) (ASTM D-92)
MELTING POINT F(C): NA POUR POINT F(C): -50(-46)
BOILING POINT F(C): > 600(316)
RELATIVE DENSITY, 15/4 C: 0.87 SOLUBILITY IN WATER: Negligible
VAPOR PRESSURE-mm Hg 20C: < .1

NA=Not Applicable NE=Not Established D=Decomposes
FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

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

None

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

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

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

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---
THRESHOLD LIMIT VALUE: 5.00 mg/m3 Suggested for Oil Mist
EFFECTS OF OVEREXPOSURE: Not expected to be a problem.

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

--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: Flush thoroughly with water. If irritation persists, call a physician.
SKIN CONTACT: Wash contact areas with soap and water.
INHALATION: Remove from further exposure. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance and call a physician. If breathing has stopped, use mouth to mouth resuscitation.
INGESTION: Not expected to be a problem when ingested. If uncomfortable seek medical assistance.

Mobil

********** VI. FIRE AND EXPLOSION HAZARD DATA **********
FLASH POINT F(C): > 480(249) (ASTM D-92)
FLAMMABLE LIMITS. LEL: .6% UEL: 7.0%
EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.
SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fires in enclosed areas, firefighters must use self-contained breathing apparatus. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.
UNUSUAL FIRE AND EXPLOSION HAZARDS: None.
NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

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

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

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

********** X. SPECIAL PRECAUTIONS **********
No special precautions required.

MATERIAL SAFETY DATA SHEET

DATE: 08/11/95 **REVISED: 08/11/95** **SUPERSEDES: 07/31/95**

I. PRODUCT IDENTIFICATION

Trade Name:	**SUM-CLEAN**
Chief Constituent:	TEA Dodecylbenzene Sulfonate
Hazardous Ingredients/OSHA:	2 - Butoxyethanol, (OSHA PEL - 25 ppm) (ACGIH TL - 25 ppm)
Carcinogenic Ingredients/OSHA/NTP/IARC:	None
Ingredients Regulated by SARA Title 3, Section 313:	2-Butoxyethanol

II. WARNING STATEMENTS

None

III. PHYSICAL AND CHEMICAL DATA

Appearance and Odor: Red on green

Specific Gravity:	1.05		
Boiling Point:	212°F	Evaporation Rate:	1.5
Vapor Pressure:	24 mm Hg.	Solubility in Water:	100%

IV. FIRE PROTECTION

Flash Point:	None
Extinguishing Media:	N/A
Special Firefighting Procedure:	None

V. REACTIVITY DATA

Thermal Stability:	Stable
Materials to Avoid:	Acids
Hazardous Polymerization:	Will not occur
Hazardous Decomposition Products:	None

VI. HEALTH HAZARD DATA

Exposure Limits:	Skin - TLV 50 ppm
Effects of Overexposure:	Dry skin, stings eyes. Harmful if swallowed.

VII. PHYSIOLOGICAL EFFECTS SUMMARY

ACUTE:

Eyes:	Irritant to eyes.
Skin:	Will dry skin in concentrated forms.
Respiratory System:	Not Determined (Avoid breathing mist)

CHRONIC: Exposure of rats by inhalation to 2-BE caused hemolysis, hemoglobinuria (blood in the urine) and a slight increase in liver weight. Other species, including man, were less sensitive or more resistant to hemolysis. The hemolytic effect in rats was transitory and/or reversible and not considered to be relevant to human health. Inhalation exposure of pregnant rabbits caused some lethality to the dam and fetus at 200 PPM, but there were no effects at 100 PPM and below. Inhalation exposure to pregnant rats caused irritancy to the dams and related fetotoxicity at 200 and 100 PPM, but there were no effects at 50 PPM and below. 2-BE did not cause birth defects in either study.

VIII. PRECAUTIONS FOR SAFE HANDLING

For general personal hygiene, wash hands thoroughly after handling material. Avoid contact with skin and eyes.

Keep from freezing. If frozen, thaw and agitate before use.

IX. PROTECTION AND CONTROL MEASURES

Protective Equipment:	Rubber gloves, splash goggles and eye wash.
Respiratory Protection:	None
Ventilation:	N/A

X. EMERGENCY AND FIRST AID PROCEDURES

Eye Contact:	Flush with water. If irritation persists, get medical attention.
Skin Contact:	Wash with soap and water.
Inhalation:	Remove to fresh air and if burning persists, call physician.
Ingestion:	Take one or two glasses of water and induce vomiting. Call a physician.

XI. SPILL AND DISPOSAL PROCEDURES

Environmental Impact: Report spills as required to appropriate authorities. U. S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard Toll Free Number (800) 424-8802. In case of accident or road spill, notify Chemtrec (800) 424-9300.

Procedures if Material is Released or Spilled: Rinse with copious quantities of water to dilute. Sodium carbonate or calcium carbonate may be used to soak up liquid.

Waste Management: Material is considered non-hazardous and biodegradable as received. Spent material may be disposed of according to Federal, State and Local regulations in sewer system with water flush.

Toxic Substance Inventory Control Act: All components are included on the TSCA Inventory and are in compliance with the TSCA.

FOR ADDITIONAL INFORMATION CONTACT:

PLAINS OIL COMPANY
P. O. [illegible]
[illegible]
HOBBS, NEW MEXICO

MATERIAL SAFETY DATA SHEET

I. PRODUCT IDENTIFICATION

TRADE NAME (as labeled)
SulfaTreat

MANUFACTURER'S NAME & ADDRESS
The SulfaTreat Company
900 Roosevelt Pkwy, Suite 610
Chesterfield, Missouri 63017

Phone number for additional information: 1-800-726-7687 (314-532-2189)

Date prepared or revised: 6/21/94

II. HAZARDOUS INGREDIENTS

Chemical Names	CAS Numbers	Percent	Exposure Limits in Air (units) ACGIH TLV	OSHA PEL	Other (specify)
None					
NA					

SulfaTreat contains no hazardous materials as listed by ACGIH (American Conference of Governmental Hygenists).

III. PHYSICAL PROPERTIES

Vapor density (air=1)	NA	Melting point or range, °F	NA
Specific gravity	2.4	Boiling point or range, °F	NA
Solubility in water	0	Evaporation rate (butyl acetate=1)	NA
Vapor pressure, mmHg at 20°C	0		

Appearance and odor: Black, Granular, Odorless

How to detect this substance (warning properties of substance as a gas, vapor, dust, or mist): NA

IV. FIRE AND EXPLOSION

Flash Point, °F (give method) NA Auto ignition temperature, °F NA

Flammable limits in air, volume %: NA lower (LEL)___ upper (UEL)___

Fire extinguishing materials: NA water spray; NA foam; NA carbon dioxide; NA dry chemical; NA other:

Special firefighting procedures: None

Unusual fire and explosion hazards: None

V. HEALTH HAZARD INFORMATION

SYMPTOMS OF OVEREXPOSURE (for each potential route of exposure)

Inhaled: Over exposure to dust may irritate nasal passage.

Contact with skin or eyes: Contact with skin has no affect; could cause eye irritation similar to dust.

Absorbed through skin: None. Swallowed: None

HEALTH EFFECTS OR RISKS FROM EXPOSURE: Explain in lay terms. Attach extra page if more space is needed.

Acute: No acute effects to health are known. LD50 greater than 3990 mg/kg (highest practical test level). Not toxic.

Chronic: No chronic effects to health are known.

FIRST AID: EMERGENCY PROCEDURES

Eye Contact: Flush with water. Skin Contact: None. Swallowed: None.

Inhaled: Remove to fresh air.

SUSPECTED CANCER AGENT? _X_NO - This product's ingredients are not found in the lists below.

___Federal OSHA ___NTP ___IARC

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: None known.

VI. REACTIVITY DATA

Stability: _X_Stable ___Unstable

Conditions to avoid: NA Incompatibility (materials to avoid): NA

Hazardous decomposition products (including combustion products): None

Hazardous polymerization: ___May occur _X_Will not occur

VII. SPILL, LEAK, AND DISPOSAL PROCEDURES

Spill response procedures (include employee protection measures): No special procedures required.

Preparing wastes for disposal (container types, neutralization, etc.): No special procedures required.

NOTE: Dispose of all wastes in accordance with federal, state and local regulations.

VIII. SPECIAL HANDLING INFORMATION

Ventilation and engineering controls: No special requirements.

Respiratory protection (type): NIOSH/MSHA approved dust mask (TC-21C-132)

Eye protection (type): None required. Gloves (specify material): None required.

Other clothing and equipment: No special requirements.

Work practices, hygienic practices: No special requirements.

Other handling and storage requirements: No special requirements.

Protective measures during maintenance of contaminated equipment: NA

EVALUATION OF THE ENVIRONMENTAL CHARACTERISTICS OF SulfaTreat® AND ITS REACTION PRODUCTS USING EPA GUIDELINES FOR THE "IDENTIFICATION AND LISTING OF HAZARDOUS WASTE" MARCH, 1992

I. SUMMARY

SulfaTreat® is used in a patented process which consists of the use of a proprietary iron compound to remove hydrogen sulfide from natural gas. As a result of the process, a solid residue is produced.

Laboratory evaluations were performed on SulfaTreat® and its air dried reaction products according to U.S. Environmental Protection Agency (EPA) test protocol cited in 40 CFR Subpart C (Section 261.20 through 261.24) of Section 3001 of the Resource Conservation and Recovery Act in the Federal Register, Volume 45, Number 98, on May 19, 1980, revised July 1,1989 and the Toxicity Characteristics Leaching Procedure (TCLP) effective September 2, 1990. Reacted SulfaTreat® was also analyzed according to extractable California title 22 methods using the calwet extraction procedure.

Evaluations included testing of the ignitability, corrosivity, reactivity, and the determination of the presence of heavy metals and pesticides as prescribed in the regulations.

Also the oral and dermal toxicity and the aquatic 96 hour LC_{50} was determined and the agricultural characteristics were studied. All results showed SulfaTreat® and its reaction products to be safe for personnel and non-hazardous to the environment and effective for plant growth.

The work summarized herein was performed for Gas Sweetener Associates dba The SulfaTreat Company by the following companies and individuals:

EPA:

Gulf South Research Institute (GSRI)
Shilstone Testing Laboratories
Tim Sloan, Scientific Consultant
Dr. R. P. Wendt, Professor of Chemistry, Loyola University
Thermo Analytical Inc.
SPL, Inc.

ORAL AND DERMAL TOXICITY:

Scientific Associates, Inc.

CORN GROWTH EXPERIMENTS:

Terry L. Smith, Ph.D., California Polytechnic State University, Soil Science Deparent.

II. EXPERIMENTAL RESULTS

A. Characteristics of Ignitability

The residue is not a liquid. Flash point of wet sludge - Does not flash below 100°C. Flash point of dry sludge - 137°C.

1. Friction Testing
Friction testing was conducted by grinding the sample under standard temperature and pressure in a mortar and pestle and monitoring the temperature. There was neither ignition nor any variation in the temperature or cause of fire during the course of the evaluation.

2. Flame Testing
Flame testing was conducted by 1) directly heating the sample with a Fischer burner flame and 2) indirectly heating the sample in a porcelain crucible. In both cases, the sample did not ignite but merely glowed with red color due to high temperature.

3. Exposure to Moisture Testing
Exposure to moisture testing was conducted by placing small amounts of the sample in water. The sample remained unchanged.

4. Oxidizer
By the definition stated in 49 CFR 173.141, the sample is not an oxidizer.

B. Characteristics of Corrosivity

1. pH Determination
The pH determination was made on a slurried sample in accordance with EPA 600/4.79-020. The initial pH reading was approximately 9.

2. Corrosion Rate Determination
The corrosion rate of the sample on 1020 steel was determined using a potentiodynamic polarization technique (ASTM G-5 specification). The studies were conducted using a Princeton Applied Research computerized Model 350 corrosion measurement system.

The results of the potentiodynamic polarization experiment with SAE 1020 steel showed that the general corrosion rate a 455C (130°F) of 5.8 mils (.15 mm) per year is substantially below the maximum 0.250 inches (6.25 mm) per year specified in the regulation.

C. Characteristics of Reactivity

1. Stability Testing
An aqueous suspension of the reacted SulfaTreat® monitored with a potentiometer from pH 1 to pH 12.5. The pH alterations were accomplished using dilute HCL and dilute NaOH. The material was stable and totally unreactive when exposed to these pH extremes without any evolution of gases, including H_2S and SO_2.

2. Classification as an Explosive
Neither the material nor anything similar to this material is listed as a Forbidden, Class A, or Class B explosive in 49 CFR 173.51, 49 CFR 173.53, or 49 CFR 173.88.

D. Characteristics of EP Toxicity

Laboratory evaluations of the EP toxicity required a leaching step prior to analysis. The leaching step was carried out in accordance with the test methods described within the Federal Register, Volume 45, Number 98 on May 19, 1980 (Appendix III). 100 grams of the ground solid sample were placed in a mechanically stirred extractor with 1600 g of deionized water. The pH was maintained at 5 for a period of 24 hours by the addition of 0.5 N acetic acid at 30 minute intervals as needed. This solution was then filtered using a 0.45 millipore filter. The filtrate was analyzed for the presence of contaminants using the following EPA methods:

Contaminant	EPA Method
Mercury	245.1
Arsenic	206.1
Barium	208.1
Cadmium	213.1
Chromium	218.1
Lead	239.2
Selenium	270.3
Silver	272.1
Mercury	245.1
TCLP	1311

The concentration of contaminants in the extract is far below the maximum allowable limits in all cases.

E. Oral and Dermal Toxicity

1. Unreacted SulfaTreat® (Oral Toxicity)
The acute oral LD50 of SulfaTreat® when administered as a 67% w/w aqueous suspension to male and female SASCO rats weighing 219 to 345 grams, was found to be greater than 39.91 g/kg of body weight.

As the term is defined in the Federal Hazardous Substances Act (FHSA), the product was found not to be a Toxic Substance.

2. Reacted SulfaTreat® (Oral Toxicity)
Undiluted, reacted SulfaTreat® (semisolid phase) was administered orally to ten SASCO-SD rats (five male and five females), weighing 198 to 265 grams at a dosage level of 5.00 grams per kilogram of body weight. All of the animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substance Act (FHSA), the semisolid phase of the test material was found not to be a Toxic Substance.

3. Reacted SulfaTreat® (Dermal Toxicity)
Undiluted, reacted SulfaTreat® (liquid phase) was applied for twenty-four hours to the abraded skin of five male and five female New Zealand White Rabbits, weighing 2.72 to 3.09 kilograms, at a dosage level of 2.00 grams per kilogram of body weight. All ten animals survived dosage and the fourteen-day observation period which followed. As the term is defined in the Federal Hazardous Substances Act (FHSA), the liquid phase of the test material was found not to be a Toxic Substance.

4. Reacted SulfaTreat® (Aquatic Toxicity)
Passed the aquatic 96 hour LC50 which was determined to be more than 500 milligrams per liter when measured in soft water with fathead minnows.

F. Other

The material is not listed (as a hazardous waste) in Subpart 261.30-261.33 of "Identification and Listing of Hazardous Wastes, "EPA-8700-12(FR), May 29, 1980.