

**GW - 265**

**PERMITS,  
RENEWALS,  
& MODS  
Application**



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
**Oil Conservation Division**

November 28, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5357-7096**

Mr. Andy Price  
El Paso Field Services  
3300 North A Street  
Bldg. 2, Suite 200  
Midland, TX 79707

RE: Discharge Plan Renewal GW-265  
El Paso Field Services  
Texaco Bilbrey Compressor Station  
Lea County, New Mexico

Dear Mr. Price:

The ground water discharge plan renewal GW-265 for the El Paso Field Services Texaco Bilbrey Compressor Station located in the SE/4 SW/4 of Section 4, Township 22 South, Range 32 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 thirty (30) days of receipt of this letter. Please note new mailing address below.

The discharge plan renewal application letter, dated October 1, 2001, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 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 El Paso Field Services of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve El Paso Field Services of its responsibility to comply with any other governmental authority's rules and regulations.

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

El Paso Field Service

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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, El Paso Field Services 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 renewal plan is for a period of five years. This renewal will expire on November 25, 2006, and El Paso Field Services 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.

The discharge plan renewal application for the El Paso Field Services Texaco Bilbrey Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application will be assessed a fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating 0 to 1,000 horsepower of \$400.00.

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/eem  
Attachment

Xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-265  
EL PASO FIELD SERVICES  
**TEXACO BILBREY COMPRESSOR STATION**  
DISCHARGE PLAN APPROVAL CONDITIONS  
November 28, 2001

1. Payment of Discharge Plan Fees: The \$100.00 filing fee has not been received by the OCD. There is a required flat fee for natural gas compressor stations with horsepower rating 0 to 1,000 horsepower. The renewal flat fee required for this facility is \$400.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval. All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.
2. Commitments: El Paso Field Services will abide by all commitments submitted in the discharge plan renewal application letter dated October 1, 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. Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
  1. the waste stream is identified, and authorized, as such in the discharge plan, and;
  2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.
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 below grade tanks and sumps installed must be tested annually. Permit holders may propose various methods for testing such as 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 approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Permit holders 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 approved for construction and/or operation unless it can be demonstrated that groundwater will be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.
16. Closure: The OCD will be notified when operations of the Texaco Bilbrey Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Conditions accepted by: El Paso Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services further acknowledges that the 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.

**El Paso Field Services**

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH**

I hereby acknowledge receipt of check No. 1076076 dated 1/25/02  
or cash received on 1/29/02 in the amount of \$ 2000.00  
from EL PASO FIELD SERVICES  
for SEE BELOW

Submitted by: <sup>(Family Name)</sup> ED MARTIN Date: <sup>(Date)</sup> \_\_\_\_\_  
Submitted to ASD by: Ed Martin Date: 1/29/02  
Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.  
Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

GW-241 BURTON FLATS NORTH C.S.	FILING FEE	\$ 100
" " " "	RENEWAL FEE	400
GW-246 AXIS #2 COMP. STA.	FILING FEE	100
" " " "	RENEWAL FEE	400
GW-265 TEXACO BILBREY COMP. STA.	FILING FEE	100
" " " "	RENEWAL FEE	400
GW-267 BASS JAMES C.S.	FILING FEE	100
" " " "	RENEWAL FEE	400
		<u>\$ 2,000.00</u>

**NEW MEXICO ENVIRONMENT DEPARTMENT  
REVENUE TRANSMITTAL FORM**

Description	FUND	CEB	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT
1 CY Reimbursement Project Tax	064	01					
5 Gross Receipt Tax	064	01		2329	900000	2329134	
3 Air Quality Title V	092	13	1300	1696	900000	4169134	
4 PRP Prepayments	248	14	1400	9696	900000	4989014	
2 Climax Chemical Co.	248	14	1400	9696	900000	4989015	
6 Circle K Reimbursements	248	14	1400	9696	900000	4989248	
7 Hazardous Waste Permits	339	27	2700	1696	900000	4169027	
8 Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339	
10 Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	
11 Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4189029	\$2000.00
12 Air Quality Permits	631	31	2500	1696	900000	4169031	
13 Payments under Protest	851	33		2919	900000	2918033	
*14 Xerox Copies	652	34		2349	900000	2349001	
15 Ground Water Penalties	652	34		2349	900000	2349002	
16 Witness Fees	652	34		2349	900000	2439003	
17 Air Quality Penalties	652	34		2349	900000	2349004	
18 OSHA Penalties	652	34		2349	900000	2349005	
19 Prior Year Reimbursement	652	34		2349	900000	2349006	
20 Surface Water Quality Certification	652	34		2349	900000	2349009	
21 Jury Duty	652	34		2349	900000	2349012	
22 CY Reimbursements ( i.e. telephone)	652	34		2349	900000	2349014	
*23 UST Owner's List	783	24	2500	9696	900000	4989201	
*24 Hazardous Waste Notifiers List	783	24	2500	9696	900000	4989202	
*25 UST Maps	783	24	2500	9696	900000	4989203	
*26 UST Owner's Update	783	24	2500	9696	900000	4989205	
*28 Hazardous Waste Regulations	783	24	2500	9696	900000	4989207	
*29 Radiologic Tech. Regulations	783	24	2500	9696	900000	4989208	
*30 Superfund CERLIS List	783	24	2500	9696	900000	4989211	
31 Solid Waste Permit Fees	783	24	2500	9696	900000	4989213	
32 Smoking School	783	24	2500	9696	900000	4989214	
*33 SWQB - NPS Publications	783	24	2500	9696	900000	4989222	
*34 Radiation Licensing Regulation	783	24	2500	9696	900000	4989228	
*35 Sale of Equipment	783	24	2500	9696	900000	4989301	
*36 Sale of Automobile	783	24	2500	9696	900000	4989302	
*37 Lost Recoveries	783	24	2500	9696	900000	4989814	
*38 Lost Repayments	783	24	2500	9696	900000	4989815	
39 Surface Water Publication	783	24	2500	9696	900000	4989801	
40 Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4989242	
41 Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032	
42 Radiologic Tech. Certification	987	05	0500	1696	900000	4169005	
44 Ust Permit Fees	989	20	3100	1696	900000	4169020	
45 UST Tank Installers Fees	989	20	3100	1696	900000	4169021	
46 Food Permit Fees	991	26	2600	1696	900000	4169026	
43 Other							

TOTAL \$2000.00

\* Gross Receipt Tax Required

\*\* Site Name & Project Code Required

Contact Person: ED MARTIN Phone: 476-3492 Date: 1/29/02

Received in ASD By: \_\_\_\_\_ Date: \_\_\_\_\_ RT #: \_\_\_\_\_ ST #: \_\_\_\_\_



Robert "Andy" Price, C.H.M.M, R.E.M.  
Principal Environmental Scientist  
3300 North A Street, Bldg 2, Suite 200  
Midland, TX 79707

Office: (915) 686-3277  
Fax: (915) 686-3292

January 28, 2002

Ed Martin  
New Mexico Oil Conservation Division  
1220 S. St. Francis  
Santa Fe, NM 87505

**Re: Discharge Plan Renewal and Filing Fees**

Dear Mr. Martin:

Enclosed, please find a check in the amount of \$2,000.00 for the following facilities:

GW-241	Burton Flats North Comp. Sta.	\$100.00 filing fee \$400.00 renewal fee
GW-246	Axis #2 Comp. Sta.	\$100.00 filing fee \$400.00 renewal fee
GW-265	Texaco Bilbrey Comp. Sta.	\$100.00 filing fee \$400.00 renewal fee
GW-267	Bass James Comp. Sta.	\$100.00 filing fee \$400.00 renewal fee

If you have any questions or require additional information, please contact me at (915) 686-3277.

Sincerely,

Robert "Andy" Price  
Principal Environmental Scientist

Cc: Courtney Ragsdale, Lead - Carlsbad

EL PASO FIELD SERVICES COMPANY  
EL PASO FIELD SERVICES  
Houston, TX 77002

CHECK DATE  
01/25/2002

CHECK NUMBER

**WATER QUALITY MANAGEMENT FUND**

NEW MEXICO OIL CONSERVATION  
DIVISION  
1220 S ST FRANCIS DR  
SANTA FE, NM 87505

**REMITTANCE ADVICE      RETAIN FOR YOUR RECORDS**  
Refer Payment Inquires to EPFS - 713-420-4200

**VENDOR      0000002667**  
**WATER QUALITY MANAGEMENT FUND**

Voucher ID	Invoice Number	Invoice Date	Description	Discount	Paid Amount
00126333	CKREQ020124	01/24/2002	ENVIRONMENTAL FEES	0.00	2,000.00
<b>TOTAL</b>				<b>\$0.00</b>	<b>\$2,000.00</b>

EL PASO FIELD SERVICES COMPANY  
EL PASO FIELD SERVICES  
Houston, TX 77002

CITIBANK  
One Penn's Way  
New Castle, DE 19720

CHECK DATE  
01/25/2002

CHECK NUMBER

62-20  
311

Amount

\*\*\*\$2,000.00

VOID AFTER ONE YEAR

Pay \*\*\*TWO THOUSAND AND XX / 100 US DOLLAR\*\*\*

To The  
Order Of

**WATER QUALITY MANAGEMENT FUND**

NEW MEXICO OIL CONSERVATION  
DIVISION  
1220 S ST FRANCIS DR  
SANTA FE, NM 87505



Authorized Signature

**Martin, Ed**

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**To:** Andy Price (E-mail)  
**Subject:** Discharge Plan Renewals

We have still not received the following items:

GW-241 renewal conditions	Burton Flats North Comp. Sta.	\$100.00 filing fee	\$400.00 renewal fee	Signed
GW-246 renewal conditions	Axis #2 Comp. Sta.	\$100.00 filing fee	\$400.00 renewal fee	Signed
GW-265 renewal conditions	Texaco Bilbrey Comp. Sta.	\$100.00 filing fee	\$400.00 renewal fee	Signed
GW-267 renewal conditions	Bass James Comp. Sta.	\$100.00 filing fee	\$400.00 renewal fee	Signed

All of these items are past due.

Forward these to this office as soon as possible, but **no later than January 31, 2002.**

If you have any questions, contact me.

Ed Martin  
New Mexico Oil Conservation Division  
Environmental Bureau  
1220 S. St. Francis  
Santa Fe, NM 87505

RECEIVED

Ms. Sandra Miller  
EPFS GW-265  
November 25, 1996  
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JAN - 3 1997

Environmental Bureau  
Of Conservation Division

**ATTACHMENT TO DISCHARGE PLAN GW-265**  
**Permit Conditions**  
**EPFS - Texaco Bilbrey Compressor Station**  
**DISCHARGE PLAN REQUIREMENTS**  
**(November 25, 1996)**

1. **Payment of Discharge Plan Fees:** The \$50 filing fee has been received by the OCD, and there is no flat fee for this facility since the horsepower is less than 1,000.
2. **EPFS Commitments:** EPFS will abide by all commitments submitted in the Application dated September 30, 1996 from ESI on behalf of EPFS, as well as the additional information dated October 9, 1996 from ESI on behalf of EPFS, and this approval letter with conditions of approval from OCD dated November 25, 1996.
3. **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.  
  
All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.
4. **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.
5. **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.
6. **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.
7. **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.
8. **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.

Ms. Sandra Miller  
EPFS GW-265  
November 25, 1996  
Page 4

9. **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. The OCD will be notified at least 72 hours prior to all testing so that an OCD representative may witness the testing.

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

Any soils contaminated with a non-exempt waste at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

11. **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.

12. **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.

13. **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.

14. **Certification:** EPFS, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EPFS, 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 groundwater, human health and the environment.

Accepted:

El Paso Field Services *Gondie D. Mills*  
by *Superintendent, Operations Compliance*  
Title

Accepted:

Compressor Systems Inc.  
by *Terry Christen, Environmental Coord.*  
Title