

GW - 265

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2001 - 1996

THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

NM OIL CONSERVATION DIVISION  
ATTN: ED MARTIN

AD NUMBER: 232826      ACCOUNT: 56689  
LEGAL NO: 70279      P.O.#: 02199000249  
186 LINES      1 time(s) at \$ 82.00  
AFFIDAVITS:      5.25  
TAX:      5.45  
TOTAL:      92.70

AFFIDAVIT OF PUBLICATION

NOTICE OF PUBLICATION

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

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

(GW-265) El Paso Field Services, Mr. Robert A. Price, Principal Environmental Scientist, 3300 North A Street, Building 2, Suite 200, Midland, Texas 79705, has submitted a discharge plan application renewal for their Texaco Bilbrey Compressor Station, located in the SE/4, SW/4, Section 4, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to surface is at a depth of approximately 490 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 application 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 plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of August 2000.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL  
LORI WROTENBERY, Director  
Legal #70279  
Pub. October 26, 2001

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, \_\_\_\_\_ 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 #70279 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/26/2001 and 10/26/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 26 day of October, 2001 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  
26 day of October A.D., 2001

Notary \_\_\_\_\_

Commission Expires \_\_\_\_\_

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 October 26 2001 and ending with the issue dated

October 26 2001

Kathi Bearden  
Publisher

Sworn and subscribed to before me this 26th day of

October 2001

Jodi Benson  
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.

LEGAL NOTICE  
October 26, 2001

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 **4th day of August 2000.**

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

(seal)  
LORI WROTENBERY, Director  
#18506

01100060000 67503491  
State of New Mexico Oil &  
1220 S. St. Francis  
Santa Fe, NM 87505

THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

NM OIL CONSERVATION DIVISION  
ATTN: ED MARTIN

AD NUMBER: 232826      ACCOUNT: 56689  
LEGAL NO: 70279      P.O.#: 02199000249  
186 LINES      1 time(s) at \$ 82.00  
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ENERGY, MINERALS  
AND  
NATURAL RESOURCES  
DEPARTMENT  
OIL CONSERVATION  
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of August 2000.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL  
LORI WROTENBERY, Director  
Legal #70279  
Pub. October 26, 2001

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, M. M. 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 #70279 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/26/2001 and 10/26/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 26 day of October, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ M. M. Weideman  
LEGAL ADVERTISEMENT REPRESENTATIVE

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

Notary Laura E. Hardip

Commission Expires 11/23/03

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

State of New Mexico  
Energy Minerals and Natural Resources

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

Revised 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 FACILITIES  
AND CRUDE OIL PUMP STATIONS**

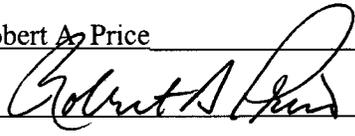
(Refer to the OCD Guidelines for assistance in completing the application)

New  Renewal  Modification

1. Type: Texaco Bilbrey Facility
2. Operator: El Paso Field Services Company  
Address: 3300 North A Street, Bldg. 2, Ste 200  
Contact Person: Robert A. Price Phone: (915) 686-3277
3. Location: SE /4 SW /4 Section 4 Township 22 S Range 32 E  
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: Robert A. Price

Title: Principal Environmental Scientist

Signature: 

Date: October 1, 2001

**Martin, Ed**

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**From:** Martin, Ed  
**Sent:** Thursday, March 01, 2001 10:49 AM  
**To:** 'David Bays'  
**Subject:** Discharge Plans and General Info.

Just a reminder that the following facilities' discharge plans will need to be renewed this year:

GW-232 Trunk A Compressor expired 2/5/2001  
GW-071-1 Ballard Hydrocarbon Recovery Unit expires 5/9/2001  
GW-049-1 Kutz Recovery Unit expires 6/17/2001  
GW-242 Burton Flats South Compressor expires 8/9/2001

This is a 95 hp compressor in Eddy County operated or formerly operated by Compressor Systems, Inc.

GW-241 Burton Flats North Compressor expires 8/9/2001

This is an 810 hp compressor in Eddy County operated or formerly operated by Compressor Systems, Inc.

GW-247 Whiting Compressor Station expires 9/5/2001

GW-246 Axis #2 Compressor Station expires 9/5/2001

GW-265 Texaco Bilbrey expires 11/25/2001

This is a compressor station in Lea County. Last renewal for this facility was signed by Sandra Miller.

GW-267 Bass James Compressor Station expires 12/10/2001

This is a compressor station in Eddy County. Last renewal for this facility was signed by Sandra Miller.

Also, please send me documentation as to the operational changes that will be made to improve housekeeping at the following facilities:

GW-212 Ballard Compressor Station  
GW-189 Angel Peak Compressor Station  
GW-186 Kutz 2 Compressor Station  
GW-188-1 Hart Canyon #1 Compressor Station  
GW-188 3B-1 Compressor Station  
GW-188-2 Hart Canyon #2 Compressor Station  
GW-188-3 Hart Canyon #3 Compressor Station



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

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

NOV 08 1996

October 29, 1996

William J. Lemay, Director  
Oil Conservation Division  
New Mexico Energy, Minerals  
and Natural Resources Dept.  
2040 S. Pacheco  
Santa Fe, New Mexico 87505

RECEIVED

NOV 04 1996

Environmental Bureau  
Oil Conservation Division

Dear Mr. Lemay:

This responds to your agency's public notices dated October 7, October 8, and October 9, 1996, regarding the Energy, Minerals and Natural Resources Department Oil Conservation Division's proposal to approve the discharge plans for the three applicants listed below.

**(GW-089) - Transwestern Pipeline Company.** Mr. Larry Campell has submitted an application for renewal of the company's approved discharge plan for the Corona Compressor Station located in Section 36, Township 4 South, Range 15 East, Lincoln County, New Mexico. Approximately 25 gallons per day of washdown water will be stored in an above ground steel tank prior to transport to an approved off-site disposal facility.

The U.S. Fish and Wildlife Service (Service) typically recommends the use of excluding technology (nets, fences, enclosed tanks, etc.) to prevent migratory bird and other wildlife access to any open top waste water tank that contains toxic chemicals, or which may harbor a surface oil sheen. During flight, migratory birds may not distinguish between such tanks or lagoons and natural waterbodies. If the artificial waterbody contains substances potentially injurious to migratory birds (and other wildlife), it may serve as an "attractive nuisance" if measures are not taken to exclude their access.

Our intent is to inform and intercede before any migratory bird deaths occur, since these birds constitute a legally protected resource. Under the Migratory Bird Treaty Act (MBTA), the courts have held that an operator of brine, waste water, or other produced water storage facilities may be held liable for an "illegal take" of migratory birds. An "illegal take" has been interpreted to include accidental poisoning or accumulation of harmful concentrations of contaminants by migratory birds, which might occur as a result of access to the stored water. Hydrocarbon pollutants, for instance, can be carried to the nest on the breast feathers and feet of adult birds (or in contaminated nesting materials), where they can contact the eggs, and subsequently result in reduced egg viability and/or embryo death.

If the construction and operation of the structure results in migratory bird deaths and the problem is not addressed, the operator may be held liable under the enforcement provisions of the MBTA. Therefore, the Service recommends that the Oil Conservation Division (Division) require storage tanks to be constructed in a manner that prevents bird access (e.g., netted), or that the applicant demonstrates that the retained waters are "bird-safe" (e.g., can meet New Mexico general water quality standards 1102.B, 1102.F, and 3101.K or 3101.L). The Service would rather prevent a problem resulting from migratory bird access to contaminated ponds, lagoons, and tanks than take enforcement actions, which are expensive and disruptive to legitimate mineral extraction and production activities.

**(GW-264) - Abbott Brothers.** Mr. Floyd Abbott has submitted a Discharge Plan Application for their Hobbs Facility located in Section 28, Township 18 South, Range 38 East, Lea County, New Mexico. Potential discharges will be stored in a closed top receptacle.

**(GW-265) - El Paso Field Services.** Ms. Sandra Miller has submitted a Discharge Plan Application for their "Texaco Billbrey" compressor station located in Section 4, Township 22 South, Range 32 East, Lea County, New Mexico. Potential discharges will be stored in a closed top receptacle.

The Service has no objection to the Division approving discharge plans which utilize closed top receptacles, as the closed tops prevent wildlife access to potentially toxic chemicals. We recommend the use of berms around these receptacles to help prevent migration of contaminated waters into the surface waters of New Mexico during an accidental rupture or spill.

Thank you for the opportunity to review and comment on these discharge plan applications. If you have any questions about these comments, please contact Dennis W. Byrnes at (505) 761-4525.

Sincerely,

NOV 04 1996  
Enforcement Unit 303  
Oil Conservation Division

*Sonja Jahnke*  
for Jennifer Fowler-Propst  
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
Geographic Manager, New Mexico Ecosystems, U.S. Fish and Wildlife Service,  
Albuquerque, New Mexico  
Senior Resident Agent, U.S. Fish and Wildlife Service, Albuquerque, New Mexico  
Migratory Bird Office, U.S. Fish and Wildlife Service, Albuquerque, New Mexico

Affidavit of Publication

RECEIVED

OCT 31 1996

STATE OF NEW MEXICO )

) ss.

Environmental Bureau
Oil Conservation Division

COUNTY OF LEA )

OIL CONSERVATION DIVISION
19852

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 numbers 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

October 17, 19 96

and ending with the issue of

October 17, 19 96

And that the cost of publishing said notice is the sum of \$ 42.40

which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 25th

day of October, 19 96

Jean Series

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 application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-265) - El Paso Field Services, Ms. Sandra Miller, (505)-599-2141, P.O. Box 4990, Farmington, NM, 87499, has submitted a Discharge Plan Application for their "Texaco Bilbrey" compressor station located in the SE/4 SW/4, Section 4, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 490 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.

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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 the 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 9th day of October, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

SEAL

WJL/pws

Published in the Lovington Daily Leader October 17, 1996.

Handwritten signatures and date 10-31-96



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

November 25, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-690**

Ms. Sandra Miller  
Superintendent, Environmental Compliance  
El Paso Field Services (EPFS)  
P.O. Box 4990  
Farmington, NM 87499

**RE: Approval of Discharge Plan GW-265  
Texaco Bilbrey - Compressor Station  
Lea County, New Mexico**

Dear Ms. Miller:

**The discharge plan GW-265 for the EPFS Texaco Bilbrey Compressor Station located in the SE/4 SW/4, Section 4, Township 22 South, Range 32 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 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. Enclosed are two copies of the conditions of approval. Please sign and return one copy of the permit conditions 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 EPFS 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.

Ms. Sandra Miller  
EPFS GW-265  
November 25, 1996  
Page 2

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 EPFS 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.

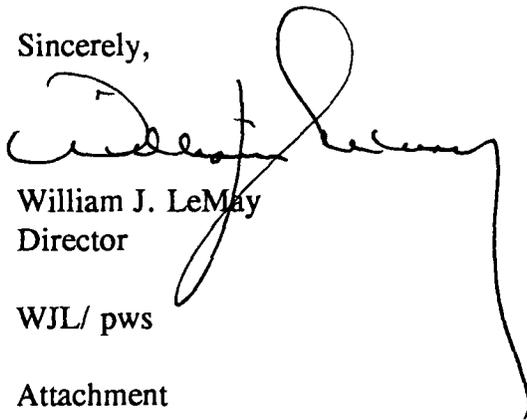
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. **This approval will expire November 25, 2001, and an application for renewal should be submitted in ample time before that date.** It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval.

The discharge plan for the EPFS Texaco Bilbrey Compressor Station GW-265 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). Note, there is no flat fee for this facility since the horsepower is less than 1,000.

**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

P 288 258 690

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

Sent to EPFS - Miller	
Street & Number "Texaco Bilbrey" GW-265	
Post Office, State, & ZIP Code Approval	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
<b>TOTAL Postage &amp; Fees</b>	<b>\$</b>
Postmark or Date	

PS Form 3800, April 1995

xc: Mr. Wayne Price - OCD District I

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

**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

by \_\_\_\_\_  
Title

# The Santa Fe New Mexican

Since 1849. We Read You.

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

AD NUMBER: 568579

ACCOUNT: 56689

LEGAL NO: 60573

P.O. #: 96199002997

RECEIVED

OCT 29 1996

Environmental Bureau  
Oil Conservation Division

167 LINES once at \$ 66.80  
Affidavits: 5.25  
Tax: 4.50  
Total: \$ 76.55

### 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 renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, 87505, Telephone (505) 827-7131:

(GW-265) - El Paso Field Services, Ms. Sandra Miller, (505) 599-2141, P.O. Box 4990, Farmington, NM, 87499, has submitted a Discharge Plan Application for their "Texaco Billbrey" compressor station located in the SE/4 SW/4, Section 4, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 490 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 application 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 modifications, 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 plans based on information available. If a public hearing is held, the director will approve or disapprove the proposed plans based on the information in the discharge plan renewal applications and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of October 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION  
WILLIAM J. LEMAY,  
Director  
Legal #60573  
Pub. October 17, 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 # 60573 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 17th day of OCTOBER 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 17th day of OCTOBER A.D., 1996



OFFICIAL SEAL

LAURA E. HARDING

NOTARY PUBLIC & STATE OF NEW MEXICO

11/23/99

Laura E. Harding

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/4/96  
or cash received on \_\_\_\_\_ in the amount of \$ 50.00

from ESI for EPN6  
for Teraco Balbray C.S. GW-265  
(Facility Name) (GP No.)

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Submitted to ASD by: RH Date: 10/18/96

Received in ASD by: PVick Date: 10/23/96

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(Specify)

Organization Code 521.07 Applicable FY 97

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

ENVIRONMENTAL SERVICES, INC. 4665 INDIAN SCHOOL RD. NE, STE. 106 PH. 266-6611 ALBUQUERQUE, NM 87110		[redacted]
DATE	<u>10/4/96</u>	95-32/1070 0109676338
PAY TO THE ORDER OF	<u>New Mexico Water Quality Management Fund</u> \$ <u>50.00</u>	
	<u>Fifty and no/100</u>	DOLLARS <input type="checkbox"/> <small>Security Features Change on back.</small>
<b>SUNWEST</b>		
SUNWEST BANK OF ALBUQUERQUE, N.A. ALBUQUERQUE, NEW MEXICO 87125-0500 (505) 765-2800		
MEMO	<u>Sally Tracy</u>	
[redacted]	FINE LINE	



October 8, 1996

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

Subject: Discharge Plan Application, Texaco Bilbrey Facility, Lea County, NM,

GW-265

Dear Mr. Anderson

On behalf of our client, Compressor Systems, Inc. (CSI), I am enclosing two copies of a discharge plan application for the Texaco Bilbrey facility located on El Paso Field Services right of way. Please note that this facility will be constructed and operated under contract by CSI.

The \$50 application fee is also enclosed. If you have any questions, please don't hesitate to contact me or Terry Christian at (915) 563-1170.

Sincerely

*Robin K. DeLapp*

Robin K. DeLapp  
Environmental Scientist

cc: Terry Christian, CSI  
Sandra Miller, EPFS  
Jim Bishop, EPFS  
Matt Tschierhart, EPFS  
Wayne Price, OCD Hobbs

**RECEIVED**

**OCT 9 1996**

Environmental Bureau  
Oil Conservation Division

**EPFS**  
**EL PASO FIELD SERVICES**

RECEIVED  
OCT 11 1996  
ENVIRONMENTAL BUREAU  
OIL CONSERVATION DIVISION

P.O. BOX 4990  
FARMINGTON, NM 87499

October 7, 1996

*fax followed by mail transmittal*

Mr. Roger Anderson  
Oil Conservation Division  
P O Box 6429  
Santa Fe, NM 87505-6429

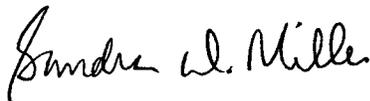
Dear Mr. Anderson,

El Paso Field Services (EPFS) requests authorization under section 3-106B. of the New Mexico Water Quality Control Commission (WQCC) regulations to discharge without an approved discharge plan at the following facility. This facility will be constructed by Compressor Systems Inc. (CSI) and located on EPFS right of way.

Texaco Bilbrey Facility, Lea County, NM  
Township 22 South, Range 32 East, SE/4 SW/4 sec. 4

Please feel free to contact me at 599-2141 if you have any question or need clarification.

Sincerely,



Sandra D. Miller  
Superintendent, Operations Compliance

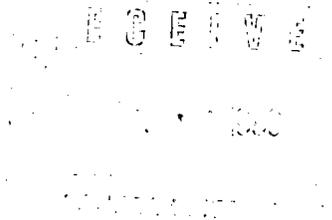
RECEIVED

OCT 11 1996

Environmental Bureau  
Oil Conservation Division

xc: J.C. Bishop, EPFS  
J.T. Boswell, CSI  
Robin DeLapp, ESI  
M.E. Tschirhart, EPFS

F A X L E T T E R



RECEIVED

OCT 11 1996

Envir. Bureau  
Oil Conservation Division

October 9, 1996

Pat Sanchez  
New Mexico Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, NM 87505  
(505) 827-5741

Subject: Discharge Plan Application, Texaco Bilbrey Facility, Lea County, NM

Dear Pat

As per your request, I am sending an amended Item 8 for the subject discharge plan application. We have removed Whistle Stop Disposal as the receiving facility of washdown water from the Texaco Bilbrey application since this is a Class II disposal well and unable to receive the non-exempt washdown water. The washdown water will now be disposed of at Controlled Recovery Inc., an OCD-permitted surface disposal facility.

Please let me know if I can be of any further assistance. As you mentioned on the phone, this amendment should not cause any delays in the review process or the public notice publication.

Sincerely

Robin K. DeLapp

cc: Terry Christian, CSI  
Sandra Miller, EPFS  
Jim Bishop, EPFS  
Matt Tschirhart, EPFS  
Wayne Price, OCD Hobbs

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611

FAX 505 266 7738

### Item 8

Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

<i>Type of waste</i>	<i>Collection</i>	<i>Storage</i>	<i>Hauled by</i>	<i>Disposal</i>
Used oil and filters	Drained in 55-gal drums	Steel drum	Removed as generated by CSI to CSI's corporate office, Carlsbad, NM	Safety-Kleen (formerly Industrial Services Corp.)
Washdown water	Collected in partially buried double-lined steel sump, pumped via underground steel pipes to TK-2	TK-2	Rowland Trucking	Controlled Recovery Inc.
Solid waste	None on-site	Trash receptacle	Removed as generated by CSI to CSI's corporate office, Carlsbad, NM	City of Carlsbad, municipal landfill
Special waste (used filters, sorbents)	Drained in 55-gal drums	Steel drum	Removed as generated by CSI to CSI's corporate office, Carlsbad, NM	Safety-Kleen (formerly Industrial Services Corp.)
Natural gas liquids	Aboveground and underground steel pipes to Texaco's TK-3 tank	TK-3	I & W Trucking contracted by Texaco	Mesquite SWD, Inc. Disposal well "Dorstate #1"

### Receiving Facilities

**Rowland Trucking**, 1609 East Greene, Carlsbad, NM, (505) 855-2053

**Controlled Recovery Inc.**, P.O. Box 369, Hobbs, NM 88240 (505) 393-1079

**Safety-Kleen (formerly Industrial Services Corp.)**, P. O. Box 711, Slaton, TX 79364, (800-762-1989). Physical location: Slaton Hwy., Posey, TX

**Compressor Systems, Inc.**, 3611 National Parks Hwy, Carlsbad, NM, (505) 885-3586

**I & W Trucking**, P. O. Box 98, Loco Hills, NM, (505) 855-6663

**Mesquite SWD, Inc.**, Disposal Well "Dorstate #1" (T25S, R28E, sec. 27 se/4 of ne/4), Carlsbad, NM, (505) 885-3396

Engine wash water generated during monthly washings will be drained via underground pipes into a double-lined, partially buried steel sump which will be treated for corrosion. The sump will also be equipped with a pump which automatically turns on to transfer liquids via aboveground pipes to the waste water tank TK-2. A diagram of the sump pump is attached. No RCRA-listed hazardous wastes will be contained in the wash water. All piping will be doped and wrapped.



**NOTICE OF PUBLICATION**

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

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

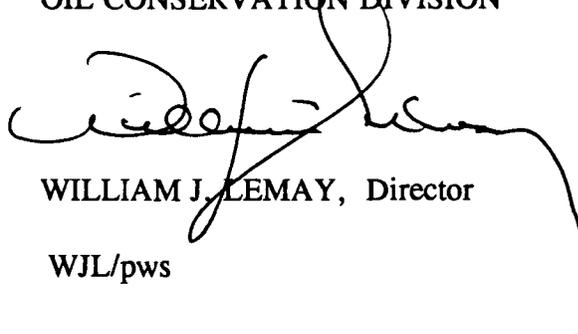
**(GW-265) - El Paso Field Services, Ms. Sandra Miller, (505)-599-2141, P.O. Box 4990, Farmington, NM, 87499, has submitted a Discharge Plan Application for their "Texaco Bilbrey" compressor station located in the SE/4 SW/4, Section 4, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 490 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 application 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 9th day of October, 1996.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

WJL/pws

SEAL

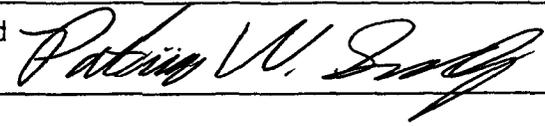
MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 8:30 AM	Date 10-9-96
<u>Originating Party</u>	<u>Other Parties</u>	
Pat Sanchez - OCD	Robin DeLapp - ESI, consultant for EPFS / CSI.	
<u>Subject</u> Discharge Plan GW-265, EPFS "Texaco Bilbray"		

Discussion Let Ms. DeLapp know that I had received the discharge plan application for the EPFS "Texaco Bilbray" Compressor station. Told her the application looks fine except that the "washdown" water is Non-Exempt and cannot be injected into a Class II disposal i.e. "Whistle Stop Disposal" SWD 461. See indicated that the facility was under construction and had not yet generated any "washdown", therefore see will look at all - surface disposal options. I gave her Wayne Prices phone in Hobbs - He can list 711's.

Conclusions or Agreements Ms. DeLapp will send an amended page to correct "item 8" in the permit.

Distribution File, Roger Anderson,  
Dave Catanach, Wayne Price.

Signed 



October 8, 1996

GW-265

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

Subject: Discharge Plan Application, Texaco Bilbrey Facility, Lea County, NM,

Dear Mr. Anderson

On behalf of our client, Compressor Systems, Inc. (CSI), I am enclosing two copies of a discharge plan application for the Texaco Bilbrey facility located on El Paso Field Services right of way. Please note that this facility will be constructed and operated under contract by CSI.

The \$50 application fee is also enclosed. If you have any questions, please don't hesitate to contact me or Terry Christian at (915) 563-1170.

Sincerely

Robin K. DeLapp  
Environmental Scientist

cc: Terry Christian, CSI  
Sandra Miller, EPFS  
Jim Bishop, EPFS  
Matt Tschierhart, EPFS  
Wayne Price, OCD Hobbs

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OCT 9 1996

Environmental Bureau  
Oil Conservation Division

GW-264

**ENVIRONMENTAL SERVICES, INC.**

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



DATE 10/4/96

95-32/1070  
0109676338

PAY TO THE  
ORDER OF

New Mexico Water Quality Management Fund \$ 50.00

Fifty and no/100

DOLLARS Security features included. Details on back.

**SUNWEST**

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

*Sally Tracy*

MEMO



FINE LINE

GW-265

**Application for  
Groundwater Discharge Plan**

**Texaco Bilbrey Facility**

**RECEIVED**

OCT 9 1996

Environmental Bureau  
Oil Conservation Division

prepared for

**Compressor Systems, Inc.  
October 1996**

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 12/1/9

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

GW-265

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)

New

Renewal

Modification

1. Type: Texaco Bilbrey Facility
2. Operator: Compressor Systems, Inc. for  
El Paso Field Services Company  
Address: P.O. Box 60760, Midland, TX 79111-0760 (CSI)  
2500 City West Blvd., Suite 1400, Houston, TX 77042 (EPFS)  
Contact Person: Sandra Miller, Sup. Env. Compliance Phone: (505) 599-2141
3. Location: SE 1/4 SW 1/4 Section 4 Township 22 S Range 32 E  
Submit large scale topographic map showing exact location.  
see attached item 3
4. Attach the name, telephone number and address of the landowner of the facility site.  
see attached item 4
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility  
see attached item 5
6. Attach a description of all materials stored or used at the facility.  
see attached item 6
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.  
see attached item 7
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.  
see attached item 8
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.  
see attached item 9
10. Attach a routine inspection and maintenance plan to ensure permit compliance.  
see attached item 10
11. Attach a contingency plan for reporting and clean-up of spills or releases.  
see attached item 11
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.  
see attached item 12
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCC rules, regulations and/or orders.  
see attached item 13
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: Sandra Miller Title: Superintendent, Environmental Compliance

Signature: Sandra Miller Date: 9/30/96

---

**Item 1**

*Indicate the major operational purpose of the facility. If the facility is a compressor station include the total combined site rated horsepower.*

The Texaco Bilbrey facility, operated by Compressor Systems Inc. (CSI), is a compressor station and will include one portable skid-mounted Caterpillar G398 NA HCR engine and Ariel compressor package and associated storage tanks. The site rated horsepower will be 500. The facility will be located on El Paso Field Services Company right-of-way.



---

**Item 2**

*Name of operator or legally responsible party and local representative.*

**Legally Responsible Party**      Hugh A. Shaffer  
Vice President, Operations and Engineering  
El Paso Field Services Company  
2500 City West Blvd. Suite 1400  
Houston, TX 77042  
713-510-2500

**Local Representative**      Sandra Miller  
Superintendent, Environmental Compliance  
El Paso Field Services Company  
614 Reilly Ave.  
Farmington, NM 87401  
505-599-2141  
1-800-203-1347

**Operator**      Terry Christian  
Compressor Systems, Inc.  
P.O. Box 60760  
Midland, TX 79711-0760  
915-563-1170



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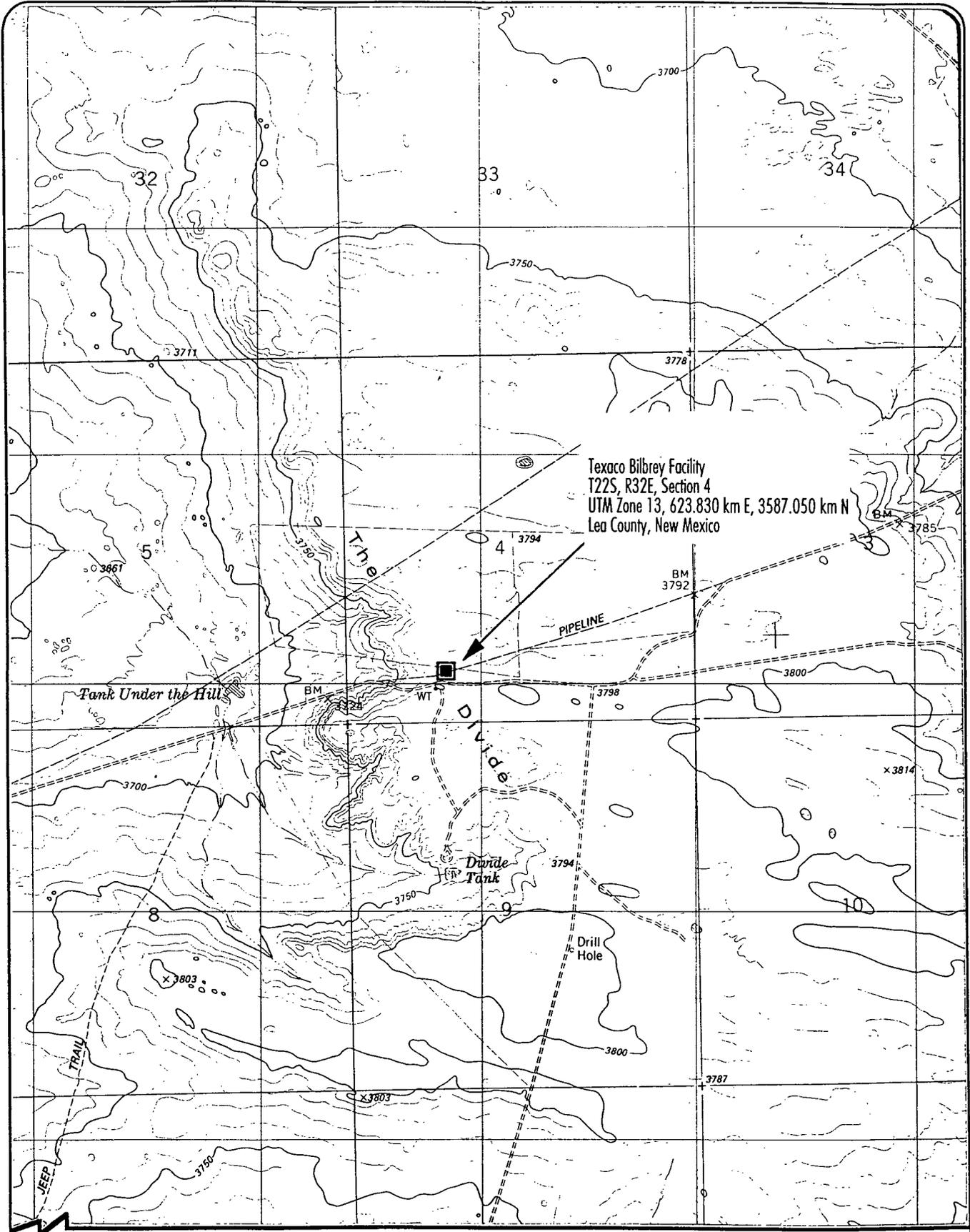
**Item 3**

*Give a legal description of the location and county. Attach a large scale topographic map.*

Lea County, New Mexico

Township 22 South, Range 32 East, SE/4 SW/4 sec. 4





**Location of Facility**  
The Divide, N.Mex. 7.5-Minute Quadrangle

---

**Item 4**

*Attach the name, telephone number and address of the landowner of the facility site.*

New Mexico State Land Office  
Records Management Division  
PO Box 1148  
Santa Fe, NM 87504-1148  
(505) 827-5721



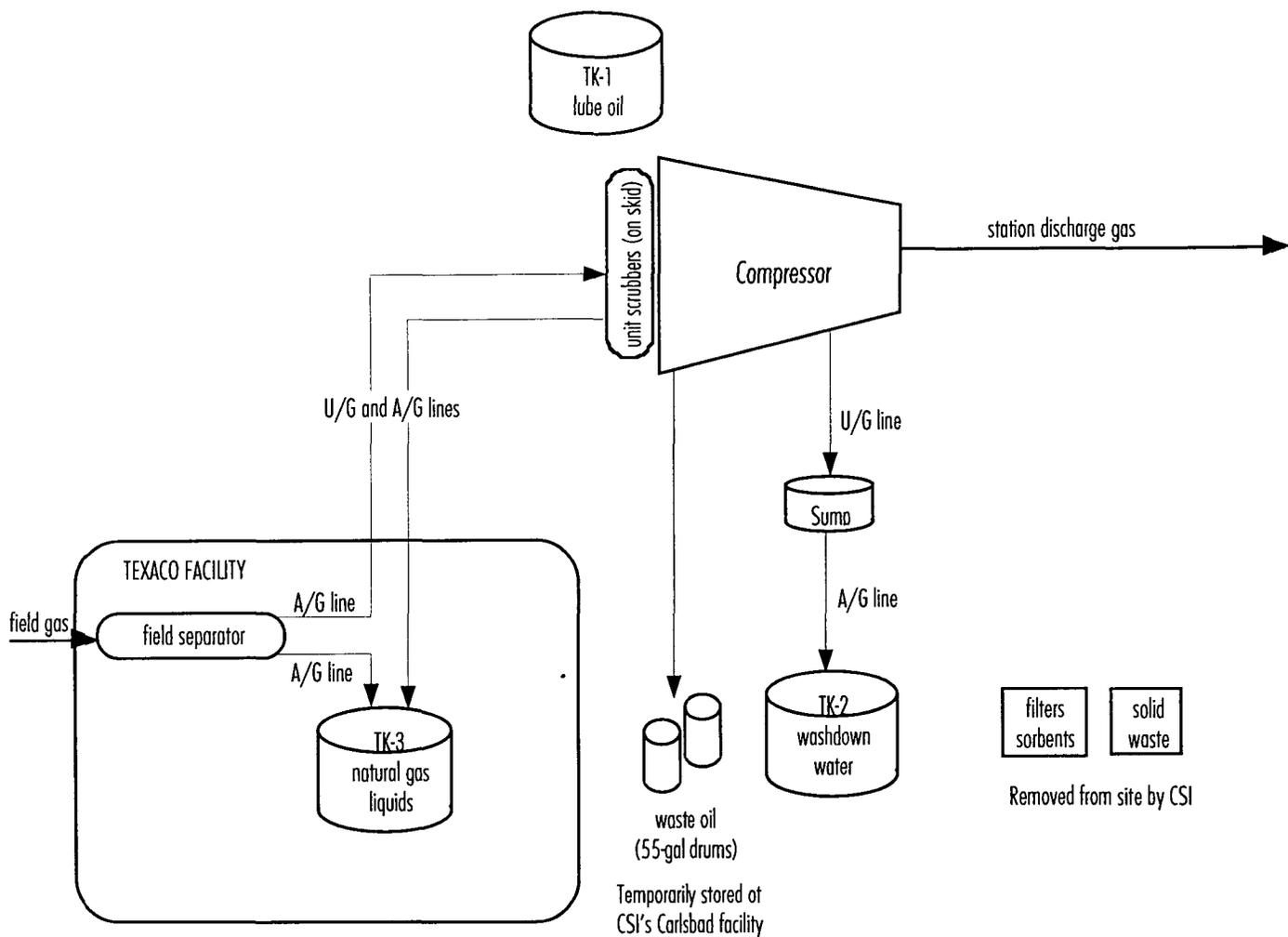
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**Item 5**

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

Natural gas will enter the station via an underground Texaco pipeline and then pass through a Texaco field separator. The gas is routed through an Ariel compressor driven by a Caterpillar G398 NA HCR engine and then compressed into El Paso Field Services 1009 transmission line. Two unit scrubbers are located on the skid with the compressor. Simplified process flow and layout diagrams are attached.



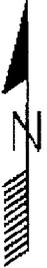
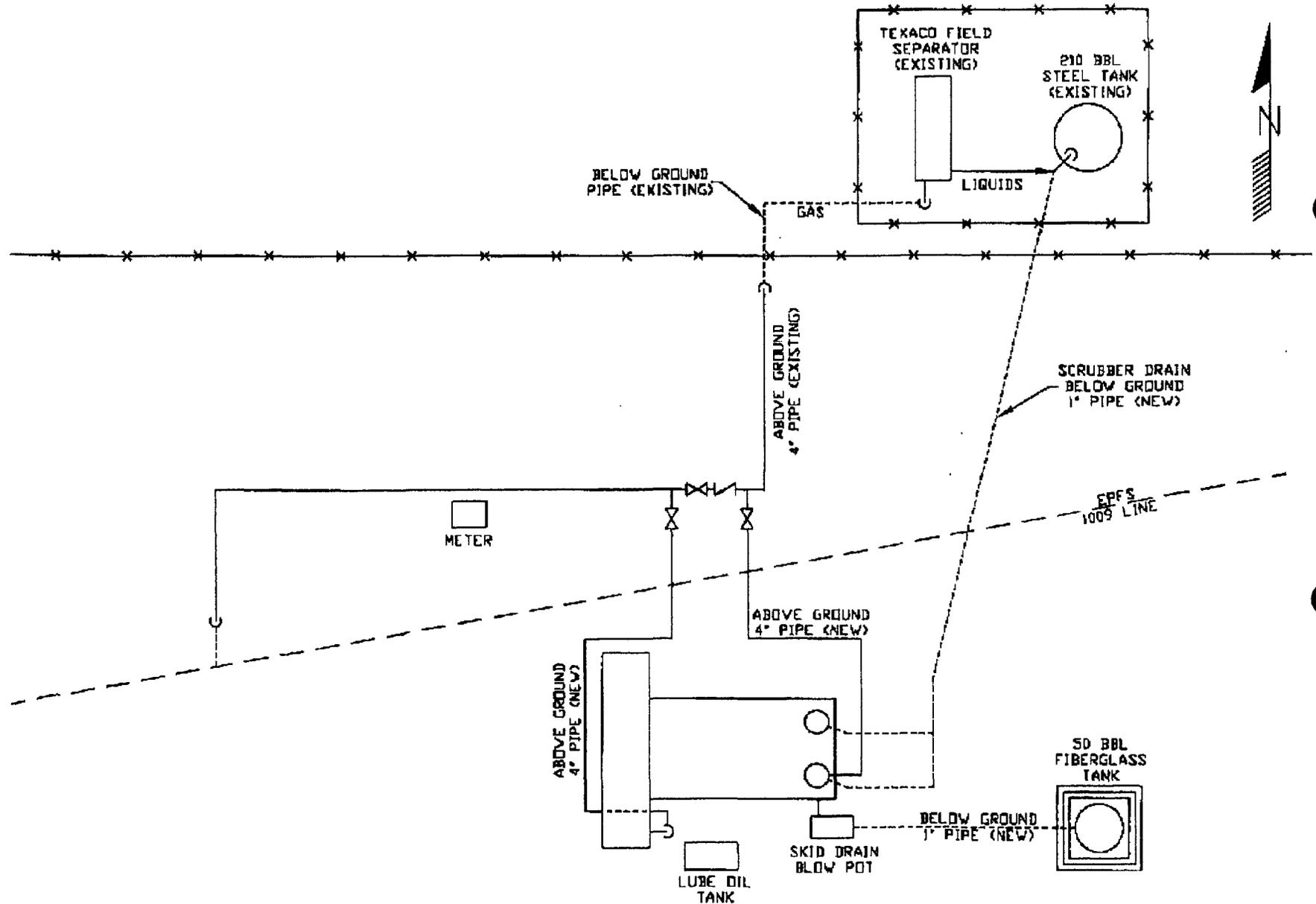


## Texaco Bilbrey Facility Effluent and Solid Waste Production Diagram

EPFS - TEXACO BILBREY

CSI #6029

SEC. 4, T225, R32E  
LEA CO., NM



10-7-96

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### Item 6

*Attach a description of all materials stored or used at the facility.*

<i>Container</i>	<i>ID</i>	<i>Material</i>	<i>Form</i>	<i>Volume</i>	<i>Location</i>	<i>Containment</i>
Steel						Fiberglass containment
AGT-elev	TK-1	Lube Oil	Liquid	500 gal	Near compressor	basin with curb
Fiberglass						Impermeable barrier, surrounded by gravel,
AGT	TK-2	Washdown water	Liquid	2100 gal	Near compressor	secondary containment-dirt
Steel					NE of compressor,	Secondary containment-dirt
AGT	TK-3	Natural gas liquids	Liquid	8820 gal	on Texaco facility	
Steel drum (not stored on-site)		Waste oil	Liquid	55 gal	CSI's Carlsbad facility	Curbed concrete pad

AGT - aboveground tank (non-pressurized)

AGT-elev - aboveground tank elevated or on saddle tank

All tanks will be installed on an impermeable layer and contained in berms constructed to contain 1.33 times the volume of the tank. Drums will be used to collect waste oil but will not be stored at the facility. Any aboveground saddle tanks will be installed on an impermeable containment such as curbed concrete or a metal pan or fiberglass containment.

MSD sheets for the site are maintained in CSI's corporate office and are available upon request.

Liquids from Texaco's field separator and the compressor scrubber will flow via underground and aboveground steel piping into a 210-barrel natural gas liquids tank, TK-3, which is owned by Texaco. The tank is located on a property leased by Texaco from the State of New Mexico and is not part of this discharge plan. The tank is a non-pressurized, aboveground steel tank. All underground piping will be doped and wrapped.



---

**Item 7**

*Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.*

<b>Source</b>	<b>Unit</b>	<b>Type of waste</b>	<b>Volume</b>	<b>Quality</b>
Compressor	Caterpillar G398 NA HCR	Used engine oil	<150 gal, 6x/yr	Used motor oil with no additives
		Used filters	3 filters, 12x/yr	No additives
		Washdown water	<75 gal, 12x/yr	Water with detergents and lube oil.
		Sorbent material and rags	varies	No additives
Unit Scrubbers		Natural gas liquids	<250 bbl, 12x/yr	No additives
Miscellaneous	Trash	Solid waste	varies	Paper and other solid waste



### Item 8

Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

<i>Type of waste</i>	<i>Collection</i>	<i>Storage</i>	<i>Hauled by</i>	<i>Disposal</i>
Used oil and filters	Drained in 55-gal drums	Steel drum	Removed as generated by CSI to CSI's corporate office, Carlsbad, NM	Safety-Kleen (formerly Industrial Services Corp.)
Washdown water	Collected in partially buried double-lined steel sump, pumped via underground steel pipes to TK-2	TK-2	Rowland Trucking	Whistle Stop Disposal
Solid waste	None on-site	Trash receptacle	Removed as generated by CSI to CSI's corporate office, Carlsbad, NM	City of Carlsbad, municipal landfill
Special waste (used filters, sorbents)	Drained in 55-gal drums	Steel drum	Removed as generated by CSI to CSI's corporate office, Carlsbad, NM	Safety-Kleen (formerly Industrial Services Corp.)
Natural gas liquids	Aboveground and underground steel pipes to Texaco's TK-3 tank	TK-3	I & W Trucking contracted by Texaco	Mesquite SWD, Inc. Disposal well "Dorstate #1"

### Receiving Facilities

**Rowland Trucking**, 1609 East Greene, Carlsbad, NM, (505) 855-2053

**Whistle Stop Disposal**, Dakota Resources, Operator, OCD Permit SWD461

**Safety-Kleen (formerly Industrial Services Corp.)**, P. O. Box 711, Slaton, TX 79364, (800-762-1989). Physical location: Slaton Hwy., Posey, TX

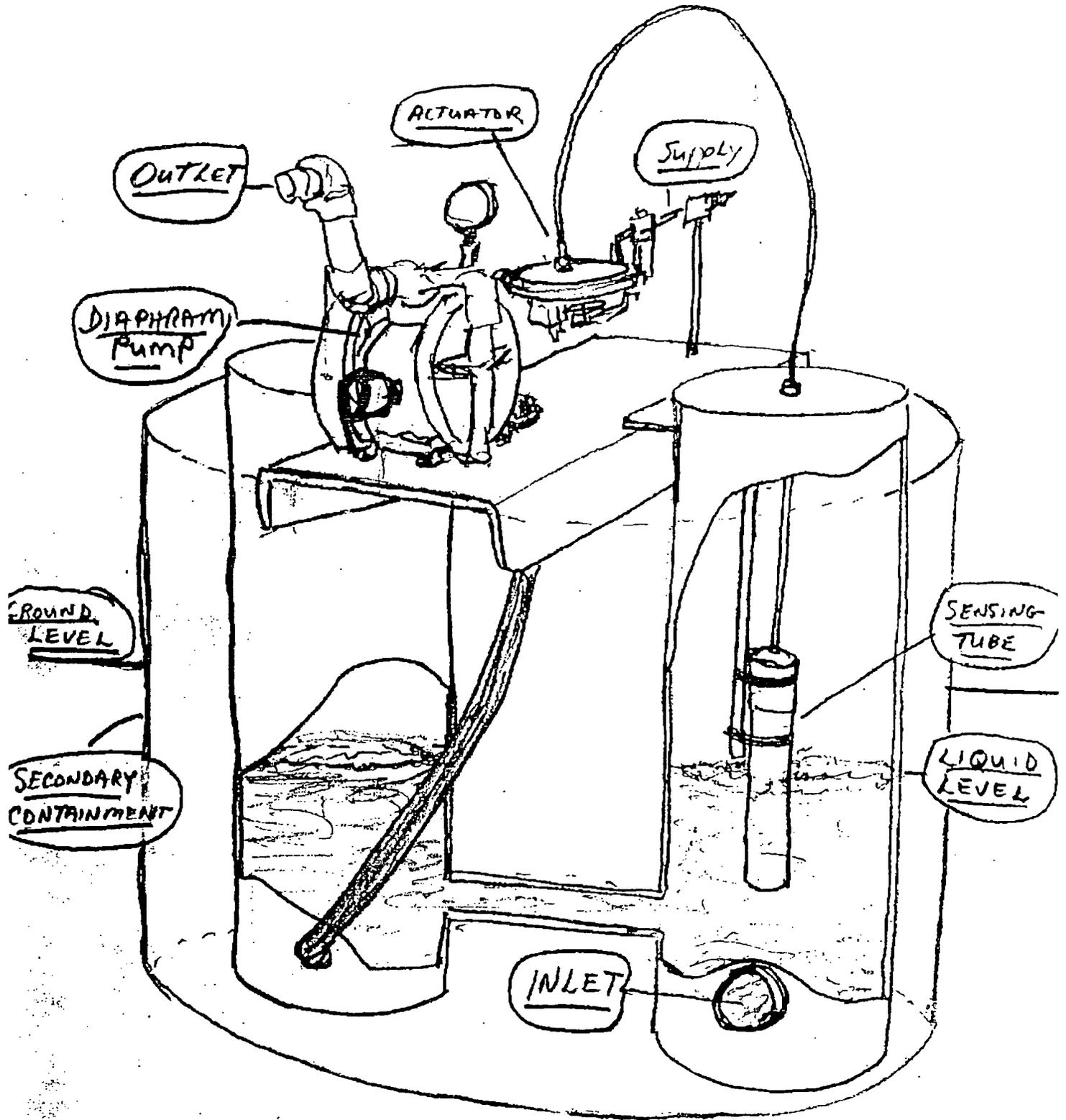
**Compressor Systems, Inc.**, 3611 National Parks Hwy, Carlsbad, NM, (505) 885-3586

**I & W Trucking**, P. O. Box 98, Loco Hills, NM, (505) 855-6663

**Mesquite SWD, Inc.**, Disposal Well "Dorstate #1" (T25S, R28E, sec. 27 se/4 of ne/4), Carlsbad, NM, (505) 885-3396

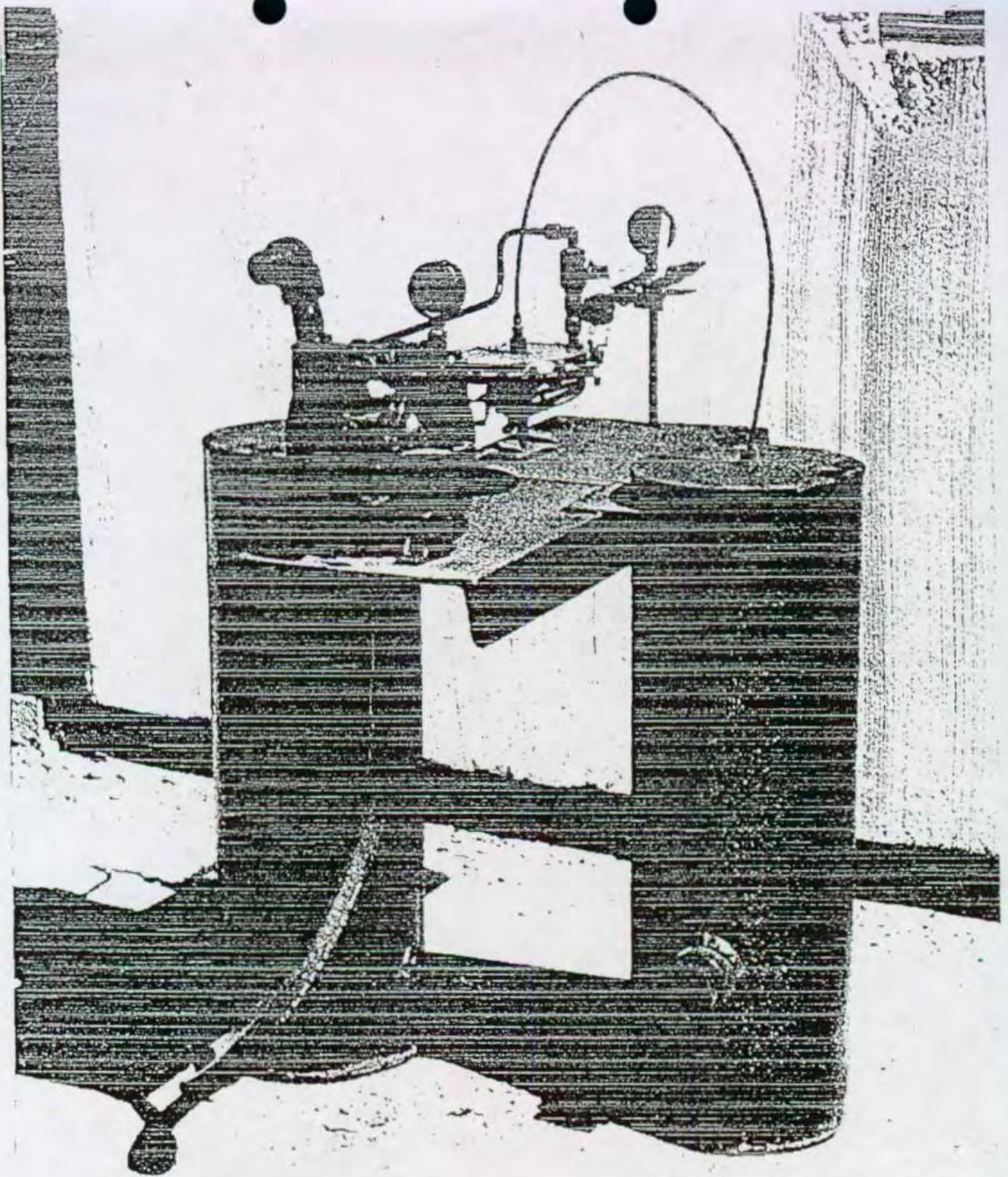
Engine wash water generated during monthly washings will be drained via underground pipes into a double-lined, partially buried steel sump which will be treated for corrosion. The sump will also be equipped with a pump which automatically turns on to transfer liquids via aboveground pipes to the waste water tank TK-2. A diagram of the sump pump is attached. No RCRA-listed hazardous wastes will be contained in the wash water. All piping will be doped and wrapped.





#### OPERATION

Air pressure created by rising liquid in the sensing tube is transmitted to a diaphragm in the actuator via nylon tubing. The diaphragm activates an air pilot valve which opens the valve to the pump.



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**Item 9**

*Attach a description of proposed modifications to existing collection/treatment/disposal systems.*

No modifications to the facility are necessary to meet NMOCD requirements.



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**Item 10**

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

The facility will be inspected daily by the operator. Maintenance will be performed and records will be kept according to CSI procedures.

The integrity of any buried piping installed at the facility will be tested prior to commencement of operation and then re-tested once every five years. The double-lined below-grade sump installed at the facility will be internally inspected for leaks annually by CSI.



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**Item 11**

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

CSI will handle all spills and leaks immediately as required by CSI procedures and will report all spills and leaks according to the requirements of the State of New Mexico found in NMOCD Rule 116 and WQCC Section 1203. Copies of these regulations are attached. CSI will notify El Paso Field Services of any and all spills and/or releases.



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.

DUE TO BE REVISED, STILL CURRENT AS OF 10/3/96

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.

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."\*

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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

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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

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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

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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]

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**Item 12**

*Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.*

Texaco Bilbrey Facility is located in the northern portion of an area identified as the Antelope Ridge. It is bounded the west by the west-facing scarps of The Divide. The Antelope Ridge area has a relatively flat, sand-covered surface, underlain for the most part by a hard caliche surface. The facility is located east of the James Dunes area where dune sands rest directly on Triassic rocks (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).

An unnamed arroyo is 0.5 miles west of the facility. There are two groundwater discharge sites on the Divide 7.5' U.S.G.S. Quadrangle within 1 mile of the facility. The unnamed arroyo goes to Tanks Under the Hill pond 0.5 miles west of the facility. The arroyo then splits with one branch continuing southeast and going to the Divide Tank located 0.5 miles south of the facility. The second branch continues south and ends 1.0 mile south of the facility.

As of August, 1996, no wells within 0.25 miles of the perimeter of the facility were recorded with the New Mexico State Engineer's office in Roswell.

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 6) shows the elevation of the water table at the site to be about 3300 feet. The elevation of the facility is 3790 feet, placing the depth to the water table at the site at 490 feet.

The aquifers 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 dolomite limestones. Almost all the wells in the Antelope Ridge area derive their water from Triassic rocks (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).



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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. 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). 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 soil type at the facility is Simona-Upton Association, which is typically on ridges, foot slopes, and fans. The Simona soils are gravelly fine sandy loam. They form in wind-worked, calcareous sediments over fractured caliche. The Upton soils are well-drained gravelly loams underlain by indurated caliche at a depth of 6 to 20 inches (Soil Survey, Lea County, New Mexico, 1974, U.S.D.A., Soil Conservation Survey).

Flooding potential at the facility is low as the site is located on well-drained soils with slow to medium runoff (Soil Survey, Lea County, New Mexico, 1974, U.S.D.A., Soil Conservation Survey). Any runoff from the facility would probably collect in the shallow depressions to the north and south of the facility.



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**Item 13**

*Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.*

All reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC 6.2.3103 quality standards should CSI choose to permanently close the facility. 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.





STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 S. PACHECO  
SANTA FE, NEW MEXICO 87505  
(505) 827-7131

P 288 258 661

October 8, 1996

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-288-258-661**

Ms. Sandra Miller  
Superintendent, Environmental Compliance  
El Paso Field Services ( EPFS )  
P.O. Box 4990  
Farmington, NM 87499

**RE: Extension to Discharge**  
**"Texaco Bilbrey" Compressor Station**  
**Lea County, New Mexico**

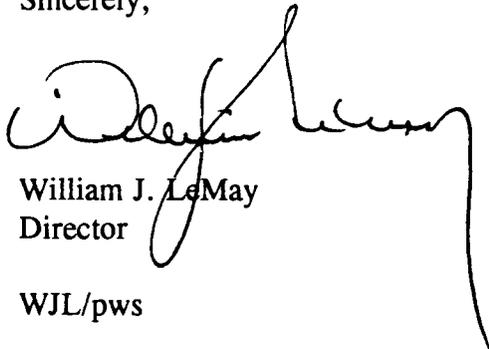
Dear Ms. Miller:

The New Mexico Oil Conservation Division has received the request (via Fax - with certified hard copy letter to follow) dated October 7, 1996 from EPFS for an extension to discharge without an approved discharge plan for 120 days.

Pursuant to Water Quality Control Commission (WQCC) Regulations 3106.B, and for good cause shown, an extension to February 4, 1997 to discharge without an approved discharge plan for the EPFS facility located in the SE/4 SW/4, Section 4, Township 22 South, Range 32 East, NMPM, Lea County, New Mexico is hereby approved.

Please be advised this extension does not relieve EPFS of liability should the operation of the facility result in pollution of surface waters, ground waters or the environment.

Sincerely,



William J. LeMay  
Director

WJL/pws

xc: Mr. Wayne Price - OCD Hobbs

US Postal Service  
**Receipt for Certified Mail**

No Insurance Coverage Provided.  
Do not use for International Mail (See reverse)

Sent to		Ms. Miller
Street & Number		EPFS - Est.
Post Office, State, & ZIP Code		Texaco, Bilbrey.
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date		

PS Form 3800, April 1995

# **EPFS**

**EL PASO FIELD SERVICES**

614 Reilly Avenue  
Farmington NM 87401

**RECEIVED**

OCT 8 1996

Environmental Bureau  
Oil Conservation Division

## F A X C O V E R S H E E T

**DATE:** Monday, October 07, 1996

**TIME:** 10:45 am

**TO:** Mr Roger Anderson  
OIL CONSERVATION DIVISION

**PHONE:** (505)  
**FAX:** (505) ~~827-7177~~ - 827-8177

**FROM:** Sandra Miller

**PHONE:** (505) 599-2141  
**FAX:** (505) 599-2119

**RE:**

**CC:**

Number of pages including cover sheet: 2

**EPFS**  
**EL PASO FIELD SERVICES**P.O. BOX 4990  
FARMINGTON, NM 87499

October 7, 1996

*fax followed by mail transmittal***Mr. Roger Anderson**  
Oil Conservation Division  
P O Box 6429  
Santa Fe, NM 87505-6429

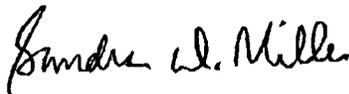
Dear Mr. Anderson,

El Paso Field Services (EPFS) requests authorization under section 3-106B. of the New Mexico Water Quality Control Commission (WQCC) regulations to discharge without an approved discharge plan at the following facility. This facility will be constructed by Compressor Systems Inc. (CSI) and located on EPFS right of way.

Texaco Bilbrey Facility, Lea County, NM  
Township 22 South, Range 32 East, SE/4 SW/4 sec. 4

Please feel free to contact me at 599-2141 if you have any question or need clarification.

Sincerely,

**Sandra D. Miller**  
Superintendent, Operations Compliance**RECEIVED**

OCT 8 1996

xc: **J.C. Bishop, EPFS**  
**J.T. Boswell, CSI**  
**Robin DeLapp, ESI**  
**M.E. Tschirhart, EPFS**Environmental Bureau  
Oil Conservation Division

September 25, 1996

RECEIVED  
SEP 26 1996  
Oil Conservation Division



Mr. Bill LeMay, Director  
Oil Conservation Division  
PO Box 6429  
Santa Fe, NM 87505-6429

*fax followed by mail transmittal*

Dear Mr. LeMay

I am writing this letter on behalf of my client, Compressor Systems, Inc. (CSI). CSI requests authorization under Section 3106.B of the New Mexico Water Quality Control Commission (WQCC) regulations to discharge without an approved discharge plan at the following facility which will be constructed by CSI for El Paso Natural Gas (EPNG).

Texaco Billbrey Facility, Lea County, NM,  
Township 22 South, Range 32 East, SE/4 SW/4 sec. 4

EPNG will be submitting an application to discharge around the first week of October, 1996. Please feel free to contact me or Terry Christian at CSI (915-563-1170) if you have any questions.

Sincerely

Robin K. DeLapp  
Environmental Scientist

cc: Terry Christian, CSI  
David Bays, EPNG

4665 INDIAN SCHOOL NE

SUITE 106

ALBUQUERQUE

NEW MEXICO

87110

PHO 505 266 6611