

GW - 288

**GENERAL
CORRESPONDENCE**

YEAR(S):
2002-1997

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, July 11, 2008 8:56 AM
To: 'Klein, Elisabeth Anne'
Cc: Price, Wayne, EMNRD; Lowe, Leonard, EMNRD
Subject: DCP Midstream LP. Closure of Facilities

Elisabeth:

The OCD requests to visit the discharge permit facilities listed below that DCP Midstream, LP. has are inactive or expressed an interest in closing. The OCD would like to schedule a date for the facility visits in August of 2008. The OCD would prefer to meet with a company representative and then visit the facilities.

GW-24 Avalon Gas Plant

OCD Status: Rambo CS. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive.

According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

DCP Status: Avalon Gas Plant (Rambo Compressor) (GW-24) - DCP MIDSTREAM LP previously renewed the permit for this facility. An approval letter, dated April 7, 2004, from the OCD was received by the company. DCP MIDSTREAM LP was required, as a condition of the approval, to submit pit closure reports and analytical results. The report and results were submitted to the OCD on April 23, 2004.

GW-42 Indian Hills Gas Plant (last permit 6/18/1997 Stage 1)

OCD Status: Indian Hills Gas Plant (GW-42): OCO records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

DCP Status: Indian Hills Gas Plant (GW-42) - This facility was dismantled and only a meter facility and pig launcher exist on the site. A copy of the company's notification, dated December 10, 2001, to the OCD regarding the status of this site and OCD's receipt of this letter is in Attachment 5.

GW-44 Hobbs Booster Station (OCD has processed the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCO will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater

7/11/2008

Monitoring Results and Additional Site Characterization Activities at the
Hobbs Booster Station: Hobbs, New Mexico
Units C and D Section 4, T 19 5, R 38 E, NMPM

GW-288 Pardue Compressor Station (OCD has process the DP 3/7/2008 Stage 4, but DCP appears to want to close it instead?)

OCD Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Status: Pardue CS. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007.

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Please contact me. Thank you.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")

7/11/2008

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DCP Status:

Discharge Plan GW-044: Summary of First Quarter 2008 Groundwater

7/11/2008

Price, Wayne

From: Price, Wayne
Sent: Tuesday, February 05, 2002 12:08 PM
To: 'Bishop, Mark A.'
Subject: RE: Non-exempt waste disposal for Conoco CG&P

OCD hereby approves of your request and will place a copy of this approval in each Discharge Plan.

-----Original Message-----

From: Bishop, Mark A. [mailto:Mark.A.Bishop@conoco.com]
Sent: Tuesday, February 05, 2002 11:24 AM
To: WPrice@state.nm.us
Subject: Non-exempt waste disposal for Conoco CG&P facilities

Mr. Price,

A reevaluation of preferred non-exempt waste handling facilities has been completed for southeast New Mexico and a team of Conoco personnel has chosen Sundance waste handling facility at Eunice, NM to be our primary non-exempt waste handling facility. Controlled recovery Inc. will be the secondary facility. We would like to amend the following OCD Groundwater discharge permits to include the Sundance facility for disposal of non-exempt fluids. Thank you for your consideration of our request

Maljamar Gas Plant	GW-020
Maljamar Area Blanket OCD permit	
Antelope Ridge Gas Plant	GW-162
Hobbs Gas Plant	GW-175
Apex compressor Station	GW-163
Bootleg Compressor Station	GW-176
Bright /Yates Compressor Station	GW-160
Cedar Canyon Compressor Station	GW-296
Cal-Mon Compressor Station	GW-143
NE Carlsbad Compressor Station	GW-280
Cotton Draw Compressor Station	GW-311
Hat Mesa Compressor Station	GW-316
Lee Compressor Station	GW-227
Pardue Compressor Station	GW-288
Pure Gold Compressor Station	GW-150
Malaga Compressor Station	GW-167

Mark Bishop
 Environmental Specialist
 Conoco Inc. CG&P
 SE New Mexico Operating Unit
 505-391-1956

2/6/2002



Mark Bishop
Environmental Specialist
SH&E Services
Natural Gas & Gas Products

OIL CONSERVATION DIV.
01 APR 16 PM 3:20

Conoco Inc.
P.O. Box 90
Maljamar NM 88264
Phone 505-676-3519
Cell (281) 380-0018
E-mail mark.a.bishop@usa.conoco.com

04/06/2001

**Return Receipt Requested
Certified Mail No.
7099 3220 0001 4997 4299**

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

**Re: Discharge Plan GW – 288, Pardue Farms Compressor Station
Inspection frequency change request**

Dear Mr. Price:

Conoco, Inc. requests that the inspection frequency required in Discharge Plan Approval Condition 11 (Housekeeping) be changed to monthly. This will allow us to maintain consistency with other facility Discharge Plans.

If you have any questions or require more information please contact me at 505-676-3519.

Sincerely,

Mark Bishop

CC:

Joyce Miley
File: Env

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 2/24/03
or cash received on _____ in the amount of \$ 400⁰⁰

from CONOCO PHILLIPS

for PARQUE COMP ST GW-288

Submitted by: ^(Facility Name) WAYNE PRICE Date: ^(OF No.) 2/24/03

Submitted to ASD by: [Signature] Date: "

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2003

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

THIS IS WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

CONOCOPHILLIPS COMPANY
HOUSTON, TX 77079

62-20/311

Check No. [REDACTED]

To: Citibank Delaware
One Penns Way
New Castle, DE 19720

*** VOID AFTER 90 DAYS ***

FEBRUARY 24, 2003

Vendor Code: 217921R01

Exactly *****400.00**

Pay To the Order Of
OIL CONSERVATION DIVISION
WATER QUALITY MANAGEMENT FUND
1220 S SAINT FRANCIS DRIVE
SANTA FE NM 87505-5472

[Signature]
Authorized Signature



RECEIVED

JUN 11 2002

Environmental Bureau
Oil Conservation Division

RECEIVED
JUN 11 2002
Environmental Bureau
Oil Conservation Division



Flatrock Energy
PARTNERS

15600 San Pedro, Suite 401
San Antonio, Texas 78232
P: 210.494.6777
F: 210.499.1192

06/07/2002
State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Re: Renewal Application for Discharge Plan GW-288
Pardue Compressor Station
Eddy County, New Mexico

Dear Sir or Madam:

Flatrock Energy Partners on behalf of Raptor Gas Transmission LLC and Conoco Gas and Power (Conoco) hereby submits the attached documentation and application for renewal of Discharge Plan GW-288. This submittal includes the application filing fee of \$100.

In order to maintain consistency with other facilities in this area, Conoco Gas and Power requests that this discharge plan be rolled in with the "blanket" discharge permit issued on June 16, 1998 (see appendix B for blanket discharge permit documentation and conditions). The blanket discharge permit provides coverage for other facilities in the area that are operated by Conoco Gas and Power.

Please contact me at 210 494 6777 or Mark Bishop at 505 393 2153 if you have questions or require additional information.

Sincerely,

Clay Y. Smith, PE

cc: Mark Bishop – Hobbs, NM
Joyce Miley – Houston, TX

THE SANTA FE
NEW MEXICAN

Founded 1849

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

ATTN WAYNE PRICE AD NUMBER: 266388 ACCOUNT: 56689
LEGAL NO: 71651 P.O.#: 02199000249
204 LINES 1 time(s) at \$ 89.93
AFFIDAVITS: 5.25.
TAX: 5.95
TOTAL: 101.13

NOTICE OF PUBLICATION

**STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL RE-
SOURCES DEPARTMENT
OIL CONSERVATION
DIVISION**

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

(GW-288) - Flatrock Energy Partners on behalf of Raptor Gas Transmission LLC, operated by Conoco Gas & Power, Joyce Miley, (281) 293-4498, P.O. Box 2197-Humble 3036, Houston, Texas 77252-2197, has submitted a discharge plan application for the Par-due Compressor Station located in the SE/4 NW/4 of Section 10, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 20 feet with a total dissolved solids concentration of approximately 549 mg/l. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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 7th day of June 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL
LORI WROTENBERY, Director
Legal #71651
Pub. June 19, 2002

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, A. Voorhees 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 #71651 a copy of which is hereto attached was published in said newspaper 1 day(s) between 06/19/2002 and 06/19/2002 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 19 day of June, 2002 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

1/s/ A. Voorhees
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 19 day of June A.D., 2002

Notary Laura R Harding
Commission Expires 11/23/03

APPROVED
W Price

REC'D JUN 21 PM 12:44
OIL CONSERVATION DIV

Affidavit of Publication

State of New Mexico,
County of Eddy, ss.

Dawn Higgins

being first duly sworn, on oath says:

That she is Business Manager of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the State wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

<u>June 19</u>	,	<u>2002</u>
_____	,	<u>2002</u>

That the cost of publication is \$ 72.21, and that payment thereof has been made and will be assessed as court costs.

Dawn Higgins

Subscribed and sworn to before me this

20 day of June, 2002

Stephanie DeBson

My commission expires 12/13/05
Notary Public

June 19, 2002

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AND NATURAL
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7th day of June 2002.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION

LORI WROTENBERY
Director

No 22176

02 JUN 24 PM 2:35

OIL CONSERVATION DIVISION

Approved
Lori Wrotenbery
6/25/02

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/6/02
or cash received on _____ in the amount of \$ 100⁰⁰
from FLAT ROCK ENERGY PARTNERS
for PARDUE COMP. ST GW-288-

Submitted by: ^(Facility Name) WAYNE PRICE Date: ^(DP No.) 6/19/02

Submitted to ASD by: [Signature] Date: 11

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____
(Agency)

Organization Code 521.07 Applicable FY 2008

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

FLATROCK ENERGY PARTNERS, LP 05-00
15600 SAN PEDRO, SUITE 100
SAN ANTONIO, TX 78232-3738

COMPASS BANK
SAN ANTONIO TX 78216
35-1054/1130

6/6/2002

PAY TO THE ORDER OF State of New Mexico \$ **100.00

One Hundred and 00/100***** DOLLARS 

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

MEMO Permit

P. J. Martin

[redacted]

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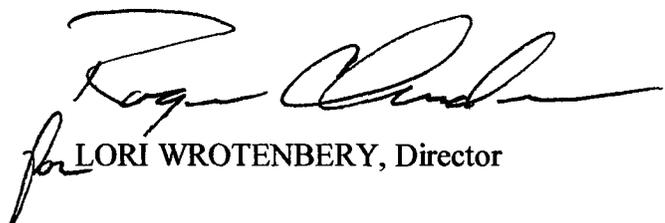
PARQUE
J

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OIL CONSERVATION DIVISION


for LORI WROTENBERY, Director

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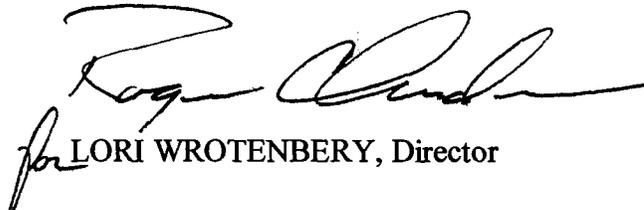
PARQUE
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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


for LORI WROTENBERY, Director

SEAL

OCD ENVIRONMENTAL BUREAU
SITE INSPECTION SHEET

DATE: 5-14-02 Time: 2:10 PM

Type of Facility: Refinery Gas Plant Compressor St. Brine St. Oilfield Service Co.
Surface Waste Mgt. Facility E&P Site Crude Oil Pump Station
Other _____

Discharge Plan No Yes GW# 288

FACILITY NAME: PAR DUE COMP. ST.
PHYSICAL LOCATION: 32° 19' 13.5" N / 104° 4' 39.2" W
Legal: QTR QTR Sec TS R County EDDY

OWNER/OPERATOR (NAME) CONOCO INC.
Contact Person: MARK BUSHOP Tele:# _____

MAILING ADDRESS: _____ State _____ ZIP _____
Owner/Operator Rep's: _____

OCD INSPECTORS: W PRICE, E MARTIN

1. **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.

OK

2. **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.

OK

3. 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.

4. 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.

TEG + GLYCOL WASTE WATER TANK NEEDS CONTAINMENT

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

OK

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

OK

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

OK

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly?

Does the facility have an EPA hazardous waste number? _____ Yes _____ No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES NO IF NO DETAIL BELOW.

9. Class V Wells: 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. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO YES IF YES DESCRIBE BELOW! Undetermined

10. 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.

Good

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

12. Does the facility have any other potential environmental concerns/issues?

NONE

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

—

14. ANY WATER WELLS ON SITE? NO YES IF YES, HOW IS IT BEING USED ?

15. Documents reviewed:

Miscellaneous Comments:

Photos taken: 2

Documents Reviewed/Collected:

DCP00 168 - 169



Picture #1- Entrance date should be 5/14/02



Picture #2- TEG & Glycol wastewater tank-both need containment.



Picture #1- Entrance date should be 5/14/02



Picture #2- TEG & Glycol wastewater tank-both need containment.



Picture #1- Entrance date should be 5/14/02



Picture #2- TEG & Glycol wastewater tank-both need containment.



Joyce M. Miley
 Environmental Consultant
 Engineering and Compliance
 Natural Gas & Gas Products Department

Conoco Inc.
 600 N. Dairy Ashford Rd.
 P.O. Box 2197, HU3036
 Houston, TX 77252
 Telephone: (281) 293-4498
 Facsimile: (281) 293-1214

1 8 0 0
 DEC 18 2000
 CONSERVATION DIV

November 30, 2000

Certified Mail No. 7099 3220 0003 1150 1803
Return Receipt Requested

Mr. Roger Anderson
 Environmental Bureau Chief
 New Mexico Energy, Minerals & Natural Resources Department
 Oil Conservation Division
 2040 South Pacheco Street
 Santa Fe, New Mexico 87505

Re: Change of Ownership
 Conoco Inc., Natural Gas & Gas Products Department

Dear Mr. Anderson:

Effective December 1, 2000, Conoco Inc., Natural Gas & Gas Products Department (NG&GP) assumed ownership of LG&E Natural Gathering & Processing LLC,; and LG&E Natural Pipeline LLC (LG&E). These LG&E entities, in turn, own certain natural gas facilities in SE New Mexico. These facilities and their OCD Groundwater Discharge numbers are listed in the table below.

Facility Name	OCD Groundwater Discharge Permit
Antelope Ridge Gas Plant	GW-162
Hobbs Gas Plant	GW-175
Apex Compressor Station	GW-163
Bootleg (aka. NBR) Compressor Station	GW-176
Bright/Yates Compressor Station	GW-160
Cedar Canyon Compressor Station	GW-296
Cal-Mon Compressor Station	GW-143
NE Carlsbad Compressor Station	GW-280
Cotton Draw Compressor Station	GW-311
Hat Mesa Compressor Station	GW-316
Lee (aka. Lea and/or Fagan/Gillespie) Compressor Station	GW-227
Pardue Farms Compressor Station	GW-288
Pure Gold 28 Compressor Station	GW-150
Parker & Parsley (aka. Malaga) Compressor Station	GW-167

Several of these locations have conditions in their permits that require the new owner to supply a written commitment to comply with the terms and conditions of the previously approved discharge plans. LG&E has informed Conoco that all above locations are in compliance with the discharge plans. Conoco has copies of all of the approval letters and LG&E signed conditions of approval for these locations. We agree to continue to operate the locations in conformance with the groundwater permits, the approval conditions and the OCD regulations.

In addition, pursuant to certain requirements of the transaction in which Conoco acquired the entities, the names of certain entities have been changed to the following: Raptor Natural Gathering & Processing LLC and Raptor Natural Pipeline LLC (in each case replacing LG&E with Raptor).

Conoco Inc. requests that all future correspondence concerning these facilities be forwarded to me at the address above. If you have any questions or require additional information, please do not hesitate to contact Mr. Mark Bishop at (505) 623-5659 or myself at (281) 293-4498.

Sincerely,



Joyce M. Miley

cc.:

Ms. Patricia Merrill
LG&E Energy Corp.
220 West Main Street
PO Box 32030
Louisville, KY 40232-2030

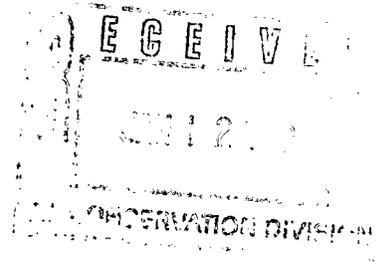
Certified Mail No. 7099 3220 0003 1150 1797
Return Receipt Requested



LG&E Natural Gathering and Processing Co.
921 West Sanger
Hobbs, New Mexico 88240
(505) 393-2153
FAX (505) 393-0381

January 9, 1998

Mr. Mark Ashley
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505



Dear Mark,

In regards to Discharge Plan Number GW-288, here is the signed copy of the "Approval Conditions." If you have any questions please let me know.

Thank you for all of your help and your cooperation in assisting our needs. We look forward to a continued close working relationship in the future.

Sincerely,

Ed Stoman
Supervisor
Operations Support

ATTACHMENT TO THE DISCHARGE PLAN GW-288
LG&E NATURAL GATHERING AND PROCESSING CO.
PARDUE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(November 24, 1997)

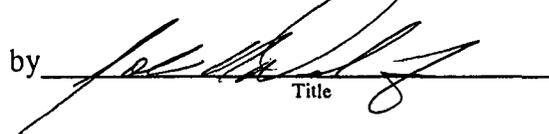
1. LG&E Commitments: LG&E will abide by all commitments submitted in the discharge plan application dated October 3, 1997.
2. Waste Disposal: All wastes shall be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
3. 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.
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 within the berm.
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. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they 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 must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

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 thereafter, or prior to discharge plan renewal. Permittees 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.
10. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
11. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.
13. 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.
14. 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.
15. Certification: LG&E, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. LG&E further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

LG&E NATURAL GATHERING AND PROCESSING CO.

by


Title



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 24, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-999

Mr. Ed Sloman
LG&E Natural Gathering and Processing Co.
921 West Sanger
Hobbs, New Mexico 88240

**RE: Discharge Plan GW-288
Pardue Compressor Station
Eddy County, New Mexico**

Dear Mr. Sloman:

The ground water discharge plan GW-288, for the LG&E Natural Gathering and Processing Co. (LG&E) Pardue Compressor Station located in the SE/4 NW/4 of Section 10, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the discharge application dated October 3, 1997. 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 10 working days of receipt of this letter.**

The discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve LG&E of liability should operations result in pollution of surface water, ground water, or the environment.

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

Mr. Ed Sloman
November 24, 1997
Page 2

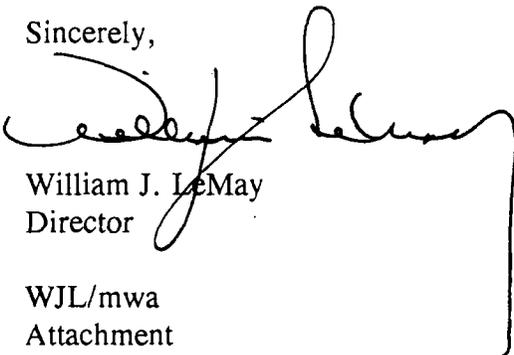
Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. LG&E is required to notify the Director of any facility expansion, production increase, or process modification 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 years. This approval will expire on November 24, 2002, and LG&E should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the LG&E Natural Gathering and Processing Co. Pardue Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50. The OCD has received the filing fee. There are no flat fees for compressor stations with a total combined horsepower of 1,000 or less.

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,



William J. LeMay
Director

WJL/mwa
Attachment

xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN GW-288
LG&E NATURAL GATHERING AND PROCESSING CO.
PARDUE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(November 24, 1997)

1. LG&E Commitments: LG&E will abide by all commitments submitted in the discharge plan application dated October 3, 1997.
2. Waste Disposal: All wastes shall 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 by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
3. 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.
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 within the berm.
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. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they 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 must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

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11. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.
13. 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.
14. 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.
15. Certification: LG&E, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. LG&E further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

LG&E NATURAL GATHERING AND PROCESSING CO.

by _____
Title

P 288 258 999

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
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

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/2/97,

or cash received on _____ in the amount of \$ 50.00

from Llano

for Pardue C.S. GW-288

(Facility Name)

(CP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: B. [Signature] Date: 10/20/97

Received in ASD by: _____ Date: _____

Filing Fee X New Facility _____ Renewal _____

Modification _____ Other _____

(Legend)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

LLANO, INC.

30X 1320
HOBBS, NEW MEXICO 88240

SUNWEST BANK OF HOBBS, N.A.
HOBBS, NEW MEXICO 88240

95-321
1122

CHECK DATE	CHECK NO.
10-02-97	03130

CHECK AMOUNT
\$ 50.00*****

PAY TO THE ORDER OF

Water Quality Management Fund
NM Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

LLANO, INC. - GENERAL ACCOUNT

[Signature]
VOID AFTER 90 DAYS



LLANO, INC.

INVOICE NO.	INVOICE DATE	DESCRIPTION	GROSS AMOUNT	DISCOUNT	NET AMOUNT
		Application of Discharge Plan for the Pardue Compressor Station Project #1031			<i>50.00</i>
CHECK NUMBER		TOTALS ▶			\$50.00

Affidavit of Publication

STATE OF NEW MEXICO)

) ss.

COUNTY OF LEA)

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

That the notice which is hereto attached, entitled

Legal Notice
Notice of Publication

~~and numbered~~ ~~XXXXXX~~

~~XXXXXXXXXXXXXXXXXXXX~~ was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ~~XXXX XXXXXXXXXXXXXXXXXXXX~~

~~XXXXXXXXXXXXXXXXXXXX~~ for one (1) day

~~XXXXXXXXXXXXXXXXXXXX~~ beginning with the issue of October 23, 1997

and ending with the issue of October 23, 1997

And that the cost of publishing said notice is the sum of \$62.80

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

Joyce Clemens

Subscribed and sworn to before me this 23rd

day of October 19 97

Jean Sevier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

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

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

(GW-288) - LG&E Natural Gathering and Processing Co., Ed Sloman, (505) 393-2153, 921 West Sanger, Hobbs, New Mexico 88240, has submitted a discharge application for the Pardue Compressor Station located in the SE/4 NW/4 of Section 10, Township

23 South, Range 28 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to off-site disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 20 feet with a total dissolved solids concentration of approximately 549 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-127) - Duke Energy Field Services, Robert L. Pearson, (303) 595-3331, P.O. Box 5493, Denver, Colorado 80217, has submitted a discharge application for its previously approved discharge plan for the Burton Flats Gas Plant located in the SW/4 NE/4 of Section 9, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to off-site disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 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(s) 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 application(s), the Director of the Oil Conservation Division shall allow at least (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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

Given under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of October 1997.

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

SEAL
Published in the Lovington Daily Leader October 23, 1997.

OK - WJ
10-31-97

October 26, 1997

Affidavit of Publication

State of New Mexico,
County of Eddy, ss.

Amy McKay

being first duly sworn, on oath says:

That she is Business Manager
of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the state wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

October 26, 1997
_____, 19____
_____, 19____
_____, 19____
_____, 19____
_____, 19____

That the cost of publication is \$ 63.50,
and that payment thereof has been made and will be assessed as court costs.

Amy McKay

Subscribed and sworn to before me this

27th day of October, 1997

Donna Crump

My commission expires 8/1/98
Notary Public

NOTICE OF PUBLICATION

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

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(GW-288) - LG&E Natural Gathering and Processing Co., Ed Sloman, (505) 393-2153, 921 West Sanger, Hobbs, New Mexico 88240, has submitted a discharge application for the Pardue Compressor Station located in the SE/4 NW/4 of Section 10, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 20 feet with a total dissolved solids concentration of approximately 549 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-127) - Duke Energy Field Services, Robert L. Pearson, (303) 595-3331, P.O. Box 5493, Denver, Colorado 80217, has submitted a discharge application for its previously approved discharge plan for the Burton Flats Gas Plant located in the SW/4 NE/4 of Section 9, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

No 18876

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(s) 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 application(s), 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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of October 1997.

STATE OF NEW
MEXICO

OIL CONSERVATION
DIVISION

WILLIAM J. LEMAY,
Director

*OK MM
10-26-97*

NM State Energy - Mineral

CARLSBAD CURRENT-ARGUS

620 South Main • P.O. Box 1629
Carlsbad, New Mexico 88220
(505) 887-5501

CLASSIFIED ADVERTISING INVOICE

START DATE	10/26/97	STOP DATE	10/26/97
NO. INSERTIONS	1	NO. LINES	142
CLASSIFICATION	100	AD NO.	227269

AMOUNT DUE	IF PAID AFTER	
\$ 63.50	10/26/97	\$

YOUR AD READ:

OCTOBER 26 1997

Thank You

First Notice

RETURN POSTAGE GUARANTEED

NM State Energy, Mineral
Oil Conservation Division
2040 South Pacheco St
Santa Fe
NM 87505

PLEASE RETURN WITH YOUR REMITTANCE

ADNUM: 227269

STOP PAY: 10/26 100

10/26/97 63.50

No.

The Santa Fe New Mexican

Since 1849. We Read You.

NM OCD
ATTN: SALLY MARTINEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 711342

ACCOUNT: 56689

LEGAL NO: 62535

P.O. #: 98-199-00257

216 LINES ONCE at \$ 86.40

Affidavits: 5.25

Tax: 5.73

Total: \$ 97.38

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

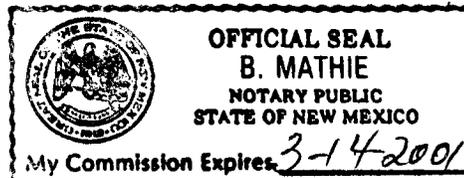
I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 62535 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 24 day of OCTOBER 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 24 day of OCTOBER A.D., 1997

Notary B. Mathie
Commission Expires 3-14-2001

RECEIVED
OCT 28 1997



• P.O. Box 2048 • Santa Fe, New Mexico 87501

505-983-3303

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

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

(GW-288) - LG&E Natural Gathering and Processing Co., Ed Sloman, (505) 393-2153, 921 West Sanger, Hobbs, New Mexico 88240, has submitted a discharge application for the Purdue Compressor Station located in the SE/4 NW/4 of Section 10, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 20 feet with a total dissolved solids concentration of approximately 549 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-127) - Duke Energy Field Services, Robert L. Pearson, (303) 595-3331, P.O. Box 5493, Denver, Colorado 80217, has submitted a discharge application for its previously approved discharge plan for the Burton Flats Gas Plant located in the SW/4 NE/4 of Section 9, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico. All wastes generated will be stored in closed top receptacles prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

cling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 800 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(s) 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 application(s), 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(s) based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan(s) based on the information in the discharge plan application(s) and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of October 1997.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
Legal #62535
Pub. October 24, 1997

OK AM
10-24-97



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

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

October 20, 1997

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. **Publisher's affidavit in duplicate.**
2. **Statement of cost (also in duplicate.)**
3. **CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than October 27, 1997.

Sincerely,

Sally E. Martinez
Sally E. Martinez
Administrative Secretary

Attachment

PS Form **3800**, March 1993

Sent to	Lovington Daily Leader
Street	P.O. Box 1717
P.O., State and ZIP Code	Lovington, NM 88260
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Z 755 962 247

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Lovington Daily Leader
P.O. Box 1717
Lovington, NM 88260

MARK
STH

4a. Article Number

2765962247

4b. Service Type

- Registered Certified
- Express Mail Insured
- Return Receipt for Merchandise COD

7. Date of Delivery

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X *Thanda Rodriguez*

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

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

October 20, 1997

CARLSBAD CURRENT ARGUS
P. O. Box 1629
Carlsbad, New Mexico 88221

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. **Publisher's affidavit in duplicate.**
2. **Statement of cost (also in duplicate.)**
3. **CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than October 27, 1997.

Sincerely,

Sally Martinez
Sally E. Martinez
Administrative Secretary

Attachment

PS Form 3800, March 1993

Sent to	Carlsbad Current
Street and No.	Argus
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Z 765 962 348

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Carlsbad Current
 Argue
 P.O. BOX 1629
 Carlsbad, NM 88221

4a. Article Number
 2765962248

4b. Service Type

<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Certified
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured
<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> COD

7. Date of Delivery

5. Received By: (Print Name)
 Mark

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 [Signature]



Thank you for using Return Receipt Service.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

October 20, _____, 1997

THE NEW MEXICAN
202 E. Marcy
Santa Fe, New Mexico 87501

RE: NOTICE OF PUBLICATION

PO #96-199-002997-
#98-199-00257

ATTN: Betsy Perner

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

- 1. Publisher's affidavit.*
- 2. Invoices for prompt payment.*

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice on Friday, October 24, 1997.

Sincerely,

*Sally E. Martinez
Administrative Secretary*

Attachment

NOTICE OF PUBLICATION

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

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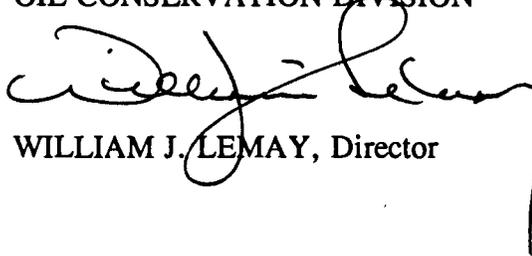
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of October 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL

NOTICE OF PUBLICATION

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

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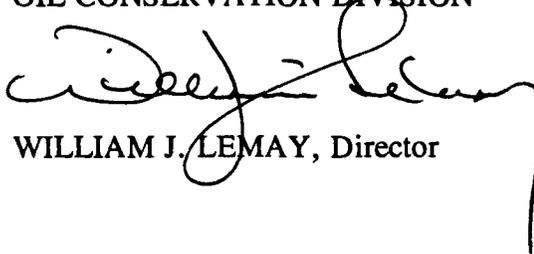
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of October 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

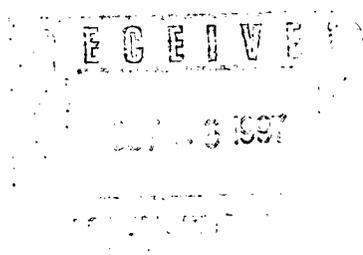
SEAL



LG&E Natural Gathering and Processing Co.
921 West Sanger
Hobbs, New Mexico 88240
(505) 393-2153
FAX (505) 393-0381

October 3, 1997

Mr. Mark Ashley
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505



500-288

Dear Mark,

Here is another discharge plan application. This facility will be the Pardue Compressor Station. I have included the original, with our check attached to it, and one additional copy for your offices. I have also sent one to the Proper district office. I have included a copy of the check for application fees with the additional copies.

If you have any questions concerning this discharge plan please let me know.

Thanks for all of your help.

Sincerely

Ed Sloman
Supervisor
Operations Support

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

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

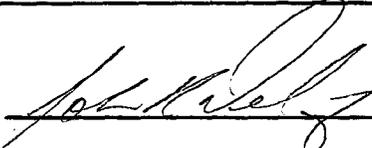
(Refer to OCD Guidelines for assistance in completing the application.)

- I. **TYPE:** Compressor Station
- II. **OPERATOR:** L G & E Natural Gathering and Processing Co.
ADDRESS: 921 West Sanger, Hobbs, NM 88240
CONTACT PERSON: Ed Sloman **PHONE:** 505-393-2153
- III. **LOCATION:** SE /4 NW /4 Section 10 Township 23S Range 28E
 Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. Attach a description of current liquid and solid waste disposal procedures.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a contingency plan for reporting and clean-up of spills or releases.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XIII. **CERTIFICATION**

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

Name: John R. Delaney

Title: General Manager

Signature: 

Date: 10-3-97

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

I.

The major purpose of this facility, The Pardue Compressor Station, is to compress natural gas.

This compressor station will be a "Booster," station. We will take gas from one section of our pipeline gathering system, boost the pressure of the natural gas, and move the natural gas at a higher pressure to another section of our gathering pipeline system. To accomplish this goal we will be using one natural gas fired engine driven compressor of approximately 280 H. P.

At this facility we will have an inlet scrubber to the compressor station, and skid mounted scrubbers on the compressor itself. There will be a dehydrator on the outlet side of this station. These scrubbers will remove free liquid from the inlet stream of natural gas before it is compressed. There will be a 210 bbl. Standard API closed tank, and two 100 bbl. Standard API closed tanks installed at this location. All of the fluids from the scrubbers and dehydrator will be piped into the 210 bbl. tank for storage. As the liquids separate into condensate and water, the water will be transferred to one of the 100 bbl. tanks. The tanks will be emptied into trucks as often as necessary, and transported to either market, or to a licensed disposal which ever is applicable. All fluids will be dealt with in an approved manner.

The fluids caught from the compressor skid from wash down water, and rain water will be piped into the other 100 bbl. tank. This tank will not be connected to the other two tanks.

II.

The Owner/Operator of this facility will be:
LG&E Natural Gathering and Processing Co.
921 West Sanger
Hobbs, New Mexico 88240

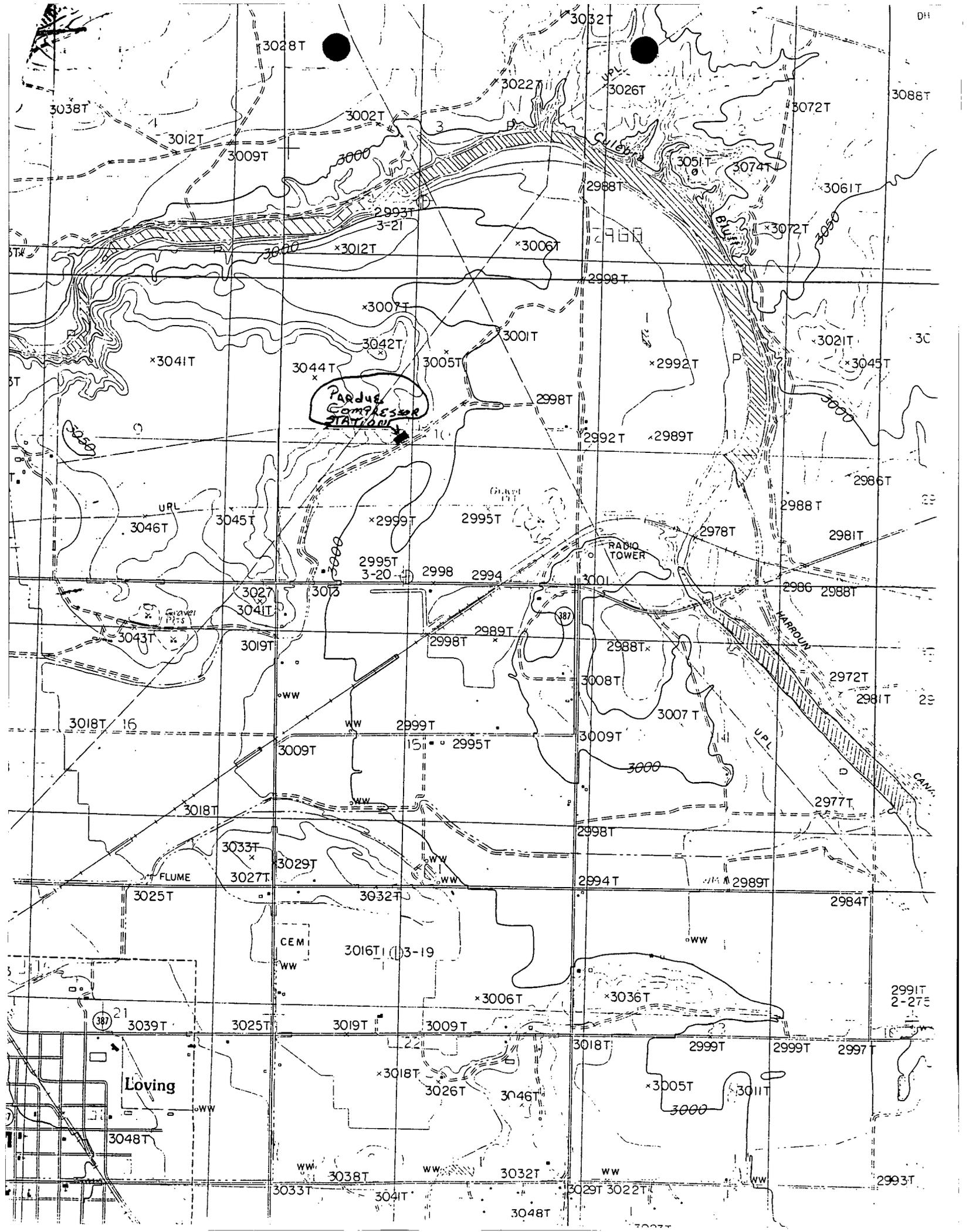
Mr. J. R. Delaney
General Manager; Operations and Construction
921 West Sanger
Hobbs, New Mexico 88240

(505) 393-2153

III.

Location: SE/4: NW/4: Section 10, Township 23 S, Range 28 E,
NMPM, Eddy County, New Mexico:

Attached please find a copy of the topographic map showing the location of the compressor station.



PROJECT 1031 - "PARDUE" COMPRESSOR

Location : SE1/4 NW1/4 Sec. 10, Twp. 23 S., Rng. 28 E, NMPM, Eddy County,
NM

- 1) 0.9 Km - Residence - C. Onsurez
- 2) 31.3 Km - Living Desert State Park
- 3) 26.2 Km - Carlsbad, NM
- 4) 122.4 Km - Roswell, NM
- 5) 50.7 Km - Carlsbad Caverns National Park
- 6) 4.3 Km - Loving, NM
- 7) Federal Lands
- 8) UTM Zone 13: North 3576.09 Km
 East 587.06 Km
 Elev. 3008 Ft.

IV.

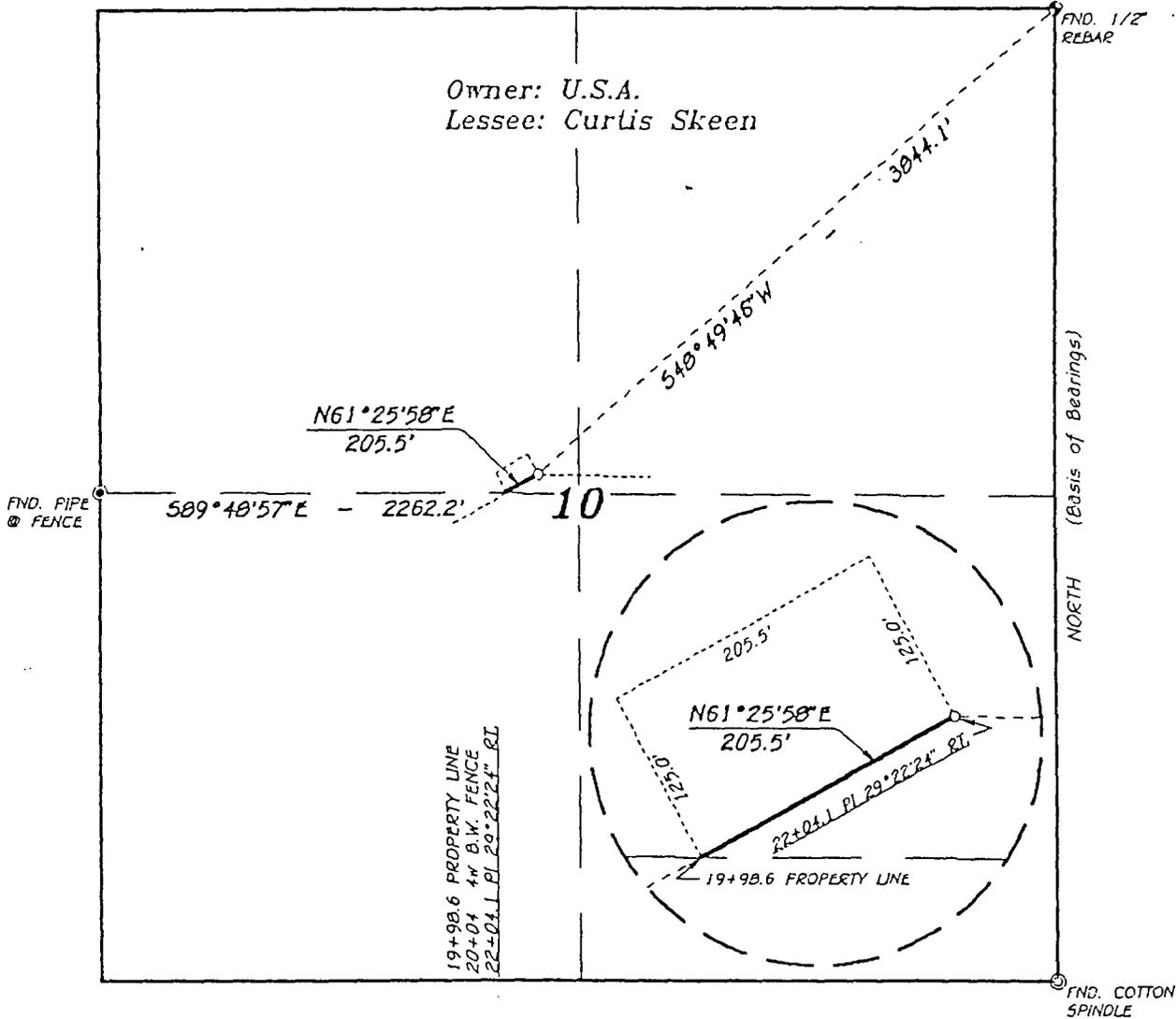
According to the Rights - of - Way documents the land owner for this property is:

United States
Department Of The Interior
Bureau Of Land Management

RDO - Carlsbad Resources Area

see attached Rights-Of-Way grant with Survey Plot:

SECTION 10, TOWNSHIP 23 SOUTH, RANGE 28 EAST, N.M.P.M.,
 EDDY COUNTY, NEW MEXICO.

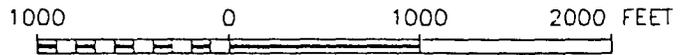


LEGAL DESCRIPTION

A STRIP OF LAND 150.0 FEET WIDE, LOCATED IN SECTION 10, TOWNSHIP 23 SOUTH, RANGE 28 EAST, N.M.P.M., EDDY COUNTY, NEW MEXICO AND BEING 125.0 FEET LEFT AND 25 FEET RIGHT OF THE ABOVE PLATTED CENTERLINE SURVEY.

205.5 FEET = 0.04 MILES

I HEREBY CERTIFY THAT THIS PLAT WAS PREPARED FROM FIELD NOTES OF AN ACTUAL SURVEY AND MEETS OR EXCEEDS ALL REQUIREMENTS FOR LAND SURVEYS AS SPECIFIED BY THIS STATE.



Gary L. Jones
 GARY L. JONES N.M. P.S. No. 7977
 TEXAS P.L.S. No. 5074

BASIN SURVEYS P.O. BOX 1786-HOBBS, NEW MEXICO

HADSON GAS GATHERING & PROCESSING

H.G.G.P. PROJ. No. - 1031

A PIPELINE CROSSING U.S.A. LAND IN
 SECTION 10, TOWNSHIP 23 SOUTH, RANGE 28 EAST,
 N.M.P.M., EDDY COUNTY, NEW MEXICO.

W.D. Number: 6486

Drawn By: S.C. NICHOLS

Date: 11-13-96

Disk: SCN #32 - HAD6486A.DWG

Survey Date: 11-12-96

Sheet 1 of 1 Sheets

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

RECEIPT AND ACCOUNTING ADVICE

NO. 2229104

Subject: R/W application fee - Compressor Site
Applicant: Project 1031 - Pardue

11-26 BKYoung:Carlsbad Resource Area, NM
1996 5102-77 (015) \$150.00

Hudson Gas Gathering & Processing Co
921 W. Sanger
Hobbs, NM 88241

Remitter:

Assignor:

SERIAL NO.
84587
NM- 57326
Amendment

REFER TO THE ABOVE CASE SERIAL NUMBER IN ALL CORRESPONDENCE. PLEASE INFORM THIS OFFICE OF ANY CHANGE IN ADDRESS.

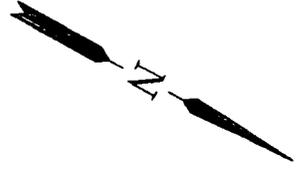
NOTE: This notice is a receipt for monies paid the United States. If these monies are for required fees in connection with your application to lease, purchase, enter, or otherwise acquire an interest in public lands or resources, this receipt is not an authorization to utilize the land applied for and it does not convey any right, title, or interest in the land for which application is made.

ck #39029

V. Facility Description:

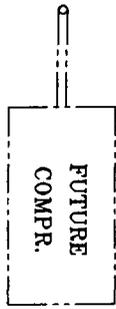
This compressor station, The Pardue Compressor Station, consist of one natural gas engine driven natural gas compressor. The station will have a station inlet scrubber, and there are scrubbers for the compressor mounted on the compressor skid. There will be a dehydrator on the outlet side of this station, drying the natural gas before it leaves the compressor station. This compressor will be compressing natural gas from the east side of our gathering system, boosting the pressure and sending the natural gas to the west down our gathering system. There will be three tanks set at this facility. There will be one 210 bbl. closed steel API tank which the scrubbers and dehydrator will dump into. There will be two 100 bbl. steel API tanks set, one of which, will be a produced water tank. The purpose of this 100 bbl. tank is to transfer the water from the 210 bbl. tank to the 100 bbl. tank for proper management of the fluids. The water will be trucked from location and disposed of in an approved manner at a permitted facility. The condensate left in the 210 bbl. tank will be sold to a company of choice as a product of this facility. There will be a blow case system installed at this location. The blow case system will have the drains from the compressor skid piped into it. This blow case will be piped to the other 100 bbl API steel tank. This will collect the wash down fluids, and rain water caught from the compressor skid. This tank will not be connected to the other tanks at this facility. The liquids from this tank will be trucked from location as often as necessary to an approved facility, and disposed of in an approved manner.

The natural gas enters this station from a single pipeline, is compressed, dehydrated and is discharged through a single pipeline. The design of this station is simply a booster compressor station.



205.5'
(TRACT)

125'
(TRACT)



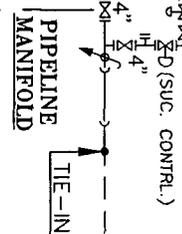
"PARDUE" COMPRESSOR
STATION SITE
SE/4 NW/4 SEC. 10, T23S, R28E
EDDY CO., NM

PROP. LN. AND
TRACT CRN.
STA. 19+98.6

FENCE
STA. 20+04

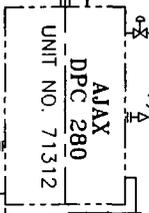
39' ±
(REF.)

BLK. VLV.



(EDGE OF UNIT)
40'

(DISCH. DITCH)
35'

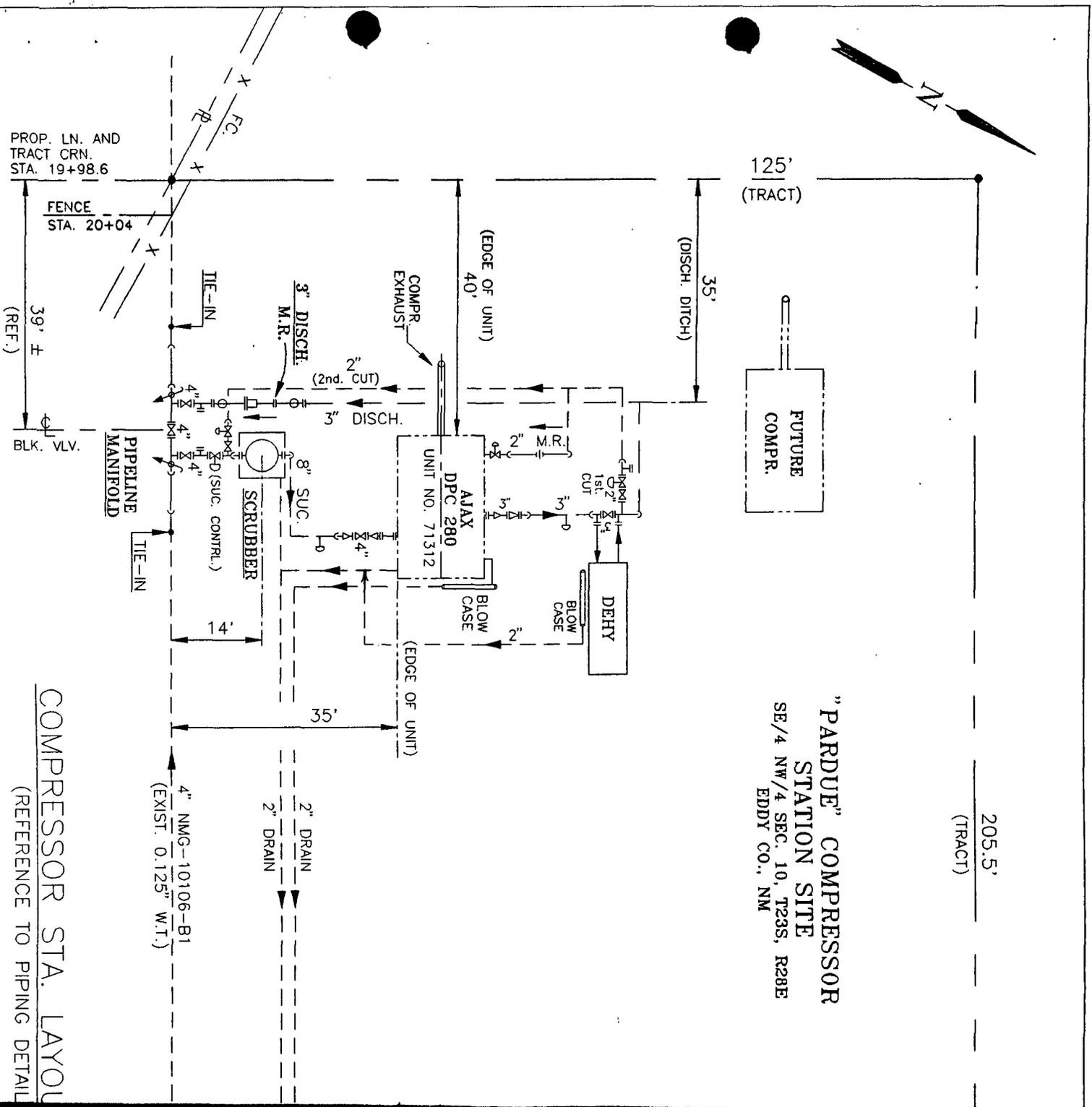


(EDGE OF UNIT)
35'

2" DRAIN

4" NMG-10106-B1
(EXIST. 0.125" W.T.)

COMPRESSOR STA. LAYOUT
(REFERENCE TO PIPING DETAIL)



VI. Sources, Quantities, & Quality of Effluent & Waste Solids:

1. Engine Cooling Water - The engine driving the compressor contains approximately 220 gallons of a 50% Norkool, 50% water mixture for cooling purposes. This is a closed loop system and normally required no make-up.
2. Separators - Each scrubber, the station inlet, and each of the two scrubbers which are skid mounted on the compressor, will remove an estimated 0 to 30 bbl. of liquid per day, condensate & produced water, depending on the ambient conditions, and other factors involved.
3. Waste Lubrication Oils- The compressor contains approximately 25 gallons of lubricating oil, and the engine contains approximately 28 gallons of lubrication oil. The lubrication oil is a standard 30 or 40 weight oil and is replaced approximately every 5000 hours of run time, or as required by oil analysis.
4. Used Oil Filters- Used oil filters will be properly drained, and will be stored in a receptacle on location for this purpose. Our engine oil vendor will collect the filters and will dispose of them in an approved manner.
5. The liquids caught from the environmental skid of the compressor will be piped to a separate 100 bbl. tank. This tank will not be connected to the other tanks for proper management of the waste streams.
6. The scrubber section of the dehydrator will remove an estimated 0-30 bbl. per day of produced water and hydrocarbon liquids. There will be a drip pan placed under the dehydrator to prevent any exempt dehydration fluids from contacting the ground. All the drains from the dehydrator will be piped into the 210 bbl. tank.

The produced water and hydrocarbon liquids will be commingled within the facility. Individual rates, volumes and concentrations should not vary beyond the ranges identified above. All Process units will be self-contained to prevent unintentional or inadvertent discharges and spills.

VII. Transfer & Storage of Process Fluid & Effluents

Produced water and hydrocarbon liquid are collected in the scrubbers. The produced water and hydrocarbon liquids are commingled and piped to a closed storage tank. (see attached facility schematic).

Each of the scrubbers are pressurized vessels. The closed storage tank will be maintained at atmospheric pressure. There will be a 100 bbl. steel API storage tank which will be utilized for storage of produced water.

The condensate storage tank is a standard API 210 bbl. tank. The tank is constructed above ground level. The 100 bbl. tanks are constructed above ground level. These tanks will have an earthen dike enclosure to provide secondary containment equal to one-third greater than the tank capacity. The containment area will have an impermeable barrier installed to prevent contamination of soils.

Waste lubrication oil will be collected in a mobile tank provided for the purpose of oil changes. This used lubrication oil is collected, and relinquished to a licensed oil reclaiming facility for proper recycling and handling of the used lubrication oil. This used lubrication oil and filters will be handled through our oil vendor.

The compressor will be set on an "environmental" base. This base will provide a guttering system which will keep any rain water from running off of the equipment and onto the ground. This guttering system will be piped to a blow case system. This blow case system will be piped to our other 100 bbl. storage tank. These liquids will be stored separately from our "produced" liquids and the tanks will not be connected for proper management of the fluids.

VIII.

This is not a disposal site for EFFLUENT Liquid.

As previously stated, the purpose of this site is to compress natural gas. There will be some produced water, and condensate which will be recovered from the natural gas. These liquids will be stored in a 210 Bbl. and a 100 Bbl. tank, and will be hauled from location. The produced water will be disposed of by a trucking company, either Rowland Trucking, or AA Oilfield Service. Both of these companies have approved disposal wells which they use, and charge us for the disposal of the produced water.

The condensate will be sold to a refinery. The refinery of choice will be elected by price, and they will pick up the condensate from the storage tank and transport it to their facility.

The used engine lubricants, and filters will be handled by our compressor vendor. The Compressor is owned by Hanover Compression and all maintenance required on this unit will be performed by Hanover Compression.

The storage tanks will be set on an impermeable barrier, and monitored by our operators on a daily bases. Our operators will be reporting to their supervisor by mobile communications if this tank should need any further attention. Our supervisors have the means to order a truck to haul liquid at the time our operator's report to him. With this type of check, and safety check, there should be no ground water contamination to contend with.

Simply stated, if the liquid is contained in the tanks, then it cannot contaminate the ground, or ground water.

IX.

This facility will have an operator which will check the operations of the facility on a daily bases. The operator will report the functioning of the compressors, and a log will be kept of the units. If the operator should locate any problem in any of the equipment, what-so-ever, he will report the problem to his supervisor. Each operator is equipped with mobile communications, which is monitored 24 hours a day.

In the event of a "reportable spill", the operator would notify his supervisor immediately of the occurrence. The supervisor would in turn notify his immediate supervisor, and our emergency report and operating plan would be implemented.

Fluids will be collected inside pressure vessels. These vessels will be ASME stamped, approved, pressure vessels. Therefore, no precipitation can be collected in them.

The compressor unit has an "environmental" skid, which will not allow precipitation which has contacted this unit to runoff onto the ground. The new unit skid will be piped into a blow case system which will transfer all fluids to an above ground storage tank. As previously stated the contents of these tanks will be hauled by truck as often as necessary to assure proper levels are maintained.

The blow case system will be piped to a separate tank for management of fluids. The drain lines will be tested at least once every five years to assure OCD compliance.

X.

Our contingency plan for cleaning up spills, and reporting same is not complicated. We have a supervisor on call who is available 24 hours a day. There are administrative support supervisors available when ever needed.

If a spill should occur, the supervisor on duty would start the field operations of the clean-up, by first stopping the source of the spill, and containing all fluids that he possibly can. The on duty supervisor would notify the support people of the situation. The OCD would be notified pursuant to rule 116, and a contractor would be dispatched at that time to start clean up. The land owner would be notified, and all measures would be taken to protect his live-stock, as well as any wild animals.

All clean up would be carried out in an approved manner, and all necessary waste would be dealt with accordingly .

XI. SITE CHARACTERISTICS

A. There are several water wells within a one mile radius of this compressor station located. However, these wells are not serviceable. After checking with the residents in the area, and other industries, it was learned that these wells are old wells which will not pump water. The Otis water system now furnishes water to these residents, and they water their crops from irrigation through the Carlsbad irrigation district via the river water. Therefore, as the wells they have owned needed maintenance to keep them producing, they did not repair their equipment; thus- the wells are not in service. One domestic well was located at the intersection of Nymeyer and London roads. This well is outside the one mile radius of the Compressor station. It is located to the south of the compressor station site, and according to the State of NM Engineer's Office, the water does flow to the south east in direction. A water sample was obtained from this well and the results of the analytical testing is submitted with the application for a discharge plan.

This is not a disposal site. So we would not adversely effect any water, ground, or other environmental state with the disposal of waste.

(ALSO SEE SECTION 5)



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
 LG & E NATURAL GAS
 ATTN: ED SLOMAN
 927 W. SANGER
 HOBBS, NM 88240
 FAX TO: 505-393-0381

Receiving Date: 09/12/97
 Reporting Date: 09/16/97
 Project Number: 1031
 Project Name: PARDUE COMP. STA.
 Project Location: EDDY CO., NM

Sampling Date: 09/12/97
 Sample Type: GROUNDWATER
 Sample Condition: COOL, INTACT
 Sample Received By: AH
 Analyzed By: AH

LAB NUMBER	SAMPLE ID	Na (mg/L)	Ca (mg/L)	Mg (mg/L)	K (mg/L)	Conductivity (umhos/cm)	T-Alkalinity (mgCaCO3/L)
ANALYSIS DATE:		09/17/97	09/15/97	09/15/97	09/15/97	09/15/97	09/15/97
H3197-1	COMPOSITE	26	85	39	0.5	766	204
Quality Control		NR	NR	NR	NR	1429	NR
True Value QC		NR	NR	NR	NR	1413	NR
% Accuracy		NR	NR	NR	NR	101	NR
Relative Percent Difference		NR	NR	NR	NR	0.4	NR

METHODS:	SM3500-Ca-D	3500-Mg E	8049	120.1	310.1
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	Cl ⁻ (mg/L)	SO4 (mg/L)	CO3 (mg/L)	HCO3 (mg/L)	pH (s.u.)	TDS (mg/L)
ANALYSIS DATE:		09/15/97	09/15/97	09/15/97	09/15/97	09/15/97
H3197-1	COMPOSITE	40	164	0	249	7.03
Quality Control		484	99.7	NR	NR	7.04
True Value QC		500	100	NR	NR	7.00
% Accuracy		96.8	99.7	NR	NR	100
Relative Percent Difference		0	0.3	NR	NR	0.6

METHODS:	SM4500-Cl-B	375.4	310.1	310.1	150.1	160.1
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 Gayle A. Potter, Chemist

09/23/97
 Date

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 Reporting Date: 09/23/97
 Project Number: 1031
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 Project Location: EDDY CO., NM

Sampling Date: 09/12/97
 Sample Type: GROUNDWATER
 Sample Condition: COOL, INTACT
 Sample Received By: AH
 Analyzed By: GP

RCRA METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		09/20/97	09/20/97	09/22/97	09/20/97	09/20/97	09/20/97	09/20/97	09/20/97
H3197-1	COMPOSITE	0.002	<0.01	0.3	0.010	<0.01	0.03	<0.02	<0.01
Quality Control		0.052	4.01	20.5	2.005	0.98	2.06	0.0084	0.097
True Value QC		0.050	4.00	20.0	2.000	1.00	2.00	0.0100	0.100
% Recovery		104	100	103	101	98	103	84	97
Relative Percent Difference		17.9	0.6	0.8	2.7	2.7	1.2	7.2	3.6
METHODS: EPA 600/4-79-020		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2
METHODS:	SW-846	7060A	7760A	7080A	7130	7190	7420	7470A	7740

Bayle R. Patten
 Chemist

09/23/97
 Date

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 Project Location: EDDY CO., NM

Sampling Date: 09/12/97
 Sample Type: GROUNDWATER
 Sample Condition: COOL, INTACT
 Sample Received By: AH
 Analyzed By: BC

LAB NUMBER	SAMPLE ID	TPH (mg/L)	BENZENE (mg/L)	TOLUENE (mg/L)	ETHYL BENZENE (mg/L)	TOTAL XYLENES (mg/L)
ANALYSIS DATE:		09/12/97	09/15/97	09/15/97	09/15/97	09/15/97
H3197-1	COMPOSITE	<1.0	<0.002	<0.002	<0.002	<0.006
Quality Control		188	0.096	0.095	0.091	0.267
True Value QC		200	0.090	0.090	0.087	0.260
% Recovery		93.8	106	106	104	103
Relative Percent Difference		4.2	1.8	1.5	5.1	2.6

METHODS: TRPHC - EPA 600/7-79-020, 418.1; BTEX - EPA SW-846-8020

Burgess J. A. Cooke
 Burgess J. A. Cooke, Ph. D.

9/16/97
 Date

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