

GW - 313

**GENERAL  
CORRESPONDENCE**

**YEAR(S):**

2006 - 1999

**Price, Wayne, EMNRD**

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**From:** Price, Wayne, EMNRD  
**Sent:** Thursday, December 21, 2006 12:59 PM  
**To:** 'tsieh@shorehamoilandgas.com'  
**Cc:** Bratcher, Mike, EMNRD  
**Subject:** North White Ranch Comp. St near Roswell NM Sec 7- TS-8S-R29E

Dear Tom:

Our records indicate that your permit #GW 313 has expired. Please let us know the status of this facility. If it is closed please provide some photos and written verification there is no significant contamination that would result in water being contaminated.

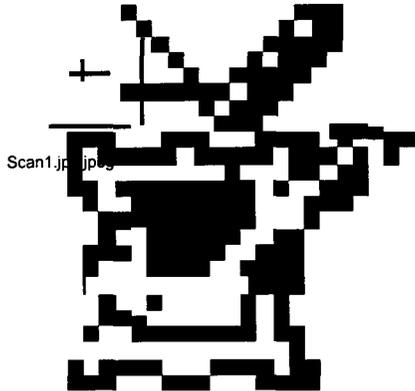
Price, Wayne

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**From:** Price, Wayne  
**Sent:** Tuesday, February 27, 2001 9:25 AM  
**To:** Stubblefield, Mike  
**Subject:** Shoreham Pipeline GW-313 7-8s-29e

Dear Mike:

Would you please follow-up to see if they are actually making any progress on the remediation. Enclosed is a letter for reference.



called Tom Siem  
THEY ARE GETTING  
A CONTRACTOR TO  
CLEAN-UP!

THEY WILL CALL THE  
ARTESIA DISTRICT!

J

To: MIKE STOBBLEFIELD FAX 748-9720  
COULD YOU FOLLOW-UP ON THIS CLEAN-UP!

**Shoreham Pipeline Company**

Wayne Price JD

December 28, 2000

JAN 2 2001

CONSERVATION DIVISION

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

Re: Discharge Plan GW-313  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico

Dear Mr. Price:

Reference is made to your letter of November 18, 2000. We intend to till the soil with rototillers surrounding the compressor station and put fertilizer in this plowed area to return the soil back to original condition.

We believe because the soil was compacted by heavy machinery when the unit was installed that no migration of oil into soil has occurred.

The unit was towed back on April 1, 2000 because it was not running properly. We have had discussions with other companies to replace this unit, but at the present we do not have a unit to move into this location until this site is cleaned up.

Very truly yours,



Thomas W. Sieh  
President

cc: Bud Holloway  
Operations Manager

505-370-6888

CALLED 1/5/00

D:\mmem-discharge-122800



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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

November 18, 2000

**Lori Wrotenbery**  
Director  
Oil Conservation Division

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 4768**

Mr. Tom Sieh  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

*TSIEH@SHOREHAMOILANDGAS.COM*

RE: Discharge Plan GW-313  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico

Dear Mr. Sieh:

You are hereby ordered to submit a Storm Water Plan and Site Remediation Plan pursuant to Discharge Plan Approval Conditions items 17. And 18. Respectively by December 31, 2000. Please note failure to abide by the discharge plans conditions may result in a notice of violation being issued for non-compliance.

If you have any questions please do not hesitate to call me at 505-827-7155.

Sincerely;

Wayne Price-Pet. Engr. Spec.

Cc: OCD Artesia Office



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

April 19, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 4676**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

RE: Discharge Plan GW-313  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico

Dear Mr. Brehm:

The groundwater discharge plan application for the Shoreham Pipeline Company GW-313 operated by Shoreham Pipeline Company located in the NW/4 of Section 07, Township 08 South, Range 29 East, NMPM, Chaves County, New Mexico is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within ten working days of receipt of this letter.**

The discharge plan application was submitted on September 23, 1999 with supplemental information received by OCD on December 31, 1999. The discharge plan application, including attachments, was submitted pursuant to Sections 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is approved pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Shoreham Pipeline Company of liability should operations result in pollution of surface or ground waters, or the environment.

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

Mr. Roy M. Brehm

04/19/00

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., Shoreham Pipeline Company is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire April 19, 2005** and an application for renewal should be submitted in ample time before that date. Pursuant to 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 plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the Shoreham Pipeline Company is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus an initial flat fee. There is no flat fee for compressor stations with less than 1000 horsepower.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief  
RCA/lwp  
Attachments-1

xc: OCD Artesia Office

**ATTACHMENT TO THE DISCHARGE PLAN GW-313 APPROVAL  
Shoreham Pipeline Company - North White Ranch Compressor St.  
DISCHARGE PLAN APPROVAL CONDITIONS  
April 19, 2000**

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by OCD.
2. Commitments: Shoreham Pipeline Company will abide by all commitments submitted in the discharge plan application dated October 26, 1999 and these conditions for approval.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. 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 must also be stored on an impermeable pad with curbing.
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 other containers 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 must be tested to demonstrate their mechanical integrity no later than June 30, 2000 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating

pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by July 30, 2000.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June 30, 2000 and every 5 years, from tested date, thereafter. 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. The test results will be submitted to OCD by July 30, 2000.
10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily 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. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. 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.

16. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
17. Storm Water Plan: Shoreham Pipeline Company will submit a storm water run-off plan for OCD approval by June 30, 2000.
18. Site Remediation : Shoreham Pipeline Company commits to investigating and remediating contaminated soil from past operations.
19. Conditions accepted by: Shoreham Pipeline Company by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Shoreham Pipeline Company** 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.

**Shoreham Pipeline Company**

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

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

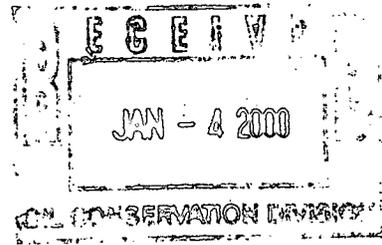
Title: \_\_\_\_\_

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

# Shoreham Pipeline Company

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December 31, 1999



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

Dear Mr. Price:

This is in response to your letter of September 29, 1999 (copy enclosed). As highlighted in Shoreham Pipeline Company's proposed Discharge Plan for Shoreham's North White Ranch Compressor, and as mentioned in your letter, Shoreham had previously remediated the pit before the subsequent inspection and submission of this proposed Discharge Plan. A description of this remediation and copies of the soil and material analysis for the removed materials was also included in this proposed Discharge Plan.

With respect to a plan of clean up for the other "discharged wastes", such is also included in the proposed Discharge Plan previously submitted. If something is needed differently, please advise. With respect to landfarming, Shoreham has elected not to do any landfarming. All materials that need to be removed/cleaned will be removed for disposal to the properly approved site.

Sincerely,

Roy M. Brehm, Jr.  
Director - Marketing &  
Pipeline Operations

Enclosure



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

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

September 29, 1999

**CERTIFIED MAIL  
RETURN RECEIPT No. Z 274 520 510**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

**RE: Clean-up Work Plan for the  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico**

Dear Mr. Brehm:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Shoreham Pipeline Company's letter dated July 8, 1999 concerning the submitted work plan for the above captioned site. The NMOCD has the following comments and requires the following information in order to evaluate your work plan.

1. Previous NMOCD field inspections (copy of pictures enclosed) revealed there were two unlined pits on site. One located on the south side of the site in which Shoreham Pipeline Company removed solid waste and hauled off-site. Shoreham's correspondence of July 8, 1999 item #2. indicates this pit was located on the north side of the property. The other pit observed by NMOCD was located on the north side of the site near the compressor and lube oil tanks. This small pit had an active discharge of fluids going into the pit. Both of these pits were covered before the site inspection on March 3, 1999.

Please clarify the issue of the solids pit location and submit pit closure plans to NMOCD for approval. Please note a copy of the NMOCD's pit closure and leak & spill guidelines may be obtained from the Internet at <http://www.emnrd.state.nm.us/ocd/>. The plan shall identify whether any contaminated soils or waste would be classified as EPA RCRA hazardous waste.

Mr. Roy M. Brehm  
September 29, 1999  
Page 2

2. NMOCD inspections revealed that Shoreham had discharged waste onto the ground in several different areas of the site, i.e. compressor area, de-hydration area, glycol tank area, water tank area including a run-off ditch, and others.

Please submit to NMOCD for approval a work plan to investigate and/or remediate any area which releases of water contaminates had occurred. The plan shall identify whether any contaminated soils or waste would be classified as EPA RCRA hazardous waste.

3. Please note if Shoreham plans on land farming on-site please submit a more detail plan for NMOCD approval. Please include in the plan how the vadose zone under the landfarm will be monitored, include time schedules, plot plans, run-on/run-off protection, chemicals of concern, methods of remediation, final clean-up standards, and final disposition of the waste.

**Please provide this information to the NMOCD by November 1, 1999.** If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,



Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

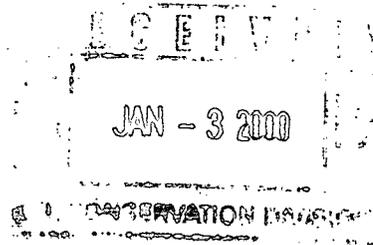
cc: OCD Artesia Office

attachments- copies of photos

# Shoreham Pipeline Company

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December 31, 1999



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

Dear Mr. Price:

In response to your letter of September 28, 1999 (copy enclosed), please find a Topographic Map marked to depict the location of Shoreham Pipeline Company's North White Ranch Compressor Station and a one mile radius from this location. This station is located in the Southeast Corner of the Northeast Quarter of the Northwest Quarter of Section 7, Township 8 South, Range 29 East of Chaves County, New Mexico.

With respect to "watercourses" within this one mile radius, the only one is the Sand Lake Lake Bed located to the northeast of this site. The prairie pot holes and playa lakes mentioned in your letter are located in the Sand Lake Lake Bed.

With respect to the depth to ground water in feet below ground level and the total dissolved solids concentration for the closest water well (four to five miles away), the ranch on which this well is located has recently been sold and they now have new personnel working on this ranch. Those individuals contacted had no idea of this data or where to find it.

I apologize for not getting this information to you sooner, but I have had trouble getting in touch with these people, although this delayed contact was not productive.

Sincerely,

Roy M. Brehm, Jr.  
Director - Marketing &  
Pipeline Operations

Enclosures



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

September 28, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT No. Z 274 520 509**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

**RE: Discharge Plan Deficiencies  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico**

Dear Mr. Brehm:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Shoreham Pipeline Company's letter and discharge plan application dated September 23, 1999 for the above captioned facility. In order for the NMOCD to continue the permitting process and issue public notice as required in the Water Quality Control Commission regulations 20 NMAC 6.2.3108 the following information is required:

1. Please provide the depth to ground water in feet below ground level and the total dissolved solids concentration for the closest water well on record.
2. Please provide a topographic map marked to depict the location of the site and identify any watercourses within one mile of the site. The definition of water course is defined as any lake bed, or gully, draw, stream bed, wash, arroyo, or natural or human-made channel through which water flows or has flowed. Please note that prairie pot holes and playa lakes meet this definition.
3. Please provide the quarter/quarter section of the legal description.

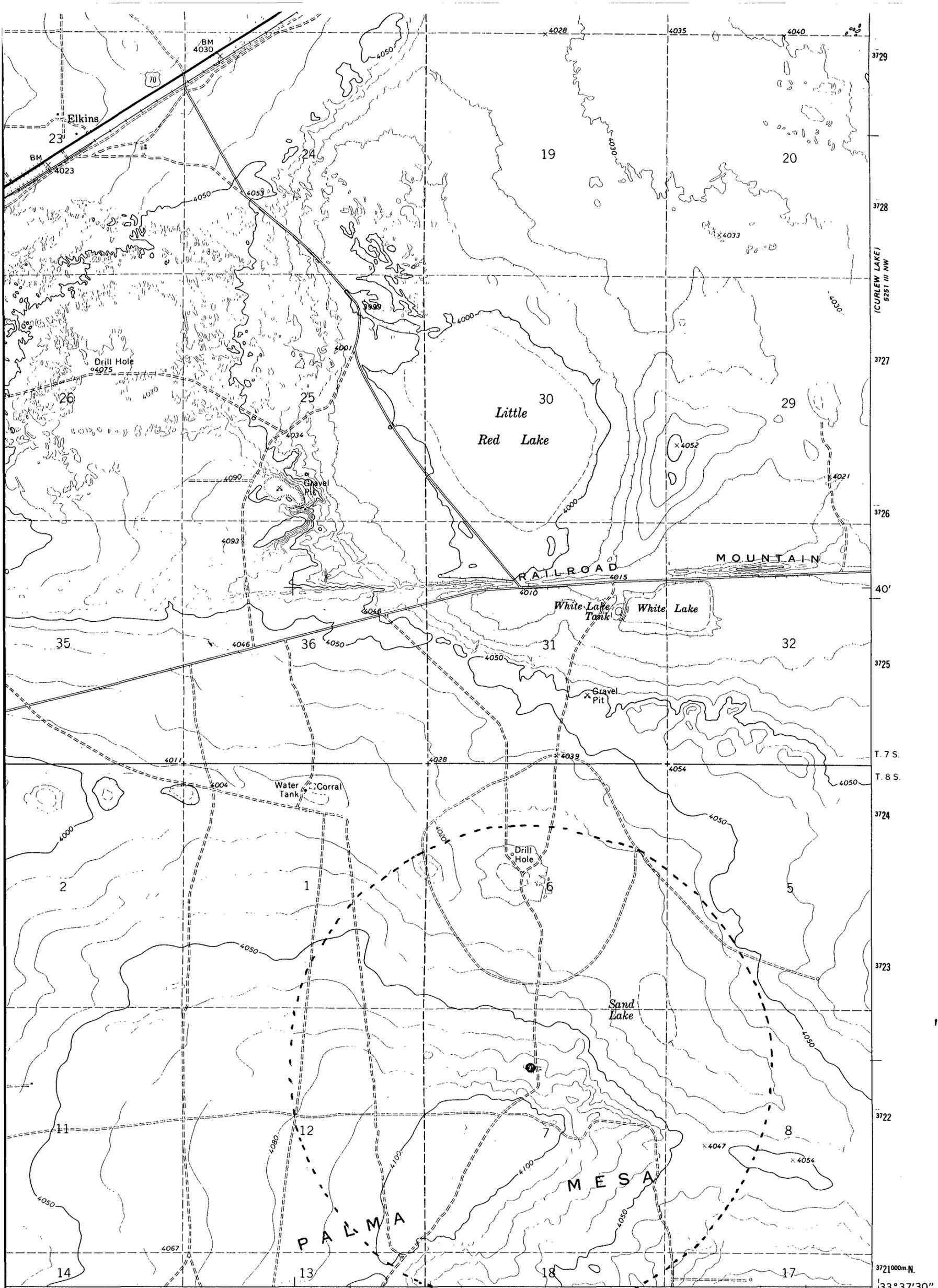
Please provide this information by October 15, 1999. If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Wayne Price-Pet".

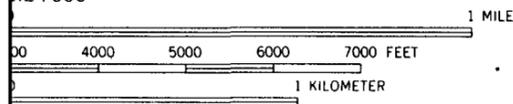
Wayne Price-Pet, Engr. Spec.  
Environmental Bureau

cc: OCD Artesia Office



3729  
3728  
3727  
3726  
40'  
3725  
T. 7 S.  
T. 8 S.  
3724  
3723  
3722  
3721000m.N.  
33°37'30"

RDINE LAKE) 5151 II SE  
24 000  
1:588 2'30" 589 R. 28 E. R. 29 E. 590 592000m.E. 104°00'



VERTICAL DATUM OF 1929

NATIONAL MAP ACCURACY STANDARDS  
COLORADO 80225, OR RESTON, VIRGINIA 22092  
AND SYMBOLS IS AVAILABLE ON REQUEST



QUADRANGLE LOCATION

**Gaylord Stickle Co & Assoc. Inc.**  
Ph: 713-529-8471  
Fax: 713-529-2625  
WEB Address-www.GStickle.com

**ROAD CLASSIFICATION**  
Heavy-duty —————  
Light-duty - - - - -  
Unimproved dirt =====

U.S. Route

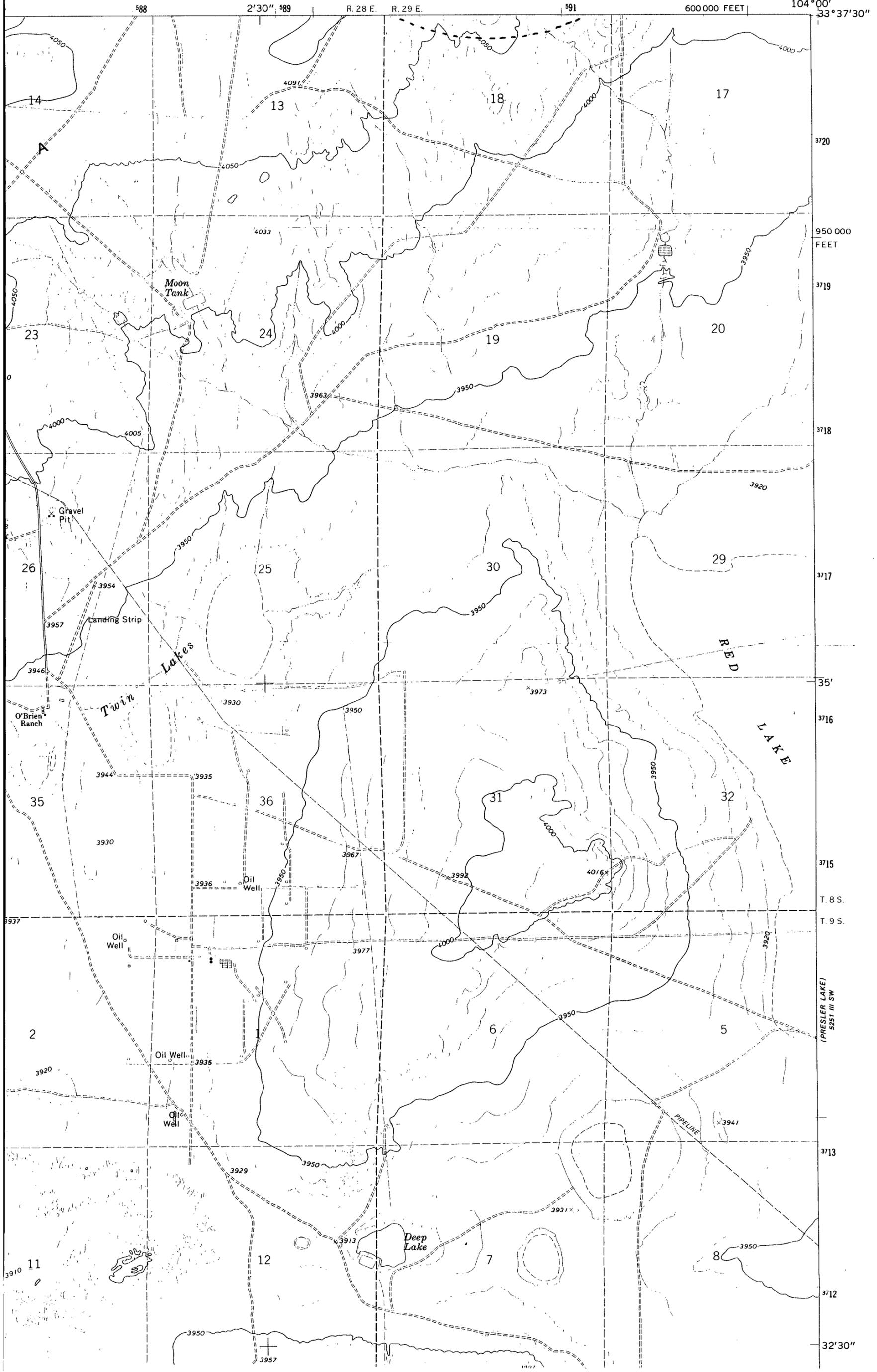
**ELKINS, N. MEX.**  
N3337.5—W10400/7.5

1967  
PHOTOREVISED 1982  
DMA 5151 II NE-SERIES V881

(PRESLER LAKE)  
5251 III SW

SARDINE LAKE QUADRANGLE  
NEW MEXICO-CHAVES CO.  
7.5 MINUTE SERIES (TOPOGRAPHIC)

5251 III NW  
(CURLW LAKE)

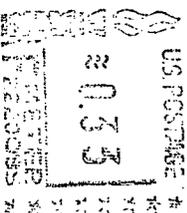
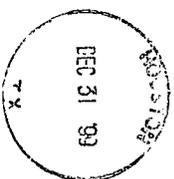


(PRESLER LAKE)  
5251 III SW



**Shoreham Pipeline Company**

333 Clay Street, Suite 4010  
Houston, Texas 77002



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

47585-8122 47





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

OIL CONSERVATION DIVISION  
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Sincerely Yours,



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Environmental Bureau

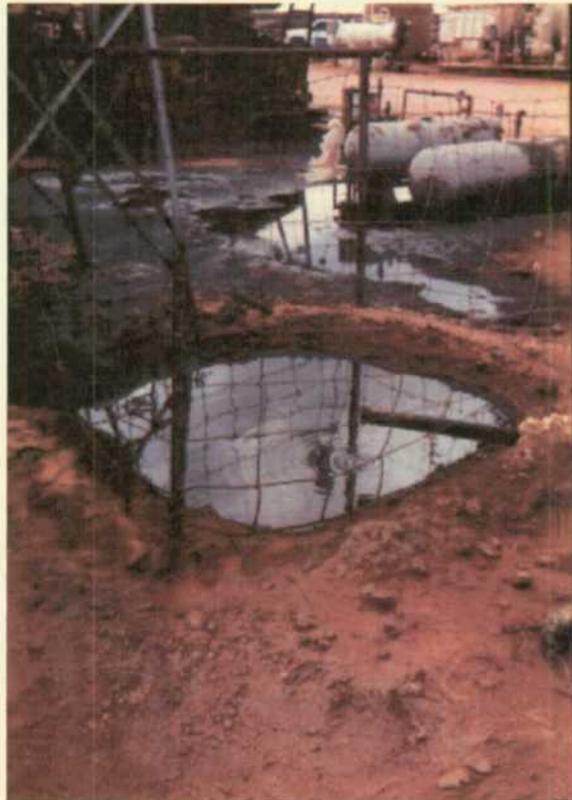
cc: OCD Artesia Office

attachments- copies of photos

Shoreham Pipeline North White Ranch Compressor St  
Sec 7-Ts8 s-R29e

Photos #1,2&3 By: Gary Williams-OCD

#1 Small pit north of compressor active discharge



#2 photo  
Old solids pit located south side of site.



Photo # 3  
Leaks & spills around compressor area



Photos by: W Price -OCD  
March 3, 1999  
Looking East -Ditch



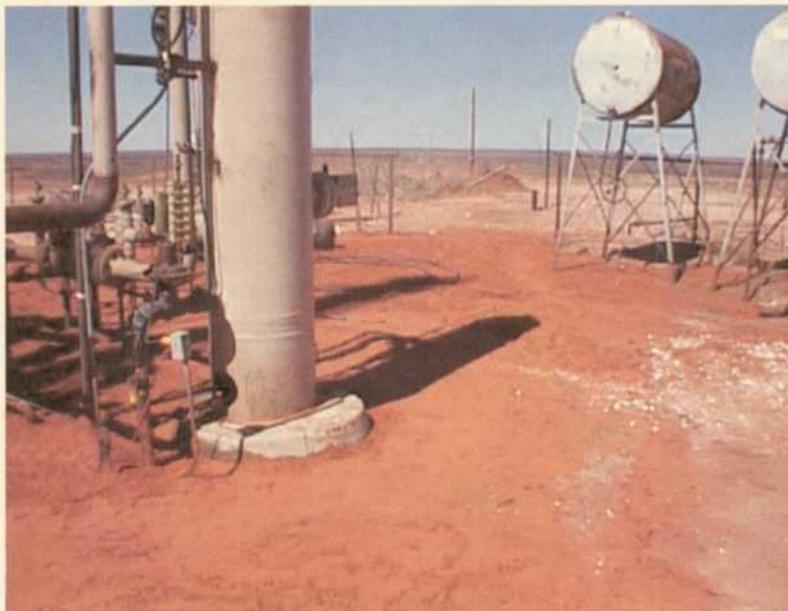
Photo By: Wayne Price  
March 3, 1999

Water tank where fluids are discharged to ditch.  
Picture show soil erosion from valve discharge area.



Photo By: Wayne Price  
March 3, 1999

Area north & east of compressor where leaks & spills have been covered with sand.  
Sampled soil 6" below surface found gross contamination, checked with PID results = 1077 ppm





NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

September 28, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT No. Z 274 520 509**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

**RE: Discharge Plan Deficiencies  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico**

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Sincerely Yours,

Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

cc: OCD Artesia Office

**ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH**

I hereby acknowledge receipt of check No. 017925 dated 9/23/99  
or cash received on \_\_\_\_\_ in the amount of \$ 50<sup>00</sup>  
from SHOREHAM PIPELINE COMPANY

for NORTH WHITE RANCH COMPRESSOR 5 t GW-313

Submitted by: (Facility Name) WAYNE PRICE Date: (DP No.) 9/28/99

Submitted to ASD by: Wayne Price Date: 7/25/99

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

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

Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

**SHOREHAM PIPELINE COMPANY**  
PH. 713-654-7033  
333 CLAY STREET, SUITE 4010  
HOUSTON, TX 77002

COMPASS BANK  
BUNKER HILL  
9801 KATY FRWY.  
HOUSTON, TX 77024

35-1054 / 1130

**017925**

THIS CHECK VOID UNLESS PRESENTED FOR  
PAYMENT WITHIN 90 DAYS OF ISSUE DATE

CHECK DATE	CHECK NUMBER	AMOUNT
09/23/1999	017925	*****50.00

\*\*\*\*\*50\*DOLLARS AND \*00\* CENTS

TO  
THE  
ORDER  
OF

NMED WATER QUALITY MGMT, NM  
ENERGY MINERALS&NAT RES DEPT  
2040 SOUTH PACHECO STREET  
SANTA FE NM 87505-5472

*Shoreham*

sw-313

⑈017925⑈ ⑆113010547⑆ ⑈001⑈0488⑈

SHOREHAM PIPELINE COMPANY

DATE	INVOICE NUMBER	DESCRIPTION	AMOUNT	DISCOUNT OR DEDUCTION	NET AMOUNT
09/23/1999	092399	WQCC DISCHARGE PLAN FILING FEE Shoreham Pipeline Company's North White Ranch Compressor Station Section 7, Township 8 South, Range 29 East Chaves County, New Mexico	50.00	.00	50.00
CHECK DATE 09/23/1999	CHECK NUMBER 017925	REF. NO. 01952	50.00		

GW-313

# Shoreham Pipeline Company

---

September 23, 1999

Mr. Roger Anderson  
New Mexico Energy, Minerals  
& Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505-5472



Dear Mr. Anderson:

As requested in your letter of April 23, 1999, enclosed please find three (3) copies of Shoreham Pipeline Company's proposed Discharge Plan for Shoreham's North White Ranch Compressor Station located in Section 7, Township 8 South, Range 29 East of Chaves County, New Mexico. We have also enclosed Shoreham's check in the amount of \$50.00 for the Discharge Plan Filing Fee.

Thank you for the detailed guideline which you provided to assist in the preparation of this plan. We await your comments and response to such. If we may provide any additional information or may be of further service on any matter, please do not hesitate to call on me.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy M. Brehm, Jr." with a stylized flourish at the end.

Roy M. Brehm, Jr.  
Director - Marketing &  
Pipeline Operations

Enclosures

# Shoreham Pipeline Company

---

July 8, 1999

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

Re: Shoreham Pipeline Company North White Ranch Compressor Site  
Section 7, Township 8 South, Range 29 East, Chaves County, New Mexico

Dear Mr. Price:

We are in receipt of your letter of June 9, 1999 (copy attached). Thank you for providing us with a copy of this letter which included the list of discrepancies noted during the site inspection of March 3, 1999. As discussed during this inspection, and as outlined below, Shoreham has taken and will take the following actions as a site inspection work plan to correct these deficiencies and to cause this site to remain in compliance.

1. The requested Discharge Plan is being prepared and will be filed timely.
2. The "pit" on the north boundary of this site has been cleaned and filed. The non-exempt waste materials (compressor oil filters, empty drums, non-exempt contaminated soil, etc) were removed and transported initially to the Gandy-Marley Landfarm. This soil was tested (copy of test report enclosed) and these materials were moved to the Controlled Recovery, Inc. facility for permanent disposal.
3. The suppliers of the equipment at this site have been instructed to repair and eliminate any leak source points on all equipment at this site. Shoreham's operators have also been instructed to perform inspection, cleaning, and repair if they are able to do such, to each new leak source point.
4. Empty containers, used oil filters, etc, will not be stored at this site. All such containers will be removed for proper disposal.
5. A containment wall will be constructed around each piece of equipment on this site, as well as around each storage area where chemicals, oil, etc. is stored. This inside of each of these containment areas will be lined with heavy grade plastic to insure that any spill is caught and contained for proper disposal.
6. All "contaminated soil" from prior leaks/spills will be remediated by on site landfarming and/or aeration. This landfarming site shall also be properly contained.
7. The fence previously around this facility will be restored and kept in proper repair.
8. Any and all run-off areas will be repaired and removed so that no contaminated run-off is able to leave this site.

Mr. Wayne Price  
July 8, 1999  
Page Two

I believe that these actions will address each of the issues we discussed in the field and as outlined in your letter of June 9, 1999, and will prevent a further occurrence. If you are aware of any other action which you may suggest for inclusion into this plan, please do not hesitate to contact me so that it may also be incorporated. Thank you again for your continued assistance and if we may be of further service, please do not hesitate to call on me.

Sincerely,



Roy M. Brehm, Jr.  
Director - Marketing &  
Pipeline Operations

Attachment/Enclosures

copy:

Mr. E. L. Gonzales  
Energy, Minerals and Natural  
Resources Department  
811 South First Street  
Artesia, New Mexico 88210

Mr. Ron Erwin  
Mr. Bud Holloway  
Mr. Jimmy Dawson



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

**OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87508  
(505) 827-7131**

June 9, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT No. Z 357 870 134**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

**RE: North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico**

Dear Mr. Brehm:

On March 3, 1999 The New Mexico Oil Conservation Division (NMOCD) performed an on-site inspection at the above captioned facility and as a result of the inspection (field report enclosed) determined that Shoreham Pipeline Company (SPC) was required to file for a discharge plan under the provisions of the Water Quality Control Commission (WQCC) Regulations and henceforth notified SPC on April 23, 1999.

The inspection revealed discharges of water contaminants onto the ground, covered leaks, spills, pits, and RCRA non-exempt solid waste disposal without OCD approval. Therefore in addition to filing of the above mentioned discharge plan, SPC shall submit to the NMOCD Santa Fe office and a copy to the NMOCD Artesia office a site investigation work plan describing how SPC will address and delineate the on-site contamination. This plan shall be submitted by July 15, 1999 for NMOCD approval.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Wayne Price".

Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

cc: OCD Artesia Office



# NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury  
CABINET SECRETARY

Oil Conservation Div.  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

## Field Inspection Report

**Time:** 10am-12 noon  
**Date:** March 3, 1999

**Re: Site/Location:** North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico

**Subject:** Site Inspection

**Originating Party:** Wayne Price- V. Barton, E. Gonzales, D. Williams- NMOCD

**Other Parties:** Roy Brehm-Shorcham PL, and Contract Pumper (Bud Halloway)

### Findings:

A small gas gathering compressor station with (gas condensate and water) de-hydration and sweetening processes.

Previous inspections by OCD inspectors revealed unlined pits, active discharges, and numerous leaks and spills. Current inspection revealed fresh sand has been spread over these previous leaks and spills, and all pits had been covered.

OCD collected a soil sample just NE of the main compressor where previous leak & spills had been covered with fresh sand. A field test was conducted using a PID to check for volatile organics. The results were 1077 ppm of BTEX which is 10 times the OCD guideline allowable.

The inspection revealed Shoreham had removed RCRA type non-exempt waste (compressor oil filters, empty drums, non-exempt contaminated soil, etc) from an on-site unlined pit and sent this waste to Gandy-Marley landfarm. There was no sampling or testing to determine if this waste was RCRA hazardous.

There were tanks and drums of various chemical treating and lubricating fluids, condensate, etc with no containment. The compressor was leaking used oils onto the ground. There was evidence of a point source discharge from the condensate/water tank in which fluids were being drained off into a graded ditch which leads off-site to a small playa lake located approximately 1/4-1/2 mile north of the facility.

**Conclusion/Agreements:** OCD instructed Shoreham to call Gandy-Marly Landfarm and have waste isolated for testing. OCD will evaluate site to determine if a Discharge Plan is required and will notify Shoreham of clean-up requirements.

**Photos Taken:** Yes- Filed O/Envr....Pic Cam album (Shorcham) 3/3/99

**CC:** OCD Artesia  
Martyne Kieling-OCD

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

Receiving Date: 03/05/99  
Sample Type: Soil  
Project Name: North Compressor Station  
Project Location: Nona Given  
Field Code: Composite Soil

Analysis Date: 03/10/99  
Sampling Date: 03/03/99  
Sample Condition: Intact

TCLP SEMIVOLATILE ORGANICS (mg/L)	REPORTING LIMIT	ELT# 17170	RPD	%EA	%IA
Pyridine	0.05	ND	1	43	95
1,4-Dichlorobenzene	0.05	ND	4	42	90
o-Cresol	0.05	ND	2	62	109
Nitrobenzene	0.05	ND	1	60	92
m,p -Cresol	0.05	ND	2	54	105
Hexachloroethane	0.05	ND	3	39	96
Hexachlorobutadiene	0.05	ND	3	41	95
2,4,6-Trichlorophenol	0.05	ND	3	75	98
2,4,5-Trichlorophenol	0.05	ND	3	78	100
2,4-Dinitrotoluene	0.05	ND	3	76	110
Hexachlorobenzene	0.05	ND	3	64	94
Pentachlorophenol	0.05	ND	4	72	108
2,4-D	0.05	ND	2	18	105
2,4,5-TP	0.05	ND	9	48	112

ND= NOT DETECTED, < REPORTING LIMIT  
SYSTEM MONITORING COMPOUNDS

	% Recovery
2-Fluorophenol	37
Phenol-d6	25
Nitrobenzene-d5	66
2-Fluorobiphenyl	60
2,4,6-Tribromophenol	77
Terphenyl-d14	68

Method: SW 846-8270C.1311

Raland K. Turtle  
Raland K. Turtle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

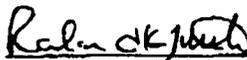
RECEIVING DATE: 03/05/99  
SAMPLE TYPE: Soil  
PROJECT : North Compressor Station  
FIELD CODE: Composite Soil  
PROJECT LOCATION: None Given

ANALYSIS DATE: 03/12/99  
SAMPLING DATE: 03/03/99  
SAMPLE CONDITION: Intact

TCLP VOLATILES (mg/L)	SAMPLE 17170	PQL	BLANK	%EA	%DEV
1,1-Dichloroethene	ND	0.001	ND	99	-2.0
2-Butanone	ND	0.010	ND		-10.4
Chloroform	ND	0.001	ND		1.9
Benzene	ND	0.001	ND	95	1.6
1,2-Dichloroethane	ND	0.001	ND		-3.8
Vinyl Chloride	ND	0.001	ND		4.6
Carbon Tetrachloride	ND	0.001	ND		7.7
Trichloroethene	ND	0.001	ND	95	0.8
Tetrachloroethene	ND	0.001	ND		-1.2
Chlorobenzene	ND	0.001	ND	89	3.8
1,4-Dichlorobenzene	ND	0.001	ND		7.7

SYSTEM MONITORING COMPOUNDS	% RECOVERY
dibromofluoromethane	95
toluene-d8	96
4-bromofluorobenzene	97

ND = < PQL  
PQL = PRACTICAL QUANTITATION LIMIT  
Methods: EPA SW 846-8240, 1311

  
Raland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

Receiving Date: 03/05/99  
Sample Type: Soil  
Project: North Compressor Station  
Project Location: None Given

Analysis Date: see below  
Sampling Date: 03/03/99  
Sample Condition: Intact

### TCLP METALS (mg/L)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5.00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
17170	Composite Soil	0.01	<0.10	<0.50	0.014	<0.03	<0.010	0.14	<0.100
	REPORTING LIMIT	0.01	0.10	0.50	0.005	0.03	0.010	0.10	0.100
	% IA	100	103	108	102	104	98	105	97
	% EA	105	102	98	95	85	100	93	89

METHODS: EPA SW 846-1311, 7760, 7080, 7130, 7190, 7420, SW-846 Revision 3, 6010B, 7470A

Raland K. Tuttle  
Raland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

RECEIVING DATE: 03/05/99  
SAMPLE TYPE: Soil  
PROJECT #: None Given  
PROJECT NAME: North Compressor Station  
PROJECT LOCATION: None Given

ANALYSIS DATE: 03/05/99  
SAMPLING DATE: 03/03/99  
SAMPLE CONDITION: Intact

ELT#	FIELD CODE	TPH (mg/kg)
17170	Composite Soil	7475

BLANK	<10
% INSTRUMENT ACCURACY	100
% EXTRACTION ACCURACY	110

Methods: EPA 418.1

Raland K Tuttle  
Raland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

Receiving Date: 03/05/99  
Sample Type: Soil  
Project Name: North Compressor Station  
Project Location: None Given

Analysis Date: see below  
Sampling Date: 03/03/99  
Sample Condition: Intact

ELT#	Field Code	REACTIVITY		CORROSIVITY	IGNITABILITY
		H2S (ppm)	CN- (ppm)	(s.u.)	
17170	Composite Soil	NON-REACTIVE <10.0	NON-CORROSIVE <2.5	Non Corrosive 9.66	>140 deg. F
	RPD	0	0	0	0
	% PRECISION				
	% INSTRUMENT ACCURACY			100	
	ANALYSIS DATE	3/12/99	3/12/99	3/08/99	3/18/99

METHODS: EPA SW-846-2.1.3.2.1,2,2.1.1

Raland K Tuttle  
Raland K. Tuttle

3-22-99  
Date





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

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87506  
(505) 827-7131

June 9, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT No. Z 357 870 134**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

**RE: North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico**

Dear Mr. Brehm:

On March 3, 1999 The New Mexico Oil Conservation Division (NMOCD) performed an on-site inspection at the above captioned facility and as a result of the inspection (field report enclosed) determined that Shoreham Pipeline Company (SPC) was required to file for a discharge plan under the provisions of the Water Quality Control Commission (WQCC) Regulations and henceforth notified SPC on April 23, 1999.

The inspection revealed discharges of water contaminants onto the ground, covered leaks, spills, pits, and RCRA non-exempt solid waste disposal without OCD approval. Therefore in addition to filing of the above mentioned discharge plan, SPC shall submit to the NMOCD Santa Fe office and a copy to the NMOCD Artesia office a site investigation work plan describing how SPC will address and delineate the on-site contamination. This plan shall be submitted by July 15, 1999 for NMOCD approval.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Wayne Price-Pet".

Wayne Price-Pet. Engr. Spec.  
Environmental Bureau

cc: OCD Artesia Office

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

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

RECEIVED

JUN 3 1999

Environmental Bureau  
Oil Conservation Division

Originated 8/8

Submit Original  
Plus 1 Copy  
to appropriate  
District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <b>Shoreham Pipeline</b>
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <b>N. Compressor Site</b>
2. Management Facility Destination <b>Controlled Recovery, Inc.</b>	6. Transporter <b>Gandy</b>
3. Address of Facility Operator <b>P. O. Box 388, Hobbs</b>	8. State <b>NM</b>
7. Location of Material (Street Address or ULSTR) <b>333 Clay Street, Suite 4010, Houston, TX 77002</b>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.  All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

**Oil & Chemical Drums, used compressor filters.  
I am enclosing analytical on the above items, as well as, the Certificate of waste and chain of custody. This was clean-up.**

05-004

Estimated Volume 18 yds. cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE: *Kath Harper* TITLE: Bookkeeper DATE: 5-26-99  
Waste Management Facility Authorized Agent  
TYPE OR PRINT NAME: Kath Harper TELEPHONE NO. 505-393-1079

(This space for State Use)

APPROVED BY: *Anna Williams* TITLE: Environmental Engineer DATE: 6-1-99  
APPROVED BY: *Monty J. Shelby* TITLE: Environmental Geologist DATE: 6-3-99

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  
**RECEIVED**  
 Oil Conservation Division  
 2040 South Pacheco Street  
 Santa Fe, New Mexico 87505  
 (505) 827-7131  
 Environmental Bureau  
 Oil Conservation Division

FORM C-10  
 Originated 8/8/  
 Submit Original  
 Plus 1 Copy  
 to appropriate  
 District Office

APR 2 1999

**REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE**

1. RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>Shoreham Pipeline</u>
Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	5. Originating Site <u>North Compressor Station</u>
2. Management Facility Destination <u>SUNDANCE SERVICES INC.</u>	6. Transporter <u>Gandy</u>
3. Address of Facility Operator <u>P.O. BOX 1737 Eunice NM 88231</u>	8. State <u>NEW MEXICO</u>
7. Location of Material (Street Address or ULSTR) <u>Section 7 Township 8 South Range 29 East</u>	
9. Circle One: A. All requests for approval to accept oilfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job. (B) All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.	
All transporters must certify the wastes delivered are only those consigned for transport.	

**BRIEF DESCRIPTION OF MATERIAL:**

The following analytical results are from Shoreham Pipeline's North compressor Station. This waste was generated by cleaning up on this compressor site and a pit located on this site. This material was hauled to Gandy Disposal and can not be landfarmed by this facility. The generator now would like to move this material to our facility for disposal. All dirt, filters, and barrels will transported to our facility upon OCD approval. I have included a certificate of waste status and chain of custody on the above mention material. Sundance would like to request approval for accept this material into our Parabo disposal.

Estimated Volume 18 yards cy Known Volume (to be entered by the operator at the end of the haul) \_\_\_\_\_ cy

SIGNATURE: Donna L. Roach TITLE: OFFICE MGR DATE: \_\_\_\_\_  
Waste Management Facility Authorized Agent  
 TYPE OR PRINT NAME: DONNA L. ROACH TELEPHONE NO. 505-394-2511

(This space for State Use)

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

APPROVED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_ DATE: \_\_\_\_\_

**DENIED**

**Shoreham Pipeline Company**

---

April 20, 1999

Ms. Donna Roach  
Sundance Services Inc.

Dear Ms. Roach:

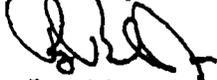
In early March 1999, Shoreham Pipeline Company was ordered to clean a compressor site location and "pit" located at Shoreham's North Compressor Station in Section 7, Township 8 South, Range 29 East of Chaves County, New Mexico by the New Mexico Oil Conservation Commission. To complete this work, Shoreham did the following:

1. Scraped a small amount of dirt from around the compressor for removal and disposal.
2. Spread new dirt around the compressor.
3. Dug the soiled dirt from the bottom of the "pit" for removal and disposal.
4. Removed the "oil and chemical drums" and used compressor filters from the pit for disposal.
5. Filled the pit.

All items removed for disposal were sent to the Gandy Disposal Site located in Chaves County, New Mexico on March 5, 1999. A copy of the Waste Transmittal Sheet for this movement is enclosed. In that the filters and dirt were transported in the same truck, we were told by the Oil Conservation Commission, that we would have to have the dirt sampled to insure that the filters had not contaminated the dirt. This was done with the results being attached with this letter also. This report indicates that we did not contaminate the dirt.

We have now been notified by Mr. Larry Gandy that he can accept and dispose of the dirt, but not the filters and barrels, which need to be sent to your facility. To accomplish such, I have completed and enclosed the Certificate of Waste Status Form you supplied. Hopefully this letter and the enclosed Certificate will supply the data which you need. As to quantity to be transported, please contact Mr. Larry Gandy as I am unsure as to the exact amount, although I do not remember it to be a lot. Thank you for your assistance and attention to this matter. If we may be of further service or provide any additional information, please do not hesitate to call on me.

Sincerely,



Roy M. Brehm, Jr.  
Director - Marketing & Pipeline Operations

Enclosures

cc: Mr. Larry Gandy  
Mr. Ron Erwin

APR-19-88 MON 10:11

SUNDANCE SERVICES INC

FAX NO. 5053942590

P.02

**CERTIFICATE OF WASTE STATUS**

**NON-EXEMPT WASTE MATERIAL**

CURRENT LOCATION: GANDY DISPOSAL SITE,  
CHALES COUNTY, NEW MEXICO

ORIGINATING LOCATION: CAME FROM SOURCE DEPICTED BELOW

SOURCE: SHOREHAM PIPELINE COMPANY'S NORTH COMPRESSOR SITE  
LOCATED IN SECTION 7, TOWNSHIP 8 SOUTH RANGE 29 EAST,  
CHALES COUNTY, NEW MEXICO

DISPOSAL LOCATION: SUNDANCE SERVICES INC.

As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, Section 261.3.

I, the undersigned as the agent for SHOREHAM PIPELINE COMPANY concur with the status of the waste from the subject site.

Name ROY M. BREHM, JR.  
Title/Agency DIRECTOR - MARKETING & PIPELINE OPERATIONS  
Address 333 CLAY STREET, SUITE 4010  
HOUSTON, TEXAS 77002  
Signature   
Date APRIL 20, 1999

16 - 18 yds



# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

RECEIVING DATE: 03/05/99  
SAMPLE TYPE: Soil  
PROJECT #: None Given  
PROJECT NAME: North Compressor Station  
PROJECT LOCATION: None Given

ANALYSIS DATE: 03/05/99  
SAMPLING DATE: 03/03/99  
SAMPLE CONDITION: Intact

ELT#	FIELD CODE	TPH (mg/kg)
17170	Composite Soil	7475

BLANK	<10
% INSTRUMENT ACCURACY	100
% EXTRACTION ACCURACY	110

Methods: EPA 418.1

Roland K Tuttle  
Roland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

Receiving Date: 03/05/99  
Sample Type: Soil  
Project: North Compressor Station  
Project Location: None Given

Analysis Date: see below  
Sampling Date: 03/03/99  
Sample Condition: Intact

TCLP METALS (mg/L)

ELT#	Field Code	Ag	As	Ba	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5.00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
17170	Composite Soil	0.01	<0.10	<0.50	0.014	<0.03	<0.010	0.14	<0.100
	REPORTING LIMIT	0.01	0.10	0.50	0.005	0.03	0.010	0.10	0.100
	% IA	100	103	108	102	104	98	105	97
	% EA	105	102	98	95	85	100	93	89

METHODS: EPA SW 846-1311,7760, 7080,7130, 7190, 7420,SW-846 Revision 3, 6010B, 7470A

Raland K. Tuttle  
Raland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

RECEIVING DATE: 03/05/99  
SAMPLE TYPE: Soil  
PROJECT : North Compressor Station  
FIELD CODE: Composite Soil  
PROJECT LOCATION: None Given

ANALYSIS DATE: 03/12/99  
SAMPLING DATE: 03/03/99  
SAMPLE CONDITION: Intact

TCLP VOLATILES (mg/L)	SAMPLE 17170	PQL	BLANK	%EA	%DEV
1,1-Dichloroethene	ND	0.001	ND	99	-2.0
2-Butanone	ND	0.010	ND		-10.4
Chloroform	ND	0.001	ND		1.9
Benzene	ND	0.001	ND	95	1.6
1,2-Dichloroethane	ND	0.001	ND		-3.8
Vinyl Chloride	ND	0.001	ND		4.6
Carbon Tetrachloride	ND	0.001	ND		7.7
Trichloroethene	ND	0.001	ND	95	0.8
Tetrachloroethene	ND	0.001	ND		-1.2
Chlorobenzene	ND	0.001	ND	89	3.8
1,4-Dichlorobenzene	ND	0.001	ND		7.7

#### SYSTEM MONITORING COMPOUNDS

dibromofluoromethane  
toluene-d8  
4-bromofluorobenzene

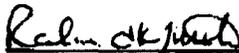
#### % RECOVERY

95  
96  
97

ND = < PQL

PQL = PRACTICAL QUANTITATION LIMIT

Methods: EPA SW 846-8240, 1311

  
Raland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

Receiving Date: 03/05/99  
Sample Type: Soil  
Project Name: North Compressor Station  
Project Location: None Given  
Field Code: Composite Soil

Analysis Date: 03/10/99  
Sampling Date: 03/03/99  
Sample Condition: Intact

TCLP SEMIVOLATILE ORGANICS (mg/L)	REPORTING LIMIT	ELT# 17170	RPD	%EA	%IA
Pyridine	0.05	ND	1	43	95
1,4-Dichlorobenzene	0.05	ND	4	42	90
o-Cresol	0.05	ND	2	62	109
Nitrobenzene	0.05	ND	1	60	92
m,p -Cresol	0.05	ND	2	54	105
Hexachloroethane	0.05	ND	3	39	96
Hexachlorobutadiene	0.05	ND	3	41	95
2,4,6-Trichlorophenol	0.05	ND	3	75	98
2,4,5-Trichlorophenol	0.05	ND	3	78	100
2,4-Dinitrotoluene	0.05	ND	3	76	110
Hexachlorobenzene	0.05	ND	3	64	94
Pentachlorophenol	0.05	ND	4	72	108
2,4-D	0.05	ND	2	18	105
2,4,5-TP	0.05	ND	9	48	112

ND= NOT DETECTED, < REPORTING LIMIT  
SYSTEM MONITORING COMPOUNDS

	% Recovery
2-Fluorophenol	37
Phenol-d6	25
Nitrobenzene-d5	66
2-Fluorobiphenyl	80
2,4,6-Tribromophenol	77
Terphenyl-d14	68

Method: SW 846-8270C.1311

Roland K Tuttle  
Roland K. Tuttle

3-22-99  
Date

# ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO.  
ATTN: MR. ROY BREHM  
333 N. CLAY STREET  
HOUSTON, TEXAS 77002

Receiving Date: 03/05/99  
Sample Type: Soil  
Project Name: North Compressor Station  
Project Location: None Given

Analysis Date: see below  
Sampling Date: 03/03/99  
Sample Condition: Intact

ELT#	Field Code	REACTIVITY		CORROSIVITY	IGNITABILITY
		H2S	CN-	(s.u.)	
		NON-REACTIVE		NON-CORROSIVE	
		(ppm)	(ppm)		
17170	Composite Soil	<10.0	<2.5	Non Corrosive 9.66	>140 deg. F
	RPD	0	0	0	0
	% PRECISION				
	% INSTRUMENT ACCURACY			100	
	ANALYSIS DATE	3/12/99	3/12/99	3/08/99	3/18/99

METHODS: EPA SW-846-2.1.3.2.1.2.2.1.1

Roland K Tuttle  
Roland K. Tuttle

3-22-99  
Date



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

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

April 23, 1999

**CERTIFIED MAIL**  
**RETURN RECEIPT No. Z 559 573 588**

Mr. Roy M. Brehm  
Shoreham Pipeline Company  
333 Clay St. Suite 4010  
Houston, Texas 77002

GLW 313

**RE: Discharge Plan Requirement  
North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico**

Dear Mr. Brehm:

Under the provision of the Water Quality Control Commission (WQCC) Regulations, Shoreham Pipeline Company (SPC) is hereby notified that filing of a discharge plan is required for the SPC North White Ranch Compressor St. facility located in Section 7, Township 8 south, Range 29 east NMPM, Chaves County, New Mexico.

The discharge plan is required pursuant to Section 3-104 and 3-106 of the WQCC regulations. The discharge plan, defined in Section 1.101.Q of the WQCC regulations should cover all discharges of effluent or leachate at the facility site or adjacent to the facility site. Included in the plan should be plans for controlling spills and accidental discharges at the facility, including detection of leaks in buried underground tanks and/or piping.

Pursuant to Section 3-106.A, a discharge plan should be submitted for approval to the OCD Director within 120 days of receipt of this letter. Three copies of the discharge plan should be submitted.

Enclosed are copies of the discharge plan application form and guidelines to aid you in preparing the application. The guideline addresses berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the management of any solid wastes. A complete copy of the WQCC regulations is also available on the New Mexico Environment Department's website at ([www.nmenv.state.nm.us/](http://www.nmenv.state.nm.us/)).

Shoreham Z 559 573 588

April 23, 1999

Page 2

The discharge plan is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat rate fee dependant upon the size of the Gas Compressor Station as listed in WQCC Regulation 3-114 (Fees.) The fifty (50) dollar filing fee is due when the discharge plan is submitted. The flat rate fee is due upon approval of the discharge plan.

Please make all checks payable to: **NMED Water Quality Management** and addressed to the OCD Santa Fe office.

If there are any questions on this matter, please feel free to contact Wayne Price of my staff at 505-827-7155.

Sincerely,



Roger Anderson  
Environmental Bureau Chief

RCA/lwp

XC: OCD Artesia Office

attachments-2



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

Jennifer A. Salisbury  
CABINET SECRETARY

Oil Conservation Div.  
Environmental Bureau  
2040 S. Pacheco  
Santa Fe, NM 87505

**Field Inspection Report**

**Time:** 10am-12 noon  
**Date:** March 3, 1999

**Re: Site/Location:** North White Ranch Compressor St.  
Sec 7-Ts 8s-R29e  
Chaves County, New Mexico

**Subject:** Site Inspection

**Originating Party:** Wayne Price- V. Barton, E. Gonzales, D. Williams- NMOCD

**Other Parties:** Roy Brehm-Shoreham PL, and Contract Pumper (Bud Halloway)

**Findings:**

A small gas gathering compressor station with (gas condensate and water) de-hydration and sweetening processes.

Previous inspections by OCD inspectors revealed unlined pits, active discharges, and numerous leaks and spills. Current inspection revealed fresh sand has been spread over these previous leaks and spills, and all pits had been covered.

OCD collected a soil sample just NE of the main compressor where previous leak & spills had been covered with fresh sand. A field test was conducted using a PID to check for volatile organics. The results were 1077 ppm of BTEX which is 10 times the OCD guideline allowable.

The inspection revealed Shoreham had removed RCRA type non-exempt waste (compressor oil filters, empty drums, non-exempt contaminated soil, etc) from an on-site unlined pit and sent this waste to Gandy-Marley landfarm. There was no sampling or testing to determine if this waste was RCRA hazardous.

There were tanks and drums of various chemical treating and lubricating fluids, condensate, etc with no containment. The compressor was leaking used oils onto the ground. There was evidence of a point source discharge from the condensate/water tank in which fluids were being drained off into a graded ditch which leads off-site to a small playa lake located approximately 1/4-1/2 mile north of the facility.

**Conclusion/Agreements:** OCD instructed Shoreham to call Gandy-Marly Landfarm and have waste isolated for testing. OCD will evaluate site to determine if a Discharge Plan is required and will notify Shoreham of clean-up requirements.

**Photos Taken:** Yes- Filed O/Envr....Pic Cam album (Shoreham) 3/3/99

**CC:** OCD Artesia  
Martyne Kieling-OCD

Shoreham Pipeliné Company

ROY M. BREHM, JR.

333 Clay St., Suite 4010  
Houston, Texas 77002

Tel: (713) 654-7033  
Fax: (713) 659-3555







7-8-29

"SHOHĒ HĀM"

TAKES by OGD

Field Rep

J. Williams



