GW - 325

PERMITS, RENEWALS, & MODS Application

PUBLIC NOTICE

Transwestern Pipeline Company, 6381 North Main Street, Roswell, New Mexico 88201, has submitted a renewal application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan (GW-325) for their Gallup Compressor Station located in Section 8 Township 15 North, Range 17 West NMPM, McKinley County, New Mexico. The physical location of this remote facility is off CR 43 (Hassler Valley Rd.). The mailing address of the facility is 6381 North Main Street, Roswell, New Mexico, 88201.

Materials generated or used at the facility include pipeline condensate liquid generated from the removal of entrained liquids in the natural gas, new and used compressor lubrication oil generated from the operation of the compressor, gear oil and oily waste water from scrubber wash down. The wash down water amounts to approximately 25 gallons per week. All liquids utilized at the facility are stored in dedicated above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. All storage tanks are within properly engineered and OCD approved secondary containments. No onsite discharges are intentionally allowed to contact or enter surface or groundwater. The volume of discharges is zero and therefore, the quality of the discharges is not applicable. The aquifer most likely to be affected is 100 feet in depth, and the total dissolved solids concentration of this aquifer is approximately 1250 mg/l.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

NOT REVIEWED BY OCD

NOT APPROVED

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 6/8/10

or cash received on _____ in the amount of $ 300.00

from TransWestern Pipeline Co.

for GW-325

Submitted by: Lawrence Romero Date: 9/9/10

Submitted to ASD by: Lawrence Romero Date: 9/9/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ✓

Modification _____ Other Discharge Plan

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

TRANSWESTERN PIPELINE CO LLC
800 E. SONTERRA BLVD., SUITE 400
SAN ANTONIO, TX 78258-3941

Payment Date: **06/08/2010**

Check No.: **541014382**
Check Date: **06/08/2010**

Vendor: NEW MEXICO ENERGY MINERALS AND
Vendor ID: 4000001384

Invoice Number	Invoice Date	Document Number	Reference	Gross Amount	Discount	Net Amount
			The items listed below are managed on the following account: STATE OF NEW MEXICO ENVIRONMENT DEP 2905 RODEO PARK DRIVE EAST SANTE FE			
GW325	05/18/2010	3100032816	Overnight to Larry Campbe	100.00	0.00	100.00
			Check Total.....			$ 100.00

DETACH AND RETAIN THIS STATEMENT. The Attached Check Is In Payment of Items Described Above. If not Correct Please Notify Us Promptly. No Receipt Desired.

ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

August 30, 2010

Mr. Leonard Lowe
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87504

Re: Submittal of Discharge Plan Renewal Application, Transwestern Pipeline Company, Gallup Compressor Station, Discharge Plan GW-325

Dear Mr. Lowe:

By this letter, Transwestern Pipeline Company is submitting the attached discharge renewal application for the Gallup Compressor Station. The $100.00 renewal fee is included with this submittal (check no. 541014382).

Should you require any additional information concerning this renewal request, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Sr. Environmental Specialist

xc: envisions file no. 205.1.20
Gallup Team
file

6381 N. Main
Roswell, NM 88201

Transwestern Pipeline Company
Gallup Compressor Station (GW-325)
Discharge Plan Renewal Application

1. Type of Operation

The facility is a mainline natural gas pipeline compressor station with the following site rated horsepower: one (1) 12,000 hp Alstom electric motor.

2. Name of Operator

The facility owner and operator is Transwestern Pipeline Company, 4001 Indian School Rd, NE, Albuquerque, New Mexico, 87110. Facility contact is Pat Troncoso. Contact phone number is (505) 863-4101. The Senior Environmental Specialist is Larry Campbell (575) 625-8022.

3. Location of the Discharge Plan Facility

The facility is located in section 8, T.15N, R.17W. GPS coordinates are N35.54815 and W108.66164. A USGS 7.5 minute map accompanies this submittal in **Attachment A**.

4. Landowner

Refer to item no. 2 above.

5. Facility Description

The site is approximately 10 acres. A facility map accompanies this submittal and is presented in **Attachment A**. This map identifies the location of discharges, drum and tank storage facilities and the facility/property boundary.

6. Materials Stored or Used at the Facility

The following chemicals volumes represent the storage capacities of the tanks at the facility. This may or may not represent the actual volume of liquids stored.

Chemical	Solid/liquid	Container type	Volume	Location
Lubrication oil	Liquid	Tank	160 gal.	engine room
Condensate	Liquid	Tanks	3,000 gal	northeast corner of yard
Oily wastewater	Liquid	Tank	200 gal	central area of yard
Degreaser/solvent	Liquid	Drum	5 gal	auxiliary bldg

Soap	Liquid	Drum	20 gal	auxiliary bldg

7A. Sources and Quantities of Effluent and Waste Solids Generated at the Facility

Source	Mo. Generation Rate	Material
WASTES		
Oily wastewater	10 gal	Oily wastewater
Sewage Wastes/Septic Tank	300 gal	City of Gallup
Oil Filters	2	
Air Filters	3	
Domestic Trash	100 lbs	McKinley County Landfill
Pigging Wastes	20 gal	sludge/condensate
CHEMICALS		
Solvent/degreasers	10 gal	Spent degreaser
Soap	5 gal	Spent soap
Lubrication oil	25 gal	Used oil

7B.(1-2) Quality Characteristics

Due to the infrequent operation at this facility, the volume of wastes generated are extremely small. Therefore, most of the wastes are stored onsite in dedicated drums and or tanks with impermeable secondary containment, until sufficient quantities of each waste are accumulated. Because of this, there may not be analytical reports for the wastes generated or the analytical reports may be historic in nature. Presented in **Attachment B** are the analytical reports for those wastes which have been disposed of at the facility. Transwestern does not test domestic trash, air filters or sewage waste. In **Attachment C** find the MSDS for the above listed chemicals.

(3). Due to the infrequent operation of this facility, this compressor station generates extremely small quantities of the above listed used, spent or waste materials. In addition, all chemicals and or waste materials are stored in segregated containers (drums and or tanks) with impermeable concrete secondary containments.

(4). Transwestern does not use chemicals that are defined as toxic or will generate a hazardous waste after use.

(5). Because Transwestern collects all waste materials in dedicated drums and or tanks, grab samples are the collection methodology Transwestern employs to obtain sample collections for liquids and solids.

(6). Because Transwestern employs the grab method of sample collection, the normal variation of this sample methodology is expected.

7C. All waste streams at this facility have been segregated and contents are stored in drums and tanks which are then placed into dedicated and impermeable concrete secondary containment.

8A. Description of Current Liquid and solid Waste Collection /Storage/Disposal Procedures

(B1). All new and used liquid chemicals and wastes are directed through underground piping and stored in dedicated above ground tanks. Pipeline liquids and oily wastewater are collected in below grade sumps and transferred via underground piping to dedicated above ground tanks. All solid wastes are stored in above ground dedicated drums or containers. The transfer of liquids in the underground lines to the dedicated tanks are completed via pressurized natural gas or air or are gravity fed.

(B2). All drum and tanks at the facility which store chemicals or wastes are contained in impermeable concrete secondary containments which are designed to hold 150% of the capacity of the largest tank in the containment.

(B3). Under (GW-325), drainline testing is not required. However, in July 2000, as a proactive measure, Transwestern completed a drainline testing program incorporating the methodology approved by the OCD for other Transwestern facilities **(Attachment D)**. The results of this testing did not show an instance of any drain or process lines leaking or a loss of drainline integrity during the test. Transwestern proposes to use the methodology in **Attachment D** for conducting all future drainline testing activities.

The underground piping drainlines at the Gallup Compressor Station are comprised of grade B carbon steel piping with outside diameters ranging from 2" and 4 ½" with wall thicknesses ranging from .218" to .237".

(C)1. Transwestern does not dispose of any pipeline wastes onsite or into a surface impoundment, leachfield, injection well, drying bed, pit or landfarm.

(C)2. Transwestern Pipeline Company incorporates the service of Gandy Corporation in Lovington, NM for disposal and recycling of non hazardous oil and gas waste. All waste materials are transported via truck to the disposal/recycling facility in Lovington. The disposal/recycling facility address is:

Gandy Corporation
P.O. Box 2140
Lovington, NM 88260

The Gandy Corporation landfill and landfarm has been previously permitted by the OCD.

Domestic waste (paper, office trash, etc) is disposed of at the McKinley County Landfill. Septic and sewage waste is disposed of by the City of Gallup.

9.(A-B). Non applicable. The Gallup Compressor Station does not conduct any onsite disposal and does not operate any onsite ponds or pits. The only leachfield that is in use at the facility is for disposal of sewage waste which has been previously permitted by the New Mexico Environment Department Solid Waste Bureau.

10. Inspection, Maintenance and Reporting

10(A-B). Not applicable. Transwestern does not discharge wastes into any surface impoundment. Current construction activities are upgrading the existing sumps for the oily wastewater and pipeline condensate. Each sump upgrade will incorporate secondary containments and leak detection. These projects are scheduled for completion by December, 2010.

10(C). The surface water flow at the facility trend in a southerly direction. All chemical storage in drums and tanks are maintained in concrete secondary containment with a storage capacity designed to hold 150% of the contents in the largest tank in the containment area. The 10 acre site has been covered with gravel to assist in the prevention of offsite runoff of precipitation. Concrete curbing has been constructed around some of the process areas to prohibit surface contamination and runoff.

11. Spill/Leak Prevention and Reporting Procedures (Contingency Plans)

An SPCC (Spill Prevention Control and Countermeasure) Plan has been prepared for the Gallup Compressor Station as the facility stores more than 1320 gallons of oil and/or liquid hydrocarbons. The plan has been activated and annual employee training is completed. The Plan addresses notification, spill response and contingency's to be employed in the event a spill or release has occurred. The facility has spill cleanup kits at various locations around the facility to immediately respond to a spill or release of a hydrocarbon or chemical substance. Tranwestern's Contingency Plan for addressing spills and releases of chemical and hydrocarbon liquids in presented in **Attachment E**.

11.(A). In addition to compliance with the facility SPCC plan, Transwestern is also committed to the requirements of OCD Rule 116 and WQCC 1203 for notification reporting and mitigation of spills and releases. Refer to **Attachment F** for Transwestern's written procedure to notification and mitigation of spills and releases that fall under jurisdiction of Rule 116 and WQCC 120.

11(B). Transwestern has no below grade tanks at this facility. As an internal requirement, Transwestern conducts weekly visual sump, tank and containment inspections for all vessels that are store chemical or hydrocarbon liquids at the facility. This applies to tanks that store liquids other than domestic water. Should a

leak occur at a tank or drum in a containment the Contingency Plan will be immediately implemented and actions taken to stop the leak and/or repair the containment area. Liquids that are released into the containment area are transferred into a waste tank and properly disposed.

In the event chemical or hydrocarbon liquids contact the soil, Transwestern immediately excavates the contaminated soil according to the facility SPCC plan and/or Contingency Plan. The appropriate analytical testing is then completed to determine disposition of the contaminated soil. The contaminated soil is continued to be excavated until confirmation sampling verifies that the contaminated soil has been removed. Transwestern employs the 1993 NMOCD document entitled "GUIDLEINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES" (**Attachment G**) for sampling and cleanup of all chemical and hydrocarbon spills and releases which have occurred on Transwestern property. The contaminated soil is then taken to the Gandy Corporation commercial landfill in Tatum, NM for proper disposition.

11(C). Not applicable. Transwestern does not use an injection well for onsite effluent disposal.

12. Site characteristics

12(A)(1). The Rio Puerco River is located approximately 0.5 miles from the southern boundary of the facility. There are two (2) water wells located within one mile of the facility. The White Cliff Trailer Park water well is located west of the Compressor Station. The other water well (Gallup Speedway) is located north of the facility.

12(A)(2-3).The groundwater aquifer underlying the project area is in the Chinlee Formation at approximately 20 feet below ground surface (bgs). This aquifer contains a small bank of gravel, but is comprised mainly of layers of silty shale. This is not a dominant aquifer according to the State of New Mexico State Hydrologist (NMED 1999a) as the water quality is poor with minimal production. The regional aquifer (San Andres Sandstone Aquifer) is located at a depth of approximately 1200 feet bgs. The regional groundwater flow direction is to the southwest towards the Rio Puerco River.

The City of Gallup operates a series of public groundwater wells located west of the project area in T.15N, R18W, section 15 (New Mexico Office of the State Engineer, 1999a) however, none of these wells are located within 0.5 mile of the project site. A water well search was conducted in 1999 and no water wells were found to occur within 150 ft. of the compressor station site. However, the search identified five domestic drinking wells within 0.25 miles of the facility, with one of these wells located down gradient of the Gallup Compressor Station. This well was completed at a depth of 70 feet bgs.

12(A)(4). There is no record of flooding onsite.

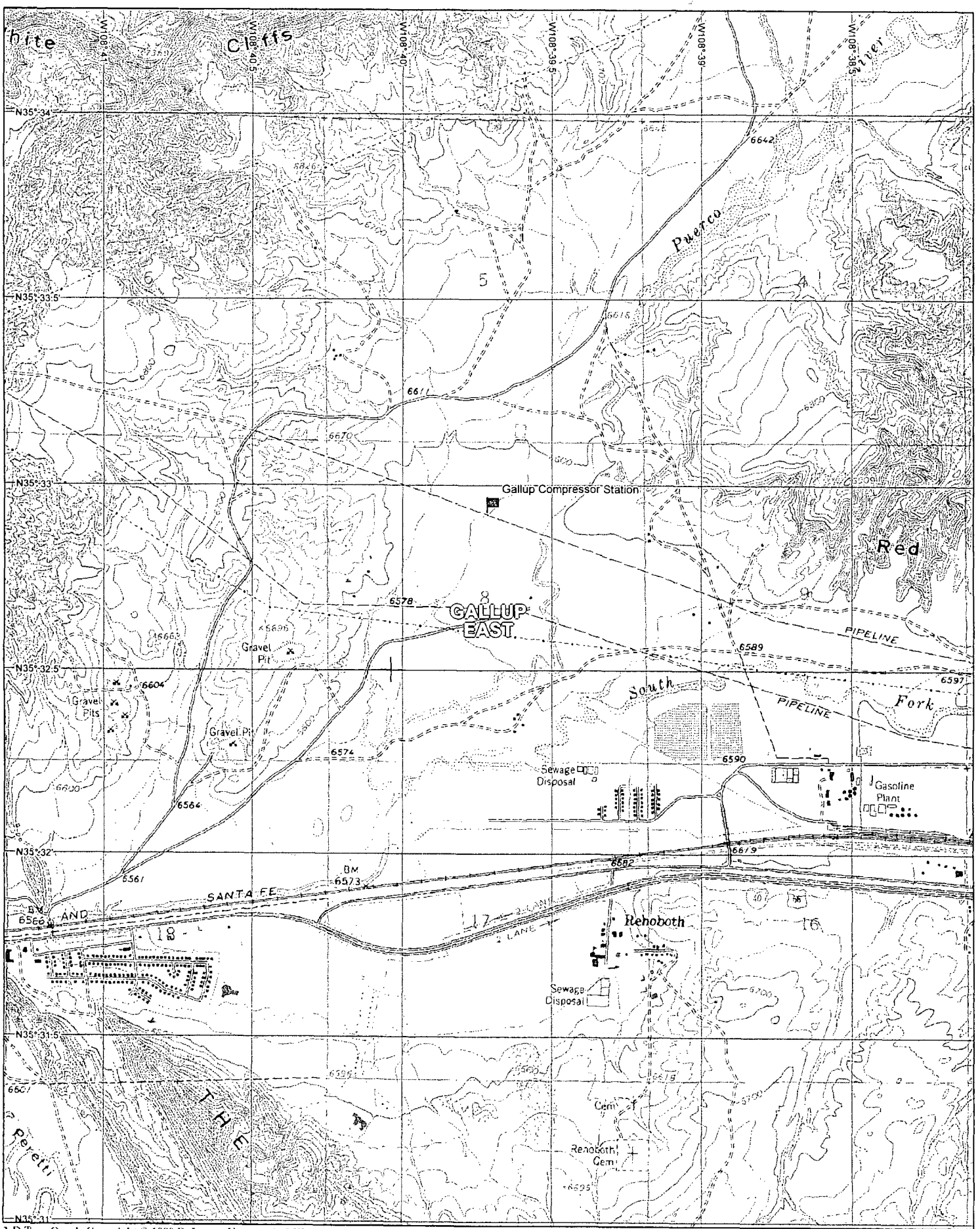
13. Other Compliance Information

The Gallup Compressor Station uses the documents presented in **Attachments D through F** and the Corporate Environmental Policy and Guidelines to demonstrate and ensure compliance with all applicable rules administrated by the NMOCD. The Gallup Compressor Station is committed to complying with NMOCD Rule 116 and WQCC Section 1203 for reporting spills, leaks and releases.

Upon facility closure, Rule 116 and WQCC Section 1203 will be employed to ensure that the abandonment and closure of the facility will not violate WQCC standards of Section 3103.

Because it is impossible to predict and develop a future plan which will address all contingencies and requirements related to site closure at a future date, at such time that the facility ceases operation, Transwestern will present to the NMOCD a post closure plan which addresses site abandonment and soil cleanup activities. This plan will include maintenance and monitoring of the site to ensure that all Rule 116 and Section 1203 standards have been achieved or that all future Rules and Sections to be implemented will be adhered to and followed.

ATTACHMENT A
(7.5 Minute USGS Map of Facility)



 1000 ft Scale: 1 : 25,000 Detail: 13-0 Datum: WGS84

EXISTING DIRT ROAD (COUNTY MAINTAINED)

PROPERTY LINE

E. 6+00

E. 5+00

E. 4+00

E. 3+00

E. 2+00

E. 1+00

E. 0+00

N. 9+00 N. 8+00 N. 7+00 N. 6+00 N. 5+00 N. 4+00 N. 3+00 N. 2+00 N. 1+00 N. 0+00

PROPERTY LINE

PROPERTY LINE

APPROXIMATE POWER ENTRY ROUTE

Oily Waste Water Tank

Pipeline Liquid Tank

Sub. Station

PCR BLDG.

Aux. BLDG

Engine Room

1 SUB STATION 2

1 2 3 4 5 6

N.S.A. 2
950' TO COMPR. BLDG.

EXISTING FENCE

EXISTING 200' X 200' SURFACE SITE
T-15-N - R-17-W
SECTION 8
0.90 ACRES

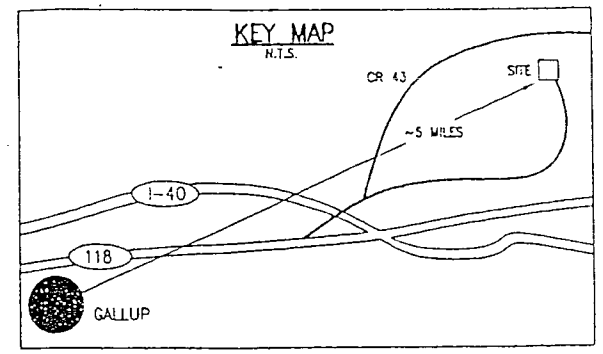
CB SCHEDULE

NO.	DEPTH	STAKED LOCATION - (BORE LOCATION) NORTH	EAST	ELEVATION
1	30'			
2	30'			
3	30'			
4	30'			
5	30'			
6	30'			
7	30'			

RESISTIVITY LINES

R	LOCATION (CENTERLINE) NORTH	EAST	DIRECTION	"A" SPACING
1				
2				
3				
4				
5				

KEY MAP
N.T.S.



DEC 2 9 1999

ISSUED FOR CONSTRUCTION

ISSUED FOR INFORMATION ONLY

40 0 40 80 120 160
FEET

DWG. NO.	REFERENCE DRAWING TITLE	NO.	REVISION - DESCRIPTION	BY	DATE	CHK'D	APP'D

DWG. STATUS	CHECKED BY	CHECKED DATE	APPROVED BY	APPROVED DATE	APPROVED BY	APPROVED DATE
PREL'Y						
BID						
CONSTR.						
CADDS						

PLOT DATE: 06/28/1999 - 15:59
FILE NAME: 258531D.DWG

P.L./STA. ACCT. NO.		SJ
CONSTRUCTION YR		1999
	BY	DATE
DESIGN	KEB	6/25/99
DRAWN	GAW	6/25/99
ASBUILT		
FILE NO.		
SCALE		NONE

Enron Engineering & Construction Co.
Transwestern Pipeline Company
Houston, Texas

GALLUP COMPRESSOR STATION

SITE MONUMENTATION AND BORING PLAN

McKINLEY COUNTY, NEW MEXICO

AFE/WORK ORDER: ST9075
ASBUILT DWG. NO.:
CONSTRUCTION DWG. NO.: S3-1D
REV. NO.: A
SHEET 1 OF 1

10

FILE: INFO-ENGR\MAS\3683\0001\258531D.dwg 1-480 10/21/1999 16:05 Mario

ATTACHMENT B
(Analytical Reports)

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

COVER LETTER

Monday, June 09, 2008

CONDENSATE

George Friend
Transwestern Pipeline
4001 Indian School Rd NE Ste 250
Albuquerque, NM 87110

TEL: (505) 260-4013
FAX

RE: Gallup Sta 210 BBL Tank

Order No.: 0805354

Dear George Friend:

Hall Environmental Analysis Laboratory, Inc. received 1 sample(s) on 5/27/2008 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Business Manager
Nancy McDuffie, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001

Hall Environmental Analysis Laboratory, Inc.

Date: *09-Jun-08*

CLIENT:	Transwestern Pipeline	**Client Sample ID:**	GCS210tank2
Lab Order:	0805354	**Collection Date:**	5/27/2008 10:00:00 AM
Project:	Gallup Sta 210 BBL Tank	**Date Received:**	5/27/2008
Lab ID:	0805354-01	**Matrix:**	OIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8021B: VOLATILES						Analyst: **NSB**
Benzene	30	1.1		mg/Kg	1	5/30/2008 12:23:07 PM
Toluene	47	1.1		mg/Kg	1	5/30/2008 12:23:07 PM
Ethylbenzene	3.4	1.1		mg/Kg	1	5/30/2008 12:23:07 PM
Xylenes, Total	37	1.1		mg/Kg	1	5/30/2008 12:23:07 PM
Surr: 4-Bromofluorobenzene	93.9	80-120		%REC	1	5/30/2008 12:23:07 PM

Qualifiers:

*	Value exceeds Maximum Contaminant Level	B	Analyte detected in the associated Method Blank
E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	MCL	Maximum Contaminant Level
ND	Not Detected at the Reporting Limit	RL	Reporting Limit
S	Spike recovery outside accepted recovery limits		

ENERGY LABORATORIES, INC. • 2393 Salt Creek Highway (82601) • P.O. Box 3258 • Casper, WY 82602
Toll Free 888.235.0515 • 307.235.0515 • Fax 307.234.1639 • casper@energylab.com • www.energylab.com

LABORATORY ANALYTICAL REPORT

Client:	Hall Environmental	**Report Date:**	06/09/08
Project:	0805354	**Collection Date:**	05/27/08 10:00
Lab ID:	C08051155-001	**DateReceived:**	05/28/08
Client Sample ID:	GCS210tank2	**Matrix:**	Oil

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
PHYSICAL PROPERTIES							
Flash Point (Ignitability)	> 140	°F		60	140	SW1010	05/29/08 15:17 / mkf
- Flashpoint has been corrected for barometric pressure.							
METALS - TOTAL							
Arsenic	12.0	mg/kg	D	0.9		SW6010B	06/06/08 14:54 / cp
Lead	ND	mg/kg		0.5		SW6010B	06/06/08 14:54 / cp

Report Definitions:
RL - Analyte reporting limit.
QCL - Quality control limit.
D - RL increased due to sample matrix interference.
MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.

ENERGY LABORATORIES, INC. • 2393 Salt Creek Highway (82601) • P.O. Box 3258 • Casper, WY 82602
Toll Free 888.235.0515 • 307.235.0515 • Fax 307.234.1639 • casper@energylab.com • www.energylab.com

QA/QC Summary Report

Client: Hall Environmental
Project: 0805354

Report Date: 06/09/08
Work Order: C08051155

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: SW1010								Batch: 080529A-FLSHPNT-LIQ	
Sample ID: MBLK1_080529A	Method Blank				Run: PM_FLASHPOINT B_080530			05/29/08 16:03	
Flash Point (Ignitability)	ND	°F							
- Flashpoint has been corrected for barometric pressure.									
Sample ID: LCS1_080529A	Laboratory Control Sample				Run: PM_FLASHPOINT B_080530			05/29/08 09:12	
Flash Point (Ignitability)	90.0	°F	60	100	96	104			
- Flashpoint has been corrected for barometric pressure.									
Method: SW6010B								Batch: 18773	
Sample ID: MB-18773	Method Blank				Run: ICP2-C_080605A			06/06/08 13:36	
Arsenic	ND	mg/kg	0.02						
Lead	ND	mg/kg	0.007						
Sample ID: LCS3-18773	Laboratory Control Sample				Run: ICP2-C_080605A			06/06/08 13:40	
Arsenic	250	mg/kg	0.79	87	85	115			
Lead	71	mg/kg	0.50	97	85	115			
Sample ID: C08060110-002AMS3	Sample Matrix Spike				Run: ICP2-C_080605A			06/06/08 15:38	
Arsenic	21	mg/kg-dry	0.61	93	75	125			
Lead	25	mg/kg-dry	0.50	104	75	125			
Sample ID: C08060110-002AMSD3	Sample Matrix Spike Duplicate				Run: ICP2-C_080605A			06/06/08 15:42	
Arsenic	22	mg/kg-dry	0.61	99	75	125	5.9	20	
Lead	25	mg/kg-dry	0.50	108	75	125	2.9	20	

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.

QA/QC SUMMARY REPORT

Client: Transwestern Pipeline
Project: Gallup Sta 210 BBL Tank **Work Order:** 0805354

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8021B: Volatiles									
Sample ID: MB-16038		*MBLK*			Batch ID:	**16038**	Analysis Date:	5/30/2008 1:05:14 AM	
Benzene	ND	mg/Kg	1.2						
Toluene	ND	mg/Kg	1.2						
Ethylbenzene	ND	mg/Kg	1.2						
Xylenes, Total	ND	mg/Kg	1.2						
Sample ID: LCS-16038		*LCS*			Batch ID:	**16038**	Analysis Date:	5/30/2008 12:35:10 AM	
Benzene	15.82	mg/Kg	1.2	113	77	122			
Toluene	104.8	mg/Kg	1.2	104	81	115			
Ethylbenzene	21.64	mg/Kg	1.2	108	84	117			
Xylenes, Total	128.8	mg/Kg	1.2	112	84	116			

Qualifiers:

E	Value above quantitation range	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
R	RPD outside accepted recovery limits	S	Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name TWP ALB | Date Received: 5/27/2008

Work Order Number 0805354 | Received by: TLS

Checklist completed by: _____ 5/27/08 | Sample ID labels checked by: _____

Signature | Date | Initials

Matrix: | Carrier name Client drop-off

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☐	Not Shipped ☑
Custody seals intact on sample bottles?	Yes ☐	No ☐	N/A ☑	
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☑	No ☐		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		
Water - VOA vials have zero headspace? No VOA vials submitted	☑	Yes ☐	No ☐	
Water - Preservation labels on bottle and cap match?	Yes ☐	No ☐	N/A ☑	
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	
Container/Temp Blank temperature?	12°	<6° C *Acceptable* If given sufficient time to cool.		

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

HALL
ENVIRONMENTAL
ANALYSIS
LABORATORY

COVER LETTER

June 24, 2005

Oil FILTERS

Mike Boatman
Transwestern Pipeline Co.
P.O. Box 9
Gallup, NM 87301
TEL: (505) 863-4104
FAX (505) 863-4281

RE: Gallup comp STA unit oil Filters

Order No.: 0506186

Dear Mike Boatman:

Hall Environmental Analysis Laboratory received 1 sample on 6/21/2005 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

Andy Freeman, Business Manager
Nancy McDuffie, Laboratory Manager

Hall Environmental Analysis Laboratory **Date:** *24-Jun-05*

CLIENT:	Transwestern Pipeline Co.
Project:	Gallup comp STA unit oil Filters
Lab Order:	0506186

CASE NARRATIVE

Method 6010: High recovery for Se in LCS-8197, and high recoveries for Se & As in LCSD-8197. Samples ND for both elements. Recoveries for Se & As in 0506186-01 MS/MSD acceptable. IN36-05109

Hall Environmental Analysis Laboratory

Date: *24-Jun-05*

CLIENT: Transwestern Pipeline Co.
Client Sample ID: Unit Oil Filter
Lab Order: 0506186
Collection Date: 6/18/2005 10:00:00 AM
Project: Gallup comp STA unit oil Filters
Lab ID: 0506186-01
Matrix: FILTER

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
MERCURY, TCLP LEACHED						Analyst: **CMC**
Mercury	ND	0.020		mg/L	1	6/23/2005
EPA METHOD 6010C: TCLP METALS						Analyst: **NMO**
Arsenic	ND	5.0		mg/L	1	6/23/2005 9:13:07 AM
Barium	ND	100		mg/L	1	6/23/2005 9:13:07 AM
Cadmium	ND	1.0		mg/L	1	6/23/2005 9:13:07 AM
Chromium	ND	5.0		mg/L	1	6/23/2005 9:13:07 AM
Lead	ND	5.0		mg/L	1	6/23/2005 9:13:07 AM
Selenium	ND	1.0		mg/L	1	6/23/2005 9:13:07 AM
Silver	ND	5.0		mg/L	1	6/23/2005 9:13:07 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range

CLIENT: Transwestern Pipeline Co.
Work Order: 0506186
Project: Gallup comp STA unit oil Filters

QC SUMMARY REPORT

Method Blank

Sample ID **MB-8211** Batch ID: **8211** Test Code: **SW7470** Units: **mg/L** Analysis Date **6/23/2005** Prep Date **6/23/2005**
Client ID: Run ID: **MI-LA254_050623A** SeqNo: **373883**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.02									

Sample ID **MB-8197** Batch ID: **8197** Test Code: **SW1311/6010** Units: **mg/L** Analysis Date **6/23/2005 8:51:47 AM** Prep Date **6/22/2005**
Client ID: Run ID: **ICP_050623B** SeqNo: **373823**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	5									
Barium	ND	100									
Cadmium	ND	1									
Chromium	ND	5									
Lead	ND	5									
Selenium	ND	1									
Silver	ND	5									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

J

Hall Environmental Analysis Laboratory

Date: *24-Jun-05*

CLIENT: Transwestern Pipeline Co.
Work Order: 0506186
Project: Gallup comp STA unit oil Filters

QC SUMMARY REPORT

Sample Duplicate

Sample ID **0506186-01A DUP** Batch ID: **8197** Test Code: **SW1311/6010** Units: **mg/L** Analysis Date **6/23/2005 9:16:57 AM** Prep Date **6/22/2005**

Client ID: ***Unit Oil Filter*** Run ID: **ICP_050623B** SeqNo: **373830**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	5	0	0	0	0	0	0	0	30	
Barium	1.046	100	0	0	0	0	0	1.03	0	30	J
Cadmium	ND	1	0	0	0	0	0	0	0	30	
Chromium	ND	5	0	0	0	0	0	0	0	30	
Lead	ND	5	0	0	0	0	0	0	0	30	
Selenium	ND	1	0	0	0	0	0	0	0	30	
Silver	ND	5	0	0	0	0	0	0	0	30	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

1

Hall Environmental Analysis Laboratory

Date: *24-Jun-05*

CLIENT: Transwestern Pipeline Co.
Work Order: *0506186*
Project: Gallup comp STA unit oil Filters

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID **0506186-01A MS** Batch ID: **8197** Test Code: **SW1311/6010** Units: **mg/L** Analysis Date **6/23/2005 9:20:45 AM** Prep Date **6/22/2005**
Client ID: **Unit Oil Filter** Run ID: **ICP_050623B** SeqNo: **373831**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.6032	0.2	0.5	0	121	75	125	0			
Barium	1.531	0.2	0.5	1.03	100	75	125	0			
Cadmium	0.5974	0.2	0.5	0	119	75	125	0			
Chromium	0.5121	0.2	0.5	0	102	75	125	0			
Lead	0.5186	0.2	0.5	0	104	75	125	0			
Selenium	0.6082	0.2	0.5	0	122	75	125	0			
Silver	0.5603	0.2	0.5	0	112	75	125	0			

Sample ID **0506186-01A MSD** Batch ID: **8197** Test Code: **SW1311/6010** Units: **mg/L** Analysis Date **6/23/2005 9:24:41 AM** Prep Date **6/22/2005**
Client ID: **Unit Oil Filter** Run ID: **ICP_050623B** SeqNo: **373832**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.6024	0.2	0.5	0	120	75	125	0.6032	0.127	20	
Barium	1.548	0.2	0.5	1.03	104	75	125	1.531	1.12	20	
Cadmium	0.5998	0.2	0.5	0	120	75	125	0.5974	0.402	20	
Chromium	0.5161	0.2	0.5	0	103	75	125	0.5121	0.783	20	
Lead	0.5221	0.2	0.5	0	104	75	125	0.5186	0.682	20	
Selenium	0.5968	0.2	0.5	0	119	75	125	0.6082	1.89	20	
Silver	0.5574	0.2	0.5	0	111	75	125	0.5603	0.521	20	

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Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

1

Hall Environmental Analysis Laboratory

Date: *24-Jun-05*

CLIENT: Transwestern Pipeline Co.
Work Order: 0506186
Project: Gallup comp STA unit oil Filters

QC SUMMARY REPORT
Laboratory Control Spike - generic

Sample ID **LCS-8211**	Batch ID: **8211**	Test Code: **SW7470**	Units: **mg/L**	Analysis Date **6/23/2005**	Prep Date **6/23/2005**
Client ID:		Run ID: **MI-LA254_050623A**		SeqNo: **373884**	

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.004856	0.002	0.005	0	97.1	80	120	0			

Sample ID **LCSD-8211**	Batch ID: **8211**	Test Code: **SW7470**	Units: **mg/L**	Analysis Date **6/23/2005**	Prep Date **6/23/2005**
Client ID:		Run ID: **MI-LA254_050623A**		SeqNo: **373890**	

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	0.004918	0.002	0.005	0	98.4	80	120	0.004856	1.28	20	

Sample ID **LCS-8197**	Batch ID: **8197**	Test Code: **SW1311/6010**	Units: **mg/L**	Analysis Date **6/23/2005 8:55:45 AM**	Prep Date **6/22/2005**
Client ID:		Run ID: **ICP_050623B**		SeqNo: **373824**	

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.5991	0.2	0.5	0	120	80	120	0			
Barium	0.5021	0.2	0.5	0	100	80	120	0			
Cadmium	0.5576	0.2	0.5	0	112	80	120	0			
Chromium	0.5067	0.2	0.5	0	101	80	120	0			
Lead	0.496	0.2	0.5	0	99.2	80	120	0			
Selenium	0.6074	0.2	0.5	0	121	80	120	0			S
Silver	0.5566	0.2	0.5	0	111	80	120	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: Transwestern Pipeline Co.
Work Order: 0506186
Project: Gallup comp STA unit oil Filters

QC SUMMARY REPORT
Laboratory Control Spike Duplicate

Sample ID **LCSD-8197** Batch ID: **8197** Test Code: **SW1311/6010** Units: **mg/L** Analysis Date **6/23/2005 8:59:37 AM** Prep Date **6/22/2005**
Client ID: Run ID: **ICP_050623B** SeqNo: **373825**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	0.6071	0.2	0.5	0	121	80	120	0.5991	1.32	20	S
Barium	0.5012	0.2	0.5	0	100	80	120	0.5021	0.169	20	
Cadmium	0.5559	0.2	0.5	0	111	80	120	0.5576	0.305	20	
Chromium	0.5029	0.2	0.5	0	101	80	120	0.5067	0.760	20	
Lead	0.489	0.2	0.5	0	97.8	80	120	0.496	1.44	20	
Selenium	0.6165	0.2	0.5	0	123	80	120	0.6074	1.48	20	S
Silver	0.5599	0.2	0.5	0	112	80	120	0.5566	0.587	20	

7 / 8

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Hall Environmental Analysis Laboratory

Sample Receipt Checklist

Client Name TWP GALLUP | Date and Time Received: 6/21/2005

Work Order Number 0506186 | Received by NMP

Checklist completed by Natasha Pahn 6/21/05
Signature | Date

Matrix | Carrier name UPS

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☑	Not Shipped ☐
Custody seals intact on sample bottles?	Yes ☐	No ☐	N/A ☑	
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☑	No ☐		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		
Water - VOA vials have zero headspace?	No VOA vials submitted ☑	Yes ☐	No ☐	
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	
Container/Temp Blank temperature?	**29°**	*4° C ± 2 Acceptable* If given sufficient time to cool.		

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding _____

Comments: _____

Corrective Action _____

OAL

L16604

Sample Summary

Sample ID	Lab #	Description	Sampled	Received
OIL FROM UNIT	L16604-1	other (oil)	06/02/2000 13:45	06/05/2000 10:30
OILY WW / OIL PHASE	L16604-2	other (oil)	06/02/2000 14:00	06/05/2000 10:30

Definition of Terms

ND Analytical result was below the reporting limit.

Laboratory Certifications*

Agency	Number
Florida Department of Health	ID #E87569
Oregon Health Division	State Lab #OR020
Washington Department of Ecology	Lab Accreditation #C136
Washington Department of Health	Washington Code #136

* Current Scopes of Accreditation are available upon request.

Analysts

Initials	Analyst	Title
CV	Cheryl Vezzani	Chemist
DMC²	Debbie McBrean-McKenzie	Chemist / Supervisor
GC	Greg Clarke	Chemist / Supervisor
KDK	Kirk Keyes	Chemist
PB	Pat Buddrus	Chemist
SBL	Shirley Lee	Technician
WB	Wayne Boyle	Chemist

OAL

L16604

Method Summary

Analysis	Method
Arsenic	EPA 200.9
Cadmium	EPA 200.7/6010
Chromium	EPA 200.7/6010
Flash Point (PMCC)	EPA 1010/ASTM D93
Halogens, Total by Bomb	ASTM D808/EPA 300.0
Lead	EPA 200.7/6010
Polychlorinated Biphenyl (PCB)	EPA 3580/8082
Semivolatiles	EPA 8270
Volatile Organic Compounds (VOC)	EPA 8260

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.*

Inorganics

Analyte	Result	Reporting Limit	Units (ppm)	Dilution	Date Analyzed	Method	Comment	Analyst
Sample ID OIL FROM UNIT — *Matrix* other (oil) — Sampled: 6/2/2000 — *Lab Number* L16604-1								
Halogens, Total by Bomb	ND	100	mg/kg		6/13/2000	ASTM D808/EPA 300.0		KDK

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPGS, Gallup/Thoreau NM: Gallup Comp Sta.*

Oil Analyses

Analyte	Result	Reporting Limit	Units	Dilution	Date Analyzed	Method	Comment	Analyst
Sample ID: OIL FROM UNIT *Matrix: other (oil)* *Sampled: 6/2/2000* *Lab Number: L16604-1*								
Flash Point (PMCC)	>200.		°F		6/12/2000	EPA 1010/ASTM D93		SBL
Sample ID: OILY WW / OIL PHASE *Matrix: other (oil)* *Sampled: 6/2/2000* *Lab Number: L16604-2*								
Flash Point (PMCC)	>200.		°F		6/13/2000	EPA 1010/ASTM D93		SBL

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPGS, Gallup/Thoreau NM: Gallup Comp Sta.*

Polychlorinated Biphenyl (PCB)

by EPA 3580/8082

Sample ID	Matrix					Lab Number
CAS	Analyte	Result	Reporting Limit	Units (ppm)	Dilution	Comment
				Sampled: 6/2/2000		
				Extracted: 6/6/2000		
OIL FROM UNIT	other (oil)			Analyzed: 6/7/2000 by WB		L16604-1
1336-36-3	Total PCB	ND	2.	mg/kg		

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.*

Semivolatiles
by EPA 8270

Sample ID	*Matrix*					*Lab Number*
CAS	Analyte	Result	Reporting Limit	Units	Dilution	Comment
				Sampled: *6/2/2000*		
				Extracted: *6/6/2000*		
OILY WW / OIL PHASE	*other (oil)*			Analyzed: *6/6/2000 by PB*		*L16604-2*
	See Attached Data Sheet					

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	Lab Number
OILY WW / OIL PHASE	LIQUID		MB06068			Sampled: 06/02/00 Analyzed: 06/06/00	L16604-2
CAS#							
108-95-2	Phenol	nd	nd	200	mg/Kg		
111-44-4	bis(2-Chloroethyl)ether	nd	nd	200	mg/Kg		
95-57-8	2-Chlorophenol	nd	nd	200	mg/Kg		
541-73-1	1,3-Dichlorobenzene	nd	nd	200	mg/Kg		
106-46-7	1,4-Dichlorobenzene	nd	nd	200	mg/Kg		
100-51-6	Benzyl alcohol	nd	nd	400	mg/Kg		
95-50-1	1,2-Dichlorobenzene	nd	nd	200	mg/Kg		
95-48-7	2-Methylphenol	nd	nd	200	mg/Kg		
108-60-1	bis(2-chloroisopropyl)ether	nd	nd	200	mg/Kg		
106-44-5	4-Methylphenol	nd	nd	200	mg/Kg		
621-64-7	N-Nitroso-di-n-propylamine	nd	nd	200	mg/Kg		
67-72-1	Hexachloroethane	nd	nd	200	mg/Kg		
98-95-3	Nitrobenzene	nd	nd	200	mg/Kg		
78-59-1	Isophorone	nd	nd	200	mg/Kg		
88-75-5	2-Nitrophenol	nd	nd	200	mg/Kg		
105-67-9	2,4-Dimethylphenol	nd	nd	200	mg/Kg		
65-85-0	Benzoic acid	nd	nd	1000	mg/Kg		
111-91-1	bis(2-Chloroethoxy)methane	nd	nd	200	mg/Kg		
120-83-2	2,4-Dichlorophenol	nd	nd	200	mg/Kg		
120-82-1	1,2,4-Trichlorobenzene	nd	nd	200	mg/Kg		
91-20-3	Naphthalene	nd	nd	200	mg/Kg		
106-47-8	4-Chloroaniline	nd	nd	400	mg/Kg		
87-68-3	Hexachlorobutadiene	nd	nd	200	mg/Kg		
59-50-7	4-Chloro-3-methylphenol	nd	nd	400	mg/Kg		
91-57-6	2-Methylnaphthalene	nd	nd	200	mg/Kg		
77-47-4	Hexachlorocyclopentadiene	nd	nd	200	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	Lab Number

OILY WW / OIL PHASE — LIQUID — MB0606B — Sampled: 06/02/00 — Analyzed: 06/06/00 — L16604-2

CAS#	Analyte	Results	Blank Result	Reporting Limit	Units	Q
88-06-2	2,4,6-Trichlorophenol	nd	nd	200	mg/Kg	
95-95-4	2,4,5-Trichlorophenol	nd	nd	200	mg/Kg	
91-58-7	2-Chloronaphthalene	nd	nd	200	mg/Kg	
88-74-4	2-Nitroaniline	nd	nd	1000	mg/Kg	
208-96-8	Acenaphthylene	nd	nd	200	mg/Kg	
131-11-3	Dimethylphthalate	nd	nd	200	mg/Kg	
606-20-2	2,6-Dinitrotoluene	nd	nd	200	mg/Kg	
83-32-9	Acenaphthene	nd	nd	200	mg/Kg	
99-09-2	3-Nitroaniline	nd	nd	1000	mg/Kg	
51-28-5	2,4-Dinitrophenol	nd	nd	1000	mg/Kg	
132-64-9	Dibenzofuran	nd	nd	200	mg/Kg	
121-14-2	2,4-Dinitrotoluene	nd	nd	200	mg/Kg	
100-02-7	4-Nitrophenol	nd	nd	1000	mg/Kg	
86-73-7	Fluorene	nd	nd	200	mg/Kg	
7005-72-3	4-Chlorophenyl-phenylether	nd	nd	200	mg/Kg	
84-66-2	Diethylphthalate	nd	nd	200	mg/Kg	
100-01-6	4-Nitroaniline	nd	nd	1000	mg/Kg	
122-66-7	1,2-Diphenylhydrazine	nd	nd	1000	mg/Kg	
534-52-1	4,6-Dinitro-2-methylphenol	nd	nd	1000	mg/Kg	
86-30-6	n-Nitrosodiphenylamine	nd	nd	200	mg/Kg	
101-55-3	4-Bromophenyl-phenylether	nd	nd	200	mg/Kg	
118-74-1	Hexachlorobenzene	nd	nd	200	mg/Kg	
87-86-5	Pentachlorophenol	nd	nd	1000	mg/Kg	
85-01-8	Phenanthrene	nd	nd	200	mg/Kg	
120-12-7	Anthracene	nd	nd	200	mg/Kg	
84-74-2	Di-n-butylphthalate	nd	nd	200	mg/Kg	

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	Lab Number
OILY WW / OIL PHASE	LIQUID		MB0606B			Sampled: 06/02/00 Analyzed: 06/06/00	L16604-2
CAS#							
206-44-0	Fluoranthene	nd	nd	200	mg/Kg		
129-00-0	Pyrene	nd	nd	200	mg/Kg		
85-68-7	Butylbenzylphthalate	nd	nd	200	mg/Kg		
91-94-1	3,3'-Dichlorobenzidine	nd	nd	400	mg/Kg		
56-55-3	Benzo[a]anthracene	nd	nd	200	mg/Kg		
218-01-9	Chrysene	nd	nd	200	mg/Kg		
117-81-7	bis(2-Ethylhexyl)phthalate	nd	nd	200	mg/Kg		
205-99-2	Benzo[b]fluoranthene	nd	nd	200	mg/Kg		
205-99-2	Benzo[b]fluoranthene	nd	nd	200	mg/Kg		
207-08-9	Benzo[k]fluoranthene	nd	nd	200	mg/Kg		
50-32-8	Benzo[a]pyrene	nd	nd	200	mg/Kg		
193-39-5	Indeno[1,2,3-cd]pyrene	nd	nd	200	mg/Kg		
53-70-3	Dibenz[a,h]anthracene	nd	nd	200	mg/Kg		
191-24-2	Benzo[g,h,i]perylene	nd	nd	200	mg/Kg		

Acid Surrogates:	Recovery L16604-2	Recovery MB0606B	Control Limits (%)	Q
2-Fluorophenol	108	105	10 - 200	
Phenol-d6	104	105	10 - 200	
2,4,6-Tribromophenol	93	93	10 - 200	

Base / Neutral Surrogates:				
1,2-Dichlorobenzene d-4	97	97	10 - 200	
Nitrobenzene-d5	108	104	10 - 200	
2-Fluorobiphenyl	97	98	10 - 200	

none detected = nd

OAL

L16604

Client: ***Enron Transwestern Pipeline***
Contact: ***Charlie Allen***

Project: ***TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.***

Total Metals

Sample ID / *Matrix* / *Lab Number*							
Analyte	**Result**	**Reporting Limit**	**Units (ppm)**	**Dilution**	**Date Analyzed**	**Method**	**Comment** **Analyst**
OIL FROM UNIT / ***other (oil)*** / **Sampled:** *6/2/2000* / Microwave Digestion EPA 3051: *6/13/2000* / *L16604-1*							
Arsenic	ND	0.20	mg/kg		6/13/2000	EPA 200.9	DMC[a]
Cadmium	ND	0.20	mg/kg		6/13/2000	EPA 200.7/6010	CV
Chromium	ND	0.50	mg/kg		6/13/2000	EPA 200.7/6010	CV
Lead	ND	2.5	mg/kg		6/13/2000	EPA 200.7/6010	CV

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPGS, Gallup/Thoreau NM: Gallup Comp Sta.*

Volatile Organic Compounds (VOC)
by EPA 8260

Sample ID	*Matrix*					*Lab Number*
CAS	Analyte	Result	Reporting Limit	Units	Dilution	Comment
				Sampled: *6/2/2000*		
				Extracted: *6/6/2000*		
OILY WW / OIL PHASE	*other (oil)*			Analyzed: *6/6/2000 by GC*		*L16604-2*
See Attached Data Sheet						

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	Lab Number
OILY WW/OIL PHASE Liquid			MB060GA			Sampled : 06/02/00 Analyzed : 06/06/00	L16604-2
CAS #							
75-71-8	Dichlorodifluoromethane	nd	nd	100	mg/Kg		
74-87-3	Chloromethane	nd	nd	100	mg/Kg		
75-01-4	Vinyl chloride	nd	nd	100	mg/Kg		
74-83-9	Bromomethane	nd	nd	100	mg/Kg		
75-00-3	Chloroethane	nd	nd	100	mg/Kg		
75-69-4	Trichlorofluoromethane	nd	nd	100	mg/Kg		
67-64-1	Acetone	nd	nd	1000	mg/Kg		
75-35-4	1,1-Dichloroethene	nd	nd	50	mg/Kg		
75-09-2	Methylene chloride	nd	nd	100	mg/Kg		
75-15-0	Carbon disulfide	nd	nd	50	mg/Kg		
156-60-5	trans-1,2-Dichloroethene	nd	nd	50	mg/Kg		
75-34-3	1,1-Dichloroethane	nd	nd	50	mg/Kg		
78-93-3	2-Butanone	nd	nd	1000	mg/Kg		
590-20-7	2,2-Dichloropropane	nd	nd	50	mg/Kg		
156-59-4	cis-1,2-Dichloroethene	nd	nd	50	mg/Kg		
74-97-5	Bromochloromethane	nd	nd	50	mg/Kg		
67-66-3	Chloroform	nd	nd	50	mg/Kg		
71-55-6	1,1,1-Trichloroethane	nd	nd	50	mg/Kg		
56-23-5	Carbon tetrachloride	nd	nd	50	mg/Kg		
563-58-6	1,1-Dichloropropene	nd	nd	50	mg/Kg		
71-43-2	Benzene	nd	nd	50	mg/Kg		
107-06-2	1,2-Dichloroethane	nd	nd	50	mg/Kg		
79-01-6	Trichloroethene	nd	nd	50	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	Lab Number
OILY WW/ OIL PHASE Liquid			MB060GA			Sampled : 06/02/00 Analyzed : 06/06/00	L16604-2
CAS #							
78-87-5	1,2-Dichloropropane	nd	nd	50	mg/Kg		
74-95-3	Dibromomethane	nd	nd	50	mg/Kg		
75-27-4	Bromodichloromethane	nd	nd	50	mg/Kg		
10061-01-5	cis-1,3-Dichloropropene	nd	nd	50	mg/Kg		
108-10-1	4-Methyl-2-pentanone	nd	nd	500	mg/Kg		
108-88-3	Toluene	nd	nd	50	mg/Kg		
591-78-6	2-Hexanone	nd	nd	500	mg/Kg		
10061-02-6	trans-1,3-Dichloropropene	nd	nd	50	mg/Kg		
79-00-5	1,1,2-Trichloroethane	nd	nd	50	mg/Kg		
127-18-4	Tetrachloroethene	nd	nd	50	mg/Kg		
542-75-6	1,3-Dichloropropene	nd	nd	50	mg/Kg		
124-48-1	Dibromochloromethane	nd	nd	50	mg/Kg		
106-93-4	1,2-Dibromoethane	nd	nd	50	mg/Kg		
108-90-7	Chlorobenzene	nd	nd	50	mg/Kg		
630-20-6	1,1,1,2-Tetrachloroethane	nd	nd	50	mg/Kg		
100-41-4	Ethylbenzene	nd	nd	50	mg/Kg		
100-42-5	Styrene	nd	nd	50	mg/Kg		
75-25-2	Bromoform	nd	nd	50	mg/Kg		
98-82-8	Isopropylbenzene	nd	nd	50	mg/Kg		
108-86-1	Bromobenzene	nd	nd	50	mg/Kg		
79-34-5	1,1,2,2-Tetrachloroethane	nd	nd	50	mg/Kg		
96-18-4	1,2,3-Trichloropropane	nd	nd	50	mg/Kg		
103-65-1	n-Propylbenzene	nd	nd	50	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	Lab Number
OILY WW / OIL PHASE Liquid			MB0606A			Sampled : 06/02/00 Analyzed : 06/06/00	L16604-3
CAS #							
95-49-8	2-Chlorotoluene	nd	nd	50	mg/Kg		
106-43-4	4-Chlorotoluene	nd	nd	50	mg/Kg		
108-67-8	1,3,5-Trimethylbenzene	nd	nd	50	mg/Kg		
98-06-6	tert-Butylbenzene	nd	nd	50	mg/Kg		
95-63-6	1,2,4-Trimethylbenzene	nd	nd	50	mg/Kg		
135-98-8	sec-Butylbenzene	nd	nd	50	mg/Kg		
541-73-1	1,3-Dichlorobenzene	nd	nd	50	mg/Kg		
99-87-6	4-Isopropyltoluene	nd	nd	50	mg/Kg		
106-46-7	1,4-Dichlorobenzene	nd	nd	50	mg/Kg		
95-50-1	1,2-Dichlorobenzene	nd	nd	50	mg/Kg		
104-51-8	n-Butylbenzene	nd	nd	50	mg/Kg		
96-12-8	1,2-Dibromo-3-chloropropane	nd	nd	50	mg/Kg		
120-82-1	1,2,4-Trichlorobenzene	nd	nd	50	mg/Kg		
87-68-3	Hexachlorobutadiene	nd	nd	50	mg/Kg		
91-20-3	Naphthalene	nd	nd	50	mg/Kg		
87-61-6	1,2,3-Trichlorobenzene	nd	nd	50	mg/Kg		
	Total Xylenes	nd	nd	50	mg/Kg		

Surrogates	Recovery L16604-3	Recovery MB0606A
1,2-Dichloroethane-d4	106%	100%
Toluene-d8	105%	100%
4-Bromofluorobenzene	103%	97%

none detected = nd

Oregon Analytical Laboratory
14855 SW Scholls Ferry Rd
Beaverton OR 97007
(503) 590-5300
FAX (503) 590-1404
1-800-644-0967
www.oalab.com

Chain of Custody Record
Laboratory Analysis Request

Sampling: ☑ Grab ☐ Comp Page 1 of 1
OAL Hours _____ Site Visit ☐
ISCO _____

Information
Company Transwestern Pipeline Co.
Charlie Allen
P.O. Box 1019
Thoreau N.M. 87323
505-862-7443 Fax # ~~505-862-7816~~

Billing Information
Company Transwestern Pipeline
Contact Ginger Bibby
Address 488 W. Main St.
Roswell N.M. 88201-7508
Phone # ~~505-625-8067~~ Fax # _____

Project Information
Project Name Gallup Comp. Sta.
Project # _____
P.O. # _____
Comments _____

Sampler's Name Charlie Allen
Signature _____
Quote # _____
NOTE: If quote number is not referenced, standard pricing will be applied.
Provide Fax Results ☐ Yes ☐ No

Have any question Call Charlie at 505-862-7443

Sample Identification	Date	Time	FOR LAB USE ONLY OAL Login #	# of Containers	Matrix: Soil	Matrix: Water	Matrix: Other (Note in Remarks)	Analyses: Volatiles 8260 / 8240 / 8260	Analyses: Semivolatiles 8270 / 8270 PAHs (SIM) 8270 PAH 8310	Analyses: Organochlor Pest 608 / 8081 PCB 608 / 8082	Analyses: NW TPH-HCID Quantify? ☐ Yes ☐ No	Analyses: NW TPH Quantification Dx DX/OIL	Analyses: BTEX 602 / 8021 ☐ MTBE ☐ Naphthalene	Analyses: Metals ☐ Total ☐ TCLP ☐ Dissolved As Ba Cd Cr Pb Hg Se Ag Other _____	Analyses: Arsenic, Chromium Totals	Analyses: Cadmium Lead	Analyses: Halogens	Analyses: PCB's	Analyses: Flash Point	Turnaround	Remarks
Gallup Comp. Sta. oil from unit.	5/31/00	15:45	L16604-1	1			X								X	X	X	X	X	N	oil from unit.
Gallup Comp. Sta. Waste water - oil phase	5/31/00	14:00	-2	1			X	X	X										X	N	oil phase from oily waste water Tank

[H] Normal - 10 working days
[S] Special - 5 working days
[R] Rush - 24-72 hrs
[O] Other - _____

Relinquished	Date	Time
[illegible]	6/2/00	16:30
Charlie Allen		

Received	Date	Time
Kelly Evans	6-5-00	1030
Kelly Evans		
OAL		

Relinquished	Date	Time
Signature		
Print Name		
Company		

Received	Date	Time
Signature		
Print Name		
Company		

Relinquished	Date	Time
Signature		
Print Name		
Company		

Received	Date	Time
Signature		
Print Name		
Company		

☐ Courier ☐ UPS ☐ FedEx ☐ Other
Received @ RT °C
Appropriate Containers ☑ Yes ☐ No
2 4oz./8oz. Jars 3 2 3
_____ VOA Vials
_____ Plastic Bottles
_____ Glass Bottles
_____ Other _____

(Oct 99)

ATTACHMENT C
(MSDS of Chemicals at Facility)

2006 Wilson Road, Humble, TX 77396, 713-446-1000

SYNDYNE

MATERIAL SAFETY DATA SHEET

SECTION 1: DESCRIPTION

PRODUCT NAME	DOT PROPER SHIPPING NAME	
SYNDYNE High Technology Engine Oil		Not Listed
(All SAE Grades)	DOT HAZARD CLASS	Non-Hazardous
CHEMICAL FAMILY	DATE	BY
Synthetic / Iso-Paraffine	February 15, 1991	JBW (713-446-1000)

SECTION 2: INGREDIENTS

COMPONENT	%

Synthetic Lube Basestock

Iso-Paraffinic Lube Basestock

Synthetic additives with Iso-Paraffinic diluents

The precise composition of this mixture is proprietary. A more complete disclosure will be provided to a physician or nurse in event of a medical emergency.

This product contains no hazardous substance within the definition of OSHA Regulation 29 CFR 1910.1200.

SECTION 3: PHYSICAL DATA

Boiling Point °C/°F	650°F - 800°F	Pour Point °C/°F	Less Than 40°F
Vapor Pressure mm Hg @ 20 °C	Less Than 0.1	Evaporation Rate	Negligible
Vapor Density (Air = 1)	Greater Than Air	Specific Gravity	Greater Than 0.87
Solubility in Water	Emulsifiable		
Appearance	Purple	Odor	Lube Oil

SECTION 4: FIRE AND EXPLOSION HAZARD DATA

Flash Point °C/°F	Greater Than 420°F
Extinguishing Media	Dry Chemical, Foam, CO_2, Water Fog
Special Fire Fighting Procedures	Positive pressure, self-contained breathing apparatus should be worn.
Unusual Fire and Explosion Hazards	None

SECTION 5: REACTIVITY HAZARDS

Stability	Unstable ☐ Stable ☒	Conditions to avoid	Extreme Heat & Open Flame
Incompatibility (materials to Avoid)	Strong Oxidizers		
Hazardous Decomposition Products	Carbon Monoxide		
Hazardous Polymerization	May Occur ☐ Will Not Occur ☒	Conditions to Avoid	

SECTION 6: HEALTH HAZARDS

1. Acute Overexposure	No significant adverse health effects are expected upon short-term exposure						
2. Chronic Overexposure	Repeated and long time skin contact for persons hypersensitive to petroleum products may cause redness and irritation of eyes and skin.						
Chemical Listed as Carcinogen or Potential Carcinogen	National Toxicology Program	Yes ☐ No ☒	I.A.R.C. Monographs	Yes ☐ No ☒	OSHA	Yes ☐ No ☒	
Threshold Limit Value	5mg / m^3 for synthetic lubricants						
Emergency and First Aid Procedures							
1. Inhalation	Vaporization is not expected at ambient temperatures, so there should be no problem.						
2. Eyes	Wash with copious quantities of water. If irritation persists, get medical attention. Slightly irritating but does not damage eye tissue.						
3. Skin	Wash with soap and water. Low order of toxicity.						
4. Ingestion	Do not induce vomiting; call physician.						

SECTION 7: SPECIAL PROTECTION INFORMATION

Respiratory Protection	None required with adequate ventilation. In enclosed areas, supplied-air may be used.		
Ventilation	If mists are present in a confined space, provide adequate ventilation to control level below the permissable exposure limit.		
Protective Gloves	Oil resistant	Eye Protection	Use splash goggles or safety glasses when eye contact may occur.
Other Protective Clothing or Equipment	If there is a likelihood of oil splashing, an oil resistant apron should be worn to protect clothing.		

SECTION 8: SPECIAL PRECAUTIONS AND SPILL / LEAK PROCEDURES

Precautions to be Taken in Handling and Storage	Normal precautions - keep away from flames, sparks or ignition sources. Do not weld, or use torch, on the container or near the container.
Other Precautions	Launder oil soaked clothing before reuse.
Steps to be Taken in Case Material is Released or Spilled	Contain spill and keep from entering waterways or sewers. Absorb on porous inert material. Large quantities can be pumped.
Waste Disposal Methods	Dispose according to current Local, State and Federal regulations. Consider recycling.

MATERIAL SAFETY DATA SHEET
AND SAFE HANDLING AND DISPOSAL INFORMATION

CLEAN ACROSS AMERICA AND THROUGHOUT THE WORLD™

ZEP MANUFACTURING COMPANY
P.O. BOX 2015
ATLANTA, GEORGIA 30301

TRANSWESTERN PIPELINE (320)
306 STATE RD 564
GALLUP, NM 87305

07/23/96.
ISSUE DATE: 06/20/94
SUPERSEDES: 07/12/89
ZEP BIG ORANGE
PRODUCT NO.: 0415 **Industrial Solvent Degrea**

SECTION I - EMERGENCY CONTACTS

TELEPHONE:
(404) 352-1680 *BETWEEN 8:00 AM - 5:00 PM (EST)*
MEDICAL EMERGENCY:
(770) 439-4200 *NON-OFFICE HOURS, WEEKENDS*
(770) 432-2873 *AND HOLIDAYS, PLEASE CALL YOUR*
(770) 424-4789 **LOCAL POISON CONTROL**
(770) 392-1480
(770) 455-8160
(770) 552-8836
TRANSPORTATION EMERGENCY:
(770) 922-0923
CHEMTREC:
1-800-424-9300 TOLL-FREE - ALL CALLS RECORDED
DISTRICT OF COLUMBIA:
(202) 483-7616 ALL CALLS RECORDED

SECTION II - HAZARDOUS INGREDIENTS

DESIGNATIONS	TLV (PPM)	EFFECTS (SEE REVERSE)	% IN PROD
™ D-LIMONENE ™ orange distillate; citrus terpene; cyclohexene, 1-methyl-4-(1-methylethenyl)-, (R)-CAS # 5989-27-5; RTECS # GW6360000; OSHA PEL N/D	N/D	CBL SEN	> 90
™ NONYLPHENOXYPOLY(ETHYLENEOXY)ETHANOL ™ npe; poly(oxy-1,2-ethanediyl), alpha-(nonylphenyl)-omega-hydroxy; CAS # 9016-45-9; RTECS # MD905000; OSHA PEL-N/D	N/D	EIR	< 5

SECTION III - HEALTH HAZARD DATA

Special Note: MSDS data pertains to the product as dispensed from the container. Adverse health effects would not be expected under recommended conditions of use (diluted) so long as prescribed safety precautions are practiced.

Acute Effects of Overexposure:
This product can be an eye irritant. Inflammation of eye tissue is characterized by redness, watering, and/or itching. One of the ingredients in this product has caused sensitization reactions in a small percentage of the general population.

Chronic Effects of Overexposure:
Contact, especially if prolonged of repeated, may cause redness, itching, or blistering of the skin. None of the hazardous ingredients are listed as carcinogens by IARC, NTP, & OSHA

Recommended PEL/TLV: Not established **Primary Routes of Entry:** N/A

HMIS Codes: HEALTH 1;FLAM. 2;REACT. 0;PERS. PROTECT. B ;CHRONIC HAZ. NO

FIRST AID PROCEDURES:
Skin: Wash contaminated skin thoroughly with soap or a mild detergent. Apply a skin cream with lanolin. Get medical attention if irritation persists.
Eyes: Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting upper and lower lids. Get medical attention at once.
Inhale: Move exposed person to fresh air. If irritation persists, get medical attention promptly.
Ingest: If this product is swallowed, do not induce vomiting. If victim is conscious give plenty of water to drink. Get medical attention at once.

SECTION IV - SPECIAL PROTECTION INFORMATION

Protective Clothing: Wear nitrile gloves or use gloves with demonstrated resistance to the ingredients in this product.
Eye Protection: Wear tight-fitting splash-proof safety glasses especially if contact lenses are worn.
Respiratory Protection: No special measures are required.
Ventilation: No special measures are required.

SECTION V - PHYSICAL DATA

Boiling Point (°F):	338-375	**Specific Gravity:**	0.853	**Vapor Pressure (mmHg):**	N/A
Percent Volatile by Volume (%):	93.8	**Vapor Density (air = 1):**	N/A	**Evaporation Rate (CCL4 = 1):**	~33
Solubility in Water:	EMULSIFIES	**pH (concentrate):**	N/A	**pH (use dilution of 1:20):**	7.6

Appearance and Odor: ORANGE LIQUID WITH A CITRUS ODOR

SECTION VI - FIRE AND EXPLOSION DATA

Flash Point (°F) (method used): 121 (TCC)
Flammable Limits: LEL N/A UEL N/A
Extinguishing Media: Carbon dioxide, dry chemical and foam.
Special Fire Fighting: Fire exposed drums should be cooled with stream of water.
Unusual Fire Hazards: None

MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

ZEP MANUFACTURING COMPANY
N MAINTENANCE PRODUCTS

ISSUE DATE: 10/30/89 ZEP BIG ORANGE
SUPERSEDES: PRODUCT NUMBER: 0114

CT) I - E M E R G E N C Y C O N T A C T S

) MANUFACTURING COMPANY TELEPHONE: (404)352-1680 BETWEEN 8:00 AM-5:00 PM (EST)
). BOX 2015 NON-OFFICE HOURS, WEEKENDS, AND HOLIDAYS: AREA CODE 404
ANTA, GEORGIA 30301 435-2973, 351-2952, 432-2873
LOCAL POISON CONTROL CENTER .....
NSPORTATION EMERGENCY: CHEMTREC: TOLL FREE 1-800-424-9300 ALL CALLS RECORDED
4)922-0923 OR DISTRICT OF COLUMBIA (202)483-7616 ALL CALLS RECORDED

TION II - H A Z A R D O U S I N G R E D I E N T S

DESIGNATIONS	TLV (PPM)	EFFECTS (SEE REVERSE)	% IN PROD.
D-LIMONENE ** ORANGE DISTILLATE; CITRUS TERPENE; CLOHEXENE, 1-METHYL-4-(1-METHYLETHENYL)-, (R)- S# 5989-27-5; RTECS# GW6360000; OSHA PEL N/D	N/D	CBL SEN	70-80
NONYLPHENOXYPOLY(ETHYLENEOXY)ETHANOL ** LY(OXY-1,2-ETHANEDIYL), ALPHA-(NONYLPHENYL)-OMEGA- DROXY; CAS# 9016-45-9; RTECS# MD905000; OSHA PEL- D	N/D	EIR	5-10
NONYLPHENOXYPOLY(ETHYLENEOXY)ETHANOL ** LY(OXY-1,2-ETHANEDIYL), ALPHA-(NONYLPHENYL)-OMEGA- DROXY; CAS# 9016-45-9; RTECS# MD0900000; OSHA PEL- D.	N/D	EIR	< 5

IAL NOTE: ADVERSE HEALTH EFFECTS WOULD NOT BE EXPECTED UNDER RECOMMENDED ITIONS OF USE SO LONG AS PRESCRIBED SAFETY PRECAUTIONS ARE PRACTICED.

ION III - H E A L T H H A Z A R D D A T A

E EFFECTS OF OVEREXPOSURE:
PRODUCT CAN BE AN EYE IRRITANT. INFLAMMATION OF EYE TISSUE IS CHARACTERIZED EDNESS, WATERING, AND/OR ITCHING.
E INGREDIENTS IN THIS PRODUCT HAS CAUSED SENSITIZATION REACTIONS IN A CENTAGE OF THE GENERAL POPULATION.

MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

ISSUE DATE: 10/30/89 ZEP BIG ORANGE
SUPERSEDES: PRODUCT NUMBER: 0114

C[illegible]N III - H E A L T H H A Z A R D D A T A (CONTINUED)

RONIC EFFECTS OF OVEREXPOSURE:
NTACT, ESPECIALLY IF PROLONGED OR REPEATED, MAY CAUSE REDNESS, ITCHING, OR
ISTERING OF THE SKIN.
NE OF THE INGREDIENTS ARE LISTED AS CARCINOGENS BY IARC, NTP, OR OSHA.

'D PEL/TLV: NOT ESTABLISHED PRIMARY ROUTES OF ENTRY: N/A

S CODES: HEALTH 1; FLAM. 2; REACT. 0; PERS. PROTECT. A ; CHRONIC HAZ. NO

ST AID PROCEDURES:
N : WASH CONTAMINATED SKIN THOROUGHLY WITH SOAP OR A MILD DETERGENT. APPLY A SKIN CREAM WITH LANOLIN. GET MEDICAL ATTENTION IF IRRITATION PERSISTS.
B : IMMEDIATELY FLUSH EYES WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES, OCCASIONALLY LIFTING UPPER AND LOWER LIDS. GET MEDICAL ATTENTION AT ONCE.
ALE: MOVE EXPOSED PERSON TO FRESH AIR. IF IRRITATION PERSISTS, GET MEDICAL ATTENTION PROMPTLY.
E IF THIS PRODUCT IS SWALLOWED, DO NOT INDUCE VOMITING. IF VICTIM IS CONSCIOUS GIVE PLENTY OF WATER TO DRINK. GET MEDICAL ATTENTION AT ONCE.

TION IV - S P E C I A L P R O T E C T I O N I N F O R M A T I O N

TECTIVE CLOTHING : THE USE OF NEOPRENE, NITRILE OR NATURAL RUBBER GLOVES IS STRONGLY RECOMMENDED, ESPECIALLY FOR PROLONGED CONTACT.
PROTECTION : WEAR TIGHT-FITTING SPLASH-PROOF SAFETY GLASSES ESPECIALLY IF CONTACT LENSES ARE WORN.
PIRATORY PROTECTION: KEEP FACE AWAY FROM SPRAY MIST AND DO NOT BREATHE VAPORS.
TILATION : VENTILATION SHOULD BE EQUAL TO OUTDOORS. USE EXHAUST FANS AND/OR EXHAUST HOOD IN ENCLOSED SPACES.

TION V - P H Y S I C A L D A T A (FOR FILL MATERIAL ONLY)

ING POINT (F)	: N/A	SPECIFIC GRAVITY	: 0.859
R PRESSURE(MMHG)	: 40 P.S.I.	PERCENT VOLATILE BY VOLUME (%)	: ~90
R DENSITY(AIR=1)	: N/A	EVAPORATION RATE(N/A =1)	: N/A
BILITY IN WATER	: COMPLETE	PH(CONCENTRATE)	: N/A
		PH(USE DILUTION OF N/A)	: N/A

ARANCE AND ODOR : CLEAR WITH ORANGE FRAGRANCE

ION VI - F I R E A N D E X P L O S I O N D A T A

[illegible]NT(F) (METHOD USED): EXTREMELY FLAMMABLE (CSMA)
MABLE LIMITS LEL N/A UEL N/A
NGUISHING MEDIA : CARBON DIOXIDE, DRY CHEMICAL, WATER FOG, FOAM.
IAL FIRE FIGHTING: WEAR SELF-CONTAINED POSITIVE PRES. BREATHING APPARATUS.
UAL FIRE HAZARDS : DIRECT WATER ONTO INTACT CONTAINERS TO [illegible]

MATERIAL SAFETY DATA SHEET

AND SAFE HANDLING AND DISPOSAL INFORMATION

ISSUE DATE: 10/30/89 ZEP BIG ORANGE
SUPERSEDES: PRODUCT NUMBER: 0114

CT VII - R E A C T I V I T Y D A T A

ABILITY : STABLE
COMPATIBILITY(AVOID) : HEAT, FLAME, SPARK, STRONG ACIDS AND/OR OXIDIZERS
LYMERIZATION : WILL NOT OCCUR.
ARDOUS DECOMPOSITION: CARBON DIOXIDE, CARBON MONOXIDE, AND OTHER UNIDENTIFIED ORGANIC COMPOUNDS.

TION VIII - S P I L L A N D D I S P O S A L P R O C E D U R E S

PS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:
ERVE SAFETY PRECAUTIONS IN SECTIONS 4 & 9 DURING SPILL CLEAN-UP. LARGE LLS ARE UNLIKELY DUE TO PACKAGING. SPILL MAY BE ABSORBED ON AN INERT ABSORB- (EG ZEP-O-ZORB), PLACED IN A SUITABLE CONTAINER FOR DISPOSAL. WASH AREA ROUGHLY WITH A DETERGENT SOLUTION AND RINSE WELL WITH WATER.

TE DISPOSAL METHOD:
DUCT IS CONSUMED IN USE. DO NOT CRUSH, PUNCTURE OR INCINERATE SPENT CONTAIN- LARGE NUMBERS OF AEROSOL CONTAINERS MAY REQUIRE HANDLING AS A HAZARDOUS TE, BUT IN MOST STATES TOTAL HAZARDOUS WASTE QUANTITIES LESS THAN 220 LBS PER TH MAY ALLOW DISPOSAL IN A CHEMICAL OR INDUSTRIAL WASTE LANDFILL. CONSULT AL, STATE AND FEDERAL AGENCIES FOR THE PROPER DISPOSAL METHOD IN YOUR AREA.

A HAZ. WASTE NOS.: D001

TION IX - S P E C I A L P R E C A U T I O N S

AUTIONS TO BE TAKEN WHEN HANDLING AND STORING:
MABLE! STORE AND USE AWAY FROM HEAT, SPARKS, OPEN FLAME, AND ANY SOURCE OF TION.
OT STORE AT TEMPERATURES ABOVE 120F. OR IN DIRECT SUNLIGHT. DO NOT TURE OR INCINERATE CONTAINER.
PRODUCT AWAY FROM SKIN AND EYES.
OT BREATHE SPRAY MISTS OR VAPORS.
HING OR SHOES WHICH BECOME CONTAMINATED WITH SUBSTANCE SHOULD BE REMOVED PTLY AND NOT REWORN UNTIL THOROUGHLY CLEANED.
OUT OF THE REACH OF CHILDREN.

ION X - T R A N S P O R T A T I O N D A T A

PROPER SHIPPING NAME
SUMER COMMODITY, AEROSOLS, COMPOUND CLEANING LIQUID
HAZARD CLASS: ORM-D
NUMBER : N/A DOT LABEL/PLACARD: ORM-D
CHEMICAL INVENTORY - ALL INGREDIENTS ARE LISTED
CWA 40CFR PART 117 SUBSTANCE(RQ IN A SINGLE CONTAINER): NONE

MATERIAL SAFETY DATA SHEE
AND SAFE HANDLING AND DISPOSAL INFORMATION

CLEAN ACROSS AMERICA AND THROUGHOUT THE WORLD™

ZEP MANUFACTURING COMPANY
P.O. BOX 2015
ATLANTA, GEORGIA 30301

TRANSWESTERN PIPELINE (320)
306 STATE RD 564
GALLUP, NM 87305

FILE

02/02/96
ISSUE DATE: 08/24/93
SUPERSEDES: 10/30/89
ZEP BIG ORANGE AEROSOL
PRODUCT NO.: 0114 **Aerosol Solvent Degrea**

SECTION I - **EMERGENCY CONTACTS**

TELEPHONE:
(404) 352-1680 *BETWEEN 8:00 AM - 5:00 PM (EST)*
MEDICAL EMERGENCY:
(770) 435-4200 *NON-OFFICE HOURS, WEEKENDS*
(404) 432-2873 *AND HOLIDAYS, PLEASE CALL YOUR*
(404) 424-4789 **LOCAL POISON CONTROL**
(404) 392-1480
(404) 455-8160
(404) 552-8836
TRANSPORTATION EMERGENCY:
(770) 922-0923
CHEMTREC:
1-800-424-9300 TOLL-FREE - ALL CALLS RECORDED
DISTRICT OF COLUMBIA:
(202) 483-7616 ALL CALLS RECORDED

SECTION II - **HAZARDOUS INGREDIENTS**

DESIGNATIONS	TLV (PPM)	EFFECTS (SEE REVERSE)	% II PROI
* D-LIMONENE * orange distillate; citrus terpene; cyclohexene, 1-methyl-4-(1-methylethenyl)-, (R)-CAS# 5989-27-5; RTECS# GW6360000; OSHA PEL N/D	N/D	CBL SEN	70-8
* NONYLPHENOXYPOLY(ETHYLENEOXY)ETHANOL * npe; poly(oxy-1,2-ethanediyl), alpha-(nonylphenyl)-omega-hydroxy; CAS# 9016-45-9; RTECS# MD905000; OSHA PEL-N/D	N/D	EIR	< 5

SECTION III - **HEALTH HAZARD DATA**

Special Note: MSDS data pertains to the product as dispensed from the container. Adverse health effects would not be expected under recommende conditions of use (diluted) so long as prescribed safety precautions are practiced.

Acute Effects of Overexposure:
This product can be an eye irritant. Inflammation of eye tissue is characterized by redness, watering, and/or itching. One of the ingredients in this product has caused sensitization reactions in a small percentage of the general population.

Chronic Effects of Overexposure:
Contact, especially if prolonged of repeated, may cause redness, itching, or blistering of the skin. None of the ingredients are listed as carcinogens by IARC, NTP, o OSHA.

st'd **PEL/TLV:** Not established **Primary Routes of Entry:** N/A

MIS Codes: HEALTH 1;FLAM. 2;REACT. 0;PERS. PROTECT. A ;CHRONIC HAZ. NO

FIRST AID PROCEDURES:
Skin: Wash contaminated skin thoroughly with soap or a mild detergent. Apply a skin cream with lanolin. Get medical attention if irritation persists.
Eyes: Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting upper and lower lids. Get medical attention at once.
Inhale: Move exposed person to fresh air. If irritation persists, get medical attention promptly.
Ingest: If this product is swallowed, do not induce vomiting. If victim is conscious give plenty of water to drink. Get medical attention at once.

SECTION IV - **SPECIAL PROTECTION INFORMATION**

Protective Clothing: Wear nitrile gloves or use gloves with demonstrated resistance to the ingredients in this product.
Eye Protection: Wear tight-fitting splash-proof safety glasses especially if contact lenses are worn.
Respiratory Protection: Keep face away from spray mist and do not breathe vapors.
Ventilation: Ventilation should be equal to outdoors. Use exhaust fans and/or exhaust hood in enclosed spaces.

SECTION V - **PHYSICAL DATA**

Boiling Point (°F):	N/A	**Specific Gravity:**	0.859	**Vapor Pressure (mmHg):**	40 P.S.I.
Percent Volatile by Volume (%):	~ 90	**Vapor Density (air = 1):**	N/A	**Evaporation Rate (N/A = 1):**	N/A
Solubility in Water:	COMPLETE	**pH (concentrate):**	N/A	**pH (use dilution of N/A):**	N/A

Appearance and Odor: CLEAR LIQUID WITH ORANGE FRAGRANCE

SECTION VI - **FIRE AND EXPLOSION DATA**

Flash Point (°F) (method used): Extremely Flammable (CSMA)
Flammable Limits: LEL N/A UEL N/A
Extinguishing Media: Carbon dioxide, dry chemical, water fog, foam.
Special Fire Fighting: Wear self-contained positive pres. breathing apparatus.
Unusual Fire Hazards: Direct water onto intact containers to prevent bursting.

This information relates only to the specific material designed and may not be valid for such material used in combination with any other materials or in any process. Such information is to the best of this company's knowledge and believed accurate and reliable as of the date indicated. However, no representation, warranty or guarantee is made as to its accuracy, reliability or completeness. It is the users responsibility to satisfy himself as to the suitableness and completeness of such information for his own particular use.

For additional non-emergency information contact:
Director of VO/Tech Training and Safety/Security

ENRON
Gas Pipeline
Operating
Company

P. O. Box 1188
Houston, Texas 77251-1188

Material Safety Data Sheet

24-HOUR EMERGENCY	Houston Pipe Line (713) 750-7113	Northern Natural Gas (713) 750-7110
Chemtrec 1 (800) 424-9300	Florida Gas Transmission (713) 654-7836	Transwestern Pipeline (713) 654-7837

I. Material Identification

Material/Trade Name: **Natural Gas Condensate**

Synonyms: **Natural Gasoline, Condensate, Wellhead Gas, Liquids, Drip**

Chemical Family/Formula: **Primarily C_3 - C_{10}**

CAS No.: **64741-48-6**

Hazard Rating*

1 Health

4 Fire

0 Reactivity

0 Least 3 High
1 Slight 4 Extreme
2 Moderate * NFPA 704

II. Ingredients

Composition: **Natural Gasoline composition varies depending on the supply point. A typical composition would be as follows:**

C_3 - C_{10}

Toxicity Data: **Non-toxic, simple asphyxiant**

III. Physical Data

Boiling Point, 760MM/HG: **-112°F (-80°C) (Propane)**

Specific Gravity, H_2O = 1: **N/A**

Vapor Pressure, MM/HG: **135-145 psia**

Vapor Density, Air = 1: **>1**

Appearance and Odor: **Colorless with sweet odor**

Solubility in H_2O, % by Weight: **Trace**

Evaporation Rate, Butal Acetate = 1: **N/A**

Molecular Weight: **52-54 (Avg)**

Freezing Point: **N/A**

IV. Fire and Explosion Data

Flash Point and Test Method: **-156°F (-104°C) (Propane)**

Auto Ignition Temperature: **875°F (468°C) (Propane)**

Flammability Limits in Air, % by Volume: **Lower >2**

Upper 10

Extinguished Media: **Stop flow. CO_2 dry chemical. (Do not completely extinguish flames unless flow is shut off)**

Special Fire Fighting Procedures: **Stop flow; use water to cool exposures.**

Unusual Fire and Explosion Hazards: **Vapor is heavier than air. A hazard of reignition or explosion exists if flame is extinguished without stopping flow of gas.**

ENRON Gas Pipeline Operating Company

Natural Gas Condensate

V. Reactivity Data

Stability: **Stable**

Hazardous Polymerization: **Will Not Occur**

Conditions and Materials to Avoid: **Avoid contact with heat or flame.**
Explosive reactions can occur between Natural Gasoline and oxidizing agents such as Chlorine, Bromine Pentafluoride, Oxygen Difluoride and Nitrogen Trifluoride. It will ignite spontaneously when mixed with Chlorine Dioxide.

Hazardous Decomposition Products: **None**

VI. Occupational Exposure Limits

Simple Asphyxiant. Gasoline TLV = 300 ppm 8 hr. TWA
The materials in this product are listed in the TSCA Inventory. Not listed as carcinogenic by IRAC, NTP, OSHA, ACGIH. This product may contain Benzene. When in excess of 0.1% and not contained in pipe or container, the exposure is covered by 29 CFR 1910.1028 & .1000.

VII. Health Information

Acute exposure to high concentration can cause central nervous system depression; loss of consciousness and possible asphyxiation.

Chronic - No permanent effects are reported.

Eye Contact - Liquid will cause severe burning sensation with temporary irritation and swelling of lids.

Ingestion - Irritation of mucus membranes of throat, esophagus and stomach may result in nausea and vomiting. Depression may occur if absorbed.

Inhalation - Asphyxiant - Non-toxic. Exposure to oxygen deficient atmosphere results in diminished mental alertness and impaired muscular coordination. Collapse and death can occur.

VIII. Emergency and First Aid Procedures

Skin — Wash contaminated area with plenty of soap and water. Apply ointment if skin is irritated. Seek medical attention if symptoms result.

Ingestion — If swallowed, do not induce vomiting. If vomiting does occur, keep airway clear. Seek medical attention immediately.

Eyes — Immediately flush with large amounts of water. Seek medical attention immediately.

Inhalation — Remove victim to fresh air. Restore breathing if necessary. Get medical help.

Note to Physician — Gastric lavage should be considered. Guard against aspiration into lungs which may result in chemical pneumonitis. Irregular heart beat may occur. Use of adrenalin is not advised. Treat symptomatically.

IX. Employee Protection

Eye — Avoid contact with face and eyes. Use face shield and goggles where liquids may be released under pressure.

Gloves — Avoid contact with skin. Impervious gloves should be worn where liquids or expanding gas may be encountered.

Clothing — Standard work clothing. Apron to avoid contact. Shoes and clothing should be decontaminated or discarded.

Respiratory — Use supplied air respiratory protection where oxygen is less than 19.5%. Monitor enclosed areas for deficiency of oxygen and explosive atmosphere.

X. Environmental Protection

Spill Clean-Up Procedure — Evacuate area. Remove sources of ignition. Stop leak if possible. Ventilate area to reduce explosion hazard.

Waste Disposal — Dispose of in accordance with Federal, State and Local requirements.

Environmental Hazards — Waste product and contaminated material should be considered a hazardous waste if flashpoint is less than 140° F; requiring disposal in an approved hazardous waste facility.

XI. Special Protection

None required.

XII. Transportation Requirements

DOT Classification: **Flammable Liquid**

DOT I.D. No.: **UN 1075, UN 1965, UN 1203**

XIII. Other Regulation Controls

None Determined

www.komfg.com
MANUFACTURING, INC. MATERIAL SAFETY DATA SHEET
P.O BOX 3574 SPRINGFIELD, MO 65808 417.866.8000 FAX 417.866.2662

#430

SECTION 1: GENERAL INFORMATION

PRODUCT NAME	HEAVY DUTY DEGREASER	**DATE PREPARED**	10/15/2004
CHEMICAL NAME & SYNONYMS	CHEMICAL BLEND	**SUPERSEDES**	6/19/2000
CHEMICAL FAMILY	ALKALINE	24 HOUR EMERGENCY ASSISTANCE	CHEMTREC 1-800-424-9300
FORMULA	PROPRIETARY		

SECTION II: PHYSICAL DATA

pH (1% SOLUTION)	11.5	**SOLUBILITY IN WATER**	COMPLETE
BOILING RANGE	212F	**EVAPORATION RATE (WATER = 1)**	<1
% VOLATILE BY VOLUME	91%		
SPECIFIC GRAVITY	1.05	**VOC CONTENT**	38g/l
APPEARANCE & ODOR	CLEAR RED LIQUID WITH A SLIGHT SOLVENT ODOR		

SECTION III: HAZARDOUS INGREDIENTS

PRINCIPAL HAZARDOUS COMPOUNDS	%	THRESHOLD LIMIT VALUE (UNITS)
SODIUM HYDROXIDE	<5	2MG/CUBIC METER
ALKYL ARYL POLYETHOXY ALCOHOL	<5	NOT ESTABLISHED (SEVERE EYE IRRITANT)
2-BUTOXYETHANOL	<5	25 PPM (SKIN)

SECTION IV: FIRE & EXPLOSION HAZARD DATA

FLASH POINT (TEST METHOD)	DOES NOT FLASH
FLAMMABILITY LIMITS	NA
EXTINGUISHING MEDIA	NA
SPECIAL FIRE FIGHTING PROCEDURES	NA
FIRE AND EXPLOSION HAZARDS	NONE

SECTION V: HEALTH HAZARD DATA

ACGIH THRESHOLD LIMIT VALUE	NOT ESTABLISHED FOR MIXTURE
CARCINOGEN - NTP PROGRAM	NO
CARCINOGEN - IARC PROGRAM	NO
PRIMARY ROUTES OF ENTRY	CAUSES SEVERE EYE IRRITATION UPON DIRECT CONTACT. SKIN CONTACT CAN CAUSE IRRITATION AND BURNS IN SOME CASES. INHALATION OF HIGH MIST CONCENTRATIONS MAY BE IRRITATING TO NOSE AND THROAT. INGESTION MAY CAUSE BURNS TO MOUTH AND THROAT
CHRONIC HEALTH HAZARDS	NONE KNOWN
EMERGENCY FIRST AID	EYES: FLUSH WITH WATER FOR 15 MINUTES. GET MEDICAL ATTENTION IF IRRITATION PERSISTS. SKIN: SLUSH WELL WITH WATER FOR 15 MINUTES INHALATION: REMOVE TO FRESH AIR. TREAT SYMPTOMATICALLY INGESTION: GIVE LARGE QUANTITIES OF WATER. CONSULT PHYSICIAN IMMEDIATELY. DO NOT INDUCE VOMITING. IF AVAILABLE, ONE PART VINEGAR TO ONE PART WATER.

SECTION V: HEALTH HAZARD DATA (Cont'd)

SECTION 313 SUPPLIER NOTIFICATION

THIS PRODUCT CONTAINS THE FOLLOWING TOXIC CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SARA TITLE III, SECTION 313 OF THE EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT OF 1986 AND 40CFR372:

CAS#	CHEMICAL NAME	PERCENT BY WEIGHT
NA	GLYCOL EHTERS	1.6%

SECTION VI: REACTIVITY DATA

STABILITY	STABLE	**CONDITIONS TO AVOID**	NONE
MATERIALS TO AVOID	STRONG ACIDS	**HAZARDOUS POLYMERIZATION**	WILL NOT OCCUR
HAZARDOUS DECOMPOSITION PRODUCTS	NA		

SECTION VII: ENVIRONMENTAL PROTECTION

SPILL RESPONSE	AVOID CONTACT WITH SKIN, EYES OR CLOTHES. WEAR PROTECTIVE EQUIPMENT. DIKE AND CONTAIN SPILLED MATERIAL. COLLECT LIQUID WITH AN INERT ABSORBENT AND TRANSFER TO A CONTAINER FOR REUSE OR DISPOSAL. FLUSH RESIDUE AWAY WITH LARGE QUANTITIES OF WATER. SMALL SPILLS MAY BE NEUTRALIZED WITH A DILUTE ACID AND FLUSHED TO A SANITARY SEWER.
WASTE DISPOSAL METHOD	FOLLOW STATE AND FEDERAL REGULATIONS REGARDING HEALTH AND POLLUTION.

SECTION VIII: SPECIAL PROTECTION INFORMATION

EYE PROTECTION	CHEMICAL SAFETY GLASSES	**SKIN PROTECTION**	RUBBER, PVC, OR NEOPRENE GLOVES
RESPIRATORY PROTECTION	NONE REQUIRED UNDER NORMAL USE	**VENTILATION RECOMMENDED**	GENERAL
OTHER PROTECTION	AS NEEDED TO PREVENT SKIN CONTACT		

SECTION IX: SPECIAL PRECAUTIONS

HANDLING & STORAGE PRECAUTIONS	CAUTION!!! ALKALINE POWDER!!! AVOID CONTACT WITH SKIN, EYES AND CLOTHING. IN CASE OF CONTACT, FLUSH SKIN AND/OR EYES WITH WATER FOR 15 MINUTES AND GET MEDICAL ATTENTION IF IRRITATION PERSISTS. DO NOT TAKE INTERNALLY. REMOVE CONTAMINATED CLOTHING AND WASH BEFORE REUSE.
OTHER PRECAUTIONS	KEEP CLOSURES TIGHT AND UPRIGHT WHEN NOT USING PRODUCT. KEEP OUT OF REACH OF CHILDREN.

ATTACHMENT D
(Approval Letter from OCD for Drainline Testing)

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

July 16, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-636

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company (TWPC)
6381 North Main
Roswell, NM 88201

RE: Approval of Methods for Underground Drain Line Testing
TWPC(New Mexico Facilities) Compressor Stations

Dear Mr. Campbell:

The OCD has received the letter dated July 8, 1997 from TWPC titled "Approval Methodology Request for Underground Drain Line Testing." Based on the testing method proposed the OCD hereby approves of this procedure for TWPC facilities that are currently permitted under discharge plans by the OCD.

This approval is subject to the condition that the OCD Santa Fe Office be notified 72 hours in advance of any testing.

Please note, OCD approval of this test procedure dues not relieve TWPC from liability should groundwater contamination result from this procedure. OCD approval also does not relieve TWPC from responsibility to comply with other federal, state, and local rules and regulations that may apply.

If TWPC has any questions regarding this matter please feel free to contact me at (505)-827-7152.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief - OCD

c: OCD District Offices.

FAX (505) 625-8060 Phone (505) 623-2761

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

July 8, 1997

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

Re: Approval Methodology Request for Underground Drain Line Testing

Dear Mr. Anderson:

Transwestern Pipeline Company (Transwestern), presents the following methodology to test the integrity of underground process /wastewater line drain testing at compressor station facilities currently under approved OCD discharge plans. This proposed testing methodology, if approved by your agency, will be implemented at all compressor stations which are owned and operated by Transwestern which are currently under an approved OCD discharge plan drain line testing requirement.

Under this testing program, Transwestern proposes to conduct a thirty minute pressure testing of each drain line at a testing pressure of 3 pounds per square inch (psi) above normal or ambient operating pressure. Each underground drain line to be tested will be isolated from all other drain lines. The test will be conducted at its origination or at the point where the drain line exits the building foundation or secondary containment. A plug or stopper will be inserted at one end of the drain line and sealed to prevent water leakage. The other end of the drain line will be engineered and designed with a water tight 90 degree piping elbow. A vertical pipe extension will be constructed and tap water added to fill the drain line and vertical pipe to a height which will allow a 3 psi pressure on the drain line system. The following equation was used to determine the height of water to be placed into the system

Feet of head = Pressure (psi) X 2.31/ specific gravity

specific gravity of water = 1.0

(3 x 2.31)/1 = 6.95 feet

This equation was taken from the Pipeline Rule of Thumb Book, 3rd edition, Gulf Publishing Company, page 293.
Transwestern proposes to conduct pressure testing on each underground drain line at each compressor station covered under an approved discharge plan. At the beginning of each thirty minute time period, Transwestern will mark on the vertical pipe at the 6.95 foot water level. Upon conclusion the thirty minute period, Transwestern will record the water level height. A report will be prepared and submitted to the OCD within 45 days of completing the study at each compressor station, depicting the results of the pressure testing.

Transwestern requests favorable consideration and approval of this pressure testing study proposal. Should you require any additional information, contact the undersigned at our Roswell Technical Operations office at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Rich Jolly
Butch Russell
file

ATTACHMENT E
(Contingency Plan)

CONTINGENCY PLAN

FOR

TRANSWESTERN PIPELINE COMPANY

GALLUP COMPRESSOR STATION

June 21, 2000

TABLE OF CONTENTS

INTRODUCTION

CONTINGENCY PLAN SCOPE

This plan is to provide guidelines for responding to emergency situations resulting from releases of hazardous substances at the Gallup Compressor Station. It is intended to provide compliance with 40 CFR 265.50 and 29 CFR 1910.120.

CONTINGENCY PLAN OBJECTIVE

The objective of this plan is to effectively manage and contain emergency situations to minimize injuries, property damage and adverse environmental effects at the Gallup Compressor Station.

For related information pertaining to emergency planning, training or drills, refer to the Gallup Team Emergency Plan maintained at the facility.

DEFINITION OF AN EMERGENCY

An emergency is any accidental release of a hazardous substance that endangers or could endanger human life, property or the environment. Small releases that can be handled in the normal course of operations are not considered emergencies.

GENERAL FACILITY INFORMATION

Gallup Compressor Station is designed to compress natural gas and is part of the process of transporting compressed natural gas west from the facility. Entrained pipeline liquids, which are a component of the natural gas, are removed from the gas and temporarily stored at the facility in a storage tank, until removed from the facility by a trucking operation. The pipeline liquids consist of water, combustible hydrocarbons.

Other regulated liquid substances at the facility include oily wastewater, new and used lubricants and cleaning compounds. All of these regulated materials are stored in tanks or drums and maintained in concrete secondary containment.

The facility is fenced to restrict access to the general public and lighted during night time hours. To arrive at the facility, from Gallup on the east side go west on I –40 to exit 22. Montoya Blvd. Go north to Hassler Valley Rd. East for Approx. 4.2 miles to Speedway Drive- North for approx. .5 miles – west to Transwestern Pipeline Gallup Compressor Station yard.

The facility is operated by the Gallup Team. Normal working hours are 7:00 am to 3:30 pm Monday through Friday. During "off hours" and on weekends, one of the employees is on call. .

I. PREEMERGENCY PLANNING AND COORDINATION WITH OUTSIDE PARTIES

The following services can be contacted for assistance by dialing the phone numbers posted near the telephones at the site:

Ambulance	Gallup Med Star (505) 722-4195
Hospital	Gallup RMCH (505) 863-7000
Sheriff	Gallup (505) 722-7205
State Police	Gallup 911or (505) 863-9353
Local fire department	Gallup 911 or (505) 722-4195

Discussions are held periodically with the local fire department. Fire department personnel are advised of the types of chemicals stored at the site, emergency situations that might occur and the type of response which might be needed at the Gallup facility.

II. PERSONNEL ROLES AND LINES OF AUTHORITY

Employees of Transwestern Pipeline Company that discover a potential emergency condition are required to notify the Team Advisor in Albuquerque , New Mexico and the Director of Operations or his designee in Albuquerque, New Mexico.

Any employee assigned to the facility may activate this plan and carry our all phases of this plan. The responsible employee who is present during an emergency is the Emergency Response Coordinator.

Team member's name, business phone, pager, cellular phone, and home number.

Team Member	Business Phone	Cellular Phone	Pager #	Home phone
Charlie Allen	(505) 862-7443	(505) 979-3177	(505)350-1212	(505)862-7311
Howard Begay	(520) 871-4266	(505) 979-1643	(505)726-2108	(520)871-5781
Michael Boatman	(505)863-4104	(505) 979-0366	(505)726-2104	(505)863-3741
Kory Kruse	(505) 863-4104	(505) 979-0371	(505)726-2103	(505)726-9146
Robert Stearns	(520) 871-4266	(505)979-1650	(505)726-2109	(520) 871-5576
Walter Rhoda	(505) 863-4104	(505)979-0374	(505)726-2105	(520) 562-7339
Patrick Troncoso	(505) 863-4104	(505)979-0323	(505)726-2102	(505) 863-8833
Douglas Young	(505) 863-4104	(505)979-0378	(505)726-2106	(505) 863-9317

III. EMERGENCY RECOGNITION AND PREVENTION

A. Natural Gas. Natural gas and related emergencies are covered in the Gallup Compressor Station Emergency Plan which is designed to comply with 49 CFR 192. Copies of this document are maintained at the facility.

B. Natural Gas Liquids. The possibility of emergencies caused by accidental releases of pipeline liquids have been minimized by the facility design and operational methods. All storage tanks holding natural gas liquids are operated at atmospheric pressure. The pipeline liquids tank is located in remote portions of the facility which further reduces any risk to the employees at the site and process equipment.

Identification of releases and or spills of any hazardous substance will include equipment repair and applicable agency notification and reporting. Control of the release and prevention will be emphasized to minimize the occurrence from becoming an emergency. The Gallup Team, located in Gallup, New Mexico (505- 863-4104) serves as operational team for this facility. Significant releases of a facility controlled substance would be deemed an emergency.

IV. SAFE DISTANCES AND PLACES OF REFUGE

Safe distances and perimeters of safety will be determined at the time of an incident by the Emergency Response Coordinator. Factors that influence safe distances include:

- Toxicological properties of the substance
- Physical state of the substance
- Quantity released
- Method, rate and height of release
- Vapor density and pressure
- Wind speed and direction
- Temperature and atmospheric stability
- Local topography

Places for personnel to take short rest breaks called, a refuge, during an emergency, will be located upwind of the emergency site and at a safe distance from the emergency area. The area will be specifically cleared of all potential obstructions and identified. Typical items in the refuge are:

- A sitting/resting area with shade
- Water for drinking
- Wind indicator
- First aid supplies
- Extra detectors, tubes and personnel monitors
- Hand tools

- Fire extinguishers
- Communication equipment

V. SITE SECURITY

Operating areas are provided with lighting. At all times, an employee is either on call or on duty. The Gallup facility is enclosed by a eight foot cyclone fence, with an entrance gate. During an emergency, the fence will be used to maintain security of the station.

VI. EVACUATION PROCEDURE

Due to the small size of this facility and quantities of materials and substances being stored, detailed evacuation procedures are not regarded as necessary for this plan. The site is in compliance with the requirement of 49 CFR 192, pertaining to emergency evacuation of DOT pipeline regulated facilities.

VII. DECONTAMINATION

A. Decontamination Plan. If an emergency occurs, an appropriate decontamination plan will be established at that time to meet the existing conditions and needs. It will be established in accordance with prior training and take into consideration the following issues:

- Establishment of general work procedures and minimize contact with all wastes and hazards and maximize worker protection.
- Design and construct the decontamination equipment and layout in a manner suitable for maximum safety regarding site conditions, site hazards and hazardous substances present on the site. A revision of the plan is necessary whenever any of the design criteria change.
- Locate the decontamination area to minimize exposure of uncontaminated employees and equipment.
- Provide an organized process by which levels of decontamination are reduced. The process is performed in a specific sequence of stations called the decontamination line.

B. Decontamination equipment checklist:

- Drop cloth(s) of suitable plastic or other suitable materials on which heavily contaminated equipment and outer protective clothing may be deposited.
- collection containers, such as drums or suitable lined trash cans for storing disposable clothing and heavily contaminated personal protective clothing or equipment to be discarded.
- Lined box with absorbents for wiping and/or rinsing off solid/liquid contaminants.
- Large galvanized tubs of stock tanks to store wash and rinse solutions.
- Wash solutions selected to wash off and reduce the hazards associated with the contaminants.
- Rinse solutions selected to remove contaminants and contaminated wash solutions.
- Brushes and towels to assist in removing and rinsing off contaminants.
- Lockers and cabinets for storage of decontaminated clothing and equipment.

- Shower facilities for full body wash or wash sinks with drain systems connected to a collection tank or appropriate treatment system.
- Soap and wash solution, wash cloths and towels for personnel involved in the activity.

VIII. EMERGENCY MEDICAL TREATMENT

The first aid training provided to Transwestern employees and the emergency services available to the facility will be used to address any injuries, illnesses or medical situations which may arise during any emergency incident.

IX. EMERGENCY ALERTNESS AND RESPONSE

A. General Response. Emergency response operations follow a sequence of procedures initiating with the notification and continues through preparation of equipment and personnel for the next emergency. The following procedure for handling emergencies will be initiated by the employee involved in the discovery process:

- Evaluate the situation.
- Evacuate the area of non essential personnel. Account for all persons.
- Notify the Team Advisor and Director of Operations of the emergency.
- Provide verbal assistance from the appropriate service (fire department, sheriffs office, hospital).
- Shut off ignition sources (open flames, heaters, electric power).
- Take action to stop and contain the release or fire. Do not do attempt any activity that training has not been provided for. Implement the "Buddy System".
- Ensure that proper safety precautions are taken and that personal protective equipment is worn as required.
- Only attempt to extinguish fires that are small and can be extinguished rapidly with portable fire extinguishers.
- Secure the area to keep media, sight seers and other non essential people outside of the restricted area.
- Call for further assistance for remediation and cleanup contractors.
- Complete required company reports.

The initial report to the Team Advisor and the Director of Operations will include the following:

- What happened
- Where emergency happened
- When emergency happened
- How emergency happened, if possible
- Initial damage
- Present condition
- what aid is needed

B. Emergency Operations. Prior to commencement of any emergency operation, meetings will be held to discuss:

- Tasks to be performed
- Time constraints (personnel protective equipment, rest breaks etc)
- hazards to be encountered, effects and symptoms, required monitoring, concentration limits and other danger signals
- Emergency procedures

Employees of Transwestern Pipeline company are instructed and trained to not attempt an emergency response or rescue until essential back up and support personnel are available onsite. Evacuation routes will be identified.

The "buddy system" will be employed at all times and where applicable. No admittance will be granted into high hazard areas without a partner. Personnel in a high hazard area must be in line-of-sight or communication contact with the incident commander or his designee at all times.

A Hazardous Materials Technician who will have access to the source of the incident during an emergency in order to abate the incident, will have successfully completed the 24 hour or the 40 hour HAZWOPER training and be specifically trained for the emergency and competent to:

- Implement the Emergency Response Plan
- Possess knowledge of the unknown and known materials present in the emergency and have skills necessary to operate field survey instruments and equipment
- Be able to function in an assigned role
- Have a working knowledge of and experience in use of personnel protective equipment
- Understand hazard and risk assessment techniques
- Ability to perform advanced release control, containment and countermeasure activities
- Understand and implement decontamination procedures
- Understand basic chemical and toxicological terminology and behavior

X. CRITIQUE AND FOLLOWUP

During a large scale emergency, a qualified person will be designated as a recording secretary. A chronological log will be kept pertaining to incident history. In addition, a tape recording may be used to assist in this activity. The following is a partial list of items to be documented:

- All notifications and reports to agencies and organizations
- Major incidents i.e., explosions, injuries
- Media contacts
- Meetings, attendees, topics, decisions
- Activities undertaken

- Contacts made for the purchase of supplies and equipment
- Approvals or directives obtained from outside agencies and support groups
- Photographs of the incident
- Samples collected and results

A review of work accomplished and problems observed should be conducted at the end of each emergency response operation. Appropriate changes should be made in this Contingency Plan to ensure employee safety and health.

XI. PERSONNEL PROTECTIVE EQUIPMENT

The following levels of personnel protective equipment (PPE) are available for responding to emergency incidents. The type of PPE used will be dependent upon the specific hazards present.

Level B: Highest level respiratory and lesser skin protection

- Self contained breathing apparatus (SCBA)
- Hooded chemical resistant clothing
- Coveralls
- Gloves, outer, chemical resistant
- Gloves, inner, chemical resistant
- Boots, outer. Chemical resistant, steel toes and shank
- Boot covers, disposable
- Hard hat
- Face shield

Level C: Concentration and type of airborne substance is known and criteria for using air purifying respirators are met

- Full face or half mask purifying respirators
- Hooded chemical resistant clothing
- coveralls
- Gloves, outer, chemical resistant
- Gloves, inner, chemical resistant
- Boots, chemical resistant, steel toed and shank
- Boot covers, outer, chemical resistant
- Hard hat
- Escape mask
- Face shield

Level D: Nuisance contamination only

- Coveralls
- Gloves

- Boots/shoes, chemical resistant, steel toed and shank
- Boots, outer, chemical resistant
- Safety glasses or chemical splash goggles
- Hard hat
- Escape mask
- Face shield

Prior to each use, the personal protective equipment will be checked to ensure that the PPE contains no cuts, punctures or defects that would expose workers to the hazards encountered at the site. Cuts and scratches on the skin will receive extra protection.

ATTACHMENT F
(Reporting Protocol for Spills and Releases)

Subject: New Mexico Energy Minerals and Natural Resources Department, OCD, Amended Rule 116 - Release Reporting
Date: April 17, 1997
Reference: February 13, 1997 Order No. R-10766
Status: Amended Rule **Effective Date:** February 13, 1997

SUMMARY: The New Mexico Oil Conservation Division (OCD) amended Rule 116 that covers "Notification of Fires, Breaks, Leaks, Spills and Blowouts." The amended Rule requires reporting of all *unauthorized* releases of any oil and gas product, produced water, oil field waste (including Regulated NORM), and oil field chemicals. New Mexico's existing rules require an entity to report releases that are anticipated, such as those from scheduled maintenance activities (e.g., pipeline blowdown). When prior notice is given under these existing rule, the releases are "authorized." Rule 116 also requires reporting of *any* release (even authorized releases) that may "with reasonable probability be detrimental to water or cause an exceedance of" the state water quality standards (e.g., hydrostatic test water discharge that is of a poorer quality than expected and could be detrimental to the receiving stream's water quality). The Rule categorizes releases into "Major" and "Minor." Major releases require "immediate verbal notification" and "timely written notice," whereas, Minor releases require "timely written notice." Lastly, when appropriate, the responsible person must remediate the release according to an OCD-approved action plan. Impact: Enron companies conducting business in New Mexico will have to report more releases. The main increase in reporting is likely to be for releases of natural gas.. Also, the spill response procedure manual must be updated. Recommended Action: The Environmental Team must update the spill response procedure manual. Division Environmental Specialists and other appropriate environmental staff that are responsible for activities in New Mexico should familiarize themselves with the amended Rule so that appropriate notifications will be made until the revised procedure is completed.

NOTIFICATION Amended Rule 116 requires that the OCD be notified whenever an *unauthorized* release of virtually any material related to oil and gas "drilling, producing, storing, disposing, injecting, transporting, servicing or processing," including "Regulated NORM," occurs. (See definitions of "Major" and "Minor" releases below for further clarification.) Generally, *authorized* releases are those that are permitted (e.g., NPDES) or those for which the appropriate agency has received prior notification, such as for air to releases associated with scheduled maintenance activities, are not reportable under Rule 116. However, even *authorized* releases must be reported if the *authorized* release is of "oil or other water contaminant" that "may with reasonable probability be detrimental to water or cause an exceedance of the" State water quality standards. Since the New Mexico Environment Department has prime jurisdiction over air pollution, reporting of unanticipated problems or amounts of *air* pollutants is also regulated by them at NMAQCR §801.

DEFINITIONS OF MAJOR AND MINOR RELEASES Rule 116 divides releases into two categories.

Major Releases are defined as:

a. an unauthorized release (excluding natural gases) in excess of 25 barrels;
b. an unauthorized release of any quantity that:
   1. results in a fire;
   2. will reach a water course;

3. may with reasonable probability endanger public health; or
4. results in substantial damage to property or the environment;

c. an unauthorized release of natural gases in excess of 500 mcf; or

d. a release of any volume that will likely be detrimental to water or cause an exceedance of State water quality standards.

Minor Releases are defined as:

a. an unauthorized release (excluding natural gases) in excess of 5 barrels but not more than 25 barrels or

b. an unauthorized release of natural gases exceeding 50 mcf but less than 500 mcf.

REPORTING OF MAJOR AND MINOR RELEASES

Major Releases must be reported by giving **immediate verbal notice** and **timely written notice,** as described below.

Minor Releases must be reported by giving **timely written notice**, as described below.

Immediate Verbal Notification indicates those situations that must be reported within 24 hours of discovery to the Division District Office for the area where the release took place. Also, if the release may be detrimental to water or cause an exceedance of the State water quality standards, **immediate verbal notification** must be provided to the Division's Environmental Bureau Chief. When providing this verbal notification, the information required on Division **Form C-141** must be provided. A copy of Form C-141 is attached.

Timely Written Notification consists of reporting within 15 days to the Division District Office and, where the release may have been detrimental to water or caused an exceedance of the State water quality standards, to the Division's Environmental Bureau Chief. **Timely written notification** is accomplished by completing **Form C-141.** The written notification should verify the prior verbal notification along with updating and/or correcting information contained in the verbal notification.

CORRECTIVE ACTION The entity responsible for the release must take appropriate **corrective action** when public health or the environment are endangered. The corrective action must be done according to a remediation plan or an abatement plan that has been approved by the Division.

The **SUMMARY** has been distributed to appropriate management personnel. If there are any questions concerning this regulation, contact Joe Kolb at 713/646-6180.

Attachments

Distribution List:
Terraso, Mike
Environmental Team
Reg Tech Team
Nutt, David
Smith, Frank
Soldano, Lou
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Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

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

Form C- 141
Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action
OPERATOR
☐ Initial Report ☐ Final Report

Name	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

Describe General Conditions Prevailing (Temperature, Precipitation, etc.).*

I hereby certify that the information given above is true and complete to the best of my knowledge and belief.	OIL CONSERVATION DIVISION	
Signature:		
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date: Phone:	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

GUIDELINES

FOR

REMEDIATION

OF

LEAKS, SPILLS AND RELEASES

(AUGUST 13, 1993)

New Mexico Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

TABLE OF CONTENTS

INTRODUCTION

The following document is to be used as a **guide** on all federal, state and fee lands when remediating contaminants resulting from leaks, spills and releases of oilfield wastes or products. The New Mexico Oil Conservation Division (OCD) requires that corrective actions be taken for leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property. These guidelines are intended to provide direction for remediation of soils and fresh waters contaminated as a result of leaks, spills or releases of oilfield wastes and products in a manner that assures protection of fresh waters, public health and the environment.

Fresh waters (to be protected) includes the water in lakes, playas, surface waters of all streams regardless of the quality of the water within any given reach, and all underground waters containing 10,000 milligrams per liter (mg/l) or less of total dissolved solids (TDS) except for which, after notice and hearing, it is found that there is no present or reasonably foreseeable beneficial use which would be impaired by contamination of such waters. The water in lakes and playas shall be protected from contamination even though it may contain more than 10,000 mg/l of TDS unless it can be shown that hydrologically connected fresh ground water will not be adversely affected.

Procedures may deviate from the following guidelines if it can be shown that the proposed procedure will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted. Specific constituents and/or requirements for soil and ground water analysis and/or remediation may vary depending on site specific conditions. Deviations from approved plans will require OCD notification and approval.

****** Note:** **Notification to OCD of leaks, spills and releases does not relieve an operator of responsibility for compliance with any other federal, state or local law and/or regulation regarding the incident. Other agencies (ie. BLM, Indian Tribes, etc) may also have guidelines or requirements for remediation of leaks spills and releases.**

I. NOTIFICATION OF LEAK, SPILL OR RELEASE

Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to the OCD pursuant to OCD Rule 116 (Appendix A) or New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Appendix B). Appendix C contains the phone numbers and addresses for reporting incidents to the OCD district and Santa Fe offices. Notification will include all information required under the respective rule or regulation. Below is a description of some of the information required:

A. RESPONSIBLE PARTY AND LOCAL CONTACT

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

B. FACILITY

The name and address of the facility or operation where the incident took place and the legal location listed by quarter-quarter, section, township and range, and by distance and direction from the nearest town or prominent landmark so that the exact site location can be readily located on the ground.

C. TIME OF INCIDENT

The date, time and duration of the incident.

D. DISCHARGE EVENT

A description of the source and cause of the incident.

E. TYPE OF DISCHARGE

A description of the nature or type of discharge. If the material leaked, spilled or released is anything other than crude oil, condensate or produced water include its chemical composition and physical characteristics.

F. QUANTITY

The known or estimated volume of the discharge.

G. SITE CHARACTERISTICS

The relevant general conditions prevailing at the site including precipitation, wind conditions, temperature, soil type, distance to nearest residence and population centers and proximity of fresh water wells or watercourse (ie. any river, lake, stream, playa, arroyo, draw, wash, gully or natural or man-made channel through which water flows or has flowed).

H. IMMEDIATE CORRECTIVE ACTIONS

Any initial response actions taken to mitigate immediate threats to fresh waters, public health and the environment.

II. INITIAL RESPONSE ACTIONS

Upon learning of a leak, spill or release of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property, the responsible party (RP) should take the following immediate actions unless the actions could create a safety hazard which would result in a threat to personal or public injury:

A. SOURCE ELIMINATION AND SITE SECURITY

The RP should take the appropriate measures to stop the source of the leak, spill or release and limit access to the site as necessary to reduce the possibility of public exposure.

B. CONTAINMENT

Once the site is secure, the RP should take steps to contain the materials leaked, spilled or released by construction of berms or dikes, the use of absorbent pads or other containment actions to limit the area impacted by the event and prevent potential fresh water contaminants from migrating to watercourses or areas which could pose a threat to public health and safety.

C. SITE STABILIZATION

After containment, the RP should recover any products or wastes which can be physically removed from the surface within the containment area. The disposition of all wastes or products removed from the site must be approved by the OCD.

III. SITE ASSESSMENT

Prior to final closure (Section VIII), soils into which nonrecoverable products or wastes have infiltrated and which have a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property should be assessed for their potential environmental impacts and remediated according to the procedures contained in the following sections. Assessment results form the basis of any required remediation. Sites will be assessed for severity of contamination and potential environmental and public health threats using a risk based ranking system.

The following characteristics should be determined in order to evaluate a sites potential risks, the need for remedial action and, if necessary, the level of cleanup required at the site:

A. GENERAL SITE CHARACTERISTICS

1. Depth To Ground Water

The operator should determine the depth to ground water at each site. The depth to ground water is defined as

the vertical distance from the lowermost contaminants to the seasonal high water elevation of the ground water. If the exact depth to ground water is unknown, the ground water depth can be estimated using either local water well information, published regional ground water information, data on file with the New Mexico State Engineer Office or the vertical distance from adjacent ground water or surface water.

2. Wellhead Protection Area

The operator should determine the horizontal distance from all water sources including private and domestic water sources. Water sources are defined as wells, springs or other sources of fresh water extraction. Private and domestic water sources are those water sources used by less than five households for domestic or stock purposes.

3. Distance To Nearest Surface Water Body

The operator should determine the horizontal distance to all downgradient surface water bodies. Surface water bodies are defined as perennial rivers, streams, creeks, irrigation canals and ditches, lakes, ponds and playas.

B. SOIL/WASTE CHARACTERISTICS

Soils/wastes within and beneath the area of the leak, spill or release should be evaluated to determine the type and extent of contamination at the site. In order to assess the level of contamination, observations should be made of the soils at the surface and samples of the impacted soils should be taken in the leak, spill or release area. Observations should note whether previous leaks, spills or releases have occurred at the site. Additional samples may be required to completely define the lateral and vertical extent of contamination. Soil samples should be obtained according to the sampling procedures in Sections V.A. and V.B. This may be accomplished using a backhoe, drill rig, hand auger, shovel or other means.

Initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A.

Varying degrees of contamination described below may co-exist at an individual site. The following sections describe the degrees of contamination that should be documented during the assessment of the level of soil contamination:

1. Highly Contaminated/Saturated Soils

Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.

2. Unsaturated Contaminated Soils

Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated, as described above, but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release. Action levels and sampling and analytical methods for determining contaminant concentrations are described in detail in Sections IV. and V.

**** **(NOTE: Soils contaminated as a result of spills, leaks or releases of non-exempt wastes must be evaluated for all RCRA Subtitle C hazardous waste characteristics. The above definitions apply only to oilfield contaminated soils which are exempt from federal RCRA Subtitle C hazardous waste provisions and nonexempt oilfield contaminated soils which are characteristically nonhazardous according to RCRA Subtitle C regulations. Any nonexempt contaminated soils which are determined to be characteristically hazardous cannot be remediated using this guidance document and will be referred to the New Mexico Environment Department Hazardous Waste Program.)**

C. GROUND WATER QUALITY

If ground water is encountered during the soil/waste characterization of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality. Ground water samples should be obtained using the sampling procedures in Section V.C. Monitor wells may be required to assess potential impacts on ground water and the extent of ground water contamination, if there is a reasonable probability of ground water contamination based upon the extent and magnitude of soil contamination defined during remedial activities.

IV. SOIL AND WATER REMEDIATION ACTION LEVELS

A. SOILS

The sections below describe the OCD's recommended remediation action levels for soils contaminated with petroleum hydrocarbons. Soils contaminated with substances other than petroleum hydrocarbons may be required to be remediated based upon the nature of the contaminant and it's potential to impact fresh waters, public health and the environment.

1. Highly Contaminated/Saturated Soils

All highly contaminated/saturated soils should be remediated insitu or excavated to the maximum extent practicable. These soils should be remediated using techniques described in Section VI.A to the contaminant specific level listed in Section IV.A.2.b.

2. Unsaturated Contaminated Soils

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

Depth To Ground Water	Ranking Score
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source,or; <200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

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

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	Total Ranking Score		
	>19	10 - 19	0 - 9
Benzene(ppm)*	10	10	10
BTEX(ppm)*	50	50	50
TPH(ppm)**	100	1000	5000

* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

** The contaminant concentration for TPH is the concentration above background levels.

B. GROUND WATER

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

V. SOIL AND WATER SAMPLING PROCEDURES

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional

constituents may be required based upon the nature of the contaminant which was leaked, spilled or released.

A. HIGHLY CONTAMINATED OR SATURATED SOILS

The following method is used to determine if soils are highly contaminated or saturated:

1. Physical Observations

Study a representative sample of the soil for observable free petroleum hydrocarbons or immiscible phases and gross staining. The immiscible phase may range from a free hydrocarbon to a sheen on any associated aqueous phase. A soil exhibiting any of these characteristics is considered highly contaminated or saturated.

B. UNSATURATED CONTAMINATED SOILS

The following methods may be used for determining the magnitude of contamination in unsaturated soils:

1. Soil Sampling Procedures for Headspace Analysis

A headspace analysis may be used to determine the total volatile organic vapor concentrations in soils (ie. in lieu of a laboratory analysis for benzene and BTEX but not in lieu of a TPH analysis). Headspace analysis procedures should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD procedures are as follows:

a) Fill a 0.5 liter or larger jar half full of sample and seal the top tightly with aluminum foil or fill a one quart zip-lock bag one-half full of sample and seal the top of the bag leaving the remainder of the bag filled with air.

b) Ensure that the sample temperature is between 15 to 25 degrees Celsius (59-77 degrees Fahrenheit).

c) Allow aromatic hydrocarbon vapors to develop within the headspace of the sample jar or bag for 5 to 10 minutes. During this period, the sample jar should be shaken vigorously for 1 minute or the contents of the bag should be gently massaged to break up soil clods.

d) If using a jar, pierce the aluminum foil seal with the probe of either a PID or FID organic vapor meter (OVM), and then record the highest (peak) measurement. If using a bag, carefully open one end of the bag and insert the probe of the OVM into the bag and re-seal the bag around the probe as much as possible to prevent vapors from escaping. Record the peak measurement. The OVM must be calibrated to assume a benzene response factor.

2. **Soil Sampling Procedures For Laboratory Analysis**

a. Sampling Procedures

Soil sampling for laboratory analysis should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD soil sampling procedures and laboratory analytical methods are as follows:

i) Collect samples in clean, air-tight glass jars supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier.

ii) Label the samples with a unique code for each sample.

iii) Cool and store samples with cold packs or on ice.

iv) Promptly ship sample to the lab for analysis following chain of custody procedures.

v) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

b. Analytical Methods

All soil samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are laboratory analytical methods commonly accepted by OCD for analysis of soil samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or released has been anything other than petroleum based fluids or wastes.

i) Benzene, toluene, ethylbenzene and xylene

- EPA Method 602/8020

ii) Total Petroleum Hydrocarbons

- EPA Method 418.1, or;
- EPA Method Modified 8015

C. GROUND WATER SAMPLING

If an investigation of ground water quality is deemed necessary, it should be conducted according to OCD approved industry standards or other OCD-approved procedures. The following methods are standard OCD accepted methods which

should be used to sample and analyze ground water at RCRA Subtitle C exempt sites (Note: The installation of monitor wells may not be required if the OCD approves of an alternate ground water investigation or sampling technique):

1. Monitor Well Installation/Location

One monitor well should be installed adjacent to and hydrologically down-gradient from the area of the leak, spill or release to determine if protectable fresh water has been impacted by the disposal activities. Additional monitor wells, located up-gradient and down-gradient of the leak, spill or release, may be required to delineate the full extent of ground water contamination if ground water underlying the leak, spill or release has been found to be contaminated.

2. Monitor Well Construction

a) Monitor well construction materials should be:

i) selected according to industry standards;

ii) chemically resistant to the contaminants to be monitored; and

iii) installed without the use of glues/adhesives.

b) Monitor wells should be constructed according to OCD approved industry standards to prevent migration of contaminants along the well casing. Monitor wells should be constructed with a minimum of fifteen (15) feet of well screen. At least five (5) feet of the well screen should be above the water table to accommodate seasonal fluctuations in the static water table.

3. Monitor Well Development

When ground water is collected for analysis from monitoring wells, the wells should be developed prior to sampling. The objective of monitor well development is to repair damage done to the formation by the drilling operation so that the natural hydraulic properties of the formation are restored and to remove any fluids introduced into the formation that could compromise the integrity of the sample. Monitoring well development is accomplished by purging fluid from the well until the pH and specific conductivity have stabilized and turbidity has been reduced to the greatest extent possible.

4. Sampling Procedures

Ground water should be sampled according to OCD accepted standards or other OCD approved methods. Samples should be collected in clean containers supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier. Samples for

different analyses require specific types of containers. The laboratory can provide information on the types of containers and preservatives required for sample collection. The following procedures are accepted by OCD as standard sampling procedures:

a) Monitor wells should be purged of a minimum of three well volumes of ground water using a clean bailer prior to sampling to ensure that the sample represents the quality of the ground water in the formation and not stagnant water in the well bore.

b) Collect samples in appropriate sample containers containing the appropriate preservative for the analysis required. No bubbles or headspace should remain in the sample container.

c) Label the sample containers with a unique code for each sample.

d) Cool and store samples with cold packs or on ice.

e) Promptly ship sample to the lab for analysis following chain of custody procedures.

f) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

5. Ground Water Laboratory Analysis

Samples should be analyzed for potential ground water contaminants contained in the waste stream, as defined by the WQCC Regulations. All ground water samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are OCD accepted laboratory analytical methods for analysis of ground water samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or release has been anything other than a petroleum based fluid or waste.

a. <u>Analytical Methods</u>

i.) Benzene, Toluene, Ethylbenzene and Xylene

- EPA Method 602/8020

ii.) Major Cations and Anions

- Various EPA or standard methods

iii.) Heavy Metals

- EPA Method 6010, or;
- Various EPA 7000 series methods

iv.) Polynuclear Aromatic Hydrocarbons

- EPA Method 8100

VI. REMEDIATION

The following discussion summarizes recommended techniques for remediation of contaminated soil and ground water as defined in Section IV.A. and IV.B. OCD approval for remediation of an individual leak, spill or release site is not required if the company is operating under an OCD approved spill containment plan. All procedures which deviate from the companies spill containment plan must be approved by OCD.

A. SOIL REMEDIATION

When RCRA Subtitle C exempt or RCRA nonhazardous petroleum contaminated soil requires remediation, it should be remediated and managed according to the criteria described below or by other OCD approved procedures which will remove, treat, or isolate contaminants in order to protect fresh waters, public health and the environment.

In lieu of remediation, OCD may accept an assessment of risk which demonstrates that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh waters, public health and the environment.

1. Contaminated Soils

Highly contaminated/saturated soils and unsaturated contaminated soils exceeding the standards described in Section IV.A. should be either:

a) Excavated from the ground until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level listed in Section IV.A.2.b or an alternate approved remediation level, or;

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

c) Treated in place, as described in Section VI.A.2.b.ii. - Treatment of Soil in Place, until a representative sample is below the contaminant specific remediation level listed in Section IV.A.2.b, or an alternate approved remediation level, or;

d) Managed according to an approved alternate method.

2. Soil Management Options

All soil management options must be approved by OCD. The following is a list of options for either on-site treatment or off-site treatment and/or disposal of contaminated soils:

a. Disposal

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

b. Soil Treatment and Remediation Techniques

i. Landfarming

Onetime applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lift within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary, upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation.

In some high risk areas an impermeable liner may be required to prevent leaching of contaminants into the underlying soil.

Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation.

ii. Insitu Soil Treatment

Insitu treatment may be accomplished using vapor venting, bioremediation or other approved treatment systems.

iii. Alternate Methods

The OCD encourages alternate methods of soil remediation including, but not limited to, active soil aeration, composting, bioremediation, solidification, and thermal treatment.

B. GROUND WATER REMEDIATION

1. Remediation Requirements

Ground water remediation activities will be reviewed and approved by OCD on a case by case basis prior to commencement of remedial activities. When contaminated

ground water exceeds WQCC ground water standards, it should be remediated according to the criteria described below.

a. Free Phase Contamination

Free phase floating product should be removed from ground water through the use of skimming devices, total-fluid type pumps, or other OCD-approved methods.

b. Dissolved Phase Contamination

Ground water contaminated with dissolved phase constituents in excess of WQCC ground water standards can be remediated by either removing and treating the ground water, or treating the ground water in place. If treated waters are to be disposed of onto or below the ground surface, a discharge plan must be submitted and approved by OCD.

c. Alternate Methods

The OCD encourages other methods of ground water remediation including, but not limited to, air sparging and bioremediation. Use of alternate methods must be approved by OCD prior to implementation.

VII. TERMINATION OF REMEDIAL ACTION

Remedial action may be terminated when the criteria described below have been met:

A. SOIL

Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level for a particular site as specified in Section IV.A.2.b.

If soil action levels cannot practicably be attained, an evaluation of risk may be performed and provided to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

B. GROUND WATER

A ground water remedial action may be terminated if all recoverable free phase product has been removed, and the concentration of the remaining dissolved phase contaminants in the ground water does not exceed New Mexico WQCC water quality standards or background levels. Termination of remedial action will be approved by OCD upon a demonstration of completion of remediation as described in above.

VIII. FINAL CLOSURE

Upon termination of any required remedial actions (Section VII.) the area of a leak, spill or release may be closed by backfilling any excavated areas, contouring to provide drainage away from the site, revegetating the area or other OCD approved methods.

IX. FINAL REPORT

Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

APPENDIX A

AND BLOWOUTS

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

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

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

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

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

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

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

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

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity

APPENDIX B

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

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

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

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

b. the name and address of the facility;

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

d. the source and cause of discharge;

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

f. the estimated volume of the discharge; and

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

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

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

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

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

ATTACHMENT TO THE DISCHARGE PLAN GW-325
TRANSWESTERN PIPELINE CO.
GALLUP COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
December 21, 2005

1. Payment of Discharge Plan Fees: There is a required flat fee for renewal for natural gas compressor stations with horsepower rating greater than 1,000 horsepower. The renewal flat fee required for this facility is $1,700. Neither the filing fee nor the permit renewal fee has been received, and both are due and payable upon receipt of this approval. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   2040 South Pacheco
   Santa Fe, New Mexico 87505

2. Commitments: Transwestern Pipeline Co. will abide by all commitments submitted in the discharge plan application letter dated June 14, 2005 and these conditions of approval.

3. Waste Disposal: All wastes will be disposed of at an OCD-approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

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

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above-Ground Tanks: All-above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above-Ground Saddle Tanks: Above-ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

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

9. Below-Grade Tanks/Sumps: All below-grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.

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 closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that 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 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.

12. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec 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. Storm Water Plan: The OCD has received a description of the layout of the storm water runoff system at the facility.

16. Closure: The OCD will be notified when operations at the Gallup Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Gallup Compressor Station, the operator will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: Transwestern Pipeline Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern Pipeline Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change these conditions and requirements of this permit administratively.

Transwestern Pipeline Company

Print Name: JOHN STEENBERG

Signature: John Steenberg

Title: Division Environmental Specialist

Date: January 4, 2006

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

December 21, 2005

Mr. John Steenberg
Transwestern Pipeline Company
4001 Indian School Rd. N.E.
Suite 250
Albuquerque, NM 87110

RE: Discharge Plan GW-325
Transwestern Pipeline Co.
Gallup Compressor Station
McKinley County, New Mexico

Dear Mr. Steenberg:

The ground water discharge plan GW-325 for the Transwestern Pipeline Co. Gallup Compressor Station located in Section 8, Township 15 North, Range 17 West, NMPM, McKinley 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 10 working days of receipt of this letter.

The original discharge plan application was submitted on June 20, 2000. The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. 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 Transwestern Pipeline Co. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Transwestern Pipeline Co. of its responsibility to comply with any other governmental authority's rules and regulations.

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

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, Transwestern Pipeline Co. is required to notify the Director of any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this plan is for a period of five years. This plan will expire on November 13, 2010, and Transwestern Pipeline Co. should submit an application for renewal in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the Transwestern Pipeline Co. Gallup Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application will be assessed a filing fee of $100. There is a flat fee assessed for gas compressor station facilities with horsepower rating greater than 1,000 horsepower equal to $1,700.

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

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

Copy: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-325
TRANSWESTERN PIPELINE CO.
GALLUP COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
December 21, 2005

1. Payment of Discharge Plan Fees: There is a required flat fee for renewal for natural gas compressor stations with horsepower rating greater than 1,000 horsepower. The renewal flat fee required for this facility is $1,700. Neither the filing fee nor the permit renewal fee has been received, and both are due and payable upon receipt of this approval. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   2040 South Pacheco
   Santa Fe, New Mexico 87505

2. Commitments: Transwestern Pipeline Co. will abide by all commitments submitted in the discharge plan application letter dated June 14, 2005 and these conditions of approval.

3. Waste Disposal: All wastes will be disposed of at an OCD-approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

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

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above-Ground Tanks: All-above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above-Ground Saddle Tanks: Above-ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

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

9. Below-Grade Tanks/Sumps: All below-grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.

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 closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that 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 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.

12. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec 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. Storm Water Plan: The OCD has received a description of the layout of the storm water runoff system at the facility.

16. Closure: The OCD will be notified when operations at the Gallup Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Gallup Compressor Station, the operator will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: Transwestern Pipeline Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern Pipeline Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change these conditions and requirements of this permit administratively.

Transwestern Pipeline Company

Print Name: _____

Signature: _____

Title: _____

Date: _____

ATTACHMENT TO THE DISCHARGE PLAN GW-325
TRANSWESTERN PIPELINE CO.
GALLUP COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
November 13, 2000

1. Payment of Discharge Plan Fees: There is a required flat fee for renewal equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating greater than 3,000 horsepower. The renewal flat fee required for this facility is $690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan. The filing fee of $50.00 is payable at the time of application for renewal. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   2040 South Pacheco
   Santa Fe, New Mexico 87505

2. Commitments: **Transwestern Pipeline Co.** will abide by all commitments submitted in the discharge plan application letter dated June 20, 2000 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

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

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

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

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.

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 closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

11. 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.

12. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec 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. Storm Water Plan: The OCD has received a description of the layout of the storm water runoff system at the facility.

16. Closure: The OCD will be notified when operations of the Gallup Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Gallup Compressor Station, the Director will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: **Transwestern Pipeline Co.**, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Transwestern Pipeline Co.** 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.

Transwestern Pipeline Co.

Print Name: Randy K. Rice

Signature: [signature]

Title: Senior Director

Date: 12/8/2000

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 13, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 3771-6913

Mr. James R. Russell
Transwestern Pipeline Co.
4001 Indian School Rd. N.E.
Suite 250
Albuquerque, NM 87110

RE: Discharge Plan GW-325
Transwestern Pipeline Co.
Gallup Compressor Station
McKinley County, New Mexico

Dear Mr. Russell:

The ground water discharge plan **GW-325** for the **Transwestern Pipeline Co. Gallup Compressor Station** located in Section 8, Township 15 North, Range 17 West, NMPM, McKinley 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 10 working days of receipt of this letter.**

The original discharge plan application was submitted on June 20, 2000. The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. 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 **Transwestern Pipeline Co.** of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Transwestern Pipeline Co. of its responsibility to comply with any other governmental authority's rules and regulations.

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

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, **Transwestern Pipeline Co.** is required to notify the Director of any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this plan is for a period of five years. This plan will expire on **November 13, 2005**, and **Transwestern Pipeline Co.** should submit an application for renewal 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.

The discharge plan application for the **Transwestern Pipeline Co.** Gallup Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of $50.00. There is a flat fee assessed for gas compressor station facilities with horsepower rating greater than 3,000 horsepower equal to $1,380.00. The OCD acknowledges receipt of both the filing fee and the flat fee required for this plan.

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

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

Xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-325
TRANSWESTERN PIPELINE CO.
GALLUP COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
November 13, 2000

1. Payment of Discharge Plan Fees: There is a required flat fee for renewal equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating greater than 3,000 horsepower. The renewal flat fee required for this facility is $690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan. The filing fee of $50.00 is payable at the time of application for renewal. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   2040 South Pacheco
   Santa Fe, New Mexico 87505

2. Commitments: **Transwestern Pipeline Co.** will abide by all commitments submitted in the discharge plan application letter dated June 20, 2000 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

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

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

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9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.

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 closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

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14. Storm Water Plan: The OCD has received a description of the layout of the storm water runoff system at the facility.

16. Closure: The OCD will be notified when operations of the Gallup Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Gallup Compressor Station, the Director will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: **Transwestern Pipeline Co.**, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Transwestern Pipeline Co.** 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.

Transwestern Pipeline Co.

Print Name: _____

Signature: _____

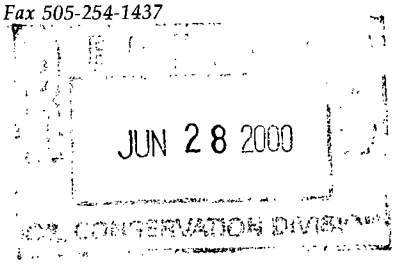
Title: _____

Date: _____

June 20, 2000

GW-325

Enron Transportation & Storage
Services Provided by Northern Natural Gas Company and Transwestern Pipeline Company
Summit Office Building
4001 Indian School Road, NE, Suite 250
Albuquerque, NM 87110
505-260-4000
Fax 505-254-1437



Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Discharge Plan Application Transwestern Pipeline Company, Gallup Compressor Station

Dear Mr. Anderson:

Enclosed find three (3) copies of a discharge plan application for the above reference facility. This document is being prepared to your agency on behalf of Transwestern Pipeline Company, owner of the Gallup Compressor Station and as required pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations.

As required under 3-114 of the Water Quality Control Regulation, enclosed find two (2) checks in the amount of $50.00 (Ck# 0602520825) and $1380.00 (CK# 0602520826) for the nonrefundable filing fee and flat fee, respectively, for this new application.

If you require any additional information or clarification concerning this discharge plan application, please contact the undersigned at our Albuquerque Technical Operations at (505) 260-4011.

Sincerely,

James R. Russell

James R. Russell
Environmental Specialist

Xc: Rich Jolly
Larry Campbell

Enron Corp.
P. O. Box 1188
Houston, TX 77251-1188

ENRON CORP

New Mecico OCD
2040 South Pacheco
Santa Fe, NM 87505

CHECK NO. [redacted]

CHECK DATE 6/20/00

PAGE OF

VENDOR NO:
REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
	6/20/00	Permit/Gallup Sta.				1,380.00
					TOTAL	

SPECIAL INSTRUCTIONS:

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS

Enron Corp.
P. O. Box 1188
Houston, TX 77251-1188

ENRON CORP

New Mexico OCD
2040 South Pacheco
Santa Fe, NM 87505

CHECK NO. [redacted]

CHECK DATE 6/20/00

PAGE OF

VENDOR NO:
REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
	6/20/00	Filing Fee/Gallup Sta.				50.00
					TOTAL	

SPECIAL INSTRUCTIONS:

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

☐XNew ☐ Renewal ☐ Modification

1. Type: _COMPRESSOR STATION
2. Operator: ENRON TRANSPORTATION & STORAGE

   Address: P.O.BOX 68 GALLUP NEW MEXICO, 87110

   Contact Person: CHARLIE ALLEN_____Phone: (505) 862-7443_
3. Location: _____/4 _____/4 Section 8_____Township 15N_Range _17NW
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. OK
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

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

Name: James R. Russell Title: Division Environmental Spec

Signature: James R. Russell Date: 6-27-00

Gallup Compressor Station Discharge Plan

Affirmation

I hereby certify that I am familiar with the information contained in and submitted with the application that such information is true, accurate and complete to the best of my knowledge.

Sincerely,

James R. Russell

James R. Russell

I.General Information

1. Type of Natural Gas Operation

This is an Electric Drive Compressor Station with one unit with a total horse of ten thousand (10,000) hp. Which will provide compression for the transmission of natural gas from San Juan Compressor Station. Once compressed at this facility, the natural gas is transported to the 30" mainline system near Gallup, New Mexico and delivered Transwestern Pipeline's Klagetoh Compressor Station # 4 to deliver gas west.

2. Name of Operator, Legal Responsible Party and Local Representative

Operator

Enron Transportation & Storage is the legal operator of this facility

Legal Responsible Party

Enron Transportation & Storage
Rich Jolly, Regional Director
Summit Office Bld. Ste. 250
4001 Indian School Road NE
Albuquerque, New Mexico 87110
Phone (505) 260-4003

Local Contact

Enron Transportation & Storage
Charlie Allen
Team Leader, Gallup Team
P.O.Box 68
Gallup, New Mexico 87305
Phone (505) 863-7443

3. Location of Discharge Plan Facility

Legal Description:
Township 15 N Range 17 NW Section 8

Maps:
Topographic map:
A State of New Mexico USGA map of the immediate area showing location of the compressor station. This presented in Appendix A.

4. Landowners

Landowner is Transwestern Pipeline Company
Summit Office Bld. Ste. 250
4001 Indian School RD. NE
Albuquerque, New Mexico 87110
Phone (505) 260-4003

5. Facility Description

1. The site is approximate 10 acres. Permanent buildings, which are present on the site, include Compressor Building, PCR Building, and Auxiliary Building. Approximately 5 acres will be graveled. In an addition, a portion of the site around the new facility will be fenced. A facility plot plan is attached as APPENDIX B that shows the location of discharge, storage, and property boundaries.

6. Material Storage or Used at the Facility

1. Water and wastewater plan schematics are not applicable, as there is no individual water treatment units on site. Liquid waste is not discharged on site. All liquids and liquids waste is temporarily stored in sumps then pumped automatically to oily wastewater tank. Then it is transferred off-site for recycle and/or disposal.

2. Potential surface and ground water containment's which may be discharged within the compressor station would be associated with sumps, and above ground storage tanks. The sumps and tanks are visually inspected periodically. The tanks have been engineered to be visually inspected for tank leakage and contained in a concrete secondary containment of capacities, which equal 150%. This surpasses the OCD requirement for 130%.

3. Lube Oil will be stored in drums that will be located in the Compressor building.

4. Oily WasteWater tank capacity is 100 bbls containing only oily waste waters from washing the unit. The location of the oily wastewater tank is 150 feet northeast of the compressor building.

5. Pipeline Condensate Tank is a 210 bbl.tank that collects pipeline liquid from the San Juan lateral line. This tank is located 300' north on the compressor bld.

7. Source and Quanties of Effluent and Waste Solids Generated at the Facility

1. One (1) Electric Motor and cooling water: The electric motor variable speed drive present at this facility uses liquid coolants in their operation. The amount of waste coolant liquid collected each month is less then two- (2) gallons.

2. Domestic Sewage: Domestic sewage is collected in a portable system, which is transferred from the site periodically.

3. Engine Wash Down and Floor Drains: Small quantities of wastewater will be collected in a sump then pumped into a 100 bbl waste water tank within a containment area. Small quantities of water collecting within the containments from rain or snow are allowed to evaporate.

4. Waste Engine Oil: Lubricate oil change outs from the Electric Drive and Compressor does not normally occur. Only when the unit is being taken out down for repair or maintenance might the oil be removed from the unit. During periods when this activity occurs, the oil is removed from the unit and transferred to a series of 55 gallon drums then transported to an off set used oil tanks for recycling. Prior to removal from the facility oil samples are collected

and analyzed from the tank for proper recycling or recovered as boiler fuel makeup. Sample results are presented in Appendix C.

5. Used Lube Oil Filters: These filters will have an analyzed run the disposed properly.

Gallup Compressor Station Discharge Plan

6. The only Chemical material stored on site in excess of 55 gallons is engine oil lube oil.

8. Quality Characteristics

1. All waste streams flow into one sump and into one 100 bbl wastewater tank. Present below are the characteristics of the waste streams which are generated on site:
   Oily wastewater tank will have two samples taken. One sample will be of the oil phase of the tank and the other sample will be of the water phase. Analytical testing results are present in APPENDIX D.

2. Used Engine Oil: Prior to removal from facility for recycling, this material is sampled as per 40 CFR 266.Analytical testing results are presented in APPENDIX C.
3. Used Engine Lube Oil Filters

4. .Underground wastewater pipes, their age and specification are: Piping material are constructed of 0.25 inch steel schedule 80 grade B and seamless. The age of the wastewater pipes is new pipe.

5. Spill/ Leak Prevention and Housekeeping Procedures

   A. SPCC Plan is not required at this location.
   B. Contractors used for disposal of the following waste streams.

   Oily Wastewater
   Mesa Oil Company
   7239 Bardburn Bld.
   West Minister, Colorado 80030
   sed Lube Oil
   Mesa Oil Company
   7239 Bardburn Bld.
   West Minister, Colorado 80030

   C. Housekeeping: Precipitation runoff is directed from the station facility. All Chemicals and products are contained is sealed secondary containments.

   D:Leak Detection: All above ground tank systems are visually inspected monthly to detect leaks and ensure tanks integrity. Visual sump inspections are performed annually.

   E. Well System: There is no on-site well system.

Gallup Compressor Station Discharge Plan

Site Features

The Project is located in an area known as White Cliffs. There is approximate 10 acres that is presently fenced for security reasons. Permanent buildings, which are present on the site, include Compressor building, PCR building, and Auxiliary building.
The Station site is adjacent to a small residential trailer community adjacent west of the area known as Hasler Valley/ White Cliffs which is comprised of several mobil homes. The closest residence to the project site two houses located approximately 700ft west-northwest and 900 ft. north-northeast respectively, of the compressor building and near the auto race track.

Geology

Surficial materials at the Gallup Compressor Station site consist of soil derived from alluvial deposits of Holocene and Pleistocene age (Dillinger 1990). This material is composed of unconsolidated sandy silt, sand and gravel deposited on graded stream valley floors and floodplains. This is underlain by older more consolidated alluvial material. The thickness of this material varies but can be thick as 80ft in the vicinity of the project area. The underlying consolidated bedrock consist of fluvio-lacustrine sequence of variegated mudstone, claystone, and sandstone.

SOILS

The U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS), has not mapped soils in the area of the Gallup Compressor Station. Scott Zschetzsche of the NRCS Cibola County Soil Survey Office informed Transwestern Pipeline Company that the soils at this location are likely to be sandy loam. The mapped soil type inCibola County (adjacent to McKinley County) most likely to be similar to soils at the subject site is 352 Zia sandy loam (U.S. Department of Agriculture, Natural Resources Conservation Service 1999).

VEGETATION

The vegetation type associated with the surrounding region of the Gallup Compressor station is the Great Basin grassland which is dominated bt grasses with numerous shrubs and forbs species (Brown 1982).

Metric Corp. characterized the vegetation of the Gallup Compressor Station site as "a desert scrub community" dominated by fourwing saltbush (Atriplex canescens), shadscale saltbrush (Atriplex confertifolia) and rubber rabbitbrush (Chrysothamnus nauseosus) with a ground cover of blue gramma (Bouteloua gracillis) and broom snakeweed (Gutierrezia sarothrae). The site has been mechanically disturbed and heavily overgrazed, leaving little more then weeds and the dominant shrub component. In addition to the dominant species listed above, other dormant perennials or annual remnants were observed and listed in table 3.1.

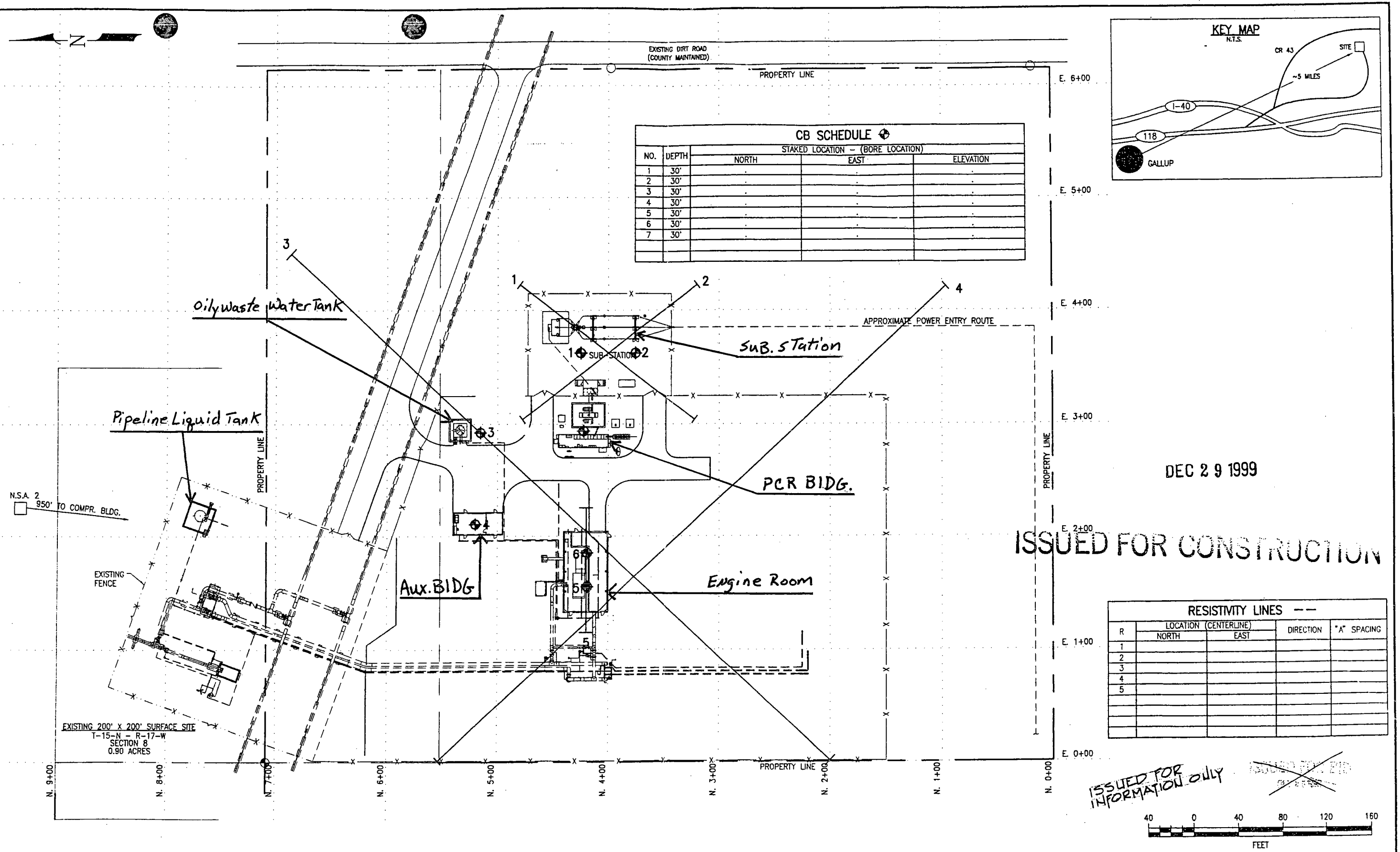
Gallup Discharge Plan
Table 3.2

Common Name	Scientific Name
Purole threeawn	Aristide Purpurea var longiseta
Big sagebrush	Artemisia tridentata
Four-wing saltbush	Atriplex canesens
Shadscale saltbrush	Atriplex confertifolia
Blue grama grass	Bouteloua gracillis
Cheatgrass	Bromus japonicum
Rubber rabbit brush	Chrysothamnus nauseosus ssp. Graveolens
Yellowspine thistle	Cirsium ochrocentrum
Redstem filaree	Erodium cirutarium
Broom snakeweed	Gutirrezia sarothrae
Annual sunfloweer	Helianthus annuus
Summercypress	Kochia scoparia
Spiny aster	Machaeranthera tagetinus
Prickly pear	Opuntia phaeacantha
Rusian thistle	Salsola kali
Tumblemustard	Sisymbrium altissimum
Gray horsebrush	Tetradymia canescens var. inermis

APPENDIX A

 1000 ft Scale: 1 : 25,000 Detail: 13-0 Datum: WGS84

APPENDIX
B



CB SCHEDULE

NO.	DEPTH	STAKED LOCATION – (BORE LOCATION) NORTH	EAST	ELEVATION
1	30'			
2	30'			
3	30'			
4	30'			
5	30'			
6	30'			
7	30'			

RESISTIVITY LINES

R	LOCATION (CENTERLINE) NORTH	EAST	DIRECTION	"A" SPACING
1				
2				
3				
4				
5				

DEC 2 9 1999

ISSUED FOR CONSTRUCTION

ISSUED FOR INFORMATION ONLY

DWG. NO.	REFERENCE DRAWING TITLE	NO.	REVISION – DESCRIPTION	BY	DATE	CHK'D	APP'D

DWG. STATUS	CHECKED BY	CHECKED DATE	APPROVED BY	APPROVED DATE	APPROVED BY	APPROVED DATE
PREL'Y						
BID						
CONSTR.						
CADDS	PLOT DATE: 06/28/1999 – 15:59		FILE NAME: 258S31D.DWG			

P.L./STA. ACCT. NO.			SJ
CONSTRUCTION YR			1999
	BY	DATE	
DESIGN	KEB	6/25/99	
DRAWN	GAW	6/25/99	
ASBUILT			
FILE NO.			
SCALE			NONE

Enron Engineering & Construction Co.
Transwestern Pipeline Company
Houston, Texas

GALLUP COMPRESSOR STATION

SITE MONUMENTATION AND BORING PLAN

McKINLEY COUNTY, NEW MEXICO

AFE/WORK ORDER: ST9075
ASBUILT DWG. NO.:
CONSTRUCTION DWG. NO.: S3-1D
SHEET 1 OF 1
REV. NO.: A

FILE INFO: I:\DRAWG\3663.000\258S310.dwg 1=480 10/21/1999 16:05 kkno

APPENDIX
C

OAL

L16604

Sample Summary

Sample ID	Lab #	Description	Sampled	Received
OIL FROM UNIT	L16604-1	other (oil)	06/02/2000 13:45	06/05/2000 10:30
OILY WW / OIL PHASE	L16604-2	other (oil)	06/02/2000 14:00	06/05/2000 10:30

Definition of Terms

ND Analytical result was below the reporting limit.

Laboratory Certifications*

Agency	Number
Florida Department of Health	ID #E87569
Oregon Health Division	State Lab #OR020
Washington Department of Ecology	Lab Accreditation #C136
Washington Department of Health	Washington Code #136

* Current Scopes of Accreditation are available upon request.

Analysts

Initials	Analyst	Title
CV	Cheryl Vezzani	Chemist
DMC²	Debbie McBreen-McKenzie	Chemist / Supervisor
GC	Greg Clarke	Chemist / Supervisor
KDK	Kirk Keyes	Chemist
PB	Pat Buddrus	Chemist
SBL	Shirley Lee	Technician
WB	Wayne Boyle	Chemist

OAL

L16604

Method Summary

Analysis	Method
Arsenic	EPA 200.9
Cadmium	EPA 200.7/6010
Chromium	EPA 200.7/6010
Flash Point (PMCC)	EPA 1010/ASTM D93
Halogens, Total by Bomb	ASTM D808/EPA 300.0
Lead	EPA 200.7/6010
Polychlorinated Biphenyl (PCB)	EPA 3580/8082
Semivolatiles	EPA 8270
Volatile Organic Compounds (VOC)	EPA 8260

OAL

L16604

Client: ***Enron Transwestern Pipeline***
Contact: ***Charlie Allen***

Project: ***TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.***

Inorganics

Sample ID / Matrix / Lab Number								
Analyte	**Result**	**Reporting Limit**	**Units (ppm)**	**Dil-ution**	**Date Analyzed**	**Method**	**Comment**	**Analyst**
OIL FROM UNIT / *other (oil)* / Sampled: *6/2/2000* / *L16604-1*								
Halogens, Total by Bomb	ND	100	mg/kg		6/13/2000	ASTM D808/EPA 300.0		KDK

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPGS, Gallup/Thoreau NM: Gallup Comp Sta.*

Oil Analyses

Analyte	Result	Reporting Limit	Units	Dilution	Date Analyzed	Method	Comment	Analyst
Sample ID *OIL FROM UNIT* ***Matrix*** *other (oil)*					***Sampled:*** *6/2/2000*		***Lab Number*** *L16604-1*	
Flash Point (PMCC)	>200.		°F		6/12/2000	EPA 1010/ASTM D93		SBL
Sample ID *OILY WW / OIL PHASE* ***Matrix*** *other (oil)*					***Sampled:*** *6/2/2000*		***Lab Number*** *L16604-2*	
Flash Point (PMCC)	>200.		°F		6/13/2000	EPA 1010/ASTM D93		SBL

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.*

Polychlorinated Biphenyl (PCB)

by EPA 3580/8082

Sample ID	Matrix						Lab Number
CAS	Analyte	Result	Reporting Limit	Units (ppm)	Dilution	Comment	
OIL FROM UNIT	other (oil)			Sampled: 6/2/2000 Extracted: 6/6/2000 Analyzed: 6/7/2000 by WB			L16604-1
1336-36-3	Total PCB	ND	2.	mg/kg			

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.*

Semivolatiles
by EPA 8270

Sample ID	Matrix						Lab Number
CAS	Analyte	Result	Reporting Limit	Units	Dilution	Comment	
				Sampled:	6/2/2000		
				Extracted:	6/6/2000		
OILY WW / OIL PHASE	other (oil)			Analyzed:	6/6/2000 by PB		L16604-2
See Attached Data Sheet							

OAL

L16604

Client: **Enron Transwestern Pipeline**
Contact: **Charlie Allen**

Project: **TWPGS, Gallup/Thoreau NM**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	Lab Number
OILY WW / OIL PHASE	LIQUID		MB0606B			Sampled: 06/02/00 Analyzed: 06/06/00	L16604-2
CAS#							
108-95-2	Phenol	nd	nd	200	mg/Kg		
111-44-4	bis(2-Chloroethyl)ether	nd	nd	200	mg/Kg		
95-57-8	2-Chlorophenol	nd	nd	200	mg/Kg		
541-73-1	1,3-Dichlorobenzene	nd	nd	200	mg/Kg		
106-46-7	1,4-Dichlorobenzene	nd	nd	200	mg/Kg		
100-51-4	Benzyl alcohol	nd	nd	400	mg/Kg		
95-50-1	1,2-Dichlorobenzene	nd	nd	200	mg/Kg		
95-48-7	2-Methylphenol	nd	nd	200	mg/Kg		
108-60-1	bis(2-chloroisopropyl)ether	nd	nd	200	mg/Kg		
106-44-5	4-Methylphenol	nd	nd	200	mg/Kg		
621-64-7	N-Nitroso-di-n-propylamine	nd	nd	200	mg/Kg		
67-72-1	Hexachloroethane	nd	nd	200	mg/Kg		
98-95-3	Nitrobenzene	nd	nd	200	mg/Kg		
78-59-1	Isophorone	nd	nd	200	mg/Kg		
88-75-5	2-Nitrophenol	nd	nd	200	mg/Kg		
105-67-9	2,4-Dimethylphenol	nd	nd	200	mg/Kg		
65-85-0	Benzoic acid	nd	nd	1000	mg/Kg		
111-91-1	bis(2-Chloroethoxy)methane	nd	nd	200	mg/Kg		
120-83-2	2,4-Dichlorophenol	nd	nd	200	mg/Kg		
120-82-1	1,2,4-Trichlorobenzene	nd	nd	200	mg/Kg		
91-20-3	Naphthalene	nd	nd	200	mg/Kg		
106-47-8	4-Chloroaniline	nd	nd	400	mg/Kg		
87-68-3	Hexachlorobutadiene	nd	nd	200	mg/Kg		
59-50-7	4-Chloro-3-methylphenol	nd	nd	400	mg/Kg		
91-57-6	2-Methylnaphthalene	nd	nd	200	mg/Kg		
77-47-4	Hexachlorocyclopentadiene	nd	nd	200	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	Lab Number
OILY WW / OIL PHASE	LIQUID		MB060602			Sampled: 06/02/00 Analyzed: 06/06/00	L16604-2
CAS#							
88-06-2	2,4,6-Trichlorophenol	nd	nd	200	mg/Kg		
95-95-4	2,4,5-Trichlorophenol	nd	nd	200	mg/Kg		
91-58-7	2-Chloronaphthalene	nd	nd	200	mg/Kg		
88-74-4	2-Nitroaniline	nd	nd	1000	mg/Kg		
208-96-8	Acenaphthylene	nd	nd	200	mg/Kg		
131-11-3	Dimethylphthalate	nd	nd	200	mg/Kg		
606-20-2	2,6-Dinitrotoluene	nd	nd	200	mg/Kg		
83-32-9	Acenaphthene	nd	nd	200	mg/Kg		
99-09-2	3-Nitroaniline	nd	nd	1000	mg/Kg		
51-28-5	2,4-Dinitrophenol	nd	nd	1000	mg/Kg		
132-64-9	Dibenzofuran	nd	nd	200	mg/Kg		
121-14-2	2,4-Dinitrotoluene	nd	nd	200	mg/Kg		
100-02-7	4-Nitrophenol	nd	nd	1000	mg/Kg		
86-73-7	Fluorene	nd	nd	200	mg/Kg		
7005-72-3	4-Chlorophenyl-phenylether	nd	nd	200	mg/Kg		
84-66-2	Diethylphthalate	nd	nd	200	mg/Kg		
100-01-6	4-Nitroaniline	nd	nd	1000	mg/Kg		
122-66-7	1,2-Diphenylhydrazine	nd	nd	1000	mg/Kg		
534-52-1	4,6-Dinitro-2-methylphenol	nd	nd	1000	mg/Kg		
86-30-6	n-Nitrosodiphenylamine	nd	nd	200	mg/Kg		
101-55-3	4-Bromophenyl-phenylether	nd	nd	200	mg/Kg		
118-74-1	Hexachlorobenzene	nd	nd	200	mg/Kg		
87-86-5	Pentachlorophenol	nd	nd	1000	mg/Kg		
85-01-8	Phenanthrene	nd	nd	200	mg/Kg		
120-12-7	Anthracene	nd	nd	200	mg/Kg		
84-74-2	Di-n-butylphthalate	nd	nd	200	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	Lab Number
OILY WW / OIL PHASE	LIQUID		MB0606B			Sampled: 06/02/00 Analyzed: 06/06/00	L16604-2
CAS#							
206-44-0	Fluoranthene	nd	nd	200	mg/Kg		
129-00-0	Pyrene	nd	nd	200	mg/Kg		
85-68-7	Butylbenzylphthalate	nd	nd	200	mg/Kg		
91-94-1	3,3'-Dichlorobenzidine	nd	nd	400	mg/Kg		
56-55-3	Benzo[a]anthracene	nd	nd	200	mg/Kg		
218-01-9	Chrysene	nd	nd	200	mg/Kg		
117-81-7	bis(2-Ethylhexyl)phthalate	nd	nd	200	mg/Kg		
205-99-2	Benzo[b]fluoranthene	nd	nd	200	mg/Kg		
205-99-2	Benzo[b]fluoranthene	nd	nd	200	mg/Kg		
207-08-9	Benzo[k]fluoranthene	nd	nd	200	mg/Kg		
50-32-8	Benzo[a]pyrene	nd	nd	200	mg/Kg		
193-39-5	Indeno[1,2,3-cd]pyrene	nd	nd	200	mg/Kg		
53-70-3	Dibenz[a,h]anthracene	nd	nd	200	mg/Kg		
191-24-2	Benzo[g,h,i]perylene	nd	nd	200	mg/Kg		

Acid Surrogates:	Recovery L16604-2	Recovery MB0606B	Control Limits (%)	Q
2-Fluorophenol	108	105	10 - 200	
Phenol-d6	104	105	10 - 200	
2,4,6-Tribromophenol	98	98	10 - 200	
Base / Neutral Surrogates:				
1,2-Dichlorobenzene d-4	97	97	10 - 200	
Nitrobenzene-d5	108	104	10 - 200	
2-Fluorobiphenyl	97	98	10 - 200	

none detected = nd

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.*

Total Metals

Sample ID / Matrix / Lab Number								
Analyte	**Result**	**Reporting Limit**	**Units (ppm)**	**Dilution**	**Date Analyzed**	**Method**	**Comment**	**Analyst**
OIL FROM UNIT / other (oil) / Sampled: 6/2/2000								L16604-1
					Microwave Digestion EPA 3051: 6/13/2000			
Arsenic	ND	0.20	mg/kg		6/13/2000	EPA 200.9		DMC[a]
Cadmium	ND	0.20	mg/kg		6/13/2000	EPA 200.7/6010		CV
Chromium	ND	0.50	mg/kg		6/13/2000	EPA 200.7/6010		CV
Lead	ND	2.5	mg/kg		6/13/2000	EPA 200.7/6010		CV

OAL

L16604

Client: *Enron Transwestern Pipeline*
Contact: *Charlie Allen*

Project: *TWPG5, Gallup/Thoreau NM: Gallup Comp Sta.*

Volatile Organic Compounds (VOC)

by EPA 8260

Sample ID	Matrix					Lab Number
CAS	Analyte	Result	Reporting Limit	Units	Dilution	Comment
				Sampled: 6/2/2000		
				Extracted: 6/6/2000		
OILY WW / OIL PHASE	other (oil)			Analyzed: 6/6/2000 by GC		L16604-2
See Attached Data Sheet						

OREGON ANALYTICAL LABORATORY
A Division of Portland General Electric

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPGS, Gallup/Thoreau NM

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	Lab Number
OILY WW/OIL PHASE Liquid			MB06064			Sampled : 06/02/00 Analyzed : 06/06/00	L16604-2
CAS #							
75-71-8	Dichlorodifluoromethane	nd	nd	100	mg/Kg		
74-87-3	Chloromethane	nd	nd	100	mg/Kg		
75-01-4	Vinyl chloride	nd	nd	100	mg/Kg		
74-83-9	Bromomethane	nd	nd	100	mg/Kg		
75-00-3	Chloroethane	nd	nd	100	mg/Kg		
75-69-4	Trichlorofluoromethane	nd	nd	100	mg/Kg		
67-64-1	Acetone	nd	nd	1000	mg/Kg		
75-35-4	1,1-Dichloroethene	nd	nd	50	mg/Kg		
75-09-2	Methylene chloride	nd	nd	100	mg/Kg		
75-15-0	Carbon disulfide	nd	nd	50	mg/Kg		
156-60-5	trans-1,2-Dichloroethene	nd	nd	50	mg/Kg		
75-34-3	1,1-Dichloroethane	nd	nd	50	mg/Kg		
78-93-3	2-Butanone	nd	nd	1000	mg/Kg		
590-20-7	2,2-Dichloropropane	nd	nd	50	mg/Kg		
156-59-4	cis-1,2-Dichloroethene	nd	nd	50	mg/Kg		
74-97-5	Bromochloromethane	nd	nd	50	mg/Kg		
67-66-3	Chloroform	nd	nd	50	mg/Kg		
71-55-6	1,1,1-Trichloroethane	nd	nd	50	mg/Kg		
56-23-5	Carbon tetrachloride	nd	nd	50	mg/Kg		
563-58-6	1,1-Dichloropropene	nd	nd	50	mg/Kg		
71-43-2	Benzene	nd	nd	50	mg/Kg		
107-06-2	1,2-Dichloroethane	nd	nd	50	mg/Kg		
79-01-6	Trichloroethene	nd	nd	50	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPG5, Gallup/Thoreau NM

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	Lab Number
OILY WW / OIL PHASE Liquid			MB060601			Sampled : 06/02/00 Analyzed : 06/06/00	L16604-2
CAS #							
78-87-5	1,2-Dichloropropane	nd	nd	50	mg/Kg		
74-95-3	Dibromomethane	nd	nd	50	mg/Kg		
75-27-4	Bromodichloromethane	nd	nd	50	mg/Kg		
10061-01-5	cis-1,3-Dichloropropene	nd	nd	50	mg/Kg		
108-10-1	4-Methyl-2-pentanone	nd	nd	500	mg/Kg		
108-88-3	Toluene	nd	nd	50	mg/Kg		
591-78-6	2-Hexanone	nd	nd	500	mg/Kg		
10061-02-6	trans-1,3-Dichloropropene	nd	nd	50	mg/Kg		
79-00-5	1,1,2-Trichloroethane	nd	nd	50	mg/Kg		
127-18-4	Tetrachloroethene	nd	nd	50	mg/Kg		
542-75-6	1,3-Dichloropropene	nd	nd	50	mg/Kg		
124-48-1	Dibromochloromethane	nd	nd	50	mg/Kg		
106-93-4	1,2-Dibromoethane	nd	nd	50	mg/Kg		
108-90-7	Chlorobenzene	nd	nd	50	mg/Kg		
630-20-6	1,1,1,2-Tetrachloroethane	nd	nd	50	mg/Kg		
100-41-4	Ethylbenzene	nd	nd	50	mg/Kg		
100-42-5	Styrene	nd	nd	50	mg/Kg		
75-25-2	Bromoform	nd	nd	50	mg/Kg		
98-82-8	Isopropylbenzene	nd	nd	50	mg/Kg		
108-86-1	Bromobenzene	nd	nd	50	mg/Kg		
79-34-5	1,1,2,2-Tetrachloroethane	nd	nd	50	mg/Kg		
96-18-4	1,2,3-Trichloropropane	nd	nd	50	mg/Kg		
103-65-1	n-Propylbenzene	nd	nd	50	mg/Kg		

none detected = nd

OAL

L16604

Client: Enron Transwestern Pipeline
Contact: Charlie Allen

Project: TWPG5, Gallup/Thoreau NM

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	Lab Number
OILY WW / OIL PHASE Liquid			MB0606A			Sampled : 06/02/00 Analyzed : 06/06/00	L16604-3
CAS #							
95-49-8	2-Chlorotoluene	nd	nd	50	mg/Kg		
106-43-4	4-Chlorotoluene	nd	nd	50	mg/Kg		
108-67-8	1,3,5-Trimethylbenzene	nd	nd	50	mg/Kg		
98-06-6	tert-Butylbenzene	nd	nd	50	mg/Kg		
95-63-6	1,2,4-Trimethylbenzene	nd	nd	50	mg/Kg		
135-98-8	sec-Butylbenzene	nd	nd	50	mg/Kg		
541-73-1	1,3-Dichlorobenzene	nd	nd	50	mg/Kg		
99-87-6	4-Isopropyltoluene	nd	nd	50	mg/Kg		
106-46-7	1,4-Dichlorobenzene	nd	nd	50	mg/Kg		
95-50-1	1,2-Dichlorobenzene	nd	nd	50	mg/Kg		
104-51-8	n-Butylbenzene	nd	nd	50	mg/Kg		
96-12-8	1,2-Dibromo-3-chloropropane	nd	nd	50	mg/Kg		
120-82-1	1,2,4-Trichlorobenzene	nd	nd	50	mg/Kg		
87-68-3	Hexachlorobutadiene	nd	nd	50	mg/Kg		
91-20-3	Naphthalene	nd	nd	50	mg/Kg		
87-61-6	1,2,3-Trichlorobenzene	nd	nd	50	mg/Kg		
	Total Xylenes	nd	nd	50	mg/Kg		

Surrogates	Recovery L16604-2	Recovery MB0606A
1,2-Dichloroethane-d4	106%	100%
Toluene-d8	105%	100%
4-Bromofluorobenzene	103%	97%

none detected = nd

Oregon Analytical Laboratory
14855 SW Schalls Ferry Rd
Beaverton OR 97007
(503) 590-5300
FAX (503) 590-1404
1-800-644-0957

Chain of Custody Record
Laboratory Analysis Request

Sampling: ☑ Grab ☐ Comp Page 1 of 1
OAL Hours _____ Site Visit ☐
ISCO _____
www.oalab.com

Information
Company: Transwestern Pipeline Co.
Charlie Allen
P.O. Box 1019
Thoreau N.M. 87323
505-862-7443 Fax # 505-862-7026

Billing Information
Company: Transwestern Pipeline
Contact: Ginger Bibby
Address: 6381 N. Main St.
Roswell N.M. 88201-9508
Phone # 505-625-8067 Fax # _____

Project Information
Project Name: Gallup Comp. Sta.
Project #: _____
P.O. # _____
Comments: _____

Sampler's Name: Charlie Allen
Signature: [signature]
Quote # _____
NOTE: If quote number is not referenced, standard pricing will be applied.
Provide Fax Results ☐ Yes ☐ No

Have any question Call Charlie at 505-862-7443

Sample Identification	Date	Time	FOR LAB USE ONLY OAL Login #	# of Containers	Matrix: Soil	Water	Other (Note in Remarks)	Analyses: Volatiles 8010/8020/8240	Semivolatiles 8250/8270 PAH(SIM)8270 PAH8310	Organochlor Pest 8081/8051 PCB 8082/8052	NW TPH-HCID Quantify? ☐ Yes ☐ No	NW TPH Quantification 8100	BTEX 8021/8021 ☐ MTBE ☐ Naphthalene	Metals ☐ Total ☐ TCLP ☐ Dissolved As Ba Cd Cr Pb Hg Se Ag Other _____	Arsenic Chromium Cadmium Lead	Halogens	PCB's	Flash Point	Turnaround	Remarks
Gallup Comp. Sta. oil from unit	6/2/00	13:45	L16604-1	1			X								X	X	X	X	X	N	oil From unit.
Gallup Comp. Sta. Waste water	6/2/00	14:00	-2	1			X	X	X										X	N	oil phase From oily Waste Water Tank
oil phase	—	—	↓																		

Turnaround: (N) Normal – 10 working days; (S) Special – 5 working days; (R) Rush – 24-72 hrs; (O) Other – _____

Relinquished	Date	Time
[signature]	6/2/00	15:30
Charlie Allen		

Received	Date	Time
Ky Evans	6-5-00	1030
Ky Evans		
OAL		

Relinquished	Date	Time
Signature		
Print Name		
Company		

Received	Date	Time
Signature		
Print Name		
Company		

Relinquished	Date	Time
Signature		
Print Name		
Company		

Received	Date	Time
Signature		
Print Name		
Company		

☐ Courier ☑ UPS ☐ FedEx ☐ Other
Received @ RT °C
Appropriate Containers ☑ Yes ☐ No
2 4oz./8oz. Jars
_____ VOA Vials
_____ Plastic Bottles
_____ Glass Bottles
_____ Other _____
3 2 3

(Oct 99)

APPENDIX
D

CONTINGENCY PLAN

FOR

TRANSWESTERN PIPELINE COMPANY

GALLUP COMPRESSOR STATION

June 21, 2000

TABLE OF CONTENTS

INTRODUCTION

CONTINGENCY PLAN SCOPE

This plan is to provide guidelines for responding to emergency situations resulting from releases of hazardous substances at the Gallup Compressor Station. It is intended to provide compliance with 40 CFR 265.50 and 29 CFR 1910.120.

CONTINGENCY PLAN OBJECTIVE

The objective of this plan is to effectively manage and contain emergency situations to minimize injuries, property damage and adverse environmental effects at the Gallup Compressor Station.

For related information pertaining to emergency planning, training or drills, refer to the Gallup Team Emergency Plan maintained at the facility.

DEFINITION OF AN EMERGENCY

An emergency is any accidental release of a hazardous substance that endangers or could endanger human life, property or the environment. Small releases that can be handled in the normal course of operations are not considered emergencies.

GENERAL FACILITY INFORMATION

Gallup Compressor Station is designed to compress natural gas and is part of the process of transporting compressed natural gas west from the facility. Entrained pipeline liquids, which are a component of the natural gas, are removed from the gas and temporarily stored at the facility in a storage tank, until removed from the facility by a trucking operation. The pipeline liquids consist of water, combustible hydrocarbons.

Other regulated liquid substances at the facility include oily wastewater, new and used lubricants and cleaning compounds. All of these regulated materials are stored in tanks or drums and maintained in concrete secondary containment.

The facility is fenced to restrict access to the general public and lighted during night time hours. To arrive at the facility, from Gallup on the east side go west on I –40 to exit 22. Montoya Blvd. Go north to Hassler Valley Rd. East for Approx. 4.2 miles to Speedway Drive- North for approx. .5 miles – west to Transwestern Pipeline Gallup Compressor Station yard.

The facility is operated by the Gallup Team. Normal working hours are 7:00 am to 3:30 pm Monday through Friday. During "off hours" and on weekends, one of the employees is on call. .

I. PREEMERGENCY PLANNING AND COORDINATION WITH OUTSIDE PARTIES

The following services can be contacted for assistance by dialing the phone numbers posted near the telephones at the site:

Ambulance	Gallup Med Star (505) 722-4195
Hospital	Gallup RMCH (505) 863-7000
Sheriff	Gallup (505) 722-7205
State Police	Gallup 911or (505) 863-9353
Local fire department	Gallup 911 or (505) 722-4195

Discussions are held periodically with the local fire department. Fire department personnel are advised of the types of chemicals stored at the site, emergency situations that might occur and the type of response which might be needed at the Gallup facility.

II. PERSONNEL ROLES AND LINES OF AUTHORITY

Employees of Transwestern Pipeline Company that discover a potential emergency condition are required to notify the Team Advisor in Albuquerque , New Mexico and the Director of Operations or his designee in Albuquerque, New Mexico.

Any employee assigned to the facility may activate this plan and carry our all phases of this plan. The responsible employee who is present during an emergency is the Emergency Response Coordinator.

Team member's name, business phone, pager, cellular phone, and home number.

Team Member	Business Phone	Cellular Phone	Pager #	Home phone
Charlie Allen	(505) 862-7443	(505) 979-3177	(505)350-1212	(505)862-7311
Howard Begay	(520) 871-4266	(505) 979-1643	(505)726-2108	(520)871-5781
Michael Boatman	(505)863-4104	(505) 979-0366	(505)726-2104	(505)863-3741
Kory Kruse	(505) 863-4104	(505) 979-0371	(505)726-2103	(505)726-9146
Robert Stearns	(520) 871-4266	(505)979-1650	(505)726-2109	(520) 871-5576
Walter Rhoda	(505) 863-4104	(505)979-0374	(505)726-2105	(520) 562-7339
Patrick Troncoso	(505) 863-4104	(505)979-0323	(505)726-2102	(505) 863-8833
Douglas Young	(505) 863-4104	(505)979-0378	(505)726-2106	(505) 863-9317

III. EMERGENCY RECOGNITION AND PREVENTION

A. Natural Gas. Natural gas and related emergencies are covered in the Gallup Compressor Station Emergency Plan which is designed to comply with 49 CFR 192. Copies of this document are maintained at the facility.

B. Natural Gas Liquids. The possibility of emergencies caused by accidental releases of pipeline liquids have been minimized by the facility design and operational methods. All storage tanks holding natural gas liquids are operated at atmospheric pressure. The pipeline liquids tank is located in remote portions of the facility which further reduces any risk to the employees at the site and process equipment.

Identification of releases and or spills of any hazardous substance will include equipment repair and applicable agency notification and reporting. Control of the release and prevention will be emphasized to minimize the occurrence from becoming an emergency. The Gallup Team, located in Gallup, New Mexico (505- 863-4104) serves as operational team for this facility. Significant releases of a facility controlled substance would be deemed an emergency.

IV. SAFE DISTANCES AND PLACES OF REFUGE

Safe distances and perimeters of safety will be determined at the time of an incident by the Emergency Response Coordinator. Factors that influence safe distances include:

- Toxicological properties of the substance
- Physical state of the substance
- Quantity released
- Method, rate and height of release
- Vapor density and pressure
- Wind speed and direction
- Temperature and atmospheric stability
- Local topography

Places for personnel to take short rest breaks called, a refuge, during an emergency, will be located upwind of the emergency site and at a safe distance from the emergency area. The area will be specifically cleared of all potential obstructions and identified. Typical items in the refuge are:

- A sitting/resting area with shade
- Water for drinking
- Wind indicator
- First aid supplies
- Extra detectors, tubes and personnel monitors
- Hand tools

- Fire extinguishers
- Communication equipment

V. SITE SECURITY

Operating areas are provided with lighting. At all times, an employee is either on call or on duty. The Gallup facility is enclosed by a eight foot cyclone fence, with an entrance gate. During an emergency, the fence will be used to maintain security of the station.

VI. EVACUATION PROCEDURE

Due to the small size of this facility and quantities of materials and substances being stored, detailed evacuation procedures are not regarded as necessary for this plan. The site is in compliance with the requirement of 49 CFR 192, pertaining to emergency evacuation of DOT pipeline regulated facilities.

VII. DECONTAMINATION

A. Decontamination Plan. If an emergency occurs, an appropriate decontamination plan will be established at that time to meet the existing conditions and needs. It will be established in accordance with prior training and take into consideration the following issues:

- Establishment of general work procedures and minimize contact with all wastes and hazards and maximize worker protection.
- Design and construct the decontamination equipment and layout in a manner suitable for maximum safety regarding site conditions, site hazards and hazardous substances present on the site. A revision of the plan is necessary whenever any of the design criteria change.
- Locate the decontamination area to minimize exposure of uncontaminated employees and equipment.
- Provide an organized process by which levels of decontamination are reduced. The process is performed in a specific sequence of stations called the decontamination line.

B. Decontamination equipment checklist:

- Drop cloth(s) of suitable plastic or other suitable materials on which heavily contaminated equipment and outer protective clothing may be deposited.
- collection containers, such as drums or suitable lined trash cans for storing disposable clothing and heavily contaminated personal protective clothing or equipment to be discarded.
- Lined box with absorbents for wiping and/or rinsing off solid/liquid contaminants.
- Large galvanized tubs of stock tanks to store wash and rinse solutions.
- Wash solutions selected to wash off and reduce the hazards associated with the contaminants.
- Rinse solutions selected to remove contaminants and contaminated wash solutions.
- Brushes and towels to assist in removing and rinsing off contaminants.
- Lockers and cabinets for storage of decontaminated clothing and equipment.

- Shower facilities for full body wash or wash sinks with drain systems connected to a collection tank or appropriate treatment system.
- Soap and wash solution, wash cloths and towels for personnel involved in the activity.

VIII. EMERGENCY MEDICAL TREATMENT

The first aid training provided to Transwestern employees and the emergency services available to the facility will be used to address any injuries, illnesses or medical situations which may arise during any emergency incident.

IX. EMERGENCY ALERTNESS AND RESPONSE

A. General Response. Emergency response operations follow a sequence of procedures initiating with the notification and continues through preparation of equipment and personnel for the next emergency. The following procedure for handling emergencies will be initiated by the employee involved in the discovery process:

- Evaluate the situation.
- Evacuate the area of non essential personnel. Account for all persons.
- Notify the Team Advisor and Director of Operations of the emergency.
- Provide verbal assistance from the appropriate service (fire department, sheriffs office, hospital).
- Shut off ignition sources (open flames, heaters, electric power).
- Take action to stop and contain the release or fire. Do not do attempt any activity that training has not been provided for. Implement the "Buddy System".
- Ensure that proper safety precautions are taken and that personal protective equipment is worn as required.
- Only attempt to extinguish fires that are small and can be extinguished rapidly with portable fire extinguishers.
- Secure the area to keep media, sight seers and other non essential people outside of the restricted area.
- Call for further assistance for remediation and cleanup contractors.
- Complete required company reports.

The initial report to the Team Advisor and the Director of Operations will include the following:

- What happened
- Where emergency happened
- When emergency happened
- How emergency happened, if possible
- Initial damage
- Present condition
- what aid is needed

B. Emergency Operations. Prior to commencement of any emergency operation, meetings will be held to discuss:

- Tasks to be performed
- Time constraints (personnel protective equipment, rest breaks etc)
- hazards to be encountered, effects and symptoms, required monitoring, concentration limits and other danger signals
- Emergency procedures

Employees of Transwestern Pipeline company are instructed and trained to not attempt an emergency response or rescue until essential back up and support personnel are available onsite. Evacuation routes will be identified.

The "buddy system" will be employed at all times and where applicable. No admittance will be granted into high hazard areas without a partner. Personnel in a high hazard area must be in line-of-sight or communication contact with the incident commander or his designee at all times.

A Hazardous Materials Technician who will have access to the source of the incident during an emergency in order to abate the incident, will have successfully completed the 24 hour or the 40 hour HAZWOPER training and be specifically trained for the emergency and competent to:

- Implement the Emergency Response Plan
- Possess knowledge of the unknown and known materials present in the emergency and have skills necessary to operate field survey instruments and equipment
- Be able to function in an assigned role
- Have a working knowledge of and experience in use of personnel protective equipment
- Understand hazard and risk assessment techniques
- Ability to perform advanced release control, containment and countermeasure activities
- Understand and implement decontamination procedures
- Understand basic chemical and toxicological terminology and behavior

X. CRITIQUE AND FOLLOWUP

During a large scale emergency, a qualified person will be designated as a recording secretary. A chronological log will be kept pertaining to incident history. In addition, a tape recording may be used to assist in this activity. The following is a partial list of items to be documented:

- All notifications and reports to agencies and organizations
- Major incidents i.e., explosions, injuries
- Media contacts
- Meetings, attendees, topics, decisions
- Activities undertaken

- Contacts made for the purchase of supplies and equipment
- Approvals or directives obtained from outside agencies and support groups
- Photographs of the incident
- Samples collected and results

A review of work accomplished and problems observed should be conducted at the end of each emergency response operation. Appropriate changes should be made in this Contingency Plan to ensure employee safety and health.

XI. PERSONNEL PROTECTIVE EQUIPMENT

The following levels of personnel protective equipment (PPE) are available for responding to emergency incidents. The type of PPE used will be dependent upon the specific hazards present.

Level B: Highest level respiratory and lesser skin protection

- Self contained breathing apparatus (SCBA)
- Hooded chemical resistant clothing
- Coveralls
- Gloves, outer, chemical resistant
- Gloves, inner, chemical resistant
- Boots, outer. Chemical resistant, steel toes and shank
- Boot covers, disposable
- Hard hat
- Face shield

Level C: Concentration and type of airborne substance is known and criteria for using air purifying respirators are met

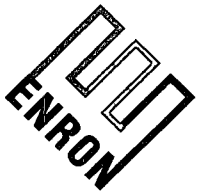
- Full face or half mask purifying respirators
- Hooded chemical resistant clothing
- coveralls
- Gloves, outer, chemical resistant
- Gloves, inner, chemical resistant
- Boots, chemical resistant, steel toed and shank
- Boot covers, outer, chemical resistant
- Hard hat
- Escape mask
- Face shield

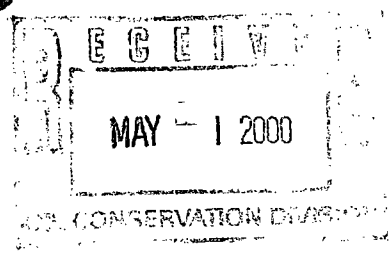
Level D: Nuisance contamination only

- Coveralls
- Gloves

- Boots/shoes, chemical resistant, steel toed and shank
- Boots, outer, chemical resistant
- Safety glasses or chemical splash goggles
- Hard hat
- Escape mask
- Face shield

Prior to each use, the personal protective equipment will be checked to ensure that the PPE contains no cuts, punctures or defects that would expose workers to the hazards encountered at the site. Cuts and scratches on the skin will receive extra protection.





Enron Transportation & Storage
Services Provided by Northern Natural Gas Company and Transwestern Pipeline Company
Summit Office Building
4001 Indian School Road, NE, Suite 250
Albuquerque, NM 87110
(505) 260-4000
Fax (505) 254-1437

April 26, 2000

Mr. Wayne Price
Oil Conservation Division
P. O. Box 2040
Santa Fe, New Mexico 87505

Re: New Compressor Station at Gallup

Dear Mr. Price

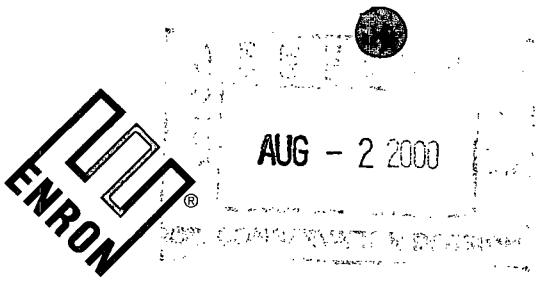
This to inform the New Mexico Oil Conservation Division that Enron Transportation & Storage owner and operator of Transwestern Pipeline Company is building a new electric Compressor Station located at our San Juan Gallup junction. This facility will be completed some time in May 2000. This facility will consist of one (1) electric motor that will compress the gas from San Juan into Transwestern main line at the Gallup Junction. Upon completion of this facility we will prepare a ground water plan to be presented to your agency.
If you should need any additional information, please give me a call at (505) 260-4011.

Sincerely:

James R. Russell

James R. Russell
Environmental Specialist

Xc: Gallup Team
David Roensch
Envision



Enron Transportation & Storage
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Summit Office Building
4001 Indian School Road, NE, Suite 250
Albuquerque, NM 87110
505-260-4000
Fax 505-254-1437

July 31, 2000

Mr. Ed Martin
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Re: Depth and quality of ground water located under the Gallup Compressor Station.

3,110 ppm per phone conversation with Butch Russell 8/4/00

Dear Mr. Martin

The main, deep aquifer underlying the project area is the San Andres Sandstone Aquifer, as artesian aquifer used for public water supply by the city Gallup and surrounding environs including the residential area adjacent to the project area. This aquifer is located at a depth of roughly 1200ft. Another shallow, less dominant aquifer underlying the area is the Chinlee Formation. This aquifer contains a small bank of gravel, but is comprised mainly of layers of silty shale. According to the NMED, the aquifer is not a dominant aquifer. Water quality is poor in the aquifer and yield is minimal (NMED 1999a).

The aquifer underlying the project area is hydraulically separated from that underlying the city of Gallup due to the presence of a large hogback 1-mile west of the project site.

Depth to groundwater has been recorded at 20 ft. below surface at a location inside the adjacent residential area (Mobil trailer park). Depth to the shallowest groundwater aquifer in this area has been measured at 20 ft. below ground surface. As stated above, deeper, more viable aquifer is found at depth of 1200ft. below surface in the San Andreas Sandstone. The state of New Mexico has been conducting groundwater investigation at this site due to potential contamination occurring there. The main groundwater contamination is nitrates (NMED1996b).

The city of Gallup operates a series of public groundwater wells located west of the project area in Range 18W, Section 15 (New Mexico Office State Engineer 1999a). None are located within ½ mile of the project site.

A water well search was conducted through the New Mexico Engineer's Office (1999b). No water well was found to occur within 150 ft. of the compressor station site. However, the search identified five domestic drinking water wells within ¼ mile of the project site.

Based on information provided by the New Mexico State Engineer Office, only one of these wells appeared to be down-gradient from the compressor station. This well (G342) is located on the property of Southwest Auto Salvage approximately 500 ft. southwest of the compressor site. This well was completed at a depth

of 70ft below ground surface. The water-bearing zone extends from a depth of 20 ft to 70 ft below ground surface.

If you should have any question, please give me a call at (505) 260-4011.

Sincerely;

James R. Russell
Environmental Specialist

Xc: Gallup Team

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 21, 2000

Mr. James R. Russell
Enron Transportation & Storage
Summit Office Building
4001 Indian School Road NE, Suite 250
Albuquerque, NM 87110

We have received your discharge plan application for the Transwestern Pipeline Company Gallup Compressor Station. This letter will also confirm receipt of two checks in the amounts of $50.00 (filing fee) and $1,380.00 (flat fee).

After review of the application, we find that we still need the hydrology information, including depth to groundwater and quality of that groundwater as requested in item 12 of the application.

If you have any questions, do not hesitate to contact me in Santa Fe at 827-7151.

Sincerely,

Ed Martin
Environmental Bureau

Cc: Denny Foust, NMOCD, Aztec, NM

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/20/00,
or cash received on 7/15/00 in the amount of $ 50.00
from ENRON CORP.
for TRANSWESTERN GALLUP COMP. STA. GW-325
(Facility Name) (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: ED MARTIN/Ed Martin Date: 7/21/00
Received in ASD by: _____ Date: _____
Filing Fee ✓ New Facility ___ Renewal ___
Modification ___ Other _____
(specify)
Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.
Full Payment ✓ or Annual Increment ___

ENRON CORP
P. O. Box 1188
Houston, TX 77251-1188

62-20
311

CHECK NO. [redacted]

CHECK DATE 6/20/00

PAY EXACTLY Fifty and 00/100 - - - - - - - - - - - - - - - - DOLLARS

$ 50.00

THIS CHECK IS VOID UNLESS PRINTED ON BLUE BACKGROUND

NOT VALID AFTER 90 DAYS

PAY TO THE ORDER OF

New Mexico OCD
2040 South Pacheco
Santa Fe, NM 87505

NOT VALID OVER $5000.00 UNLESS COUNTERSIGNED

FIELD DISBURSEMENT ACCOUNT

CITIBANK DELAWARE

[redacted]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/20/00

or cash received on 7/15/00 in the amount of $ 1,380.00

from ENRON CORP.

for TRANSWESTERN GALLUP COMP. STA. (Facility Name) GW-325 (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Ed Martin / Ed Martin Date: 7/21/00

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ✓ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

ENRON CORP

P. O. Box 1188
Houston, TX 77251-1188

62-20
311

CHECK NO. [redacted]

CHECK DATE 6/20/00

PAY EXACTLY One Thousand Three Hundred Eighty and 00/100 DOLLARS

$ 1,380.00

THIS CHECK IS VOID UNLESS PRINTED ON BLUE BACKGROUND

NOT VALID AFTER 90 DAYS

PAY TO THE ORDER OF

New Mexico OCD
2040 South Pacheco
Santa Fe, NM 87505

NOT VALID OVER $5000.00 UNLESS COUNTERSIGNED

FIELD DISBURSEMENT ACCOUNT

CITIBANK DELAWARE

[redacted]

NEW MEXICO ENVIRONMENT DEPARTMENT
REVENUE TRANSMITTAL FORM

	Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1	CY Reimbursement Project _____ Tax ___	064	01						1
5	Gross Receipt Tax	064	01		2329	900000	2329134		2
3	Air Quality Title V	092	13	1300	1696	900000	4169134		3
4	PRP Prepayments	248	14	1400	9696	900000	4969014		4
2	Climax Chemical Co.	248	14	1400	9696	900000	4969015		5
6	Circle K Reimbursements	248	14	1400	9696	900000	4969248		6
7	Hazardous Waste Permits	339	27	2700	1696	900000	4169027		7
8	Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		8
10	Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	$ 1,430.00	10
11	Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4169029		11
12	Air Quality Permits	631	31	2500	1696	900000	4169031		12
13	Payments under Protest	651	33		2919	900000	2919033		13
*14	Xerox Copies	652	34		2349	900000	2349001		*14
15	Ground Water Penalties	652	34		2349	900000	2349002		15
16	Witness Fees	652	34		2349	900000	2439003		16
17	Air Quality Penalties	652	34		2349	900000	2349004		17
18	OSHA Penalties	652	34		2349	900000	2349005		18
19	Prior Year Reimbursement	652	34		2349	900000	2349006		19
20	Surface Water Quality Certification	652	34		2349	900000	2349009		20
21	Jury Duty	652	34		2349	900000	2349012		21
22	CY Reimbursements (I.e. telephone)	652	34		2349	900000	2349014		22
*23	UST Owner's List	783	24	2500	9696	900000	4969201		*23
*24	Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
*25	UST Maps	783	24	2500	9696	900000	4969203		*25
*26	UST Owner's Update	783	24	2500	9696	900000	4969205		*26
*28	Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
*29	Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
*30	Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
31	Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
32	Smoking School	783	24	2500	9696	900000	4969214		32
*33	SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
*34	Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
*35	Sale of Equipment	783	24	2500	9696	900000	4969301		*35
*36	Sale of Automobile	783	24	2500	9696	900000	4969302		*36
*37	Lust Recoveries	783	24	2500	9696	900000	4969614		**37
*38	Lust Repayments	783	24	2500	9696	900000	4969615		**38
39	Surface Water Publication	783	24	2500	9696	900000	4969801		39
40	Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
41	Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
42	Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
44	Ust Permit Fees	989	20	3100	1696	900000	4169020		44
45	UST Tank Installers Fees	989	20	3100	1696	900000	4169021		45
46	Food Permit Fees	991	26	2600	1696	900000	4169026		46
43	Other								43

* Gross Receipt Tax Required

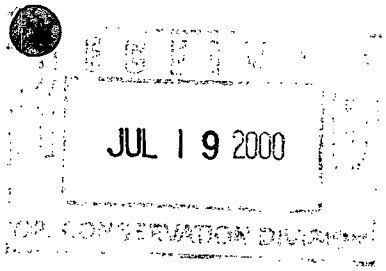
** Site Name & Project Code Required

TOTAL $ 1,430.00

Contact Person: ED MARTIN Phone: 827-7151 Date: 7/21/00

Received in ASD By: _____ Date: _____ RT #: _____ ST #: _____

FSB025
Revised 07/07/00



Enron Transportation & Storage
Services Provided by Northern Natural Gas Company and Transwestern Pipeline Company
Summit Office Building
4001 Indian School Road, NE, Suite 250
Albuquerque, NM 87110
505-260-4000
Fax 505-254-1437

Mr. Roger Anderson
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Reference: Underground Drain Testing Transwestern Pipeline Company's Gallup Compressor Station.

Dear Mr. Anderson:

The following report presents the results of the underground drain line testing at the Transwestern Pipeline Company's Gallup Compressor Station. This Compressor Station is a new facility and has applied for a Ground Water Discharge Plan. The drain lines were tested using the methodology submitted by letter to the Oil Conservation Division on July 8, 1997, which was approved by your agency on July 16, 1997.
Attached is a copy of the test report generated by Agra Earth Environmental.
If you should have any question please call the Enron Transportation and Transportation Technical office in Albuquerque (505) 260-4011.

Sincerely;

James R. Russell

James R. Russell
Environmental Specialist

Xc: Gallup Team
David Roensch
Envision File

AGRA
ENGINEERING GLOBAL SOLUTIONS

AGRA Earth & Environmental, Inc.
8519 Jefferson, N.E.
Albuquerque
New Mexico 87113
Tel (505) 821-1801
Fax (505) 821-7371

20 June 2000
AGRA Project No. 0-517-000069

Transwestern Pipeline Co.
4001 Indian School Rd. NE Ste. 250
Albuquerque, New Mexico 87110

Attention: Butch Russell

RE: DRAIN LINE TESTING
GALLUP COMPRESSOR STATION
GALLUP, NEW MEXICO

AGRA Earth & Environmental, Inc. (AGRA) is pleased to provide you with results of hydrostatic testing for the below ground, non-pressurized, process and wastewater drain system at the Gallup Compressor station located in Gallup, New Mexico. Only below ground non-pressurized process and wastewater lines were tested.

The underground pipelines carrying process or wastewater were isolated. Each isolated system was filled with clean water and air removed. A water-filled riser was of sufficient height to provide a minimum of 3 pounds per square inch above normal operating pressure. A system is considered sound when the height of the water column held steady for a period of 30 minutes.

As summarized on Table 1, all drain lines tested recorded no leaks.

Should you have any questions, please feel free to contact our office.

Respectfully submitted,

AGRA Earth & Environmental, Inc.

George A. Friend
Project Manager

Reviewed by:

Frederick T. Schelby, P.E.
Manager of Engineering

Attachments: Summary of Line Testing

TABLE 1
Summary of Drain Line Test Results
Gallup Compressor Station
AGRA Project No. 0-517-000069

Drain Line From	Drain Line To	Line Size/ Length/Type	Test Date/Time	Line Results/ Comments
Compressor building drains	Drain sump tank	4-inch/150 feet/PVC	6/19/00 13:00 - 13:30 hours	**No leaks detected**
Drain sump tank	Waste water holding tank	2-inch/246 feet/steel	6/19/00 14:00 - 14:30 hours	**No leaks detected.**
NOTE: All line lengths are approximations				