GW - 346

WORK PLANS

2002

Meridian Alliance Group, LLC

January 22, 2002

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

Attention: Mr. W. Jack Ford, C.P.G.

Subject: BP Pipelines, Inc. Bagley Station Truck Unloading Facility
Stormwater Run-Off Plan for Review and Approval

Dear Mr. Ford:

On behalf of our client, Mr. James D. Lutter, BP Pipelines, Inc., please find attached a copy of the subject Stormwater Run-off Plan for your review and approval. We believe this Plan incorporates all requirements of the OCD Discharge Permit for the same facility, and the requirements that you and I discussed in our phone conversations in December.

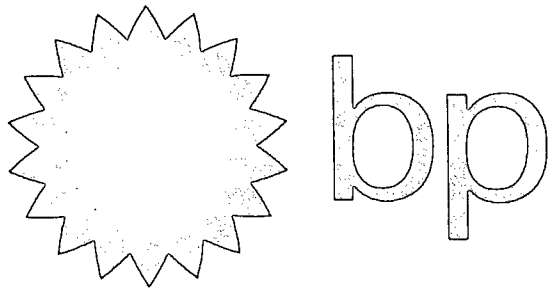
Should you have any questions on the Plan, or should you require any changes, please contact me at (409) 943-4159. Or you may contact Mr. Lutter at (806) 897-7017. Please copy both of us on any correspondence relative to the Plan. We appreciate your time and assistance in the preparation and review of this document.

Sincerely,

Win Turner

J. W. (Win) Turner, P.E.
Engineering and Technical Services
Meridian Alliance Group, LLC

cc w/ att: Mr. James D. Lutter, BP Pipelines, Inc., Levelland, TX
Mr. Mark Ehrlich, Merdian Alliance Group, LLC, Midland, TX



STORMWATER RUN-OFF PLAN

BP Pipelines, Inc.
Bagley Station Truck Unloading Facility
Lea County, New Mexico

Prepared For:

BP Pipelines, Inc.
502 N. West Avenue
Levelland, Texas 79336

Prepared By:

Meridian Alliance Group, LLC
1221 6th Street North
Texas City, Texas 77590
(409) 943-4159

January 2002

STORMWATER RUN-OFF PLAN
For
BP Pipelines, Inc.
Bagley Station Truck Unloading Facility
Lea County, New Mexico

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SECTION 1

INTRODUCTION

1.1 Background

This document is the Storm Water Run-off Plan adopted by BP Pipelines, Inc. (BP) to comply with the requirements of the New Mexico Energy, Minerals and Natural Resources Department's Environmental Bureau of the Oil Conservation Division (OCD). This plan applies to the BP's Bagley Station Truck Unloading Facility located in Lea County, New Mexico with a Standard Industrial Classification (SIC) code 4612, Crude Petroleum Pipelines. BP submitted a Discharge Plan, along with a Notice of Intent (NOI) for Storm Water Discharges Associated With Industrial Facilities to OCD on June 6, 2001. OCD issued the Discharge Plan Approval GW-346 on September 6, 2001. As part of the approval, OCD required BP to submit this Storm Water Run-off Plan within six (6) months to OCD for approval. A copy of the storm water NOI and the Discharge Plan approval and conditions are included as Attachment 1.

1.2 Scope of the Plan

Releases into storm water of crude oil or other hazardous substances from industrial facilities would be detrimental to maintaining applicable New Mexico surface water and groundwater quality standards. This plan documents the engineering and operational measures and controls utilized at the Bagley Station to prevent such releases. These measures and controls include:

- Secondary spill containment for storage and transfer operations and equipment,
- Management of storm water,
- Spill prevention and response procedures,
- Inspections and preventative maintenance,
- Employee training and pollution prevention responsibilities,
- Record keeping and internal reporting procedures, and
- Application of Best Management Practices (BMPs).

Each of these is discussed in more detail in Section 3 of this plan.

SECTION 2

FACILITY DESCRIPTION AND POTENTIAL POLLUTION SOURCES

2.1 Facility Location and Description

The BP Bagley Station Truck Unloading Facility is located along State Highway 457 in the Northwest Quarter of the Southeast Quarter of Section 2, T-12-S, R-33-E, NMPM, Lea County, New Mexico. The approximate coordinates are latitude N33° 18.159' by longitude W103° 35.014'. An Area Location Map is included as Figure 1, and a local Site Topographic Map is included as Figure 2.

The 1-acre facility receives crude oil shipments by tanker truck. The trucks offload the crude oil by truck-mounted pumps into three (3) interconnected on-site 224-barrel each (9,408 gallons) steel storage tanks. When the storage tanks are close to full, a level controller activates a pipeline transfer pump (Level Activated Custody Transfer – LACT) that transfers the contents of the storage tanks into a nearby BP pipeline for transportation to downstream facilities.

The entire site is covered in compacted caliche, and has a large circular caliche-paved drive with two (2) truck unloading stations. The three storage tanks are located inside a 98-foot by 53-foot secondary containment area entirely surrounded by a 3"-6" high compacted-caliche containment berm, and are mounted on top of an elevated, compacted-caliche tank pad. The elevated pad will keep the steel tanks out of contact with accumulated storm water inside the containment area to minimize corrosion potential. The entire containment area, tank pad and berm are lined with a 60-mil high-density polyethylene (HDPE) impervious liner system. Details of the liner system are included as Attachment 2.

The first tank in the interconnected tank system is equipped with the level transmitter for the controller, and an overflow nozzle connected to a small overflow tank. This provides an overfill alarm signal and primary containment for the crude oil in the unlikely event of a tank overfill.

The two truck unloading stations are connected to the tank fill header via an underground 6-inch corrosion-resistant poly pipe header. The underground header comes above ground where it crosses the berm into the containment area. Each unloading station is equipped with a 3-inch camlock quick disconnect hose connection located inside a lidded drip barrel to contain any leaks or drips when connecting or disconnecting to the trucks. The lid on the barrel prevents an accumulation of storm water.

The LACT pump suction header runs from the tanks through the berm to the pump located outside the bermed containment area. A watertight seal is provided where the pipe penetrates the berm, and the LACT pump is equipped with a drip pan. Figure 3 is the Site Plan, Figure 4 shows the Tank Farm Details, Figure 5 shows a Tank Farm Section, and Figure 6 is the Unloading System Details.

2.2 Potential Storm Water Pollutant Sources

Crude oil is the only material stored and handled at the Bagley Station Truck Unloading Facility, and is the primary concern as a potential storm water pollutant in the event of a release. The capacity of the storage tanks is 224-barrels (9,408 gallons) each, for a total facility capacity of 672 barrels (28,224 gallons). The crude oil is delivered to the facility in tanker trucks that can range in capacity up to 6,000 gallons.

Potential storm water pollution sources at the facility include:

- Partial or complete failure of one of the storage tanks;
- Tank overfill;
- Partial or complete failure of a piping component;
- Pump leakage;
- A partial or complete failure of a tanker;
- A failure or leak from an unloading hose;
- Leakage or failure of an unloading station drip barrel;
- Leakage of automotive fluids from trucks; and
- Debris or oily rags from equipment maintenance.

The volume of a release could range from less than a gallon in the event of minor leaks or drips, to several thousand gallons in the unlikely event of a sudden, catastrophic failure. There are no non-storm water discharges associated with this facility.

2.3 Facility and Regional Drainage

As the entire site is covered with compacted caliche, which has relatively low permeability, the majority of storm water falling outside the tank farm containment area will runoff the site through overland flow. A drainage ditch running along Highway 457 on the eastern side of the site will receive much of the runoff, with the remainder flowing onto surrounding ground surfaces.

Figure 2, Site Topographic Map, indicates that the area in which the facility is located is very flat; and no rivers, streams creeks, lakes or other surface water features are indicated within several miles of the facility. The overall regional drainage is to the southeast through overland flow, and through localized ditches

or erosion channels. Precipitation is relatively low in the area. The average annual rainfall for Lea County is 14.6 inches per year, and the average annual snowfall is 5 inches per year. The depth to shallow groundwater in the area is approximately 50 feet. As there are no nearby receiving water bodies, and due to the low amount of precipitation, much of the storm water runoff will infiltrate into the subsurface, or evaporate. Leaching of storm water contaminants into the shallow groundwater offers a greater concern for this site than potential contaminant flow into surface water.

SECTION 3

STORM WATER POLLUTION PREVENTION CONTROLS AND MEASURES

3.1 Pollution Prevention Team

BP Pipelines will organize a storm water pollution prevention team with the team members and responsibilities shown below:

Jim Lutter Health, Safety and Environmental Coordinator Work: (806) 897-7017 Cellular: (806) 632-3235
Responsibilities: • Signatory Authority • Storm water Run-Off Plan Development • Site Compliance Evaluations • Overall accountability for implementation of all aspects of the Plan including best management practices, inspections, and Plan modifications. • Emergency Response Coordinator • Employee Training Coordinator • Maintenance of records, reporting, and notifications

↓

Jimmy Humble Site Operations Work: (505) 396-2817
Responsibilities: • Implementation of best management practices and good housekeeping policy in operations and maintenance activities. • Visual monitoring of storm water in tank farm containment area prior to release. • On-site management of contaminated storm water. • Secondary emergency response coordinator. • Monitoring and inspections of tanks, pipes, valves, etc. for leaks or spills

3.2 Secondary Spill Containment

As discussed in Section 2, the crude oil storage tanks and much of the associated piping are located inside a bermed and lined secondary containment area. Allowing for the three existing tanks and one future tank, the containment area has an available containment volume in excess of 2,500-barrels versus 896-barrels required for the capacity of the tanks (it should be noted that the fourth

future tank will most likely not be installed). This greatly exceeds the OCD requirements for 1/3rd more than the total volume of all tanks, and will contain the full volume of all the tanks plus the largest anticipated rainfall event while maintaining an adequate freeboard.

Additional secondary containment features at the facility include the drip barrels at the truck unloading stations, and the drip pan on the transfer pump.

3.3 Management of Storm Water

Storm water falling within the secondary containment area of the tank farm will be retained inside the berm until inspected by operations personnel. As indicated in the previous section, more than adequate capacity exists to retain the largest of potential rainfall events. The collected storm water will be inspected for the presence of an oil sheen. Should a sheen exist, the "contaminated" storm water will not be released from the containment area. The water will be pumped into the tanks and transferred into the pipeline for ultimate processing at downstream facilities. The source of crude oil causing the sheen will then be located, and appropriate maintenance or housekeeping procedures will be implemented to eliminate any leak or contamination source. If inspection of the retained storm water shows no sheen, then the water will be released through a drain valve in the berm wall for normal drainage from the site.

Storm water falling outside of the tank farm secondary containment area will drain from the site through normal site drainage pathways. To prevent contamination of this storm water, periodic site inspections and good housekeeping practices will be employed. If an inspection reveals the presence of a leak of crude oil or automotive fluids, the impacted area will be cleaned, and any impacted soils will be containerized for appropriate off-site disposal at a BP approved facility. The source of the leak will be identified and eliminated to prevent future storm water impacts.

Any leaks of crude oil collected in the unloading station drip barrels or the pump drip pan will not be released or allowed to combine with storm water. The oil will be collected and pumped into the storage tanks, and the source of the leak will be identified and eliminated.

3.4 Spill Prevention and Response Procedures

Primary spill prevention at the facility is through a multiple combination of engineered and operational controls. All deliveries of crude oil to the Bagley Station facility are made by truck, and the driver will be present during all offloading operations. Hose connections for offloading of the truck will be made inside the drip barrels to prevent spills. As noted in Section 2.1, the interconnected tank system is equipped will a high level control and high-high level alarm device. This will prevent a spill from a tank overfill from occurring.

When the tank system reaches high level, the pump is activated to transfer the contents of the tanks into the pipeline. Should this not function for some reason, the high-high level will activate an audible alarm on the control panel to notify the truck driver to cease offloading operations. In the unlikely event these spill prevention steps should fail, the tank system is also equipped with a translucent 100-gallon overflow tank that will allow the driver a visual observation of an overfill condition while containing a minor overfill. Should all else fail the HPDE lined secondary containment area previously discussed will come into effect.

Should a spill or release of crude oil occur inside the tank farm secondary containment area, the released oil will be retained inside the HDPE lined berm. As stated in the previous two sections, adequate capacity exists in the secondary containment area for a full release of the tank volumes plus the largest anticipated rainfall event, while still maintaining an adequate freeboard to prevent berm overflow. The oil and/or storm water will be managed by pumping into the pipeline for transfer to downstream facilities. The source of the spill will be repaired, the containment area cleaned of oil residue, and the system returned to service. A spill that is contained and not released to the environment will not be considered a reportable spill.

As required by the Oil Pollution Act (OPA) of 1990, BP Pipelines has developed and maintains an oil spill contingency plan for pipeline transportation related facilities as governed by the U. S. Department of Transportation. In the event of a spill outside of the secondary containment at the Bagley Station facility, the OPA 90 spill contingency plan will be implement as appropriate. Release notification and corrective action will be implemented as discussed in the following section.

3.5 Release Notification and Corrective Action

Item 13 (Spill Reporting) of the Discharge Plan Approval Conditions for this facility states, "All spills/releases will be reported pursuant to OCD Rule 116 and Water Quality Control Commission (WQCC) 1203 to the OCD Hobbs District Office." WQCC 1203 states in Subsection A (4):

> "The oral and written notification and reporting requirements contained in this Subsection A are not intended to be duplicative of discharge notification and reporting requirements promulgated by the ... Oil Conservation Division (OCD); therefore, any facility which is subject to ... OCD discharge notification and reporting requirements need not additionally comply with the notification and reporting requirements herein."

OCD Rule 116 classifies releases as major and minor. An unauthorized Major Release is defined as a volume in excess of 25 barrels, or any volume that results in a fire, will reach a water course, may reasonably endanger public

health, results in substantial damage to property or the environment, or has a reasonable probability to be detrimental to water or cause an exceedance of the New Mexico water quality standards (a sheen on surface water or an impact to groundwater). A Minor Release is defined as an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels.

A Major Release requires both an immediate verbal notice and timely written notice. A minor release requires only timely written notice. Immediate verbal notice requires verbal notification to be given to the OCD within 24 hours of discovery of the release, and the timely written notification is to be reported within 15 days by completing and filing OCD Form C-141. Both notifications are to be given to the OCD Hobbs District Office. Additionally, if any release is suspected of endangering public health or the environment, or exceeding water quality standards, immediate verbal and written notification is to also be provided to the OCD's Environmental Bureau Chief.

A copy of OCD Rule 116 and OCD Form C-141 have been included as attachments. The OCD reporting addresses and phone numbers are:

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division

District 1 – Hobbs Office
1625 N. French Dr.
Hobbs, NM 88240
Phone: (505) 393-6161
Fax: (505) 393-0720

Environmental Bureau Chief
1220 So. St. Francis Drive
Santa Fe, NM 87505
Phone: (505) 476-3440
Fax: (505) 476-3462

Other reporting requirements shall follow internal BP procedures and the BP OPA 90 spill contingency plan.

If the release endangers public health or the environment, corrective actions must be taken to remediate the release per OCD approval of a remediation and/or abatement plan submitted to the Division.

3.6 Inspections, Recordkeeping, and Preventative Maintenance

All systems designed for spill prevention and collection at the Bagley Station facility shall be visually inspected every time a BP operator is on site, but at a minimum on a weekly basis and after each storm event as required by the Discharge Plan Approval Conditions. A detailed written inspection shall be performed monthly. Records of all inspections shall be maintained for a period of 5 years at BP Pipeline's Levelland, TX office.

The inspections shall be designed to ensure proper operation of all spill prevention and collection devices, and to prevent overfill events. If a deficiency is observed during an inspection, it shall be documented, and appropriate corrective maintenance shall be implemented. Deficiencies and corrective actions taken shall be documented as required by internal BP procedures. Additionally, preventative maintenance shall be preformed on all spill prevention and containment devices to ensure continued proper operation and prevent premature failure.

All underground process piping must be tested to demonstrate mechanical integrity at least every 5 years. Pressure testing to 3 pounds per square inch above normal operating pressure may be used, or other means acceptable to OCD. The underground piping integrity tests should be documented and records maintained for at least 5 years.

3.7 Employee Training

All BP personnel involved in operations of the Bagley Station facility shall be trained in the requirements of the OCD approved Discharge Plan, this Storm water Run-Off Plan, and BP's OPA 90 spill contingency plan. Specific training requirements, refresher frequency, new employee orientation, and maintenance of training records shall be conducted per internal BP Pipeline procedures.

3.8 Application of Best Management Practices (BMPs)

Storm water pollution prevention Best Management Practices (BMPs) will be utilized in the operation and maintenance of the Bagley Station facility. These BMPs include:

- Utilize operational procedures that prevent contamination with crude oil by practicing good housekeeping, and keep all areas cleaned and free of trash and debris.
- Store all crude or lube oil-contaminated debris in properly labeled and sealed containers.
- Use leak-proof storage containers and drip pans or other containment devices to collect leaks, drips, or accidental spills when performing maintenance.
- Reclaim leaked or spilled crude oil or crude oil contaminated water and manage by blending with crude product.
- Maintain equipment and facilities and practice preventative maintenance to reduce or prevent leaks, drips, and spills.

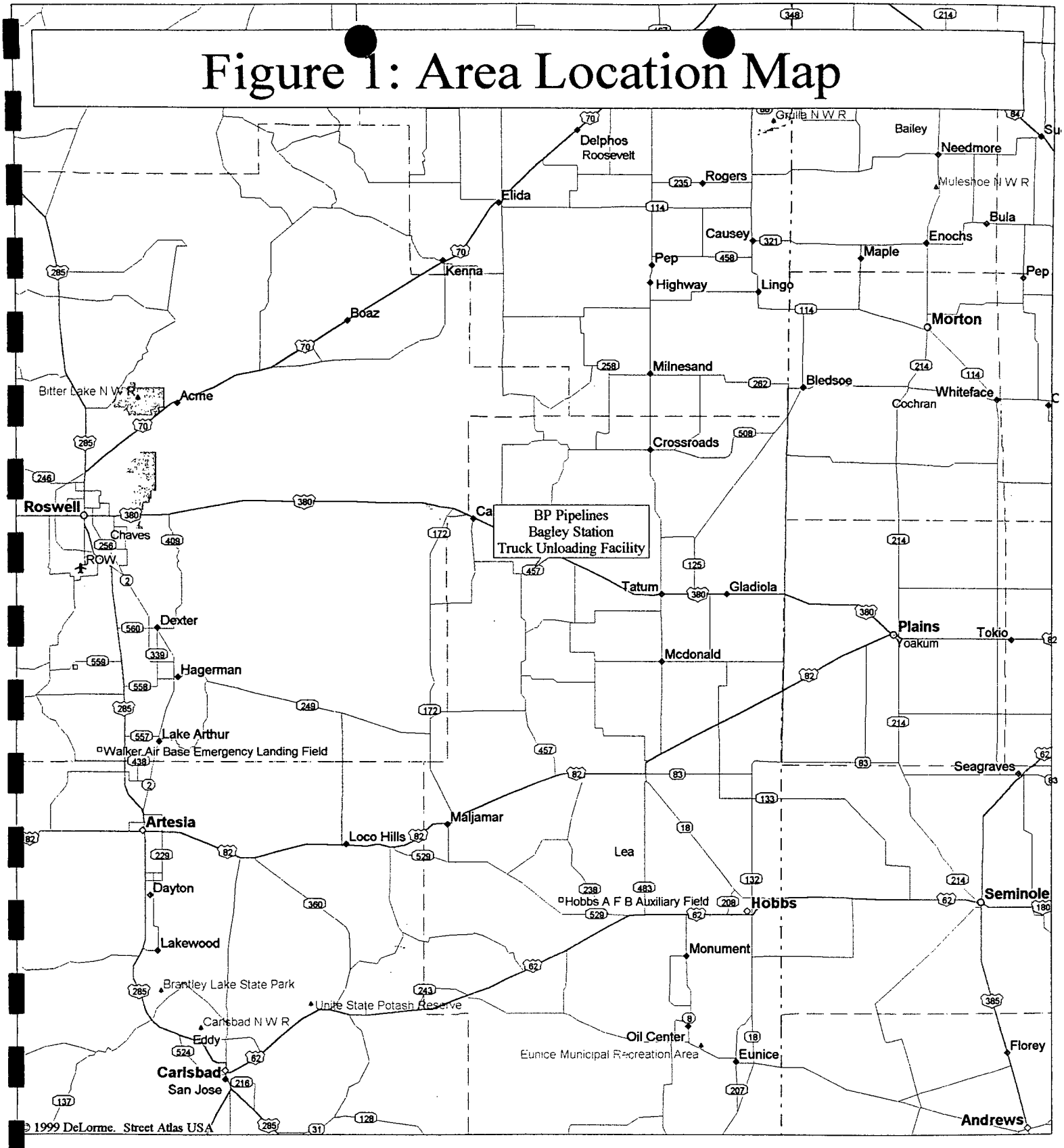
- Develop operational procedures that prevent contamination of soils with crude oil or automotive fluids.

- Cleanup spills and leaks promptly to eliminate contamination of storm water.

- Develop and implement additional BMPs as determined appropriate from operational experience.

FIGURES

Figure 1: Area Location Map



Mag 9.00
Tue Dec 18 12:42 2001

Scale 1:1,000,000 (at center)

20 Miles

20 KM

Major Road

Major Highway

Interstate/Limited Access

BP Pipelines Bagley Station Truck Unloading Facility

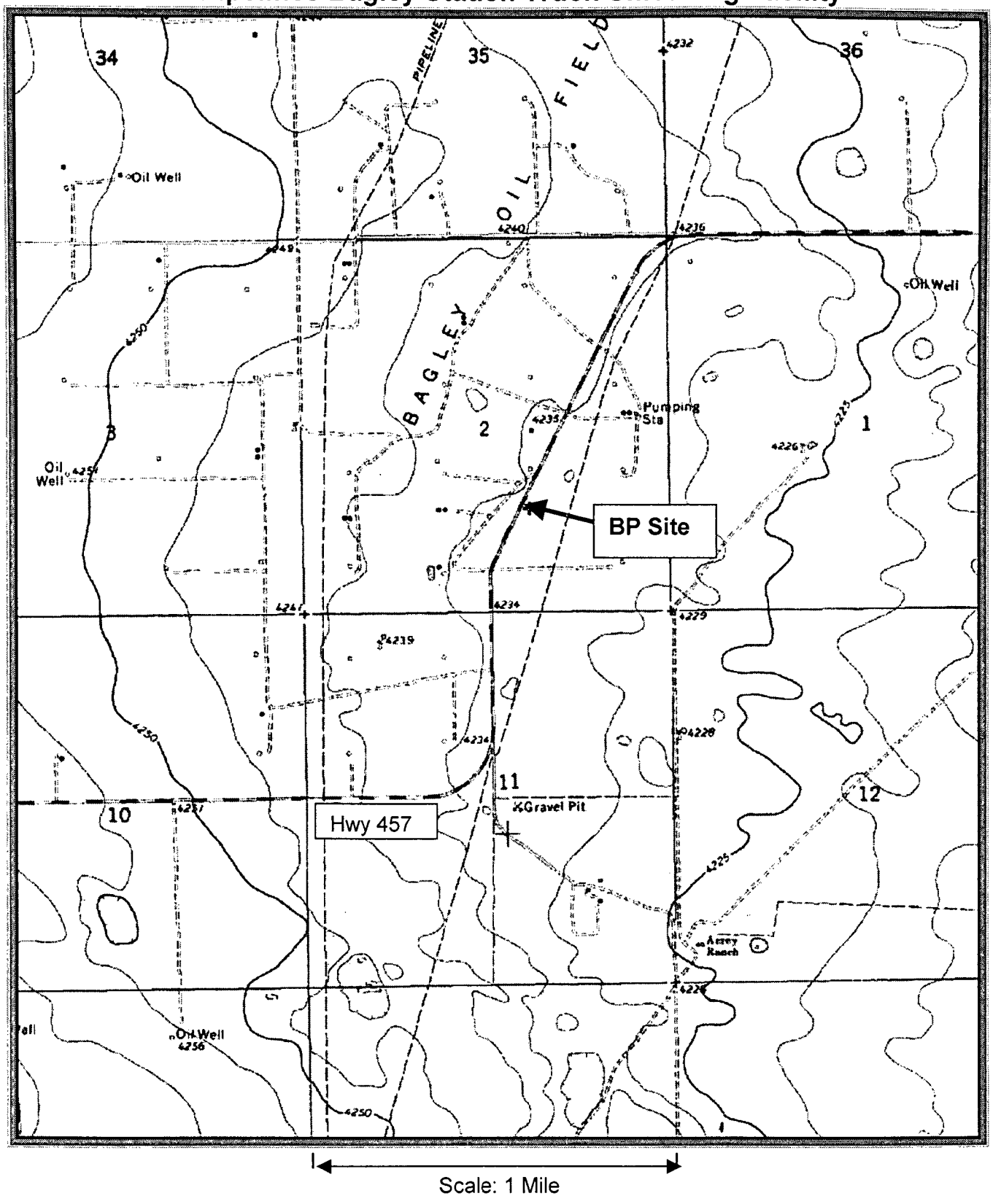


Figure 2
Site Topographic Map

BP Pipelines Bagley Station Truck Unloading Facility

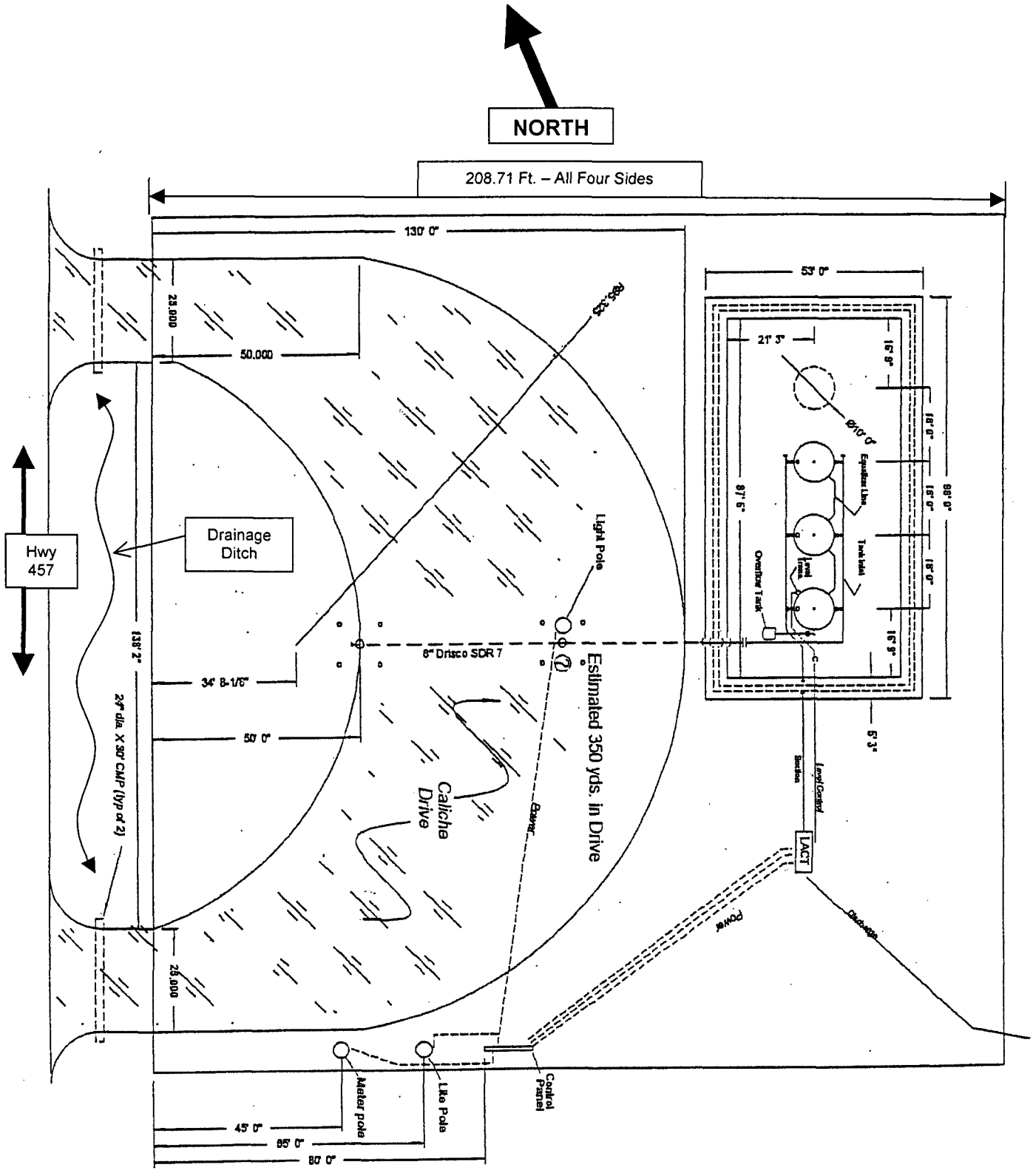


Figure 3
Site Plan

BP Pipelines Bagley Station Truck Unloading Facility

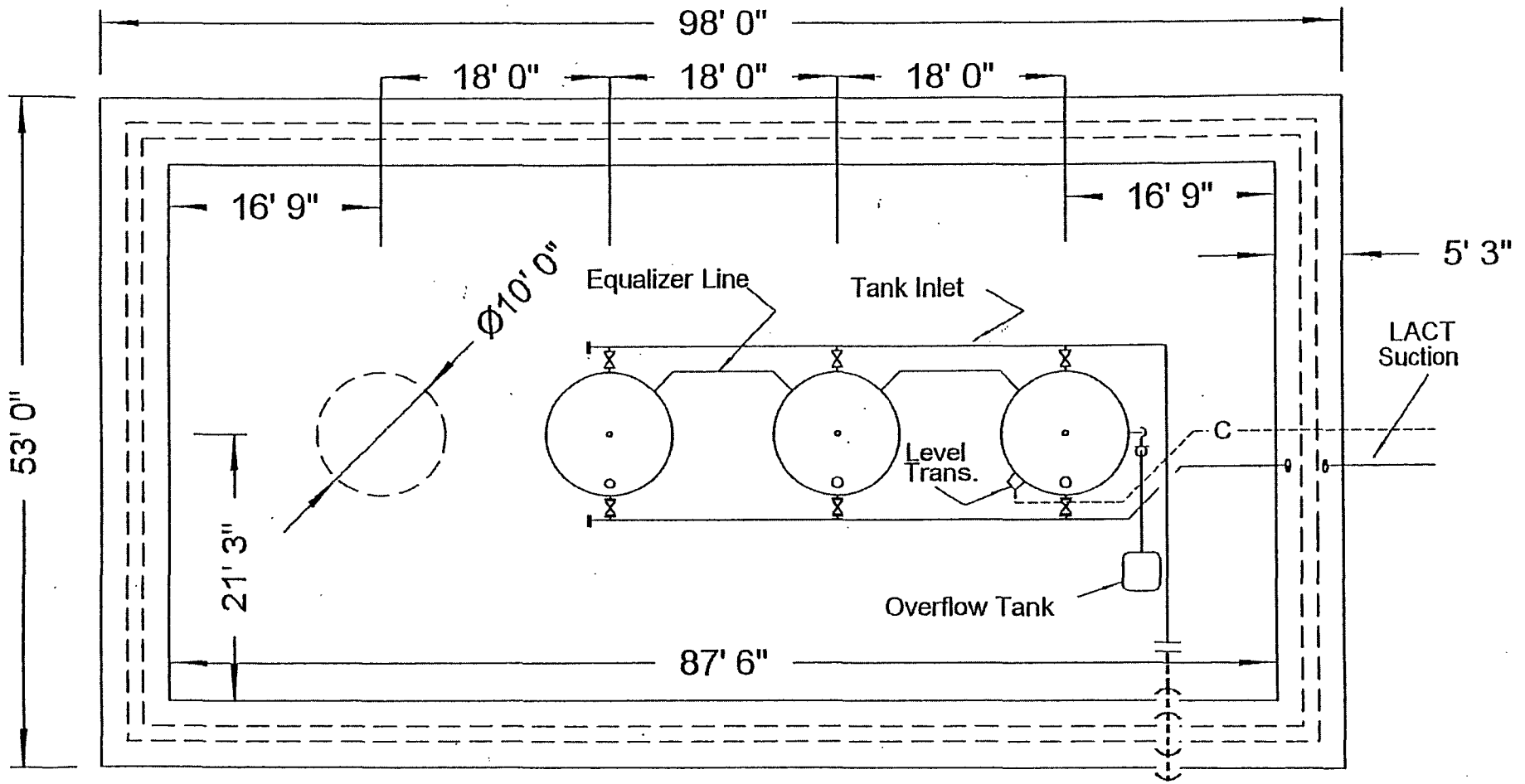


Figure 4
Tank Farm Details

BP Pipelines Bagley Station Truck Unloading Facility

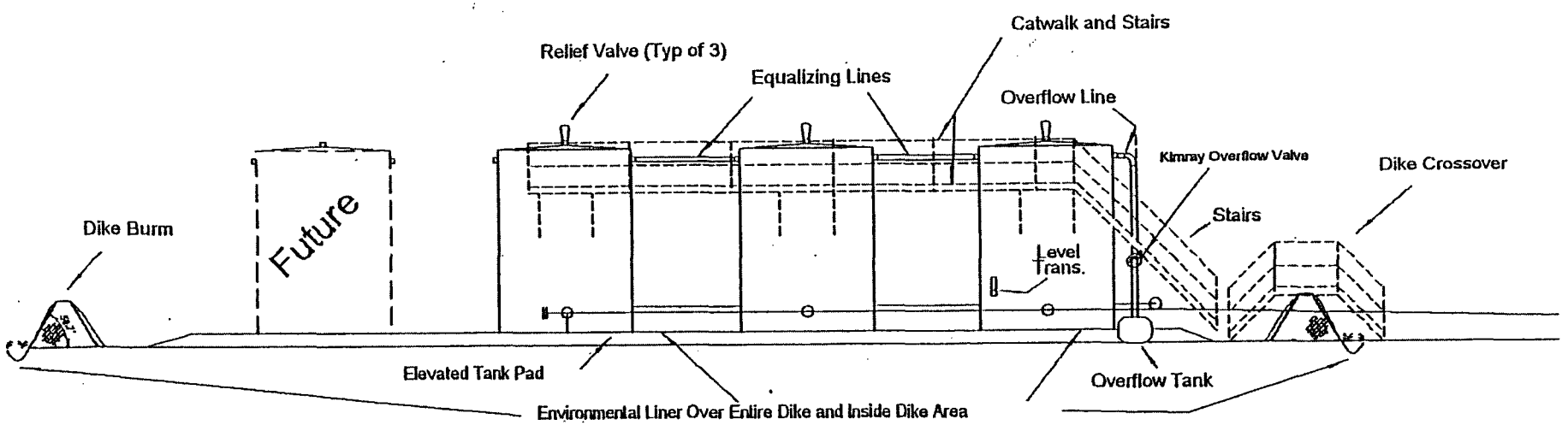


Figure 5
Tank Farm Section

BP Pipelines Bagley Station Truck Unloading Facility

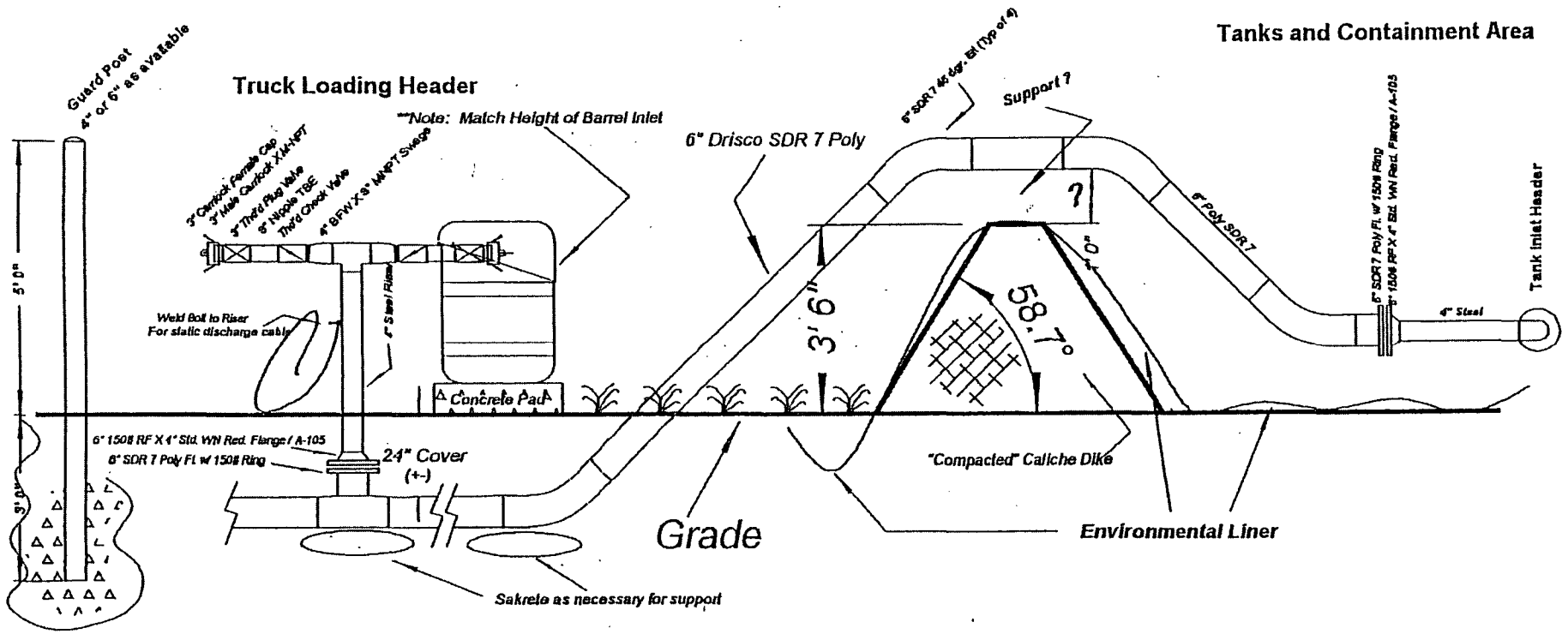


Figure 6
Unloading System Details

ATTACHMENT 1

STORM WATER RUN-OFF PLAN NOTICE OF INTENT

And

DISCHARGE PLAN APPROVAL

Notice of Intent for Storm Water Discharges Associated with Industrial Facilities

Storm Water Runoff Plan

for the New Mexico Oil Conservation Division

A. Facility Operator Information

1. Name James D. Lutter
2. Mailing Address a. Street 502 North West Avenue
   b. City Levelland c. State Texas d. Zip Code 79336
3. Permit Applicant a. X Operator b. ___ Operator and Owner
4. Operator Phone (806) 897-7017

B. Facility/Site Location

1. Facility Name BAGLEY Truck Unloading Facility
2. a. Street Address NW/4 SE/4 OF SEC 2 T12S R33E NMPM LEA COUNTY NM
   b. County Lea County c. State New Mexico
3. Is the facility located on Indian Lands? Yes ___ No X
4. Latitude N33° 18.159' Longitude W103° 35.014'
5. Total size of site associated with industrial activity 1.0 acres
6. Type of Facility Ownership
   a. Private X Type: X for profit ___ not for profit
   b. Public ___ Type: ___ federal ___ state ___ county ___ city tribal
   c. Other please explain: ___
7. Facility status a. X existing facility b. ___ new facility
   If a new facility, on what date will industrial activity begin?
8. Percent of site that is impervious (pavement, rooftops, etc.) < 1 %
9. Facility Contact Information a. Name Jimmy Humble
   b. Address (if different from B2 above:) 302 East Avenue A
   c. City Lovington d. State New Mexico e. Zip Code 88260
   f. Phone # (505) 396-2817 g. Fax # (opt.) (505) 396-2930 h. E-mail (opt.) ___

C. Receiving Water Information

1. Receiving Waters a. Total number of storm water outfalls 0
   b. Number of outfalls discharging directly to waters of the U.S. (e.g., river, lake, creek, bay, wetland, ocean, etc.) 0
   c. Name of receiving water(s) for the outfall(s) identified in Question 2
   N/A
2. Does this facility participate in a coordinated watershed management plan or in an area-wide storm water management plan ?
   Yes ___ No X Unsure ___
   If yes, with whom ? ___

D. Industrial Information

1. SIC/Activity Codes a. 4612 b. ___
2. Level of On-Site Activities
   a. List primary business activity: Truck Unloading and Storage b. Number of employees: 2
3. Types of Industrial Activities at facility (check all that apply)
   a. ___ manufacturing b. ___ vehicle maintenance c. ___ haz. waste treatment, storage, or disposal facility
   d. ___ material storage e. ___ vehicle storage f. ___ material handling g. ___ wastewater treatment
   c. ___ power generation i. ___ recycling j. ___ landfill k. other Truck Unloading System

E. Material Handling/Management Practice

1. Types of materials handled/stored outdoors (check all that apply)
   a. ___ solvents b. X petroleum products c. ___ plating products d. ___ scrap materials
   e. ___ pesticides f. ___ hazardous wastes g. ___ paints h. ___ wood treating products
   c. Others (please list) ___

Notice of Intent for Storm Water Discharges Associated with Industrial Facilities

Storm Water Runoff Plan

for the New Mexico Oil Conservation Division

Page 2

2. Identify the existing management practices employed to reduce pollutants in industrial storm water discharges

a. ___ oil/water separator b. _X_ containment c. ___ leachate collection d. ___ overhead coverage
b. _X_ waste minimization f. ___ filtration systems g. ___ recycling h. ___ retention facilities
i. ___ spill prevention j. ___ chemical treatment k. _X_ good housekeeping l. _X_ training
m. ___ detention facilities n. ___ covered dumpsters o. ___ preventative p. ___ vegetated swales
n. _X_ berms r. ___ erosion and sediment control plan maintenance s. ___ others (please list)

3. Is the facility required to monitor storm water discharges, other than visual monitoring ? Yes ___ No _X_

4. In the past three years, has the facility reported spills pursuant to 40 CFR 110.10, 40 CFR 117.21 or 40 CFR 302.6 that either contaminated, or had the potential to contaminate, storm water runoff ? Yes ___ No _X_

If yes, how many ? ____ List type of material(s) spilled _____

F. Certification Statement

I certify that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Print Name James B. Lutter

Signature _____ Date 6-7-01

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

September 6, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0784

Mr. James D. Lutter
bp Pipelines
502 N. West Avenue
Levelland, Texas 79336

RE: Discharge Plan Approval GW-346
bp Pipelines
Bagley Truck Unloading Facility
Lea County, New Mexico

Dear Mr. Lutter:

The ground water discharge plan application GW-346 for the bp Pipelines Bagley Truck Unloading Facility located in the NW/4 SE/4 of Section 2, Township 12 South, Range 33 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on May 24, 2001 pursuant to Section 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations. 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 bp Pipelines of liability should operations result in pollution of surface water, ground water, or the environment.

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

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., bp Pipelines 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 q uality or volume.

Pursuant to Section 3109.H.4., this discharge plan is for a period of five years. This plan will expire on **September 6, 2006**, and bp Pipelines should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

bp Pipelines will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the Bagley Truck Unloading Facility.

The discharge plan application for the bp Pipelines Bagley Truck Unloading Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a non-refundable fee equal to the filing fee of $50. There is a flat fee assessed for crude oil pump and handling stations equal to $575.00. The OCD has received the filing fee.

Please make all checks payable to: Water Management Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.

If you have any questions please contact Mr. W. Jack Ford at (505) 827-7156. 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/wjf
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-346

BP PIPELINES
BAGLEY TRUCK UNLOADING FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(August 3, 2000)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a flat fee assessed for crude oil pump and handling stations equal to $575.00. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. bp Pipelines Commitments: bp Pipelines will abide by all commitments submitted in the discharge plan application dated May 24, 2001 and these conditions for approval.

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

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

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

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

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

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

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

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

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be 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.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

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

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: The facility will have an approved storm water run-off plan.

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

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

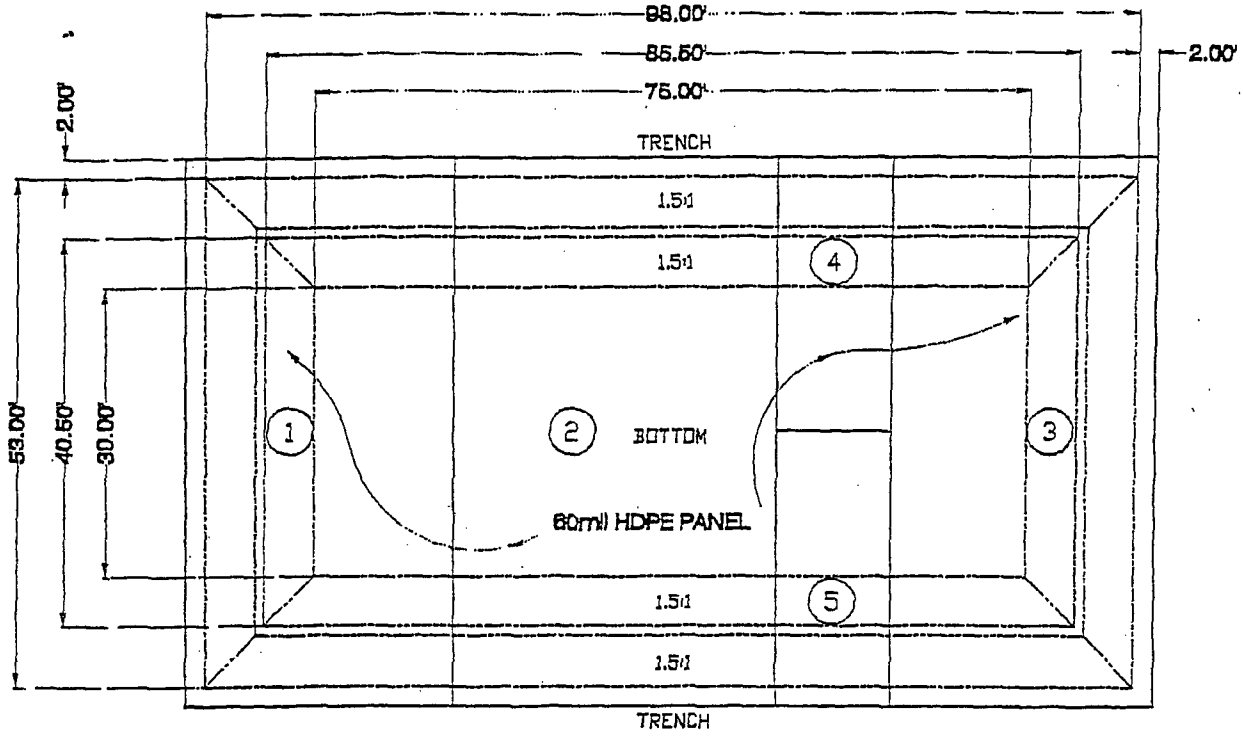
Accepted:

BP PIPELINES

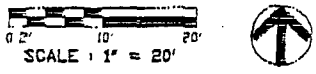
by_____
Title

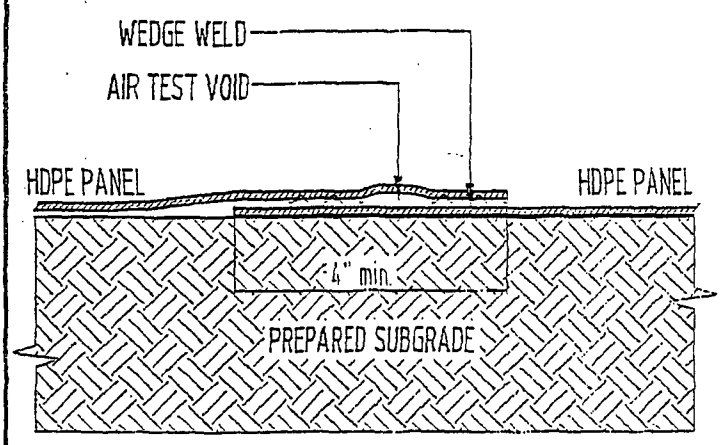
ATTACHMENT 2

HDPE CONTAINMENT LINER DETAILS

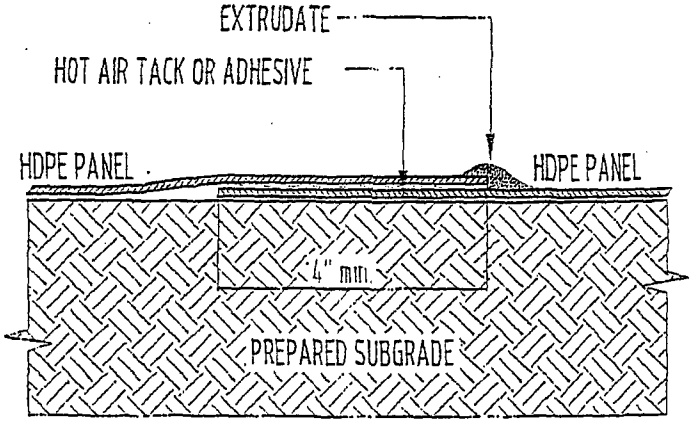


PROPOSED 60mil HDPE PANEL LAYOUT





WEDGE WELD DETAIL
not to scale



EXTRUSION WELD DETAIL
not to scale

FALCON ENVIRONMENTAL LINING SYSTEMS, INC.
5200 Johnson Road, Odessa, Tx. 79760
(915) 366-2811 FAX - 366-2999

DRAWN BY: JASMIN	DRAWING TITLE: PROPOSED LINER LAYOUT
DATE: 04/10/01	
APPROVED BY:	PROJECT/LOCATION: BAGLEY TRUCK FACILITY POND, BP AMOCO
DATE:	
SCALE: As Shown	MATERIALS: 60 MIL HD; PROJECT NO.; DRAWING NO. 1

60 Mil Liner

Minimum Properties for Standard Smooth HDPE Geomembranes

GSE HYPERFLEX® AND GSE HD™

Property	Test Method[1]					
Thickness, mil (mm)	ASTM D 5199					
Minimum Average		40 (1.0)	60 (1.5)	80 (2.0)	100 (2.5)	120 (3.0)
Lowest Individual Reading		36 (0.91)	54 (1.4)	72 (1.8)	90 (2.3)	108 (2.7)
Density, g/cm³	ASTM D 1505	0.94	0.94	0.94	0.94	0.94
Carbon Black Content, %	ASTM D 1603, modified	2.0	2.0	2.0	2.0	2.0
Carbon Black Dispersion	ASTM D 5596	*Note 2*	*Note 2*	*Note 2*	*Note 2*	*Note 2*
Tensile Properties: (each direction)	ASTM D 638 Type IV, 2 ipm					
Strength at Yield, lb/in (kN/m)		84 (15)	130 (23)	173 (30)	216 (38)	259 (45)
Strength at Break, lb/in (kN/m)		162 (28)	243 (43)	324 (57)	405 (71)	486 (85)
Elongation at Yield, %	(1.3" gauge length)	13	13	13	13	13
Elongation at Break, %	(2.0" gauge length)	700	700	700	700	700
Tear Resistance, lb (N)	ASTM D 1004	28 (124)	42 (187)	56 (249)	70 (311)	84 (373)
Puncture Resistance, lb (N)	ASTM D 4833	79 (352)	119 (530)	158 (703)	198 (881)	238 (1059)
Notched Constant Tensile Load, hours	ASTM D 5397, appendix	400	400	400	400	400
Oxidative Induction Time, min.	ASTM D 3895	100	100	100	100	100

[1] GSE utilizes test equipment and procedures that enable effective and economical confirmation that the product will conform to specifications based on the noted procedures. Some test procedures have been modified for application to geosynthetics. All procedures and values are subject to change without prior notification.

[2] Dispersion only applies to near spherical agglomerates. 9 of 10 views shall be Category 1 or 2. No more than 1 view from Category 3.

ATTACHMENT 3

OCD FORM C-141

And

OCD RULE 116

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised March 17, 1999

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 of Company	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.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by☐District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date: Phone:	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

116 RELEASE NOTIFICATION AND CORRECTIVE ACTION [1-1-50...2-1-96; A, 3-15-97]

116.A. NOTIFICATION

(1) The Division shall be notified of any unauthorized release occurring during the drilling, producing, storing, disposing, injecting, transporting, servicing or processing of crude oil, natural gases, produced water, condensate or oil field waste including Regulated NORM, or other oil field related chemicals, contaminants or mixture thereof, in the State of New Mexico in accordance with the requirements of this Rule. [1-1-50...2-1-96; A, 3-15-97]

(2) The Division shall be notified in accordance with this Rule with respect to any release from any facility of oil or other water contaminant, in such quantity as may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3-15-97]

116.B. REPORTING REQUIREMENTS: Notification of the above releases shall be made by the person operating or controlling either the release or the location of the release in accordance with the following requirements: [5-22-73...2-1-96; A, 3-15-97]

(1) A **Major Release** shall be reported by giving **both** immediate verbal notice and timely written notice pursuant to Paragraphs C(1) and C(2) of this Rule. A Major Release is:

(a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;

(b) an unauthorized release of any volume which:

(i) results in a fire;

(ii) will reach a water course;

(iii) may with reasonable probability endanger public health; or

(iv) 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 which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19. B(1), B(2) or B(3). [3/15/97]

(2) A **Minor Release** shall be reported by giving timely written notice pursuant to Paragraph C(2) of this Rule. A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases. [3-15-97]

116.C. CONTENTS OF NOTIFICATION

(1) **Immediate verbal notification** required pursuant to Paragraph B shall be reported within twenty-four (24) hours of discovery to the Division District Office for the area within which the release takes place. In addition, immediate verbal notification pursuant to Subparagraph B.(1).(d). shall be reported to the Division's Environmental Bureau Chief. This notification shall provide the information required on Division Form C-141. [5-22-73 . 2-1-96; A, 3-15-97]

(2) **Timely written notification** is required to be reported pursuant to Paragraph B within fifteen (15) days to the Division District Office for the area within which the release takes place by completing and filing Division Form C-141. In addition, timely written notification required pursuant to Subparagraph B.(1).(d). shall also be reported to the Division's Environmental Bureau Chief within fifteen (15) days after the release is discovered. The written notification shall verify the prior verbal notification and provide any appropriate additions or corrections to the information contained in the prior verbal notification. [5-22-73...2-1-96; A, 3-15-97]

116.D. CORRECTIVE ACTION: The responsible person must complete Division approved corrective action for releases which endanger public health or the environment. Releases will be addressed in accordance with a remediation plan submitted to and approved by the Division or with an abatement plan submitted in accordance with Rule 19 (19 NMAC 15.A. 19). [3-15-97]