GW - 379

PERMITS, RENEWALS, & MODS Application

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The flat fee for a gas compressor station of greater than 1,000 Horsepower is \$1,700.00. The Oil Conservation Division (OCD) has received both the required filing and flat fees.
- 2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this renewal permit is valid for a period of five years. The renewed permit will expire on September 15, 2013 and an application for renewal should be submitted no later than 120 days before the expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.
- 3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
- 4. Owner/Operator Commitments: The owner/operator shall abide by all commitments submitted in its signed April 1, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
- **5. Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase, or process modification that would result in any significant modification in the potential discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
- **6. Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

- A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.
- **B.** Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.
- 7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.
- **8. Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.
- **9. Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.
- **10. Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

- A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.
- **B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location,

foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed, and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety, and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

- C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.
- **D.** The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

- A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.
- **B.** The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.
- 13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water 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 (NMED).
- 14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be

emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

- 15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.
- **16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.
- 17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater runoff. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.
- 18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An unauthorized discharge is a violation of this permit.</u>
- 19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.
- **20.** Additional Site Specific Conditions: A closure plan including a closure schedule for the existing Eunice A compressor station will be provided to the OCD on or before October 11, 2008.
- 21. Transfer of Discharge Permit: Pursuant to WQCC 20.6.2.3111 NMAC, prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

- **22.** Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.
- 23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

EL PASO NATURAL GAS COMPANY

Company Name - print name above

KENNETH L. MORROW

Company Representative - print name

[Lemust 2 mm]

Company Representative - Signature

Passa Area Office Area Ma

Date: 10-1-08

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Director
Oil Conservation Division



September 17, 2008

Mr. Glen Thompson El Paso Natural Gas Company 3300 North A Street Building 2, Suite 200 Midland, Texas 79705

Re: Approval of Discharge Permit GW-379

El Paso Natural Gas Company

Eunice C Compressor Station (SE 1/4 of NW 1/4 [Lot 6] of Sec. 5, T21S, R36E)

Lea County, New Mexico

Mr. Thompson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for El Paso Natural Gas Company (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. 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 30 days of receipt of this letter.

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please feel free to contact Jim Griswold at (505) 476-3465 or by email at *jim.griswold@state.nm.us*. On behalf of the staff at the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely.

Wayne Price

Environmental Bureau Chief

Attachment

LWP/ig

xc: OCD District I Office, Hobbs

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No	dated 4/3/08
or cash received onin the amount of \$	
from El Paso Matural GAS Co.	
for GW-379	
Submitted by: LAurence Ponero Date:	5/2/08
Submitted to ASD by: Schwarzen Former Date:	· · / /
Received in ASD by: Date:	*
Filing Fee New Facility Renewal	· · · · · · · · · · · · · · · · · · ·
Modification Other	·
Organization Code 521.07 Applicable FY 2	.004
To be deposited in the Water Quality Management Fund.	
Full Payment or Annual Increment	

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 2/20/08
or cash received on in the amount of \$
from El Paso Hutural GAS
for GW-379
Submitted by: LAWIENE ROMENO Date: 9/8/08
Submitted to ASD by: Jan Zara Toneza Date: 9/8/08
Received in ASD by: Date:
Filing Fee New Facility Renewal
Modification Other
Organization Code 521.07 Applicable FY 2004
To be deposited in the Water Quality Management Fund.
Full Payment or Annual Increment

August 26, 2008





2008 AUG 28 PM 12a 01 Tracking# 1Z 6R4 V49 02 5137 2817

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 (505) 476-3440 office (505) 476-3462 fascimile

RE: Discharge Permit GW-379 Flat Fee

El Paso Natural Gas

Eunice C Compressor Station Lea County, New Mexico

Dear Mr. Griswold:

Per Condition 1 of the "DRAFT Renewal of Discharge Permit GW-379" submitted by the New Mexico Oil Conservation Division (NMOCD) to El Paso Natural Gas (EPNG) dated July 14, 2008, EPNG has enclosed the \$1,700.00 Flat Fee for the renewal of Discharge Permit# GW-379 for the Eunice C Compressor Station. A check for the filing fee was already submitted by Kleinfelder prior to the NMOCD confirming the application administratively complete. I also wanted to thank you for your assistance throughout the permit approval process. If you have any questions prior to issuing the final discharge permit, please contact me at (432) 686-3268.

Sincerely,

El Paso Natural Gas, Company

Glen Thompson

Principal Environmental Representative

Enc

Cc:

Kenneth Morrow - Plains Area Operations Manager, EPNG

Sandra Miller - Manager, Pipelines West Environmental Department

AFFIDAVIT OF PUBLICATION

State of New Mexico, County of Lea.

I, KATHI BEARDEN

PUBLISHER

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published in the regular and entire issue of said paper, and not a supplement thereof for a period

of 1 issue(s).
Beginning with the issue dated JULY 11, 2008 and ending with the issue dated JULY 11, 2008

PUBLISHER
Sworn and subscribed to before

me this 11 TH day of JULY 2008

Notary Public.

My Commission expires February 07, 2009 (Seal)



OFFICIAL SEAL DORA MONTZ NOTARY PUBLIC STATE OF NEW MEXICO

My Commission Expires:

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

Public Notice

Application for Discharge Permit for the Eunice C Compressor Station, Lea County, New Mexico

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit application has been submitted in accordance with Subsection B, C, and E of 20.6.2.3108 New Mexico Administrative Code.

El Paso Natural Gas Company (EPNG), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 has submitted an application for the Proposed Eunice C compressor station which will be located at the SE/4 of the NW/4, Section 5, Township 21 south, Range 36 east, in Lea County, New Mexico: The facility will be located approximately 11 miles northwest of Eunice, NM, one mile west of State Highway eight, and approximately ? mile north of the existing Eunice A Compressor Station. The mailing address for the Eunice C compressor station is El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

The Eunice C compressor station will be utilized for the compression of pipeline quality natural gas, and will be part of the EPNG Number 100 and 3000 pipeline systems. No intentional or inadvertent discharges that could affect surface or groundwater are anticipated at the facility. Potential discharges at the station will be limited to approximately 1,550 gallons of new turbine engine oil from an above-ground storage tank, 1,550 gallons of used oil from an above-ground storage tank, and less than 1,550 gallons of water with a small amount of Nalco Stabrex ST70 (to prevent algae growth) in an aboveground storage tank. These tanks will be equipped with secondary containment and liquid level indicators to prevent spills. Process fluids such as water and used oil associated with daily operations will be contained by a facility drain system, transferred to the used oil storage tank, then recycled or disposed of by a NMOCD approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of 160 feet below the ground surface. This aquifer system has a total dissolved solids concentration of between 707 and 4230 mg/L or greater.

The discharge plan submitted to the NMOCD outlines how produced water, used oil, and waste will be properly managed, including handling, storage, and final disposition. The plan also includes procedures for the proper management of leaks, accidental discharges, and spills to protect the waters of the State of New Mexico.

For additional information, to be placed on a facility-specific mailing list for future notices, or to submit comments please contact:

Brad Jones, Environmental Engineer
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe NM 87505

Phone: (505) 476-3487

The New Mexico Energy, Minerals and Natural Resources.
Department will accept comments and statements of interest regarding this application and will provide future notices for the proposed Eunice C compressor facility upon request.

49102027-000 49698011 KLEINFELDER 8300 JEFFERSON NE SUITE B ALBUQUERQUE, NM 87113

AFFIDAVIT OF PUBLICATION

State of New Mexico, County of Lea.

I, KATHI BEARDEN

PUBLISHER

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published in the regular and entire issue of said paper, and not a supplement thereof for a period

of _1___ issue(s).
Beginning with the issue dated JULY 11, 2008 and ending with the issue dated JULY 11, 2008

PUBLISHER
Sworn and subscribed to before

me this 11 TH day of

Notary Public.

My Commission expires February 07, 2009 (Seal)



OFFICIAL SEAL DORA MONTZ NOTARY PUBLIC STATE OF NEW MEXICO

My Commission Expires: __

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

Aviso Público

Uso para el permiso para la estación del compresor de Eunice C, condado de Lea, New México de la descarga

El Paso Natural Gas (EPNG) da por este medio el aviso que el uso siguiente del permiso de la descarga se ha sometido de acuerdo con la subdivisión B, C, y E del código administrativo de 20.6:2.3108 New México:

El Paso Natural Gas Company (ERNG), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 ha sometido un uso para la estación propuesta del compresor de Eunice C que será situada en el SE/4 del NW/4, sección 5, Municipio 21 del suir, se extiende 36 del este, en el condado de Lea, New México. La facilidad será situada aproximadamente 11 millas de noroeste de Eunice, del NM, de una milla al ceste de la carretera ocho del estado, y aproximadamente del norte de la ?-milla del Eunice existente una estación del compresor. La dirección del correo para la estación del compresor de Eunice C es EL Paso Natural Gas, 2316 West Bender Bivd., Hobbs, NM.88240.

La estación del compresor de Eunice C será utilizada para la compresión del gas natural de la calidad de la tubería, y será parte del EPNG los sistemas de la tubería del número 1100 y 3000. No se anticipa ningunas. descargas intencionales o madvertidas que podrían afectar la superficie o la agua subterranea en la facilidad. Las descargas potenciales en la estación serán limitadas a aproximadamente 1.550 galones de aceite de motor nuevo de turbina de un tanque de almacenaje sobre tierra, a 1.550 galones de aceite usado de un tanque de almacenaje sobre tierra, y a menos de 1.550 galones de agua con una cantidad pequeña de Nalco. Stabrex ST70 (prevenga el crecimiento de las algas) en un tanque de almacenaje sobre tierra. Estos tanques se equipan de los indicadores llanos secundarios de la contención y del líquido para prevenir derramamientos. Los líquidos de proceso tales como agua y aceite usado se asociaron a operaciones diarias serán contenidos por un sistema del dren de la facilidad, transferido al fanque de almacenaje usado de aceite, entonces reciclado o dispuesto por una facilidad aprobada NMOCD.

La primera agua subterránea probablemente que se afectara por un escape, una descarga accidental, o un derramamiento existe en una profundidad de 160 ples debajo de la superficie de tierra. Este sistema del aculfero tiene una concentración disuelta total de los sólidos entre de 707 y 4230 mg/l o mayor.

El plan de la descarga sometido a los contornos de NMOCD cómo el agua producida, el aceite usado, y la basura serán manejados correctamente, incluyendo la dirección, almacenaje, y disposición final. El plan también incluye los procedimientos para la gerencia apropiada de escapes; de descargas accidentales, y de derramamientos para proteger las aguas del estado de New México.

Para la información adicional, ser colocado en una lista que envía facilidad-específica para los avisos futuros, o someter los comentarios satisfacen el contacto:

Brad Jones, Environmental Engineer
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Teléfono: (505) 476-3487

La energía de New México, los minerales y el departamento de los recursos naturales aceptarán comentarios y declaraciones del interés con respecto a este uso y proporcionarán los avisos futuros para la facilidad propuesta del compresor de Eunice C por requerimiento.

49102027-000 49698009 KLEINFELDER 8300 JEFFERSON NE SUITE B ALBUQUERQUE, NM 87113

NEW MEXICAN

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NM EMNRD Oil Conserv Div. Jim Griswold 1220 S. St. Francis Drive Santa Fe, NM 87505

ALTERNATE ACCOUNT: 56689

AFFIDAVIT OF PUBLICATION

AD NUMBER: 00262050 ACCOUNT: 00002212

LEGAL NO: 85693

P.O. #: 52100-00000137

361 LINES 1 TIME(S)

314.16

AFFIDAVIT:

7.00

TAX:

25.49

TOTAL:

346.65

NOTICE OF PUBLICATION

STATE OF NEW MEX

ENERGY MINERALS
AND NATURAL RESOURCES DEPARTMENT

MENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2:3106 NMAC), the following discharge permit applications have been submitted to the Director of the New Mexico Oill Conservation. Division (NMOCD) 1220 S Saint Francis Drive Santa Fe, New Mexico 87505; Telephone (505):476-3440:

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, L. Paquin, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 85693 a copy of which is hereto attached was published in said newspaper 1 day(s) between 07/23/2008 and 07/23/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 23rd day of July, 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

Subscribed and sworn to before me on this 23rd day of July, 2008

Notary

Commission Expires:

Mar, 31,2011

OFFICIAL SEAL
Pamela Anne Beach
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 5.3/-//

(GW-97) BJ Services
Company USA, 11211
FM 2920 Tomball,
Texas 77375 has submitted an application
for renewal of a discharge plan for their
Farmington: Service
Facility, 3250 Southside River Road in
Farmington; NM, located in Sections 13
and 14, Township 29
North, Range 13 West,
NMPM (San Juan
County): The facility
provides oil-field services including cementing, acidizing,
and fracturing services including cementing, acidizing,
and fracturing services at oil and gas
well sites. Materials
generated and/or
stored at the facility
include but are not
limited to cement, acids, detergents, salts,
blocides Solvents,
used/oil, scrap metal,
tires, batteries, antifreeze, and wastewater in various quantities. The aquifer
most likely to be affected by an accidental leak from this facility is 25 feet in
depth and the total
dissolved solids concentration of this aquifer is approximately
1,500 (to 2,000 milligrams per liter. The
nearest surface watercourse is the Animas River located approximately one mile
to the northwest. The
San Juan River is situated approximately
1,5 miles to the south.
The discharge plan
addresses how oilfield products and
disposed of, including
how spills, leaks, and
other, accidental discharges to the surface will be managed
in order to protect
fresh water.

(GW-156) Key Energy Services, 6 Desta Drive, Suite 400, Midland, Texas 79705 has submitted an application for renewal of a discharge plan for their. Farmington Service Facility, 5651 US Highway 64 in Farmington; NM, bocated in the NE 1/4 of the NE 1/4 (Unit A) of Section 29. Township 29. North, Range 12 West, NMPM (San Juan County). The facility is used for dispatch and maintenance of petroleum exploration and production equipment. Materials generated and/or stored at the facility include but are not limited to: motor and gear oils, filters, solvents, and fuels. The aguifer beneath this facility lies at a depth between 8 and 23 feet below ground surface with jaconcentration of total dissolved soilds ranging between 1,500 to 8,500 milligrams per liter. The nearest surface, water lies withing liter: The nearest sur-face water-lies within-the San Juan River-flowing near the southern property boundary. The dis-charge plan ad-dresses how oilfield products and waste will be properly han-dled, stored, and dis-posed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect fresh water. fresh water.

(GW-294)#Plains Pipe-line = LP, = 333 = Clay

Street, Suite 1600, Houston, Texas 77210-4648 has submitted an application for renewal of a discharge plan for their Townsend Remediation Site located within Unit P of Section 11, Township 16 South, Range 35 East approximately two miles southwest of Lovington, New Mexico (Lea County) south of Highway 82. An uncontrolled release of crude oil from a ruptured pipeline occurred at the site lin 1997. At present, approximately 400 gallons of contaminated groundwater are brought to the surface on an annual basis. The discharge plan addresses the manner in which these materials are properly handled, temporarily stored on-site, and properly disposed off-site including how spills, leaks, and other accidental discharges to the surface will be managed. Groundwater in the area is at a depth of approximately 50 feet below ground surface with a concentration of total dissolved solids between 500 and 2,000 milligrams per liter.

(GW-379) El Paso
Natural Gas Company, 3300 North A
Street, Building 2
Suite 200, Midland,
Texas 79705 has submitted an application
for a new discharge
plan for their planned
Eunice C Compressor
Station, near Oil Center, NM, located in the
SE 1/4 of the NW 1/4
of Section 5, Township 21 South, Range
36 East, NMPM (Lea
County). The facility
will be used for the
compression of pipeline quality, natural
gas. Materials generated and/or stored at
the facility include
but may not be limited to new and used
lubricating oils, coolant water, filters,
paints, detergents,
and cleaning supplies. The aquifer beneath this facility lies
at a depth of 160 feet
below ground surface
with a concentration
of total dissolved solids ranging between
707 to 4-230 milligrams per liter. The
discharge plan addresses how oilffeld
products and waste
will be properly handied, stored, and disposed of, including
how spills, leaks, and
other accidental discharges to the Surface will be managed
in order to protect
fresh water.

The NMOCD has determined that these applications are administratively complete and has prepared draft permits for each facility. The NMOCD will accept comments and statements of interest regarding these applications and will create facility specific mailing lists for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility specific mailing further information. Submitting comments or requesting to be on a facility specific mailing list for future notices may contact the Environmental Bureau Chief of the Oll Conservation Division at the address given above. The administrative completeness determinations and draft permits may be viewed at the above address between 800 am, and 4:00 pm. Monday, frough Friday, or may also be viewed at the above address between 8:00 am, and 4:00 pm. Monday, frough Friday, or may also be viewed at the homoco web site http://www.emnrdist ate.mmus/ocd/ Persons interested in obtaining a copy of the applications and draft permits may contact the NMOCD web site http://www.emnrdist ate.mmus/ocd/ Persons interested in obtaining a copy of the applications and draft permits may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice during which interested persons may submit comments or public hearing shall set forth the reasons why a hearing shall set forth the proposed permits based on information in the permits are held the Director will approve for proposed permits based on information available, including all comments or information in the permit approve the proposed permit based on information submitted at those hearing.

Para obtener mas información sobre esta solicitud en espan olsirvase comunicarse por favor. New Mexico Energy Minerals and Natural Resources Department (Depto Del Energia, Minerals y Recursos Naturales de Nuevo Mexico) ol conservación División (Depto Conservación Del Petroleo) 1220 South St., Francis Drive, Santa Fe. New Mexico (Contacto. Dorothy Phillips, 505 476 3461)

GIVEN under the Seal of New Mexico Oil Conservation Com-mission at Santa Fe, New Mexico, on this 17th day of July 2008

STATE OF NEW MEX-ICO OIL CONSERVATION DIVISION

Mark Fesmire, and Director Legal No. 85693 Pub. July 23, 2008

Advertising SEIVED Receipt 2008 JUL 25 PM 2 06

Hobbs Daily News-Sun

201 N Thorp P O Box 936 Hobbs, NM 88241-0850 Phone: (575) 393-2123 Fax: (575) 397-0610

EDWARD J HANSEN NM OIL CONSERVATION DIVISION, EMNRD 1220 S. SAINT FRANCÌS DR. SANTA FE, NM 87505

Cust#:

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Phone:

(505)476-3492

Date:

07/17/08

Ad taker: C2

OIL CONSERVATION DIVISION

Salesperson: 08

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07 07 Daily News-Sun	07/19/08	07/19/08	1	109.20	•	109.20
Bold					•	1.00
Affidavit for legals						3.00
Payment Reference:	• .				Total:	□ 113.20
r dyment rielerenee.	·				Tax:	0.00
LEGAL					Net:	113.20
JULY 19, 2008					Prepaid:	0.00
NOTICE OF PUBLICATION			•			
STATE OF NEW MEXICO					Total Due	113.20

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-379) El Paso Natural Gas Company, 3300 North A Street, Building 2 Suite 200, Midland. Texas 79705 has submitted an application for a new discharge plan for their planned Eunice C

State of New Mexico, County of Lea.

I, KATHI BEARDEN

PUBLISHER

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of1	
	weeks.
Beginning with the issue da	ted
July 19	2008
and ending with the issue da	
July 19	2008
Kathi Horadey	
PUBLISHER Sworn and subscribed to be	pefore
me this 21st	day of
1 .	1

My Commission expires February 07, 2009 (Seal)

Notary Public.



OFFICIAL SEAL DORA MONTZ NOTARY PUBLIC STATE OF NEW MEXICO

My Commission Expires: _

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL JULY 19, 2008

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC)/ the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive: Santa Fe. New Mexico 87505, Telephone (505) 476-3440

(GW-379) El Paso Natural Gas Company, 3300 North A Street Building 2 Suite 200, Midland, Texas 79705 has submitted an application for a new discharge plan for their planned Eunice C Compressor Station, near Oil Center, NM, located in the SE of the NW of Section; 5, Township 21, South, Range 36; East, NMPM (Lea County). The facility will be used for the compression of pipeline quality natural gas. Materials generated and/or stored at the facility include but may notibe limited to new and used lubricating oils, coolant water, filters, paints, detergents, and cleaning, supplies. The aquifer beneath this facility lies at a depth of 160 feet below ground surface with a concentration of total dissolved solids ranging between 707 to 4(230 milligrams, per litter. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water?

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility specific mailing, list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility specific mailing list for future notices may contact the Environmental Bureau (Chief of the Oil Conservation Division at the address given above). The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.ml. and 4:00 p.ml. Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/cod/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on, any proposed discharge permit or major modification; the Director shall allow a period of at least thinty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why, a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing its held, the Director will approve or disapprove the proposed permit based on information available; including all comments received all a public hearing is held the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener mas información sobre esta solicitud en espan ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto, Del Eggergia, Minerals y Recursos Naturales de Nuevo Mexico); Oil Conservation Division (Depto Conservacio n Del Petroleo); 1220 South St. Francis Drive: Santa Fe, New Mexico (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe. New Mexico on this 27th day of June 2008.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

S.E.A.L #24246 Mark(Fesmire; Director...

01101546000 02601702 NM OIL CONSERVATION DIVISION, 1220 S. SAINT FRANCIS DR. SANTA FE, NM 87505

Bill Richardson

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Director
Oil Conservation Division



July 14, 2008

Mr. Glen Thompson El Paso Natural Gas Company 3300 North A Street, Building 2, Suite 200 Midland, Texas 79705

Re: Application for New Discharge Permit GW-379

Mr. Thompson:

The Oil Conservation Division (OCD) received El Paso Natural Gas Company's (EPNG) application dated April 1, 2008 for new discharge permit GW-379 for the planned Eunice C Compressor Station located within Section 5 of Township 21 South, Range 36 East, NMPM, in Lea County near Oil Center, New Mexico. The application has provided the required information in order to deem the application "administratively complete".

Therefore, the New Mexico Water Quality Control Commission (WQCC) regulations notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The OCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3465 or by email at *jim.griswold@state.nm.us*. Please refer to permit GW-379 in all future communication. On behalf of the OCD, I wish to thank you and your staff for your continued cooperation during the review process.

Respectfully,

Jim Griswold Hydrologist

JG/jg

cc: OCD District I Office, Hobbs

4

Griswold, Jim, EMNRD

From:

Price, Wayne, EMNRD

Sent:

Monday, July 14, 2008 9:45 AM

To:

Griswold, Jim, EMNRD

Subject:

RE: GW-379, El Paso Natural Gas, Eunice C Compressor Station

Let him proceed

From: Griswold, Jim, EMNRD

Sent: Monday, July 14, 2008 9:35 AM

To: Price, Wayne, EMNRD

Subject: GW-379, El Paso Natural Gas, Eunice C Compressor Station

Wayne,

I just spoke with Glen Thompson of EPNG regarding their application for a new discharge plan for the planned Eunice C compressor station west of Oil Center. This is one of the applications that landed on my desk-last week from Brad. I had emailed Glen last week asking him to provide me with info regarding depth to water in the area (I think it is shallower than stated in the application). He said that you had deemed the application administratively complete by an earlier email. Is this true, and if so could you forward me that email as I build the file for this plan. He already has his signs made up and is ready to hang them out for public notice. Thanks.

Jim Griswold Hydrologist Environmental Bureau ENMRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 direct: 505.476.3465

email: jim.griswold@state.nm.us

Griswold, Jim, EMNRD

From:

Griswold, Jim, EMNRD

Sent:

Wednesday, July 09, 2008 1:44 PM

To:

'glen.thompson@elpaso.com'

Subject:

Review of Discharge Plan GW-379 for Eunice C Compressor Station

Mr. Thompson,

I have been assigned to review EPNG's discharge plan application for the Eunice C Compressor Station (GW-379). The documentation accompanying the application developed by Kleinfelder states depth to first groundwater beneath the facility is approximately 160 feet below surface. I do not believe this is the case (more likely less than 100 feet), but I would like to know upon what basis the statement of 160 feet is made. Would you or someone from Kleinfelder contact me as soon as is practical in this regard. I will be in the office for the remainder of today, but will be gone tomorrow and return Friday. Thank you.

Jim Griswold Hydrologist Environmental Bureau ENMRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

direct: 505.476.3465

email: jim.griswold@state.nm.us



April 3, 2008 File No. 93014.1 – ALB08RP001

Mr. Leonard Lowe
Environmental Engineer
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

SUBJECT: Discharge Plan Application for an Initial Discharge Permit

El Paso Natural Gas Company Eunice "C" Compressor Station

Lea County, New Mexico

Dear Mr. Lowe:

Kleinfelder West, Inc. (Kleinfelder) on behalf of the El Paso Natural Gas Company (EPNG) is pleased to submit for your review the attached discharge plan for an initial discharge permit for the proposed Eunice "C" Compressor Station.

Kleinfelder has included the required information for the discharge plan as outlined in Title 20, Chapter 6, Part 2, NMAC, and "Guidelines for The Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations".

Public Notice will be published in the <u>Hobbs News Sun</u> newspaper, sent via certified mail to all landowners within a 1/3-mile radius of the proposed station, and posted in public places such as libraries, city halls, and post offices in the vicinity.

The following are attached:

- Discharge Plan Application;
- Public Notice text in both Spanish and English;
- Discharge Plan; and
- Check for \$100 made out to the Water Quality Management Fund to cover the filing fee.

Should you have any questions, please feel free to contact Marco Wikstrom or David Janney (Kleinfelder) at (505) 344-7373, or Glen Thompson (EPNG) at (432) 686-3268.

Reviewed by:

Barbara Evereti

Program Manager

Sincerely.

KLEINFELDER WEST, INC.

Marco Wikstrom Staff Geologist 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 Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

Revised June 10, 2003

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

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

New Renewal Modification
1. Type: Compressor Station
2. Operator: El Paso Natural Gas
Address: 3300 North A Street, Building 2, Suite 200, Midland, TX 79705
Contact Person: Glen Thompson Phone: (432) 686-3268
3. Location: SE/4 of the NW/4 Section 5 Township 21 South Range 36 East Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site. Attached
 Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility Attached
6. Attach a description of all materials stored or used at the facility. Attached
 Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste wat must be included. Attached
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. Attached
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. Attached
10. Attach a routine inspection and maintenance plan to ensure permit compliance. Attached
11. Attach a contingency plan for reporting and clean-up of spills or releases. Attached
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. Attached
 Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. Attached CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the
best of my knowledge and belief.
Name: Glen Thompson Title: Principal Environmental Representative
Signature: Date: 04/01/08
E-mail Address: Glen.Thompson@ElPaso.com



RECEIVED

8300 Jefferson NE, Suite B Albuquerque, NM 87113

> **p**| 505.344.7373 **f**| 505.344.1711

> kleinfelder.com

May 29, 2008 File No. 93014.1 – ALB08RP001Rev.1

Mr. Brad Jones Environmental Engineer New Mexico Energy, Minerals, and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

SUBJECT: Discharge Plan Application for an Initial Discharge Permit

El Paso Natural Gas Company Eunice "C" Compressor Station

Lea County, New Mexico

Dear Mr. Jones:

Kleinfelder West, Inc. (Kleinfelder) on behalf of the El Paso Natural Gas Company (EPNG) is pleased to submit for your review the attached revised discharge plan for an initial discharge permit for the proposed Eunice "C" Compressor Station.

Kleinfelder has included the required information for the discharge plan as outlined in Title 20, Chapter 6, Part 2, NMAC, and "Guidelines for The Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and crude Oil Pump Stations".

Public Notice will be published in the <u>Hobbs News Sun</u> newspaper, sent via certified mail to all landowners within a 1/3-mile radius of the proposed station, and posted in public places. Public notices will be posted at the proposed Eunice C site,

The following are attached:

- Copy of the Discharge Plan Application (original at NMOCD);
- Public Notice text in both Spanish and English;
- · Discharge Plan; and
- List of property owners within 1/3-mile of the proposed Eunice C compressor station.

Should you have any questions, please feel free to contact Marco Wikstrom or David Janney (Kleinfelder) at (505) 344-7373, or Glen Thompson (EPNG) at (432) 686-3268.

Sincerely,

KLEINFELDER WEST, INC.

Marco Wikstrom Staff Geologist Reviewed by:

David Jantey, P.C

Project Manager

Public Notice

Application for Discharge Permit for the Eunice C Compressor Station, Lea County, New Mexico

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit application has been submitted in accordance with Subsection B, C, and E of 20.6.2.3108 New Mexico Administrative Code.

El Paso Natural Gas Company (EPNG), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 has submitted an application for the Proposed Eunice C compressor station which will be located at the SE/4 of the NW/4, Section 5, Township 21 south, Range 36 east, in Lea County, New Mexico. The facility will be located approximately 11 miles northwest of Eunice, NM, one mile west of State Highway eight, and approximately ¼-mile north of the existing Eunice A Compressor Station. The mailing address for the Eunice C compressor station is El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

The Eunice C compressor station will be utilized for the compression of pipeline quality natural gas, and will be part of the EPNG Number 1100 and 3000 pipeline systems. No intentional or inadvertent discharges that could affect surface or groundwater are anticipated at the facility. Potential discharges at the station will be limited to approximately 1,550 gallons of new turbine engine oil from an aboveground storage tank, 1,550 gallons of used oil from an aboveground storage tank, and less than 1,550 gallons of water with a small amount of Nalco Stabrex ST70 (to prevent algae growth) in an aboveground storage tank. These tanks will be equipped with secondary containment and liquid level indicators to prevent spills. Process fluids such as water and used oil associated with daily operations will be contained by a facility drain system, transferred to the used oil storage tank, then recycled or disposed of by a NMOCD approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of 160 feet below the ground surface. This aquifer system has a total dissolved solids concentration of between 707 and 4230 mg/L or greater.

The discharge plan submitted to the NMOCD outlines how produced water, used oil, and waste will be properly managed, including handling, storage, and final disposition. The plan also includes procedures for the proper management of leaks, accidental discharges, and spills to protect the waters of the State of New Mexico.

For additional information, to be placed on a facility-specific mailing list for future notices, or to submit comments please contact:

Brad Jones, Environmental Engineer New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe NM 87505

Phone: (505) 476-3487

The New Mexico Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future notices for the proposed Eunice C compressor facility upon request.

Aviso Público

Uso para el permiso para la estación del compresor de Eunice C, condado de Lea, New México de la descarga

El Paso Natural Gas (EPNG) da por este medio el aviso que el uso siguiente del permiso de la descarga se ha sometido de acuerdo con la subdivisión B, C, y E del código administrativo de 20.6.2.3108 New México.

El Paso Natural Gas Company (EPNG), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 ha sometido un uso para la estación propuesta del compresor de Eunice C que será situada en el SE/4 del NW/4, sección 5, Municipio 21 del sur, se extiende 36 del este, en el condado de Lea, New México. La facilidad será situada aproximadamente 11 millas de noroeste de Eunice, del NM, de una milla al oeste de la carretera ocho del estado, y aproximadamente del norte de la ¼-milla del Eunice existente una estación del compresor. La dirección del correo para la estación del compresor de Eunice C es EL Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

La estación del compresor de Eunice C será utilizada para la compresión del gas natural de la calidad de la tubería, y será parte del EPNG los sistemas de la tubería del número 1100 y 3000. No se anticipa ningunas descargas intencionales o inadvertidas que podrían afectar la superficie o la agua subterránea en la facilidad. Las descargas potenciales en la estación serán limitadas a aproximadamente 1.550 galones de aceite de motor nuevo de turbina de un tanque de almacenaje sobre tierra, a 1.550 galones de aceite usado de un tanque de almacenaje sobre tierra, y a menos de 1.550 galones de agua con una cantidad pequeña de Nalco Stabrex ST70 (prevenga el crecimiento de las algas) en un tanque de almacenaje sobre tierra. Estos tanques se equipan de los indicadores llanos secundarios de la contención y del líquido para prevenir derramamientos. Los líquidos de proceso tales como agua y aceite usado se asociaron a operaciones diarias serán contenidos por un sistema del dren de la facilidad, transferido al tanque de almacenaje usado de aceite, entonces reciclado o dispuesto por una facilidad aprobada NMOCD.

La primera agua subterránea probablemente que se afectará por un escape, una descarga accidental, o un derramamiento existe en una profundidad de 160 pies debajo de la superficie de tierra. Este sistema del acuífero tiene una concentración disuelta total de los sólidos entre de 707 y 4230 mg/l o mayor.

El plan de la descarga sometido a los contornos de NMOCD cómo el agua producida, el aceite usado, y la basura serán manejados correctamente, incluyendo la dirección, almacenaje, y disposición final. El plan también incluye los procedimientos para la gerencia apropiada de escapes, de descargas accidentales, y de derramamientos para proteger las aguas del estado de New México.

Para la información adicional, ser colocado en una lista que envía facilidad-específica para los avisos futuros, o someter los comentarios satisfacen el contacto:

Brad Jones, Environmental Engineer New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Teléfono: (505) 476-3487

La energía de New México, los minerales y el departamento de los recursos naturales aceptarán comentarios y declaraciones del interés con respecto a este uso y proporcionarán los avisos futuros para la facilidad propuesta del compresor de Eunice C por requerimiento.

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

Revised June 10, 2003

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

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

	New Renewal Modification
1.	Type: Compressor Station, Eunice C
2.	Operator: El Paso Natural Gas
Ado	dress: 3300 North A Street, Building 2, Suite 200, Midland, TX 79705
	Contact Person: Glen Thompson Phone: (432) 686-3268
3.	Location: SE/4 of the NW/4 Section 5 Township 21 South Range 36 East Submit large scale topographic map showing exact location.
4.	Attach the name, telephone number and address of the landowner of the facility site. Attached
5.	Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. Attached
6.	Attach a description of all materials stored or used at the facility. Attached
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. Attached
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures. Attached
9.	Attached Attach a description of proposed modifications to existing collection/treatment/disposal systems. Attached
10.	Attach a routine inspection and maintenance plan to ensure permit compliance. Attached
11.	Attach a contingency plan for reporting and clean-up of spills or releases. Attached
12.	Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. Attached
13.	Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. Attached
	4. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the est of my knowledge and belief.
N	Title: Principal Environmental Representative
S	ignature: Copy for reference Date:
E	-mail Address:Glen.Thompson@ElPaso.com

DISCHARGE PLAN APPLICATION EL PASO NATURAL GAS CO. EUNICE "C" COMPRESSOR STATION LEA COUNTY, NM Page 1 of 27

EUNICE "C" COMPRESSOR STATION DISCHARGE PLAN EL PASO NATURAL GAS Prepared by Kleinfelder West, Inc., Albuquerque, NM

DISCHARGE PLAN APPLICATION EL PASO NATURAL GAS CO. EUNICE "C" COMPRESSOR STATION LEA COUNTY, NM Page 2 of 27

Item 1

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

The proposed El Paso Natural Gas Company (EPNG) Eunice "C" Compressor Station (Eunice C) will be utilized for the compression of pipeline quality natural gas, and will be part of the EPNG Number 1100 and 3000 pipeline systems. Eunice C will replace the existing Eunice A Station which is due for closure in December 2008. Eunice C will be part of a network that transports an amount of natural gas that varies according to customer demand. Compression is required to move natural gas through the pipelines for delivery to EPNG customers. This will be an automated station which will be inspected by EPNG personnel a minimum of once per week while in operation. A plot plan of Eunice C is included as Figure 1.

Eunice C will consist of two (2) natural gas-fueled Solar Taurus 60-7802S gas-turbine compressor engines rated at 7,137 International Standards Organization (ISO) horsepower (hp) each, one (1) natural gas-fueled Caterpillar G3612 TALE-130 reciprocating compressor engine rated at 3,785 ISO hp, and associated equipment.

The station will also contain a 450 kilowatt (kW) generator for auxiliary electrical power generation which will be driven by a Waukesha-Pierce Model L36GL natural gas-fueled reciprocating engine rated at 606 ISO hp. The auxiliary generator will be used mainly in the event of regional power failures.

Total site compressor rated horsepower will be 18,059 ISO hp. Combined with the auxiliary generator the site rated horsepower will be 18,665 ISO hp.

Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party Mike Catt, Vice President

El Paso Natural Gas Company

2 North Nevada Ave.

Colorado Springs, CO 80903

Local Representative Kenneth Morrow, Manager

El Paso Natural Gas Company

2316 W. Bender Blvd. Hobbs, NM 88240 Office: (505) 492-2380, Cell: (505) 390-3716

1-800-334-8047 (24 hour emergency notification)

Or

Local Representative (Alt.) Tim Howell

El Paso Natural Gas Company

2316 W. Bender Blvd. Hobbs, NM 88240 (505) 492-3128

Operator El Paso Natural Gas Company

3300 North A Street Building 2 Suite 200

Midland, TX 79705

Physical Address El Paso Natural Gas Company

Plains Operating Area (Eunice C)

Approximately 11 miles northwest of Eunice, NM

DISCHARGE PLAN APPLICATION EL PASO NATURAL GAS CO. EUNICE "C" COMPRESSOR STATION LEA COUNTY, NM Page 3 of 27

1 mile west of State Hwy. 8, and approximately 1/4-mile north of

the Eunice A Station (GW-46) (See Figure 2)

Mailing Address

El Paso Natural Gas Company Plains Operating Area 2316 W. Bender Blvd. Hobbs. NM 88240

Item 3

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

Lea County, New Mexico

SE1/4 of the NW1/4, Section 5, Township 21 South, Range 36 East

Latitude: North 32 Degrees 31 Minutes and 1 Second Longitude: West 103 Degrees 17 Minutes and 17 Seconds

Large-scale topographic site maps and aerial photograph are attached in Appendix A (Figures 2, 2a & 3).

Item 4

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

Before operation commences the Eunice C site will be owned by:

El Paso Natural Gas Company 2 North Nevada Ave.

Colorado Springs, CO 80903

(432) 686-3268 G. Thompson or alternate contact (719) 520-4350 S. D. Miller

Item 5

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

To accomplish natural gas compression Eunice C Station will utilize the following:

- Two (2) natural gas-fueled Solar Taurus 60-7802S gas-turbine compressor engines rated at 7,137
 ISO hp each, with centrifugal compressors;
- One (1) natural gas-fueled Caterpillar G3612 TALE-130 reciprocating compressor engine rated at 3,785 ISO hp with a reciprocating compressor;
- One (1) small fin-fan for reciprocating compressor engine cooling;
- Two (2) inlet filters for the natural gas stream (scrubbers);
- Two (2) fuel gas filters;
- Three (3) fin-fans to cool the natural gas stream (one for each compressor):
- One (1) 450 kilowatt (kW) generator driven by a natural gas fueled Waukesha-Pierce Model L36GL reciprocating engine rated at 606 ISO hp;
- Two (2) 70-gallon building sumps, one for the compressor building (T-7001) and one for the auxiliary building (T-6001);
- One (1) small fin-fan for auxiliary generator engine cooling;
- One (1) 1,550-gallon fiberglass lube oil aboveground storage tank (AST) (T-5302);
- One (1) 1,550-gallon welded steel used oil AST (T-5301);
- One (1) welded steel jacket-coolant AST (T-5304) (for the reciprocating compressor engine; volume is yet to be determined, but will be 1,550-gallons or less);
- One (1) 120-gallon lube oil AST day tank for the two turbine compressors (T-7002); and
- One (1) 53-gallon lube oil AST day tank for the reciprocating compressor (T-7010).

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Gas Compressors

The compressor building housing the compressor engines and compressors will be constructed in such as manner as to ensure containment of leaks, spills and wash down water. Any spill or wash down water from cleaning operations will be contained and discharged into the 1,550-gallon used oil AST (T-5301) via the building sumps.

Natural gas compressed by centrifugal and reciprocating compressors does not produce wastewater. The compressor engines and ancillary equipment will be washed on an as-needed basis. The wash down water will be discharged into the 1,550-gallon used oil AST (T-5301) mentioned above, and non-toxic, biodegradable detergents such as Tide® or dish soap will be used to clean the equipment.

It is estimated that the rate of used oil and wash-down water generated from the compressor engines, compressors, scrubber blow-downs, and auxiliary generator will be 1,000 gallons or less per year of operation (2.74 gallons per day). This used oil will be drained into the 1,550-gallon used oil AST (T-5301) and removed as needed by an oil recycler. EPNG currently has an oil recycling contract with Thermo Fluids (Odessa, Texas Service Office), which may be called upon to recycle the wash down water/used oil mixtures. EPNG may also use other NMOCD approved oil recycling contractors as needed.

Natural Gas Scrubbers (inlet and fuel)

All inlet gas will be passed through two (2) suction scrubbers on the upstream side of the main compressors (Figure 6). Also, two (2) fuel gas filters will remove minimal liquids and other foreign matter from the natural gas stream before entering the compressor engines or auxiliary generator. Any used oil, scrubber blow-down, or other liquids generated by the suction scrubbers and fuel gas filters will be discharged into the 1,550-gallon used oil AST (T-5301).

Filters from this operation will be replaced as needed. The filters will be characterized as prescribed by 20 New Mexico Administrative Code (NMAC) 3.1, Subpart 14, Regulated Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas industry. Regulated NORM is defined as NORM at a concentration of greater then 30 picocuries per gram of radium 226 above background, or NORM with a maximum radiation exposure reading at any accessible point that is greater than 50 microroentgens per hour, including background levels.

If any filter is characterized as NORM-regulated, it will be stored in properly labeled, UN/DOT-approved 55-gallon metal drums for disposal at an approved facility. To date, no filters have been characterized as NORM regulated at the existing Eunice A Station (Station to be replaced by Eunice C).

Gas inlet scrubber filters that are not characterized as NORM-regulated will be drained for 24 hours into the 1,550-gallon used oil AST (T-5301). After the scrubber filters are drained, non-recyclable components will be bagged and disposed of in a separate onsite dumpster that will be emptied as needed by Lea Land Inc. for transport to their industrial solid waste landfill, and recyclable components will be reused. This dumpster will be placed inside concrete-lined and curbed secondary containment.

Auxiliary Generator

Eunice C will contain a 450 kilowatt (kW) generator for auxiliary electrical power which will be driven by a natural gas-fueled Waukesha-Pierce Model L36GL reciprocating engine rated at 606 ISO hp. This generator will mainly be used when electrical power is not available from the utility power company. Anticipated oil consumption for this generator is very low and limited to periodic oil changes, and oil will be manually serviced. The auxiliary generator will be housed inside the auxiliary building which will be equipped with drains and a building sump which will drain to the 1,550-gallon used oil AST (T-5301).

1,550-Gallon Lube Oil AST

The 1,550-gallon lube oil AST (T-5302) will supply lube oil to the reciprocating compressor. This tank will be filled by lube oil contractors using tank trucks. While tank filling is in progress, drip pans will be placed under all connection points between the tank truck and lube oil tank. EPNG also requires that the tank

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truck operator be in direct, radio, or telephone contact with the station operator. The AST will be installed within concrete-lined secondary containment that is designed to contain at least one and one-third times

(133%) the volume of the largest tank in the containment or the sum of any interconnected tanks in the containment, whichever is greater.

1,550-Gallon Used Oil AST

The 1,550-gallon used oil AST (T-5301) will receive wash down water, used oil, and biodegradable detergents from the compressor building drains, auxiliary building drains, suction scrubber blow-downs, and the fuel gas filters. While tank emptying is in progress, drip pans will be placed under all connection points between the tank truck and used oil tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. The AST will be installed within concrete-lined secondary containment that is designed to contain at least one and one-third times (133%) the volume of the largest tank in the containment or the sum of any interconnected tanks in the containment, whichever is greater.

70-Gallon Building Sumps

Two below-grade 70-gallon building sumps (T-6001 and T-7001), one for the compressor building and one for the auxiliary building, will be used to collect used oil/water/detergent mixtures from the building drains. These sumps will be placed inside secondary containment that will be inspected for process fluids by site personnel at least weekly while the station is in operation.

Jacket Coolant AST

The jacket coolant AST (T-5304) will be used to store and replenish jacket cooling water in a closed system for the reciprocating compressor engine (volume is yet to be determined, but will be 1,550-gallons or less). An algae preventive, Nalco Stabrex ST70 will be added to this tank in accordance with manufacturer's instructions. While tank filling is in progress, drip pans will be placed under all connection points between the tank truck and tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. The AST will be installed within concrete-lined secondary containment that is designed to contain at least one and one-third times (133%) the volume of the largest tank in the containment or the sum of any interconnected tanks in the containment, whichever is greater.

120-Gallon Day Tank

One 120-gallon lube oil AST (T-7002 day tank) will be used to automatically replenish each of the gas turbine compressors as they consume oil with use. Lube oil drums will be used to replenish this tank via a lube oil transfer pump. The day tank and drums will be located within the compressor building which contains floor drains and a sump that drains into the 1,550-gallon used oil AST (T-5301). Secondary containment will be provided by the floor drains and building sump.

53-Gallon Day Tank

One 53-gallon lube oil AST (T-7010 day tank) will be used to automatically replenish the reciprocating compressor as it consumes oil with use. This day tank will be replenished from the lube oil storage tank (T-5302) via a lube oil pump. This day tank will be installed within the compressor building which is equipped with floor drains and a sump that drains into the 1,550-gallon used oil AST (T-5301). Secondary containment will be provided by the floor drains and building sump.

Underground Drain Lines and Planned Hydrostatic Testing

All underground piping and drain lines will be hydrostatically tested before operation of the station and every five years thereafter during the annual station shutdown. Duration of hydrostatic testing will be at least 30 minutes and piping will be subjected to at least three pounds per square inch (PSI) above operating pressure during the test. EPNG will provide the New Mexico Oil Conservation Division (NMOCD) with results of the test findings upon request.

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Initial Hydrostatic Testing

As mentioned above, hydrostatic testing of all new underground drain piping and process piping at Eunice C will take place before operation, and before any process fluids are introduced to the compressor station. It is estimated that no more than 50,000 gallons of hydrostatic test water will be used for this initial test, and subsequently discharged onsite. All piping subject to this hydrostatic test will be new piping and therefore free of process chemicals. Onsite discharge will take place in such a way, and at such a rate, as to not cause erosion, surface flow, and/or significant pooling, and will prevent surface migration of discharged water offsite. To accomplish this, a hay bale structure, with geotextile filter fabric as appropriate, will be used to dissipate the energy of discharged water (Figure 7). Flow rate is estimated to be less than 20 gallons per minute.

The source of hydrostatic test water will be the EPNG-owned "Monument" well. The most recent analytical results for the Monument well are included in Appendix B. Analytical sampling for this proposed hydrostatic test water will consist of one baseline sample of the test water to be used, collected from its source, and representative samples of used hydrostatic test water to be taken prior to discharge. This test water will be stored in tanks pending laboratory analysis then discharged onsite only if it meets standards for groundwater as prescribed in NMAC 20.6.2.3103 sections A, B, and C and after approval by NMOCD.

Samples will be subject to analysis via the following EPA methods at an EPA-approved laboratory:

- EPA method 8260, volatile organic compounds;
- EPA method 8270, semi-volatile organic compounds; and
- EPA method 6010, RCRA-8 metals.

Periodic Hydrostatic Testing

After station operation commences, periodic hydrostatic testing of underground drain lines will be accomplished every five years during the annual Station shutdown. Water for this testing will likely come from the "Monument" well mentioned above, or from another clean water source that will be analyzed prior to hydrostatic testing. Used hydrostatic test water will be disposed of via a NMOCD-approved injection well or other NMOCD-approved disposal method.

Storm Water and Other Precipitation

The proposed Eunice C site has good natural drainage to the north. Station facilities will be constructed and site grading will be accomplished in such a way to, as much as practical, prevent ingress or pooling of storm water around buildings, process vessels, piping, secondary containment, and other equipment. Storm water will be collected via gravel-lined ditches that will drain onto adjacent EPNG-owned land (as necessary). Process fluids will not intermingle with storm water drained onto adjacent rangeland.

Uncontained Wash Down Water

As necessary for general housekeeping of outdoor areas, Eunice C personnel will utilize high-pressure water-jets or high-pressure steam to remove solid particulate matter (dust, dirt, weeds, etc.) from fin fans or piping that are not contained within the buildings or secondary containment structures. No detergents or cleaning solutions will be used for this procedure, and no process fluids will intermingle with this water. This wash water will not be contained.

Contained Wash Down Water

As necessary for maintenance, repair, and general housekeeping, Eunice C personnel will utilize high-pressure water jets or high-pressure steam to clean process vessels inside secondary containment, and engines and equipment inside the compressor and auxiliary buildings. This wash down water may contain biodegradable detergents such as Tide® or dish soap. This water will drain via the Station drain system and/or building sumps to 1,550-gallon used oil AST (T-5301).

Additional Information

The Eunice C plot plan (Figure 1) shows the location of proposed fences, property boundaries, buildings, pipelines, and tanks. Schematic diagrams (Figures 4 and 5) show piping and process vessels. A

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schematic diagram (Figure 6) shows the main station processes, including compressors, fin-fans, and inlet scrubbers.

Item 6 Attach a description of all materials stored or used at the facility.

Container	ID	Material	Form	Volume	Location	Containment
Fiberglass AST	T-5302	Lube Oil	Liquid	1,550 gallons	West of auxiliary building	Concrete containment
Steel AST	T-5301	Used Oil & Water	Liquid	1,550 gallons	West of auxiliary building	Concrete containment
Steel AST	T-5304 Jacket cooling water	Water with Nalco Stabrex ST70	Liquid	1,550 gallons or less	West of auxiliary building	Concrete containment
Steel AST	T-7002 day tank	Lube Oil	Liquid	120 gallons	Inside compressor building	Building sump that is drained to the used oil tank
Steel AST	T-7010 day tank	Lube Oil	Liquid	53 gallons	Inside compressor building	Building sump that is drained to the used oil tank
Steel paint locker if more than five gallons	None	Very small quantities of paints, lubricants, detergents, and cleaning	Liquids	Likely less than five gallons	Inside auxiliary or compressor building.	Paint locker and/or building sump that is drained to the used oil tank

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

Source Type of Effluent Volume Quality Compressor and Used engine oil, wash 24 barrels per year Used lube oil, water, and auxiliary building sumps, down water, detergents. (approximately 1,000 water with detergents scrubber blow-downs, and other non-hazardous gallons per year or 2.74 and engine drains gallons per day) liquids Oil and scrubber filters, Solid waste 1.5 cubic feet per day Non-exempt, nonhazardous waste tested for fuel gas filters TCLP/metals Empty drums (EPA-Solid waste 0.5 cubic feet per day Metal, paper, cloth, clean*), domestic trash domestic trash such as paper, plastic wrappers, food waste, etc. Station Restroom Sewage Estimated to be less than Liquid and sewage sludge 50 gallons per day

supplies

^{*}EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Item 8

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

Type of Effluent	Collection	Storage	Hauler	Disposition
Used oil	Drained to the building sump and immediately to the 1,550 gallon used oil AST	1,550 gallon AST (T-5301)	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Scrubber blow- downs	Drained to the 1,550 gallon used oil AST	1,550 gallon AST (T-5301)	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Wash down water	Drained to the building sump, and/or immediately to the 1,550 gallon used oil AST	Steel 1,550 gallon AST (T-5301)	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Wash down water with detergents	Drained to the building sump, and/or immediately to the 1,550 gallon used oil AST	Steel 1,550 gallon AST (T-5301)	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Oil and scrubber filters, fuel gas filters	Scrubber filters drained for 24 hours and bagged, inlet filters bagged	Dumpster placed inside concrete-lined secondary containment	Removed as needed by an approved hauler (currently Lea Land Inc.)	Approved landfill that will accept the waste profile (currently Lea Land Inc. Industrial Solid Waste Landfill)
Empty drums (EPA- clean*), domestic trash	Trash collected in waste can and larger items placed directly into the dumpster	Dumpster	Removed as needed by an approved hauler	Approved landfill (currently the Lea County Landfill)
Domestic Sewage	Restroom drain system	1,000-gallon septic tank	Not applicable	Leach field which will be constructed in accordance with NMED guidelines for onsite disposal systems
Batteries	Moved to the interior of the auxiliary building	Used batteries stored onsite no longer than one year	Removed as needed by EPNG personnel; batteries will not be stored for more than one year	Approved battery recycler

^{*}EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Non-Exempt, Non-Hazardous Waste

Used oil will be collected as needed from the used oil AST and removed from the site by an NMOCD-approved contractor. While tank emptying is in progress, drip pans will be placed under all connection points between the tank truck and tank. EPNG also requires that the tank truck operator be in direct, radio or telephone contact with the station operator. Disposal records will be maintained at the EPNG Plains Operating Area Office (see address under Item 2).

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Hazardous Waste

No RCRA-listed hazardous wastes are expected to be generated at Eunice C other than lead-acid wet cell batteries. Auxiliary generator starting batteries and inverter batteries used for the uninterrupted power system (UPS) will be maintained and replaced by EPNG site personnel, and recycled as needed by an offsite NMED-approved recycler. Used batteries will be stored in the auxiliary building, but no batteries will be stored for more than one year.

Domestic Sewage

A restroom facility containing one wash basin and a toilet will be installed in the auxiliary building. Sewage treatment will consist of a 1,000-gallon septic tank and a leach field which will be constructed in accordance with NMED guidelines for onsite disposal systems.

Solid Waste

Solid waste consisting of EPA-clean (as prescribed in 40 C.F.R. Part 261, Section 261.7(b)) used drums and other containers, and domestic trash will be disposed of into a portable disposal dumpster that will be emptied by a solid waste contractor as needed.

Non-Exempt Solid Waste

Used oil and scrubber filters will be drained to the 1,550-gallon used oil tank (T-5301) for 24 hours and non-recyclable components will be placed into plastic bags before disposal into a separate dumpster that will be placed into secondary containment and emptied as needed by a NMOCD-approved contractor. Oil and scrubber filters will be tested for RCRA-8 TCLP metals prior to disposal. Non-recyclable components will be placed into plastic bags before disposal and recyclable components will be reused.

Names, addresses, and phone numbers of currently-used NMED and NMOCD-approved transporters/disposal facilities. EPNG will also use other NMED and NMOCD-approved transporters and/or disposal facilities as needed after a minor modification is approved by NMOCD.

Thermo Fluids (used oil recycling) 1501 Walther Road Odessa, TX 79763 Phone Number: (432) 580-3098

1 Hone (402) 500 5050

Lea Land Inc. (NMOCD permitted landfill for scrubber and oil filters)

P.O. Box 3427 Carlsbad, NM 88221

Phone Number: (505) 887-4048

Lea County Regional Landfill (approved landfill for domestic waste)

Hobbs, NM

Phone Number: (575) 394-9109

Hobbs Iron & Metal (battery recycling) 920 S. Grimes Street

Hobbs, NM 88240

Phone Number: (505) 393-1726

Item 9

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

This is the initial discharge plan for the proposed Eunice C Compressor Station. EPNG will notify NMOCD of any significant changes from this plan, process modification, or production increase that could result in a significant modification in discharges from this facility.

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Item 10

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

Eunice C will have fully automated equipment and controls and is designed to minimize on-site chemicals. Liquids stored on-site in excess of five gallons will be placed within secondary containment that will prevent or mitigate any releases to the environment. When in operation, Eunice C will be visually inspected by EPNG personnel a minimum of once per week and underground piping will be hydrostatically tested before operation and every five years during the annual station shutdown thereafter. If the station is not in operation the visual inspection will be accomplished as necessary.

Verbal and written notifications of leaks or spills will be made to the NMOCD according to NMOCD Rule 116. Any release of a chemical with a reportable quantity regulated by Title 40 Code of Federal Regulations (CFR) Part 300 and 372 will be reported to the National Response Center, and when applicable, to the New Mexico Environment Department (NMED).

Item 1.1

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

EPNG will handle all spills and leaks immediately as required by the EPNG procedures outlined in the EPNG Environmental handbook (Appendix C), and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and Water Quality Control Commission (WQCC) regulations, WQCC section 1203.

The "Spill and Release Control, Cleanup and Reporting" section of the El Paso Corporation Environmental Handbook, which is available to site personnel, provides guidance in the management of leaks or spills, and outlines procedures to be used in case of a leak or spill (a copy of the 2008 version is presented in Appendix C). Visual monitoring will be conducted on a regular basis (at least weekly when operating) of aboveground components, including all containment structures, and ASTs. As stated, hydrostatic testing of buried components will be accomplished before operation then conducted every five years thereafter.

Spills, if they occur, will be addressed by trained personnel using source removal techniques such as sorbents, excavation, collection, and proper disposal. Spill response contractors are available if additional resources are needed.

Commercial absorbent pads or rags will be used to absorb small spills. Any oil-bearing soil will be disposed of in New Mexico at an NMOCD-approved facility that approves the waste profile. Spill containment kits will be located at the facility.

Large spills will be contained within the secondary containment system consisting of containment structures, sumps, and the used oil tank. Where applicable, liquids and solid waste will be segregated, characterized and managed accordingly.

In the event of a spill, personnel are trained to notify EPNG's Environmental Department. The EPNG Environmental Department in turn will make the necessary notifications to regulatory agencies.

Site personnel will also have access to the El Paso Corporation Environmental Compliance Manual, located on the EPNG Environmental web page. It contains spill reporting thresholds for fluids typically found at EPNG compressor stations. The manual contains a decision tree to aid in proper reporting procedures, including notification guidelines for reporting to the NMOCD District Field Office, and if appropriate, procedures for reporting to the NMOCD Director. If there is a conflict between the El Paso Corporation Compliance Manual and state regulations, state regulations will always take precedence.

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EPNG contingency plans provide verbal and written notification of reportable leaks or spills to be made in accordance with OCD Rule 116 and New Mexico Water Quality Control Commission (NMWQCC) Section 1203 guidelines within the time limits set by NMOCD. Reportable releases regulated by the Code of Federal Regulations, Title 40, Parts 300 and 372 will be reported to the National Response Center, and where appropriate the NMED.

Item 12

Attach geological/hydrological information for the facility, Depth to and quality of groundwater must be included.

Geologic Description

The proposed Eunice C Station is located in an area with little topographic relief. Rock below the Station consists of clastic, carbonate, and evaporate sedimentary rocks ranging from Ordovician through Triassic in age. The Permian-age formations are an important local source of oil and natural gas. These rocks are draped by alluvial sediments of Quaternary age ranging from 30 to 60 feet in thickness consisting of sand, gravel, silt, and clay.

Site Hydrology

The proposed Eunice C Station is located in the Pecos River Basin in southern Lea County, New Mexico. The basin has no perennial streams, but there are a few ephemeral streams and broad drainages. Runoff from the site flows north, which is away from the Monument Draw located to the south of the site. There are no surface water bodies or groundwater discharges within one mile of Eunice C.

Site Hydrogeology

The Ogallala Formation, containing the Ogallala aquifer, is the principal source of domestic and industrial water in the area. The Ogallala Formation overlies the relatively impermeable Chinle Formation and dips to the southeast, generally parallel to the underlying Chinle Formation and present-day subsurface. The Ogallala aquifer is unconfined in some areas where it comes in contact with Pleistocene alluvium. Groundwater is encountered at a depth of approximately 160 feet below the ground surface. The general hydraulic gradient of 10 to 12 feet per mile (approximately 0.002 ft/ft) generally flows to the southeast (Cronin, 1969). The lateral movement of groundwater in this aquifer has been estimated to range from two inches per day (Cronin, 1969) to more than a foot per day (Minton, n.d.).

Water Quality

Water quality of the Ogallala aquifer in the area is mostly of slightly saline to moderately saline as defined as water containing 1,000 to 10,000 milligrams per liter (mg/L) of total dissolved solids (TDS) (Hem, 2005). Water above 3,000 mg/L TDS is considered water of limited use (Howells, 1990). According to the New Mexico State Engineer's Office, groundwater in this formation is deteriorating in quality (Boyer et al., 1980). Water samples collected by EPNG in January 1981 from eight privately-owned shallow wells in the vicinity of Eunice C had TDS values ranging between 707 and 4230 mg/L (Table 1).

Groundwater from formations below the Ogallala Formation contains higher concentrations of dissolved solids, primarily chloride and sulfate salts (Bureau of Reclamation, 1976). Triassic-age formations have also yielded acceptable potable water but in low to moderate quantities. The deeper Permian formation contains water of saline to brine quality. These waters are generally not used for domestic purposes, but may be used for injection into oil and gas fields for secondary recovery.

Flooding Potential

Eunice C is located in the Pecos River Basin in an area of low precipitation and high evaporation. In southern Lea County, New Mexico, the basin has no perennial streams, but there are a few ephemeral streams and broad shallow drainages. Most precipitation quickly soaks into the soil or evaporates. The land surface at the site has little relief, but topography suggests that site runoff is generally to the north. Site topographic slope is approximately 0.3 degrees or 0.006 ft/ft, dipping north (Figure 2). Federal Emergency Management Agency (FEMA) flood maps do not exist for this site. Site grading shall be

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designed to ensure that offsite drainage is diverted from the station and that pooling of water is minimized. No significant flooding has been recorded at the adjacent Eunice A and Eunice B Stations.

According to the National Oceanic and Atmospheric Administration (NOAA) Hydrometeorological Design Studies Center Precipitation Frequency Data Server, the 5-year, 10-year, 25-year, 50-year, and 100-year, 24-hour storm precipitation levels for the nearby town of Hobbs, New Mexico, are estimated at 3.60 inches, 4.33 inches, 4.45 inches, 6.17 inches, and 7.06 inches, respectively.

Wells

According to the New Mexico Office of the State Engineer, Water Administration Technical Engineering Resource System (WATERS) database there are no domestic, or stock water wells within ½-mile of the Eunice C site. The nearest well is a secondary oil recovery well located approximately one mile southeast of the site.

Additional Information

Eunice C will not contain any unlined surface impoundments, pits, leach fields (other than domestic sewage), injection wells, drying beds, solids disposal, or land farms.

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

All reasonable and necessary measures will be taken to comply with 20 NMAC 6.2.3103, Water Quality Standards. Should EPNG choose to permanently close the facility, closure measures will include removal of all aboveground and underground piping and equipment. All tanks will be emptied and removed from the site. All potential sources of toxic pollutants will be inspected and no potentially toxic materials or effluents will remain on site. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will occur, and clean-up activities will commence. Post closure maintenance and monitoring plans are not anticipated unless contamination is encountered.

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Table 1 Groundwater Quality and Analytical Results

Table 1, Groundwater Quality and Analytical Results, (El Paso Natural Gas 1981)

Analyses of Well Mater from the Ogaliala Formation Located near El Paso Natural Gas Company's Eunice and Monument Plants

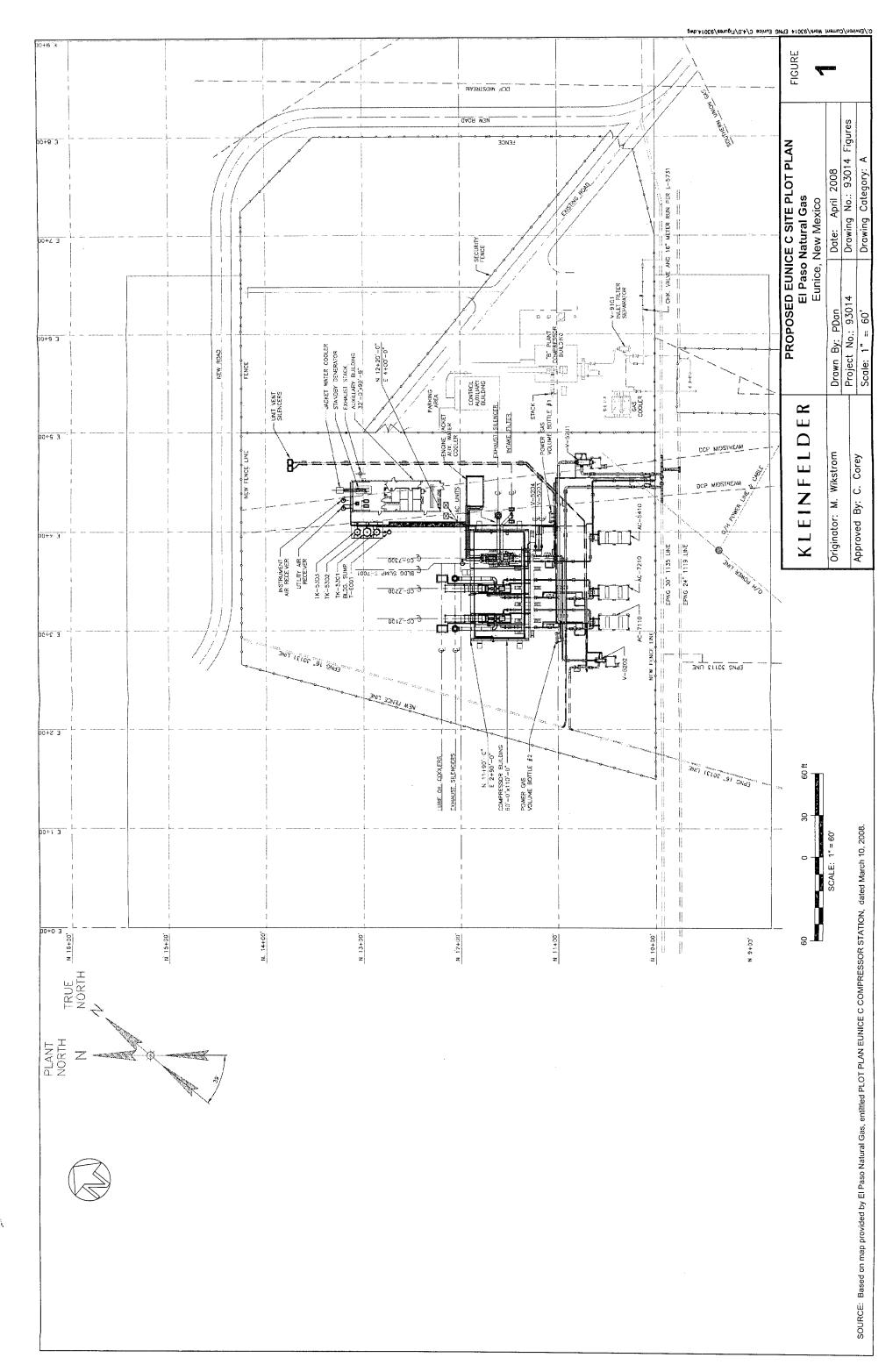
				Well Designation	nation1/			
Constituent	/ 1 /1	\ <u>42</u> /	\ <u>2</u> /	p4/	/ 5 0	n <u>6</u> √	/ <u>t</u> \$	T.87
Sulface (SO ₄), mg/L	124	1780	145	7.2	480	140	380	1480
Chioride (Ci), mg/L	1,383	1078	220	35	407	89	145	624
Mitrate (NO3 as N), mg/L	0	0	4.5	מו	S	5 6	0	ö
Specific Conductance, mmhos/cm	4100	-4800	1100	495	2010	85.0	1560	4.000:
Hď	7.2	7.15	7.8	7.75	7.85	8.1	6.7	8.05
fotal Dissolved Solids, mg/L	3801	4230	874	396	1684	707	1172	3162
Chromium (Cr), mg/L	.01	.01	0	0	.01	0	0	10.
Copper (Cu), mg/L	. 05	.05	.05	0	50'	0	0	0
Iron (FE), mg/L	. 03	.01	0	0	.01	ΫΟ΄.	0	.01
Manganese (Mn), mg/L	.17	. 10	0		.03	.02	0	. U3
Zinc (Zn), mg/L	.10	.75	.10	.70	1.25	.10	Ö	.05

Windmill 1/4 mile East of Monument Plant (East of Union Texas Britt Well #3), Windmill 1/2 to 3/4 miles SE of Eunice Plant, Windmill one mile NW of Monument Plant,

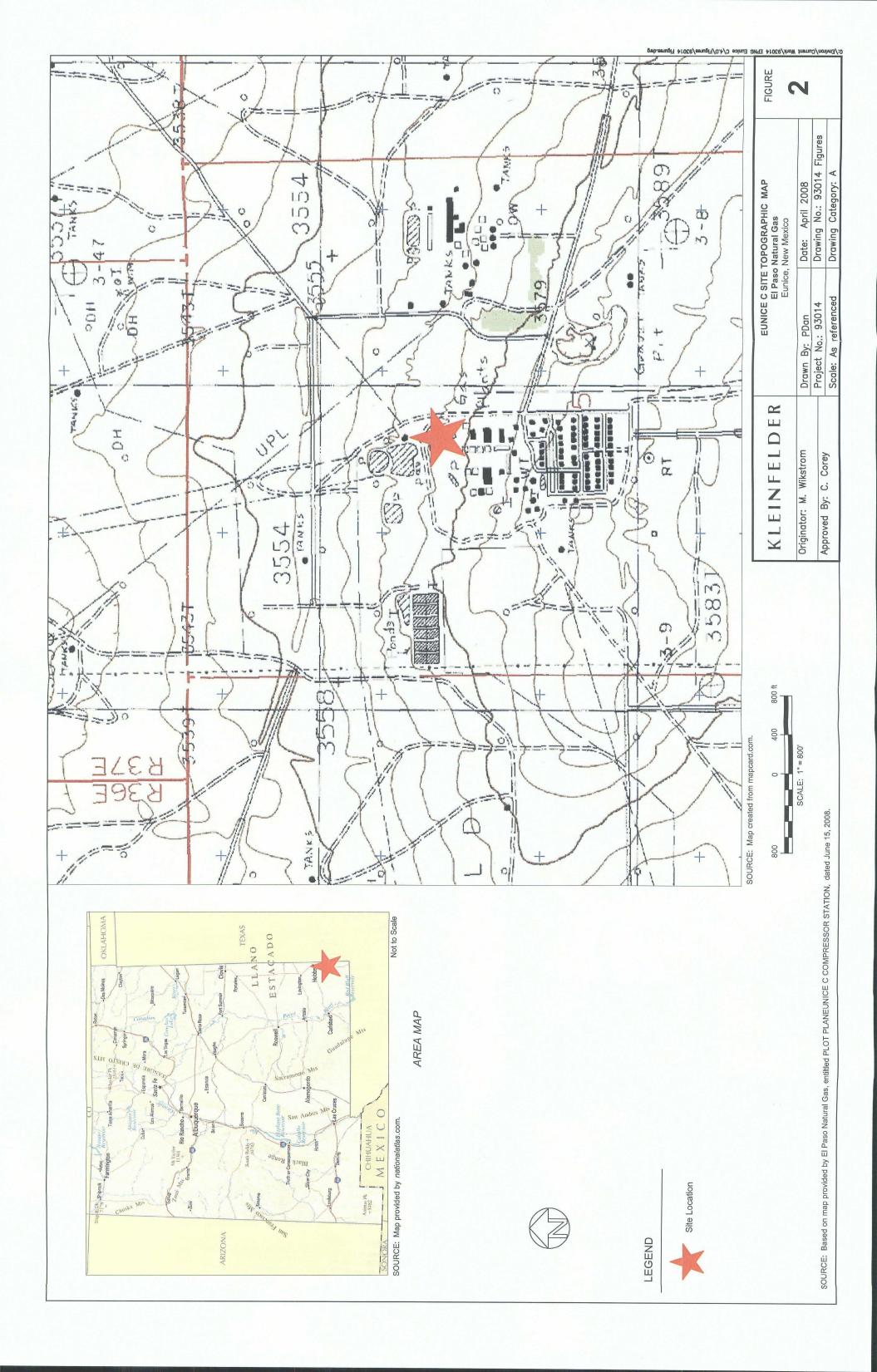
Jim Gooper Ranch Home one mile NW of Monument Plant.
Windmill 1/4 to 1/2 mile SE of Eunice Plant.
Sam Hardy Home 1/4 mile East of Eunice Plant. (Continental Oil Company, East 1/2 mile of house).
Deck Ranch windmill 1/4 mile NW of Eunice Plant.
Millard Deck Ranch windmill 1/2 mile North of Eunice Plant. निर्णाली ने विश्वानित्र

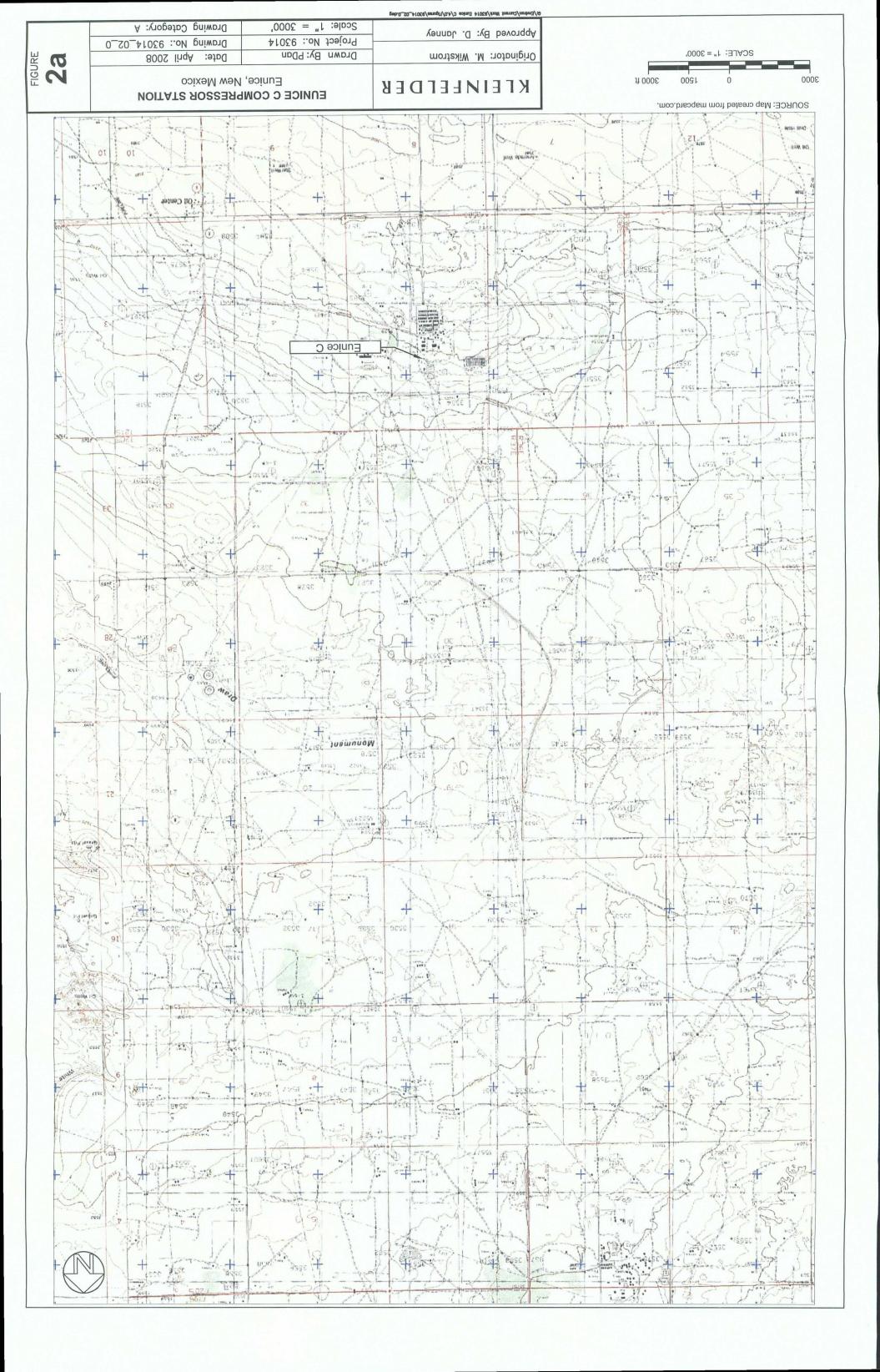
DISCHARGE PLAN APPLICATION EL PASO NATURAL GAS CO. EUNICE "C" COMPRESSOR STATION LEA COUNTY, NM Page 16 of 27

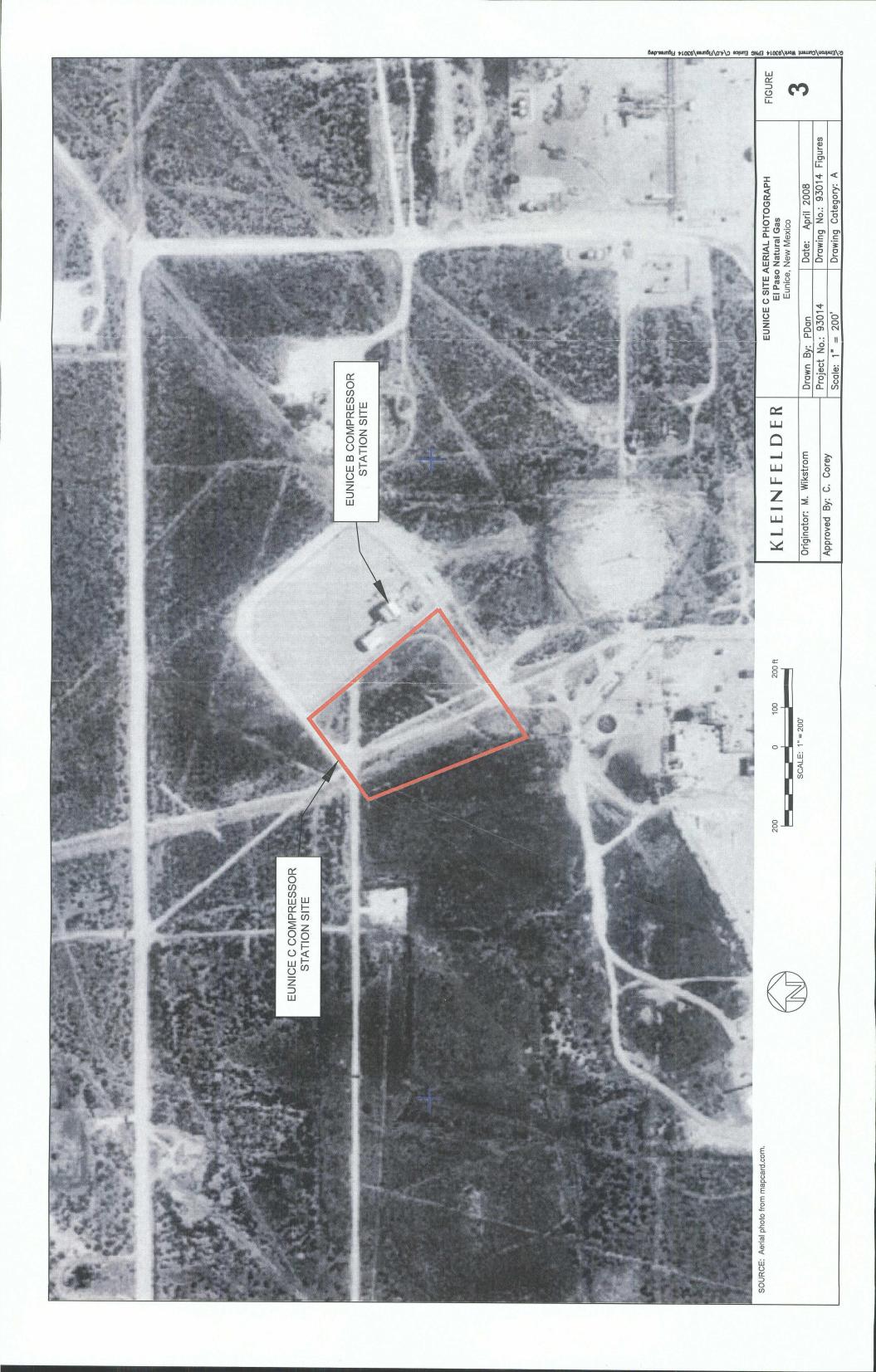
APPENDIX A, FIGURES Map, Aerial Photograph, and Drawings

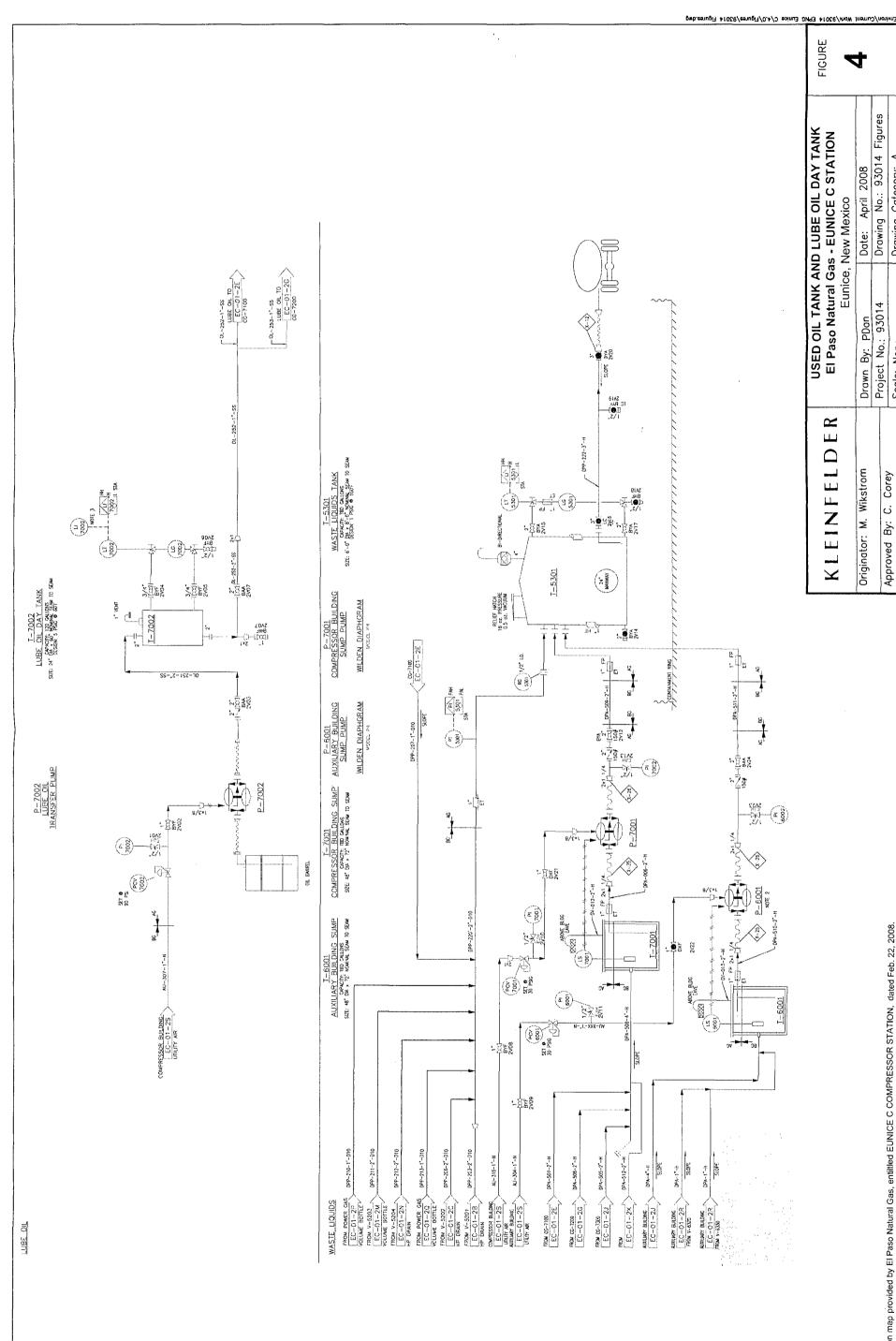


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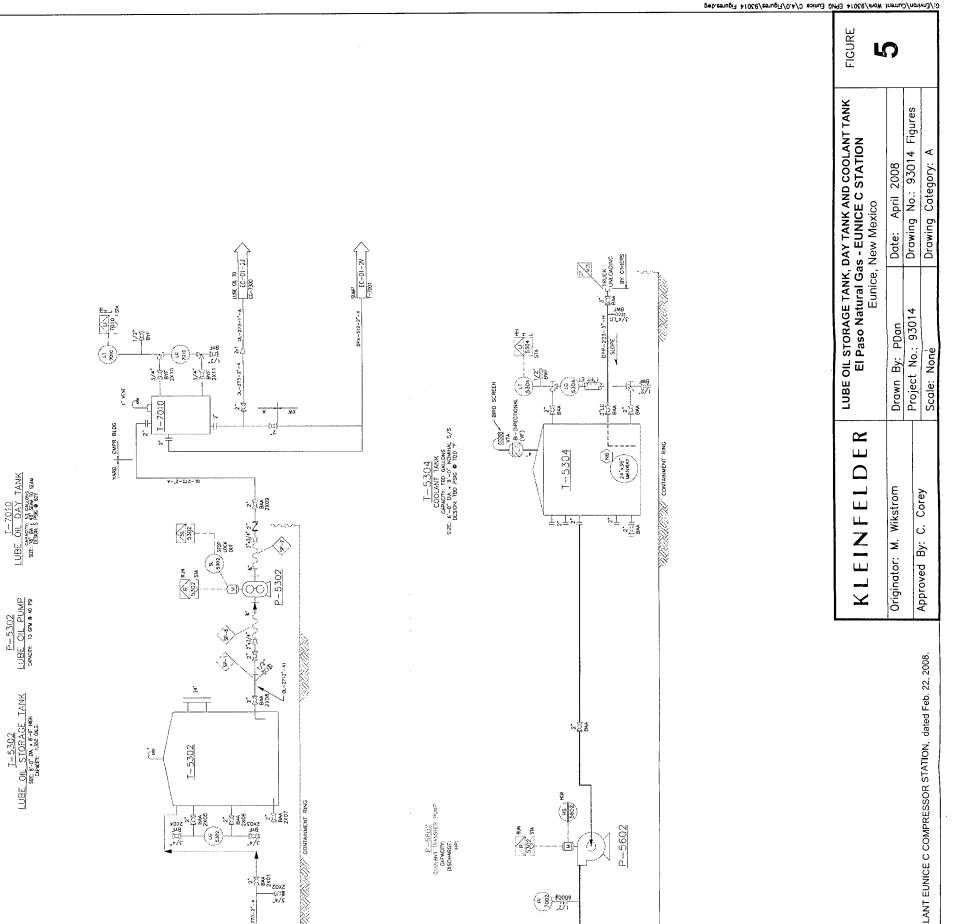






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Scale: None



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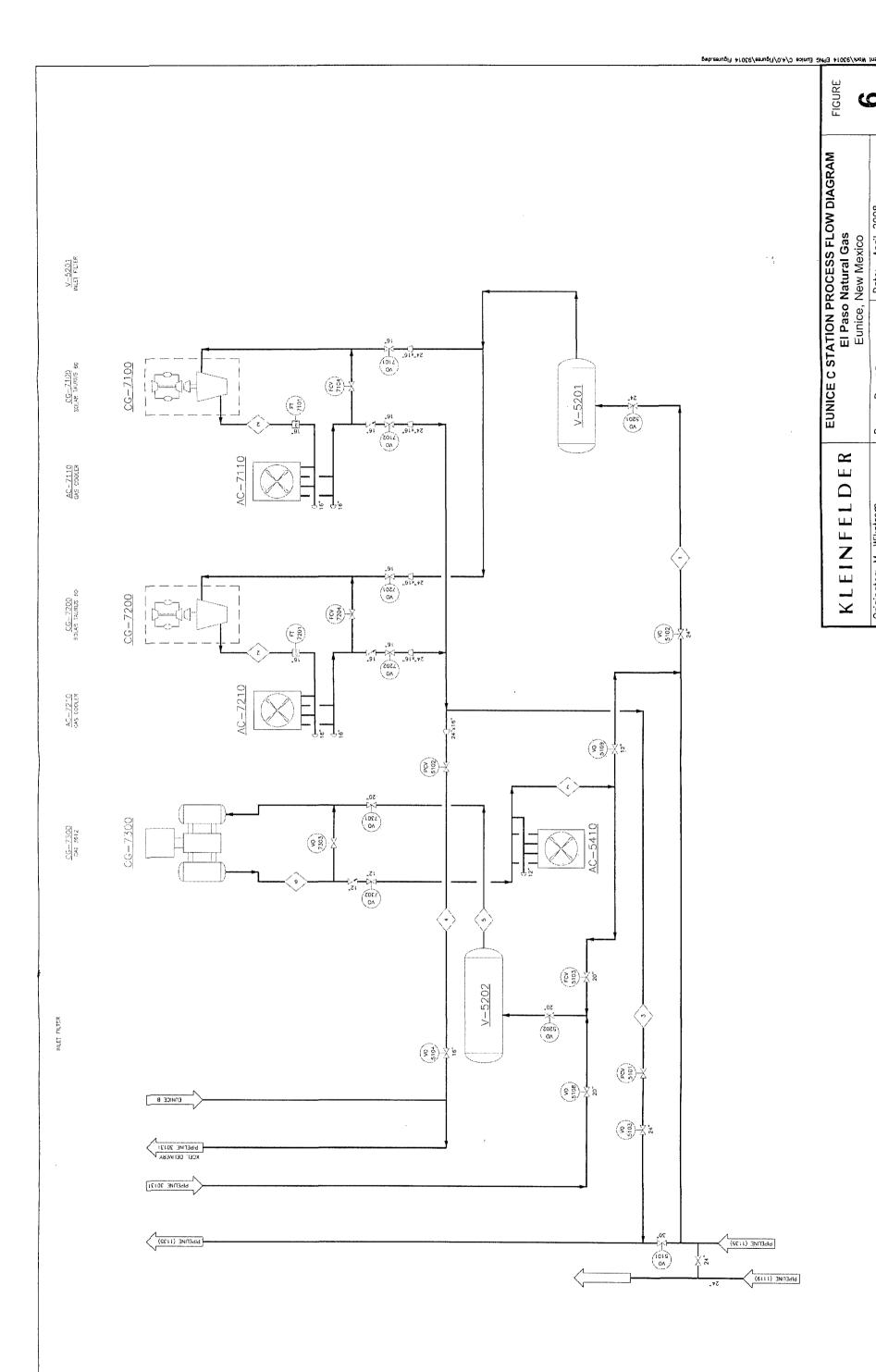
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Date: April 2008 Drawing No.: 93014 Figures

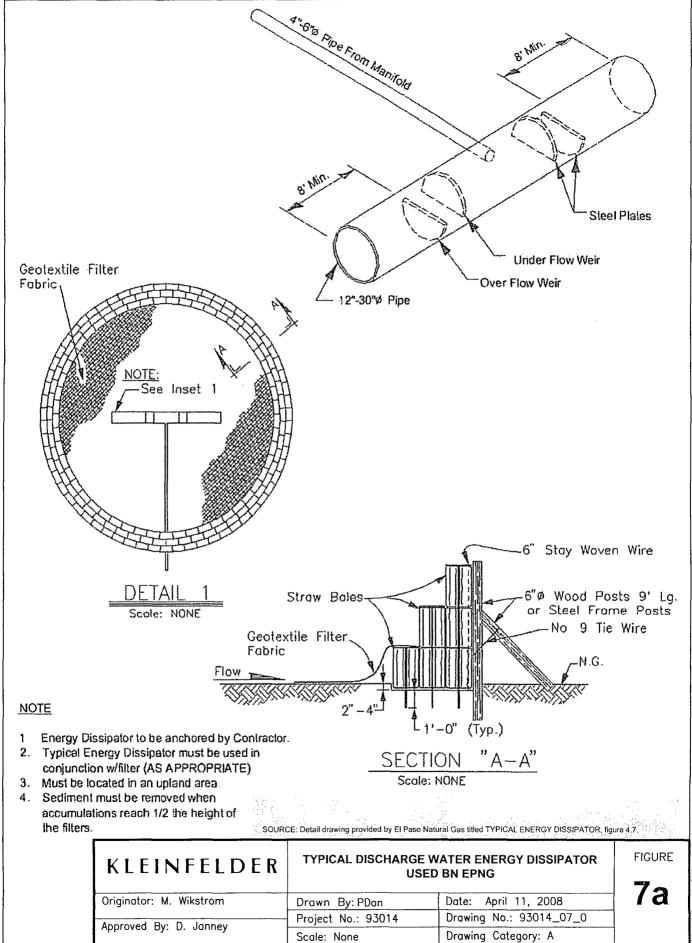
Drawn By: PDan Project No.: 93014

Originator: M. Wikstrom

Approved By: C. Corey

Scale: None

Drawing Category: A



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KLEINFELDER	EXAMPLES OF EPNG - DISS	FIGURE	
Originator: M. Wikstrom	Drawn By: PDan	Date: April 11, 2008	7 b
Approved By: D. Janney	Project No.: 93014	Drawing No.: 93014_07_0	
Approved by. D. Danney	Scale: None	Drawing Category: A	

DISCHARGE PLAN APPLICATION
EL PASO NATURAL GAS CO. EUNICE "C" COMPRESSOR STATION
LEA COUNTY, NM
Page 22 of 27

APPENDIX B Hydrostatic Test Water Baseline Analytical Results



LABORATORY SERVICE REPORT

REQUESTOR:

Morrow, Kenny

REPORT DATE:

12/30/2005

REQUEST NO:

2005121518

APPROVED BY:

Campbell, Darrell

PENDING REQ. ID:

2005121518

DISTRIBUTION:

Howell, Timothy; St. John, Robert; Havenman, Bill; Whitney, Mark

PERFORMED BY:

Aerotech Environmental Laboratories

Request Description:

Domestic water (SWDA) @ Monument

Date Received:

12/2/2005

Date Completed:

12/29/2005

Sample No:

Sampled By:

Sample Date:

12/1/2005 2:00:00 PMS

Description:

Analysis: Purpose:

WP Domestic Water - SDWA PAL Disposal/Environmental Concerns

Marrix: Location: Water

EPNG - Midland - Plains - Monument Station - 0+0 - Breakroom - sink

Mark Whitney

Data: See attached sheet(s).

Comments:

Sample:

Sample.	T
Minik	
Metals Analysis of a	< 0.2
Aluminum (mg/l)	< 0.00
Barian (mg/l)	<0.001 <0.001
Beryllium (mg/l)	< 0.2
Boron (mg/l)	< 0.001
Cadmium (mg/l)	< 2.
Calcium (mg/l)	< 0.001
Chromium (mg/l)	•
Copper (mg/l):	0.023
fron (mg/l)	< 0.05
Magnesium (mg/l)	< 2/ - ∧'no÷
Manganése (mg/l)	<.0.005
Nickel (mg/l)	< 0.001
Potassium (mg/l)	< 2
Silver (mg/l)	< 0.001
Sodium (mg/l)	< 2
Zinc (mg/l)	< 0.01
Antimony (mg/l)	≪ 0.003
Arsenic (mg/l)	< 0.001
Lead (mg/l).	< 0.001
Sclenium (mg/l)	≤ 0.002
Thallium (mg/l):	< 0.001
Hardness, Calcium/Magnesium (As CaC (ing/l)	< 13
Mercury (mg/l)	< 0.0002
Anions	
Bromide (mg/l)	< 0.5
Chloride (mg/l)	< 2
Nitrogen, Nitrate (As N) (mg/l)	< 0.2
Nitrogen, Nitrite (As N) (mg/l)	< 0.2
Sulfate (mg/l)	<2
Fluoride (mg/l)	< 0.4
General Analyses	
Alkalinity, Bicarbonate (As CaCO3) (mg/l)	<.2
Alkalinity, Carbonate (As CaGO3) (mg/l)	<2
Alkalinity, Hydroxide (As CaCO3) (mg/l)	< 2
Alkalinity, Total (As CaCO3) (mg/l)	< 6
Cyanide, Total (mg/l)	<.0.02
Specific Conductivity (µS/cm)	6.7
Chromium VI (mg/l)	< 0.01
pH (SU)	6:74
Silica (Silicon dioxide-SiO2) (mg/l)	< 0.2139.
Total Dissolved Solids (mg/l)	< 10
Suspended Solids (Residue, Non-Filt (mg/l)	< 10
Turbidity (NTU)	0.27
Ashestos (MFL)	< 0.2
in The acceptance of the	
Radiochemical Activity	1.0+/-0.5
Gross Alpha (pCi4.)	1,017-0.2

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Request: 2005121518

Sample:	1
Gross Beta (pCi/L)	<2.9
Radium 226 (pCi/L)	<0.2
Radium 228 (pCi/L)	< 0.4
Total Radium (pC/L)	<0.4
504.1 Analysis	
1(2-Dibromo-3-chloropropane (DBCP) (mg/l)	< 0.0000
1,2-Dibromoethane (EDB) (mg/l)	< 0.0000
505 Analysis	
Chlordane (mg/l)	< 0.0002
Aroclor, 1016 (mg/l)	< 0.0000
Aroclor 1221 (mg/l)	~ 0.02
Aroelor 1232 (mg/l)	< 0.0005
Aruclor 1242 (mg/l)	< 0.0003
Aroclar 1248 (mg/l)	< 0.0001
Aroclor 1254 (mg/l)	< 0.0001
Aroclor 1260 (mg/l)	< 0.0002
Toxaphene (mg/l)	< 0.001
515.1 Analysis	
2.4-D (mg/l)	< 0.0001
2,4,5-TP (Silvex) (ing/l)	< 0.0002
Pentachlorophenol (mg/l)	< 0.0000
Dalapon (mg/l)	< 0.001
Dinosch (mg/l)	₹0.0002
Picloram (mg/l)	< 0.0001
Dicamba (mg/l).	< 0.0001
524.2 Analysis	
1.1.1.2-Tetrachloroethane (mg/l)	< 0.0005
1,1,1-Trichloroethane (mg/l)	< 0.0005
1,1,2,2-Tetrachloroethane (mg/l)	< 0.0005
1,1,2-Trichloroethane (mg/l)	< 0.0005
1,1-Dichloroethane (mg/l)	< 0.0005
1.1-Dichloroethene (mg/l)	< 0.0005
1,1-Dichloropropene (mg/l)	< 0.0005
1,2,3-Trichlorobenzene (mg/l)	< 0.0005
1.2.3-Trichloropropane (mg/l)	< 0.002
1.2,4-Trichlorobenzene (mg/l)	< 0.0005
1,2;4-Trimethylbenzene (mg/l)	< 0.0005
1,2-Dibromo-3-chloropropane (mg/l)	< 0.002
12-Dibromoethane (mg/l)	< 0.0005
1,2-Dichlorobenzene (mg/l)	< 0.0005
1,2-Dichloroethane (mg/l)	< 0.0005
1,2-Dichloropropane (mg/l)	< 0.0005
1,3,5-Trimethylbenzene (mg/l)	< 0.0005
1.3-Dichlorobenzene (mg/l)	< 0.0005
1,3-Dichloropropane (mg/l)	< 0.0005
1,4-Dichlorobenzene (ing/l)	< 0.0005
2,2-Dichloropropane (mg/l)	< 0.0005

Sample:	1
2-Chlorotoluene (mg/l)	< 0.0005
4-Chlorotoluene (mg/l)	< 0.0005
4-Isopropyltoluene (mg/l)	< 0.0005
Benzene (mg/l)	< 0.0005
Bromobenzene (mg/l)	< 0.0005
Bromochloromethane (mg/l)	< 0.0005
Bromodichloromethane (mg/l)	< 0.0005
Bromoform (mg/l)	< 0.0005
Bromomethane (mg/l)	< 0.0005
Carbon tetrachloride (mg/l)	< 0.0005
Chlorobenzene (mg/l)	< 0.0005
Chloroethane (mg/l)	< 0.0005
Chloroform (mg/l)	< 0.0005
Chloromethane (mg/l)	:<0.0005
cis-1,2-Dichloroethene (mg/l)	< 0.0005
cis-1,3-Dichloropropene (mg/l)	< 0.0005
Dibromochloromethane (mg/l)	< 0.0005
Dibromomethane (mg/l)	< 0.0005
Dichlorodifluoromethane (mg/l)	< 0.0005
Ethylbenzene (mg/l)	< 0.0005
Hexachlorobutadiene (mg/l)	< 0.0005
Isopropylbenzene (mg/l)	< 0.0005
m,p-Xylene (mg/l)	< 0.0005
Methylene chloride (mg/l)	< 0.0005
Naphthalene (mg/l):	< 0.0005
n-Butylbenzene (mg/l)	≤ 0.0005
n-Propythenzene (mg/l)	< 0.0005
o-Xylene (mg/l)	< 0.0005)
sec-Butylbenzene (mg/l)	<.0.0005
Styrene (mg/l)	< 0.0005
tert-Butylbenzene (mg/l)	< 0.0005
Tetrachloroethene (mg/l)	< 0.0005
Toluene (mg/l)	₹ 0.0005
-trans-1,2-Dichloroethene (mg/l)	< 0.0005
trans-1.3-Dichloropropene (µg/l)	< 0.0005
Trichloroethene (mg/l)	< 0.0005
Trichloroffuoromethane (mg/l)	< 0.0005
Tribalomethanes, Total (mg/l)	·<.0.0005
Vinyl chloride (mg/l)	< 0.0005
Xylenes, Total (mg/l)	< 0.0005
525.2 Analysis	*.a.a
Alachlor (mg/l)	< 0.0002
Aldrin (mg/l)	< 0.0005
Atrazine (mg/l)	< 0.0001
Heptachlor (mg/l)	< 0.00004
Heptachlor epoxide (mg/l)	< 0.00002
gamma-BHC (Lindane) (mg/l)	< 0.00002
Benzo[a]pyrene (µg/l)	< 0.00002
Di(2-cthylhexyl)phthalate (mg/l)	< 0.0006
Di(2-ethylhexyl)adipate (mg/l)	< 0.0006

Request: 2005121518

Sample:	Ï.
Endrin (mg/l)	< 0.00001
Hexachlorobenzene (mg/l)	< 0.0001
Hexachlorocyclopentadiene (mg/l)	< 0.0001
Simazine (mg/l)	< 0.00007
Methoxychlor (mg/l)	< 0.0001
Propachlor (mg/l)	< 0.0005
Butachlor (mg/l)	< 0.0005
Dieldrin (mg/l)	< 0.0005
Metolachlor (mg/l)	< 0.0005
Metribuzin (mg/l)	< 0.0005
531.1 Analysis	
Aldicarb (ing/l)	< 0.0005
Aldicarh-Sulfone (mg/l)	< 0.0008
Aldicarb Sulfoxide (mg/l)	< 0.0005
Carbaryl (mg/l)	< 0.0005
Carbofuran (mg/l)	< 0.0009
3-Hydroxycarbofuran (mg/l)	< 0.0005
Methomyl (mg/l)	< 0.0005 ,
Oxamyl (ing/l)	< 0.002
547 Analysis	
Glyphosate (mg/l)	< 0.006;
548.1 Analysis	
Endothall (ing/l)	< 0.009
549.2 Analysis	
Diquat (mg/l)	< 0.0004.
1613-B Analysis	
2,3,7,8-TCDD (pg/l)	< 5.0

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CHAIN OF CUSTODY RECORD

IF SAMPLE QUANITY IS LIMITED. PLEASE ANALYZE IN ORDER GIVEN RECEIVED AT LABORATORY BY: (Signature) FAX: 915-587-3835 See Attached List RECEIVED BY: (Sygnature LABORATORY REMARKS PAL LABORATORY SERVICES
EL PASO CORPORATION
8645 RAILROAD DRIVE
EL PASO, TEXAS 79904 915-587-3729 RESULTS & INVOICES TO DA TE: × 2191 '619 '819 × 252,2, 531.1, 547 $\stackrel{\times}{\sim}$ 1.818,808 RELINGUISHED BY: (Signame) RELINGUISHED BY: (Signature) REQUESTED ANALYSIS × 204,1, 524,2 Radiochemical" × **Aspestos** General Chemistry: × SAMPLE RECIEPT REMARKS : × RECEIVED BY: (Signature) Metals" O O COMPOSITE OR GRAB MAGE CODE TO TALE NUMBER OF SAINTES 28 12-1-05 Trip Blank 118/00 SAMPLE Monument Station PROJECT NAME **三** 2 DATE MATRIX ∢ ⋖ 1400 E S TIME Testing Laboratory 2005121518 EPC Laboratory LSR NUMBER Field Sampler RELINGUISHED OF SEGMENT DATE REQUESTED TURNARGUND TIME: 7-1 LAB ID Original AIRBILL NO. Copy Copy

FM-08-0566 (05/2003).

DISCHARGE PLAN APPLICATION EL PASO NATURAL GAS CO. EUNICE "C" COMPRESSOR STATION LEA COUNTY, NM Page 23 of 27

APPENDIX C EPNG Spill and Release Control, Cleanup and Reporting

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Spill and Release Control, Cleanup and Reporting

That is a Spill or Release?

A spill is an unauthorized release of product, raw materials, chemicals or wasteroutside any secondary containment and into the environment. Spills can occur as a result of leaks, accidents or third party incidents. Spills that occur inside of secondary containment are not considered spills to the environment and are not subject to agency notification. Nonetheless, spills should still be reported to the Environmental Department and the procedures listed below should be followed.

III or Release Reporting Procedures

- Begin spill response and reporting activities upon finding a spill or release to the environment. Notify Facility Management and the Environmental Department as soon as practicable.
- Report any spill or release of the following materials regardless of location (onproperty or off-property) to the Environmental Department:
- Oil or petroleum products
- Produced water/brine
- Hazardous substances or hazardous wastes
- Chemicals
- Unblanned natural gas (flaring or venting) if required by permit or State regulation:
- Asbestos-containing materials
- Smoke or excessive opacity
- 3. Be prepaied to give the following information to the Environmental Department:
- The identity of the material released;
- Estimate of the quantity released,
- The location, time, and date the release occurred or was discovered;
- Description of how the release occurred (e.g., equipment failure);
- The extent of injuries, if any,
- Possible hazards to human health or the environment outside the facility;
- Immediate action taken in response to the release;
- Names and numbers of the persons to be contacted for further information.
 - If applicable, follow any additional spill notification procedures in your facility Spill Prevention, Control and Counteffineasures (SPCC) Plant Blowout Contingency Plan or Emergency/Operations/Procedure.
- The following releases require immediate (within thour of discovery) notification to the National Response Center (NRC):
- Any petroleum product released into streams, rivers, lakes or dry washes.

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Spill and Release Control, Cleanup and Reporting

- A release that exceeds the reportable quantity (RO) of any CERCLA hazardous substances in any 24-hour period which is not fully contained
 - A release of a hazardous substance or hazardous waste which occurs, during transportation
- A release of hazardous waste which contains a reportable quantity of a hazardous substance
- 6. The Environmental Department is responsible for making initial notifications of RO releases to applicable regulatory agencies and for handling any follow-up reporting requirements. Facility Management is responsible for verbal reports to agencies if the Environmental Department cannot be reached.
- 7. Reportable Quantity spill events will be entered into the Company's Comprehensive Incident Report Tracking System (CIRTS) and updated as needed for ongoing cleanups.

Initial Spill or Release Response

STIIdS

- Be sure that Company personnel responding to a release have the appropriate level of training and the proper Personal Protective Equipment (PPE).
- Eliminate or control the spill or release by closing valves, blowing down, or other means.
- 3. Initiate Emergency Operating Procedures (EOP) as appropriate.
- 4. Identify media (e.g., soil, water, etc.) affected by the spill and the exact location, e.g., legal description.
 - 5. Identify the material spilled or released. The MSDS may provide information about the material spilled and the proper safety precautions to use.
- 6. Alert personnel of danger and evacuate personnel and/or public from the areas where there may be an immediate danger to life or health. Emergency responders may need to be used to evacuate public areas where conditions warrant.
- 7. Barricade or isolate the spill area as needed to keep unauthorized personnel out.

Spill or Release Control and Cleanup

- 1. To prevent pollutants from entering storm water runoff, routine housekeeping should include the removal or remediation of hydrocarbon impacted soil/gravel.
- Control and clean up the spill or release using procedures outlined in your facility's Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure, if applicable. The minimum response activities include:
 - Contact the Safety Department or refer to the MSDS for help in the selection and use of PPE.
- Assemble the required response equipment including protective clothing and gear, heavy equipment (e.g., backhoe), absorbent material (e.g.,

Spill and Release Control, Cleanup and Reporting

cement, oil absorbent, pads, sand), and empty DOT-approved containers (e.g., drums).

- Contain the spill area using booms, soil berms, ditches, or similar means.
- Remove all absorbed material or liquid contained by diking and place in DOT-approved containers. Use pumps as needed.
- Use rags and cleansing agents as needed to clean spill response equipment.
- Decontaminate all reusable equipment and place decontamination wastes in containers.
- Label all containers properly.
- Transfer all containers to a temporary and secure storage area or the facility-designated waste storage area.
- Arrange with the Environmental Department for help in sampling spill wastes and their proper disposal.
- Replace used spill kit response equipment with new equipment.
- Keep a copy of any required report and all other documents associated with a spill or release including Federal, State and local forms in the facility SPCC or Spills & Releases files.

For Further Information

Refer to the following procedures in this Handbook:

- Air Permits
- Asbestos
- Emergency Operations Procedure (EOP) (outside this handbook)
- Facility Spill Prevention, Control and Countermeasures (SPCC) plan (outside this handbook)
- Labeling
- Sampling and Analysis
- Waste Characterization

Notes:

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EUNICE "C" PLANT

CONTACT LIST FOR AFFECTED LANDOWNERS

Affected Landowner	Contact Person / Phone Number	Address
New Mexico State Land Office – Hobbs District Field Office	Mr. Leon Anderson District Resource Manager Rights of Way Division.	2702-D North Grimes Hobbs, New Mexico 88240
Duke Conoco Phillips	Steve Boatenhammer Oil Center Office Supervisor- Cell No 575-390- 1997 Office No 575-394-5501	PO Box 66 Oil Center, New Mexico, 88231
Bank of America c/o Millard Deck Estate	(915) 685-2064	P.O. Box 270 Midland, Texas USA 79702
Mr. Larry Strain	432-661-6345 575-492-1220	4119 Mescalero Dr Hobbs, NM 88240-0970
Bureau of Land Management Carlsbad, New Mexico Field Office	(575) 887-6574	620 East Green Street Carlsbad, New Mexico 88220- 6292
Mr. W. T. Tivis	(575) 394-3223	P.O. Box 1614 Eunice, New Mexico 88231