UNICHEM
INTERNATIONAL

707 N. Leech, P.O. Box 1499 / Hobbs, NM 88240 / Ph. 505/393-7751, Fax 505/393-6754

OIL CONSERVATION DIVISION
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SWD-86

March 16, 1993

Mr. Bob Calhoon
Rowland Trucking Company
P.O. Box 340
Hobbs, NM 88241

Certified Mail #P 661 764 514

Dear Mr. Calhoon:

Please be advised that Unichem International elected to obtain an EPA Spill Prevention Control and Countermeasure (SPCC) plan for the Unichem/Rowland Trucking Company's Bone Springs (SPRINGS) Saltwater Disposal Permit No. SWD-86 of the New Mexico Oil Conservation Division. This plan is hereby attached for your reference.

This plan was prepared January 17, 1992 and placed on file in the Rowland Carlsbad office. This plan was prepared pursuant to the oil pollution regulations, requiring preparation of Spill Prevention, Control and Countermeasure (SPCC) Plans, were issued in late 1973 under the Federal Water Pollution Control Act (FWPCA, enacted in 1972 as P.L. 92-500). The regulations were subsequently amended under Section 311 of the Clean Water Act (CWA) (33 USCA 1251), enacted "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." (Reference to the Clean Water Act, enacted in 1977, has generally come to encompass both the FWPCA and CWA.)

The SPCC regulations, administered by the Environmental Protection Agency (EPA), establish comprehensive procedures, methods and equipment requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities, including those with AST's, into U.S. navigable waters or upon adjoining shorelines and to contain such discharges when they occur.

If your company operations warrants a need for such a plan, then we recommend your company should prepare a SPCC plan for the Bone Springs SWD-Unit.

Please note that the existing plan cannot be used due to certain reference's, services, safety aspects, maintenance items, inspections, recording, emergency spill equipment, management approval statements, and certifying engineer's statement that commits Unichem International to abide by such plan.

Therefore please note that we are **voiding** our SPCC plan for the Bone Springs SWD-86 unit and we cannot accept any future liability for the above mentioned plan.

If you have any further questions please do not hesitate to call or write. Also if you need assistance concerning SPCC plans we recommend you contact the Federal SPCC Plan Hotline at 703/934-3909, Mr. Dave Author.

Sincerely,

UNICHEM INTERNATIONAL INC.

Wayne Price
Staff Engineer

LWP:jd
cc: **Mr. Bill LeMay**
NMOCD
P.O. Box 2088
Santa Fe, NM 87501-2088

Bill Clements
Richard Brakey
Mary Hughes
Environmental File

Mr. Kenneth Davis
Carter-Burgess
505 N. Big Spring, Suite 600
Santa Fe, NM 87501-2088

NWP

UNICHEM INTERNATIONAL

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
BONE SPRINGS (SPRINGS) SALTWATER DISPOSAL
PERMIT NO. SWD-86
NEW MEXICO OIL CONSERVATION DIVISION

JANUARY 17, 1992

Prepared by:

Carter & Burgess, Inc.
Engineers♦Planners♦Surveyors
1100 Macon Street
Fort Worth, Texas 76102

C&B No. 91149201F

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

FACILITY NAME:	Bone Springs (Springs) Saltwater Disposal Permit No. SWD-86 New Mexico Oil Conservation Division
FACILITY TYPE:	Produced saltwater transfer tanks and injection well.
DATE THAT INITIAL OPERATIONS STARTED:	Facility was originally operated by Gulf Oil Company, with operations beginning on November 12, 1968. The facility was purchased from Gulf by Pioneer Water Company on December 5, 1974, which was later purchased by Rowland Trucking Company, a division of Unichem International, Inc.
FACILITY ADDRESS:	The facility is located 1,650 feet from the south line and 750 feet from the east line of Section 27, Township 20 South, Range 26 East, N.M.P.M., Eddy County, New Mexico. The Owner's address is: Unichem International, Inc. 707 N. Leech P. O. Box 1499 Hobbs, New Mexico 88240
PERSON DESIGNATED FOR ENFORCING SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN:	Name: Ed Hesserschwergt Title: Carlsbad Yard Manager
PLAN REVIEW DATE:	January 1, 1995

MANAGEMENT APPROVAL STATEMENT:

This Spill Prevention Control and Countermeasure Plan is fully supported by the management of Unichem International, Rowland Trucking Company Division. Unichem International, Rowland Trucking Company Division will implement this plan and amend it as needed due to expansions, modifications and improvements at the facility.

Richard Brakey
Vice President
Unichem International, Inc. and
Manager, Rowland Trucking Company

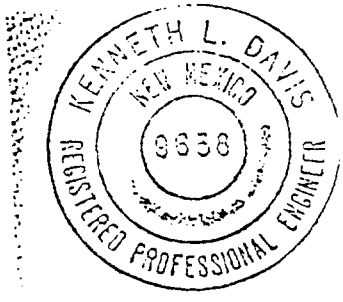
CERTIFYING ENGINEER'S STATEMENT:

This plan was prepared using sound engineering practices. I have examined the facility and this plan and find that, to the best of my knowledge and belief, the plan conforms to the guidelines and provisions of 40 CFR 112.

Date: 1/17/92

Name: Kenneth L. Davis
Company: Carter & Burgess, Inc.

Signature: Kenneth L Davis



The Bone Springs Saltwater Disposal Facility is located within 400 feet of the Pecos River just downstream from Brantley Dam. The facility is in an area that slopes generally toward the river (see Figure 1, Area Location Map). The facility consists of two (2) 1,000 barrel aboveground storage tanks, one (1) 750 barrel aboveground storage tank, all for produced water storage, and a 500 barrel aboveground storage tank for crude oil. The produced water is pumped into a disposal well via a pressure pump. Any leakage is contained within a dirt berm capable of holding 4,790 barrels of fluid, which is more than the capacity of all tanks (see Figure 2, Local Drainage Map and Facility Plan). The entire facility, including the entrance road, is approximately three acres, with approximately 1.55 acres contained within the berm. The bermed area encloses all tanks and piping. Both the 1,000 barrel tanks and the 750 barrel tank contain produced water, which is a waste that is exempted from RCRA regulation. If a material release occurs, the earth berm would easily contain the released material. The fluid and all affected soil would be recovered by company personnel and placed back into disposal or properly disposed of off-site, as applicable (see Figure 2, Local Drainage Map and Facility Plan).

In the event that the crude oil tank was to release material, the berm would again be adequate to contain the material. Again, the oil contained therein is a RCRA exempt material. In the event of release, all fluid and affected soil would be recovered by company personnel and properly disposed of off-site.

In either case, the cause of the release will be repaired and the berm restored before operations are resumed at the facility.

The containment dike is routinely inspected and any repairs necessary are made immediately. The facility is graded to prevent any release of material outside the bermed area. All storm water falling within the bermed area is captured by the berm and held for evaporation and/or infiltration. No storm water falling within the bermed area ia allowed off site.

ABOVEGROUND TANKS

There are currently four (4) aboveground storage tanks located at Springs SWD. These tanks are surrounded by a containment berm of approximately 4,790 barrels. They are:

Two (2)	-	1,000 barrel water tanks - welded steel
One (1)	-	750 barrel water tank - welded steel
One (1)	-	500 barrel oil tank - welded steel

(See Figure 2)

The unloading valve is operated solely by Rowland Trucking Company. No other company is allowed access to the facility. The unloading valve is enclosed by a drip pan which is locked when not in use. All oil collected in the system is picked up by a crude oil buyer through use of manholes which, again, are locked when not in use.

Driving and parking areas around the tanks are sufficient in size and provide any ingress, access and egress to the tank loading and unloading facilities, as well as good access for facility repair and maintenance.

- **In-Plant Product Control**

  Proper Control of liquids ensured by:

  (1) Proper sizing and matching of tanks, pumps, piping and other equipment to ensure safe level control in all tanks.

  (2) Block valves and ability to isolate any tank or combination of tanks.

(3) Employer training to ensure a good working knowledge of facility operation.

(4) Easy access for maintenance and repairs.

- Fire Safety

Fire safety is ensured by:

(1) Proper grounding of all tanks and equipment.

(2) Location of an electrical shutoff at site as well as a breaker located approximately 50 yards away, thus, allowing redundant control of the electrical system.

(3) Placement of fire extinguishers in all vehicles using the facility.

- Spill Prevention Control and Countermeasure (SPCC) considerations are:

(1) Proper gauging of tanks to prevent overfill.

(2) Use of delivery tickets to provide redundant control of amount of material stored for injection.

(3) Spill control by use of the containment berm. Any spilled fluid and affected soil will be removed by company employees for injection or proper off-site disposal.

(4) Regular, visual inspection of facilities. All piping and tanks are aboveground, with the exception of a short underground run from the compressor pump to the disposal well. All aboveground facilities are regularly and routinely inspected for leakage, corrosion, wear, etc., and are repaired immediately if problems are encountered. The underground line is under high pressure, which would make most leaks easily noticeable, and is set up to allow integrity testing on an as-needed basis. The area where this line is buried is regularly inspected for leaks, along with the rest of the aboveground facility.

(5) All piping that can properly be constructed with PVC materials are so constructed to minimize the possibility of corrosion leakage in piping.

- Worker Safety

Worker safety is ensured by:

(1) Prohibition of smoking in the facility area.

(2) Supervised orientation and training of employees who will use the facility.

(3) Regular inspection, reporting and priority repair of maintenance needs.

(4) Properly equipping employees for safety.

(5) Monthly safety meetings and briefings.

FACILITY TRANSFER OPERATIONS

All facility transfers, whether intertank or tank to wellhead, are supervised by trained personnel. As mentioned above, all piping and tanks are aboveground, with the exception of the line from compressor pump to wellhead, and are secured and isolated from traffic to the greatest possible degree. The piping may not be altered or modified unless a supervisor is present and is configured so as to allow isolation of any section in an emergency. All piping which can be practically made out of corrosion-resistant PVC materials is so constructed, and the site is kept very clean to allow easy detection of leakage.

The underground piping is limited to one run less than 50 feet long. It is capable of being isolated for integrity testing and/or repair.

FACILITY TANK TRUCK LOADING/UNLOADING

The primary operation involves unloading produced water into intake from haul trucks. The facility also has the capability of loading directly into the tanks through valves on the rear of the tanks, if needed. All valves are locked to prevent unauthorized use when not in use by company personnel.

The other regular operation at the site is removal of oil from the oil tank, which is accomplished by a crude oil buyer who unloads oil from the facility on approximately a weekly basis. Any spills which may occur will be handled as follows:

(1) Spilled fluid is picked up via vacuum truck or the crude oil buyer truck for reloading into the injection facility, or for proper off-site disposal, as required.

(2) Any affected soil will be removed for proper off-site disposal.

(3) All such spill incidents are discussed in a meeting of all involved parties and any resulting prevention methods are implemented.

(4) Also reviewed is the method of spill cleanup to ensure better efficiency, safety and environmental protection.

(5) As previously mentioned, all storage and piping facilities are within the dike containment and are, thus, prevented from discharge or private lands.

(6) Routine leakage at truck unloading is captured by a drip pan at the unloading valves. This drip pan is inspected 3 to 4 times daily to ensure that it is empty and ready for use.

- **Unloading Procedure**

(1) Driver notifies the dispatcher that he is preparing to unload at Bone Springs SWD.

(2) Driver safely parks truck, sets parking brake and exits the vehicle.

(3) Hoses are connected to the truck and unloading valve in proper order. Valves and hoses are checked for leakage and/or damage.

(4) Unloading begins, with the operator constantly checking for leakage or problems at the truck, valves, aboveground and below ground piping, the aboveground tanks, the pump and the wellhead.

(5) At the end of the unloading operation, the operator empties all hoses into the proper receptacles and checks the drip pan for its contents. If needed, the operator empties the drip pan into his truck for proper disposal.

(6) Finally, the operator locks the unloading valve and safely exists the site.

- Loading Procedure (Crude Oil)

(1) Crude oil buyer employee enters the site and notifies the dispatcher that he is preparing to load oil at Bone Springs SWD.

(2) Driver safely parks truck, sets parking brake and exits the vehicle.

(3) Hoses are connected in proper order and tanks, piping and trucks are grounded together.

(4) Oil is then skimmed off the top of the tank through manholes, with the operator constantly checking all facilities for leakage, spills, overflow, etc.

(5) After skimming is completed, the operator drains all lines properly, locks the manholes and exists the site safely.

SPILL REPORTING AND DOCUMENTATION

Any spill which involves more than a pint of liquid or a pound of solid material is reported and cleaned up as per Unichem International's policies. A copy of the spill report form and procedure is attached.

Any spill which reaches the navigable water (Pecos River) in harmful quantities (see note below) must be cleaned up immediately and reported as follows:

(1) Report to Facility Manager and Unichem's Environmental Department at (505) 393-7751.

(2) Fill out a Spill Report (see attached form).

(3) Notify the National Response Center at (800) 424-8802 or (202) 267-2675.

(4) Notify EPA Region #6 Spill Hotline at (214) 655-6595.

(5) Notify the New Mexico Environment Department, Surface Water Division, at (505) 827-2981 or emergency number for after hours calls at (505) 827-9329. In addition, a written report must be sent to the New Mexico Environment Department, Surface Water Division, within five days.

(6) Notify the New Mexico Oil Conservation Division at (505) 748-1283.

(7) A written report with the SPCC plan must be sent to EPA Region #6 Administrator within 60 days of a spill if:

(a) There is a discharge of more than 1,000 U.S. gallons of oil into or upon navigable waters of the United States, or adjoining shorelines in a single spill event; or

(b) There is a discharge of oil in harmful quantities into or upon navigable waters of the United States, or adjoining shorelines in two reportable spill events occurring within any twelve (12) month period.

NOTE: The definition of a harmful quantity as per 40 CFR 110.3 is as follows:

A harmful quantity is a discharge which:

(a) Violates applicable water quality standards; or

(b) Causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

INSPECTION AND RECORDING

Monthly inspections are performed by the Safety and Environmental Department of Unichem International, as well as a daily check by the Carlsbad yard manager or his assistant. Any deficiency is immediately recorded and corrected, as per the attached Safety/Environmental Inspection Checklist.

EMERGENCY SPILL EQUIPMENT

Unichem International and its subsidiary companies, Rowland Trucking Company and Parabo, Inc., are prepared at all times to recover any spills which might occur on its properties. The company maintains a hazardous materials response team with necessary equipment at its major facilities, as well as numerous satellite facilities with spill control equipment.

SURFACE DRAINAGE STUDY

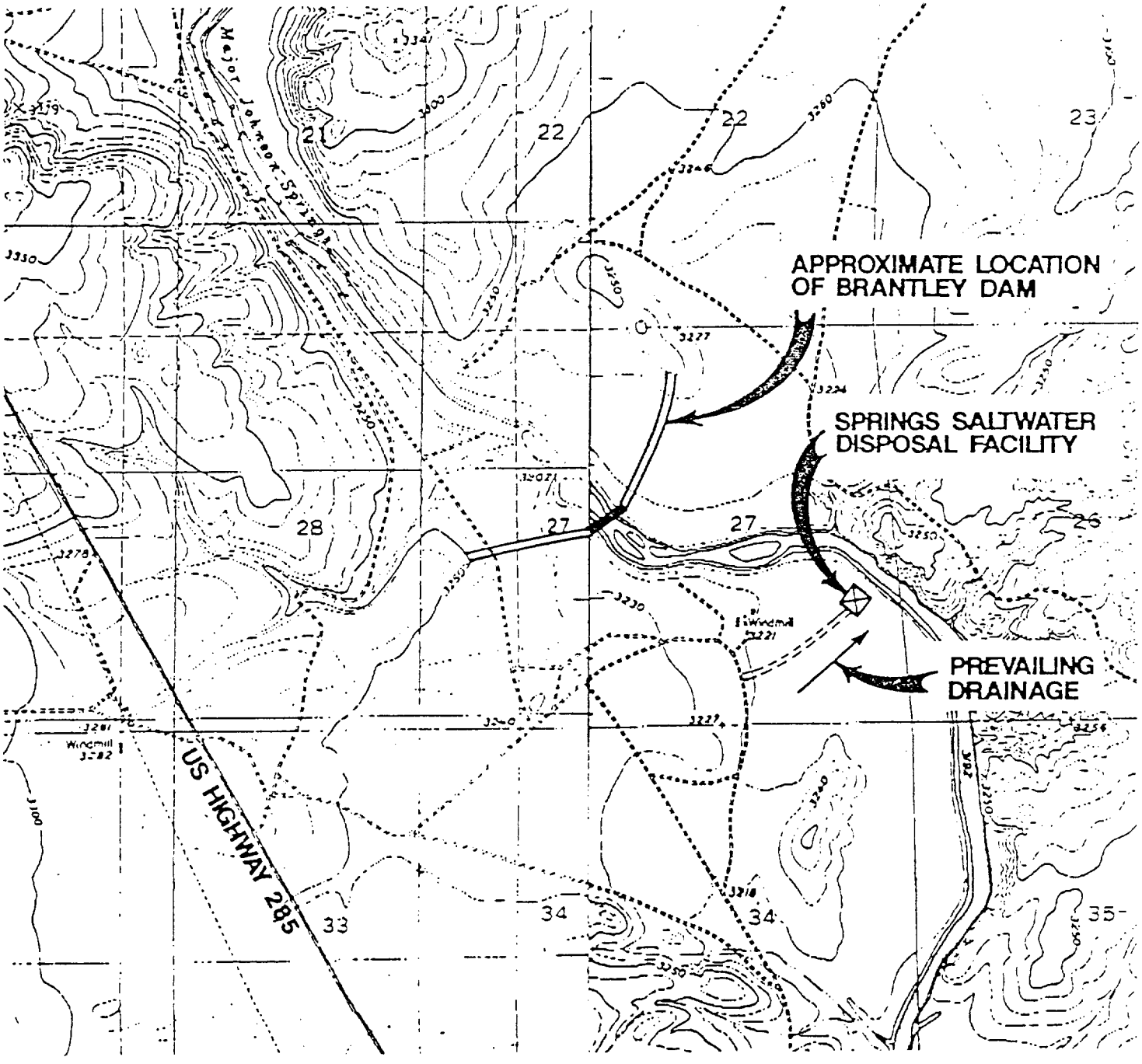


FIGURE 1-AREA LOCATION MAP

LOCATION OF THE FACILITY IS 1650' FROM THE SOUTH LINE AND 754' FROM THE EAST LINE OF SECTION 27, TOWNSHIP 20 SOUTH, RANGE 26 EAST, N.M.P.M.

NORTH

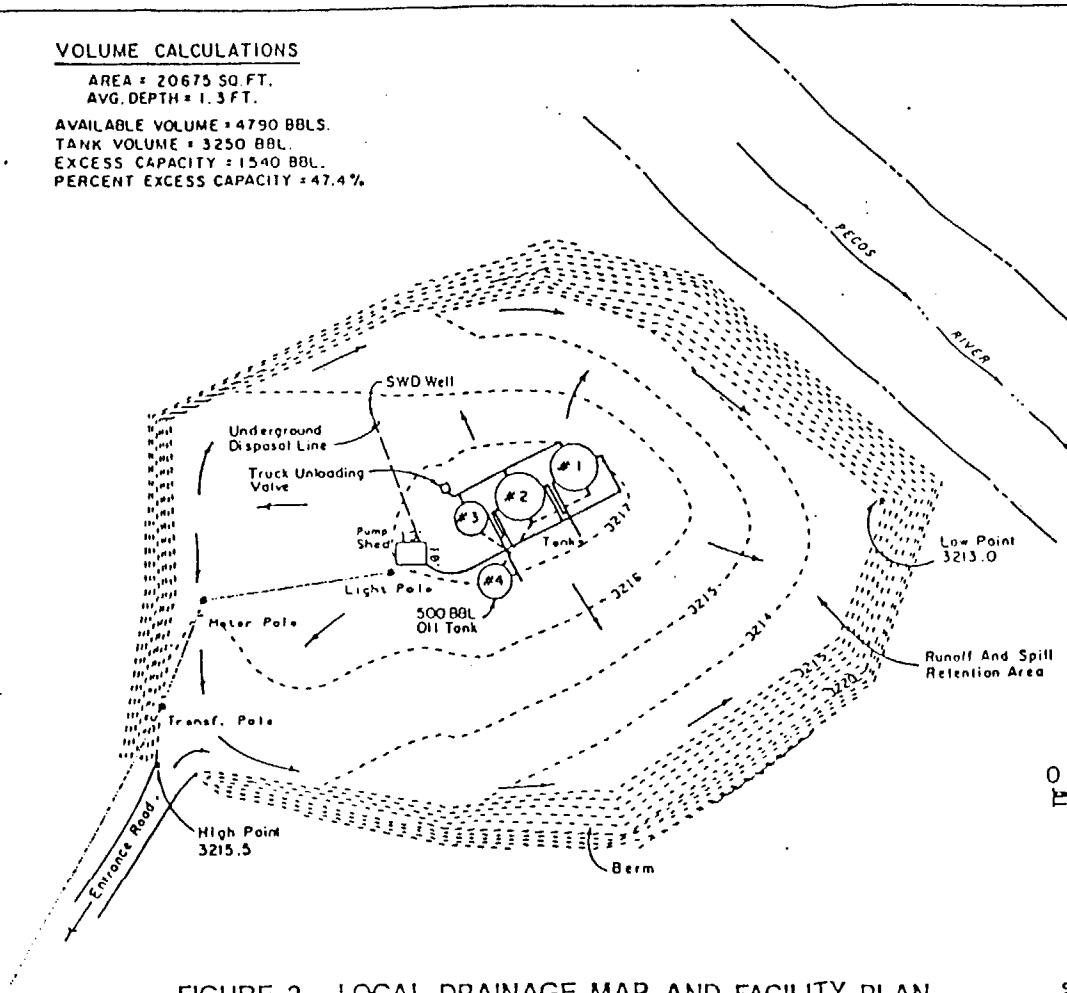
SCALE: 1" = 2000'

CARTER & BURGESS, INC.
ENGINEERS · PLANNERS · SURVEYORS
1100 MACON STREET / FORT WORTH, TEXAS 76102
(817) 335-2611 METRO 429-0178

VOLUME CALCULATIONS

AREA = 20675 SQ.FT.
AVG. DEPTH = 1.3 FT.

AVAILABLE VOLUME = 4790 BBLS.
TANK VOLUME = 3250 BBL.
EXCESS CAPACITY = 1540 BBL.
PERCENT EXCESS CAPACITY = 47.4 %



LEGEND

TANK NUMBER	TANK DESCRIPTION
1	1000 BBL SALTWATER
2	1000 BBL SALTWATER
3	750 BBL SALTWATER
4	500 BBL SKIM OIL

N
ASSUMED

0 50 100 150 200
GRAPHIC SCALE IN FEET

A

Topographic Survey
of Rowland Trucking / Unichem's
Spring Unit S.W.D. Facility, Unit 1
Section 27, T-20-S, R-26-E
N.M.P.M., Eddy Co., N.M.

FIGURE 2 - LOCAL DRAINAGE MAP AND FACILITY PLAN

+ BM = SPK Nail set in tranformer pole, Elev. = 3216.7'

DATE 01-02-91 | SHT. NO. 1
DRAWN TAB
DESIGNED -
CHECKED KLD

CARTER & BURGESS, INC.
ENGINEERS · PLANNERS

JOB NO. 911920102

REPORT FORM

Directions: Any spill of a chemical substance in a quantity greater than one pound or one pint must be reported immediately to your supervisor and the Safety Department. The term spill refers to any contact between a chemical substance and soil, pavement, concrete or water, whether inside or outside of the workplace. A spill may also involve the evaporation of a volatile chemical substance into the air which may require a report. All spills must be properly contained and disposed of. The proper personal protective equipment (goggles, rubber gloves, respirator, coveralls, rubber boots, etc.) must be worn at all times.

In the event of a spill, follow these steps:

1. Determine the nature of the chemical substance. Visually estimate the quantity spilled;

2. Prevent others from entering the area and report to your supervisor or the Safety Department;

3. Wear the appropriate personal protective equipment as determined by the MSDS, consultations with your supervisor and/or consultations with the safety department;

4. Eliminate all sources of ignition. It may be necessary to shut off nearby electrical circuits;

5. Contain the substance by appropriate methods. Check the MSDS and consult with your supervisor or the Safety Department. Measure the amount spilled;

6. Place all material and, if applicable, all soil, sand, gravel, etc. in an clean or undamaged previously used container (open top drum, five gallon pail or bucket, etc.) and seal tightly. Place all disposable cleanup items (rags, towels, absorbent pigs, coveralls, gloves, etc.) in an appropriate container and seal;

7. Mark the top and side of the containers with the identification number provided by the Safety Department. Do not move containers offsite unless the spill ocurred at a location not owned by Unichem. If necessary, move the containers to the nearest Unichem owned facility;

8. Complete the Report Form on the opposite side. Complete all blanks in the upper portion of the form. If an answer is not applicable or unknown then write "N/A" or "UNK". Be very specific and detailed in writing the descriptions. Describe the physical state as liquid, solid, vapor, or gas. Describe the container from which the spill occurred: 55 gal. steel unlined drum, '87 Chev Tank #2, XYZ Storage Tank Valve. Sign the report in the space: "Reported By:"; and

9. Turn in the report to your supervisor or Safety Department.

SPILL REPORT FORM

DIRECTIONS ON REVERSE SIDE No.: _____

Substance Trade Name: _____

Date Spill Occurred/Discovered: _____ Time: _____ Time to cleanup: _____

Location (Be Specific): _____

Location Address: _____ County: _____ St: _____

Size/Type of Container: _____ Physical State: _____

Volume or Weight of Spill: _____ Qty. Material Collected: _____

Describe all persons and events leading to the spill: _____

_____

_____

Describe methods, tools, equipment, and materials used in containment & cleanup: _____

_____

List of all persons participating in cleanup and containment: _____

_____

Reported by: _____ Reported to: _____

Date Reported: _____ Time Reported: _____

FOR OFFICE USE ONLY

Constitutients	Percent	RQ Value

Lab Tests by: _____ pH: _____ Flash Point: _____

Disposal Procedures: _____

_____

_____

_____

ADDITIONAL REPORTS

Agency Name(s): _____ Phone #: _____

_____ _____

Individuals Contacted: _____ Ext. Report#: _____

_____ _____

Reported By: _____ Date: _____ Time: _____

Comments: _____

_____

_____

_____

Dollars assigned to spill: _____

REPORT FORM 0888B USE ADDITIONAL SHEETS AS NEEDED

UNICHEM INTERNATIONAL FACILITY SAFETY/ ENVIRONMENTAL INSPECTION CHECKLIST					Sec. 9
MONTH					
LOCATION					
INSPECTOR					
PERSON ACCOMPANYING INSP.					
		DATE	DATE	DATE	DATE
ITEM	COMMENTS				
Fire extinguishers	Inspected monthly,charged and in place				
First Aid Kits	Maintain contents, & eye wash solution				
Eye Washes	Sterile, current date				
MSDS	All chemicals, accessible, including reag.				
Signs	Appropriate and legible				
Security	Locks, lights, etc.				
Bulk Tanks	No leaks, trucks using bonding cables				
a. Dikes	No standing water, intact, sump empty				
b. Hazcom labels	Appropriate, legible				
c. Valves & Plugs	Closed, no leaks				
d. Spill buckets	Carried on truck & under valves if inside				
Drums					
a. Dikes	No standing water, no leaks				
b. Empties	Horizontal, no holes, bunged, chocked				
c. Concrete	Not on dirt				
d. Labels	Hazcom, DOT, appropriate and legible				
Spill Kits	Available and full of pigs, tyvek, labels				
Salvage drum	Available, labeled				
Hazardous waste storage	Properly labeled, log sheet, location, leaks				
Monthly hazardous waste rep	Reports monthly				
Personal protective equip.	Available and being used				
Housekeeping	Neat, no trash, no chemicals,				
Eye wash and shower	Eye wash in all locations, and operable				
Trucks	Inspected daily, in good repair,				
Sewers/Drains/Sinks	No chemicals down sewer, sign on sink				
Electrical	GFCI 6' of sinks, grounded plugs, to code				
SCBA	Inspected monthly, charged and clean				
Forklifts	Condition, backup alarm				
DOT	Trucks placarded, driver files OK				
SARA records	LEPC notified of chemical stored				
Safety meetings	Held monthly, documented				
H2S Monitors	Monthly calibration, and recorded				
Containers (all sizes)	Tops on and labeled				
Field Samples	No accumulation, proper disposal				
Facility inspections	Being performed and documented				
Soil spots (Are there any?)	Loading area, yard, warehouse				
Inventory	Not over 6 mo.				
Place a checkmark in the column if the inspected item is OK.					
Place an X in the column if the inspected item is unacceptable.					
Correct it if you can. Report it to your supervisor if you cannot.					
COMMENTS (Use back if necessary)					