

GW - 26

**GENERAL
CORRESPONDENCE**

YEAR(S):

2006 - 1978



TARGA

Targa Midstream Services Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
432.688.0555
www.targaresources.com

August 28, 2006

Wayne Price
Bureau Chief
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

2006 AUG 31 PM 2 28

RE: Saunders Gas Processing Plant
Discharge Plan GW-026
Cliché Pit Closure (Lat 33° 03' 36"N, Long 103° 36' 16"W)

Dear Sir:

A per our conversation on March 16, 2006, the closure letter with photos dated March 23, 2006, and our e-mail communications Targa Midstream Services Limited Partnership has completed the pit closure as described. Gandy Construction of Tatum, NM supplied the equipment and did the work. Photos of the area are attached. All construction materials and trash was removed and the pit area was inspected for any signs of liquids, hydrocarbon, or chemical dumping. There was no indication that of any of these materials had been dumped. The soil appeared clean and undisturbed on the pit floor. As per our communication Targa used some discarded concrete footings for fill material, and then spread a layer of soil over the entire area.

Sincerely,

Cal Wrangham
Targa ES&H Specialist

Cc: Tim Jordan / Saunders Area Manager
Chris Williams / OCD District Manager

VERSADO GAS PROCESSORS, L.L.C.

OPERATED BY



TARGA MIDSTREAM SERVICES
LIMITED PARTNERSHIP

SAUNDERS PLANT

IN CASE OF EMERGENCY CALL:

(505) 396-3221















2006 MAR 29 PM 3 33

March 29, 2006

VIA HAND-DELIVERY

Mr. Arthur L. Blazer
State Forester
New Mexico State Forestry Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Targa Resources, Inc. request for Partial Exemption

Dear Mr. Blazer:

Enclosed is a Request for Partial Exemption which Holland & Hart, LLP is submitting on behalf of Targa Resources, Inc. Please feel free to contact me at (505) 988-4421 or Mr. Paul W. Chung, General Counsel for Targa at (713) 584-1000, should you have any questions or would like to discuss this request.

Thank you for your time and attention to this matter.

Sincerely,

William F. Carr
Attorney for Targa Resources, Inc.



1000 Louisiana, Suite 4700
Houston, TX 77002
713.584.1000
www.targaresources.com

March 29, 2006

Via Hand-Delivery

Arthur L. Blazer
State Forester
New Mexico State Forestry Division
Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Request for Partial Exemption - 2006-02, Smoking, Firework, Campfire and Open Fire Restrictions for Eastern, Southwestern, Central and North Central New Mexico

Dear Mr. Blazer:

On March 16, 2006, the New Mexico State Forestry Division ("Forestry Division") of the Energy, Minerals and Natural Resources Department issued its 2006-02, Smoking, Firework, Campfire and Open Fire Restrictions for Eastern, Southwestern, Central and North Central New Mexico, effective March 17, 2006 ("March 17 Rule"). The March 17 Rule prohibits, among others, the flaring of gas *except to the extent* that the following conditions are met:

1. At least one adult is on site with communications equipment adequate to reach county dispatch and the local fire department in the event of a fire. The individual should also be equipped with a shovel and a water backpack pump or other equipment to deliver water to suppress the fire.
2. The local fire and county dispatch are notified at least 24 hours in advance of anticipated releases that will result in flaring. If flaring is done by an automated system then the schedule of flaring shall be provided to the local fire department and county dispatch.
3. Unless the flaring is needed for safety purposes, flaring pursuant to this exception should not be done on days that are "red flag days" as determined by the National Weather Service or on days when the sustained wind is in excess of 25 miles per hour in the area.

The March 17 Rule also provides parties, such as Targa Resources, Inc. ("Targa"), the opportunity to seek exemption by the Forestry Division from the rule.

Our operations in New Mexico consist of natural gas gathering facilities, six natural gas compression stations and three natural gas processing facilities. All three plants and all six compressor stations have flare stacks. Like other natural gas gathering and processing companies, our processing plants are manned 24-hours per day while our compressor stations are only manned, if at all, during the day. Consequently, we are unable to supply personnel on-site with communication equipment to reach county dispatch and the local fire departments and to carry out fire suppression duties at certain of our facilities.

We have implemented condition no. 1 of the gas flaring exceptions stated in the March 17 Rule ("Condition No. 1") to the extent practicable, and we are making arrangements to procure appropriate equipment such as backpack water pumps, trucks with water pumps or other similar equipment for fire

Mr. Arthur L. Blazer
Page 2
March 29, 2006

suppression protection. Moreover, even at our facilities that are either unmanned at night or unmanned 24 hours per day, a signal is communicated to Targa's nearest manned facility in the event that the unmanned facility experiences a gas flaring event. During any period of increased wildfire activity or burn bans declared by the Forestry Division, Targa plans to dispatch personnel to any unmanned facility any time that such facility flares gas to ensure that no fire has occurred.

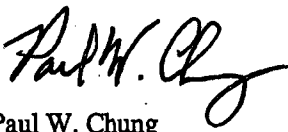

For these reasons, Targa seeks a partial exemption to Condition No. 1 to the limited extent that any Targa facility is unmanned all or some portion of each day and does not have personnel available to comply with the communications requirement and fire suppression duties stated in Condition No. 1.

As the Forestry Division indicated, a number of factors are contributing to the abnormally high potential for wildfires in New Mexico at this time, including warm temperatures, low humidity, high winds and the abundance of dry, fine fuels. We support the Forestry Division's attempts to address this situation and remain committed to safety above all else.

We appreciate your time and attention to our request. If you should have any questions, please contact me at (713) 584-1000.

Respectfully submitted,

Targa Resources, Inc.


Paul W. Chung
General Counsel 

DRAFT

SETTLEMENT AGREEMENT

WHEREAS, pursuant to NMSA 1978, Section 68-2-8, the EMNRD, Forestry Division is responsible for the prevention and suppression of forest fires on all nonfederal, non-municipal lands in the state;

WHEREAS, pursuant to NMSA 1978, Sections 68-2-14 and 68-2-16, the EMNRD, Forestry Division is authorized to adopt and enforce rules for the prevention and suppression of forest or brush fires;

WHEREAS, EMNRD, Forestry Division rules, 19.20.3.8 NMAC, provide that the State Forester may order restrictions, that place limitations on the use of fire;

WHEREAS, the State Forester ordered restrictions, 2006-01, on _____, which prohibited open burning;

WHEREAS, a grass fire started on Sunday, March 12, 2006 at Targa's Saunders gas plant along N.M. 457 between Lovington and Tatum and burned approximately 92,390 acres;

WHEREAS, the EMNRD Forestry Division has incurred costs of approximately \$_____ in suppressing the fire;

WHEREAS, pursuant to NMSA 1978, Section 68-2-17 violation of a rule adopted pursuant to the Forest Conservation Act, NMSA 1978, Sections 68-2-1 *et seq.* is a misdemeanor;

WHEREAS, pursuant to NMSA 1978, Section 30-2-1, the EMNRD, Forestry Division may recover the costs of controlling and extinguishing fires;

WHEREAS, pursuant to NMSA 1978, Section 70-2-12, the EMNRD, Oil Conservation Division has the authority to prevent fires in connection with oil and gas production;

WHEREAS, pursuant to 19.15.3.116 NMAC, oil and gas operators are required to notify the Oil Conservation Division of any unauthorized release occurring during the storing or processing of crude oil or natural gas;

WHEREAS, on February 21, 2006, a grass fire occurred at Targa's Saunders gas plant near the plant's north flare, which Targa failed to report to the Oil Conservation Division;

WHEREAS, on March 5, 2006, a release of condensate from one of the flares at Targa's Vada gas compressor station caused a grass fire of about five to ten acres, which Targa failed to report to the Oil Conservation Division; and

WHEREAS, on the morning of March 12, 2006 a grass fire occurred at Targa's Saunders gas plant near the plant's north flare burning a small area in the northeast part of the plant, and Targa failed to report this fire to the Oil Conservation Division;

THEREFORE, this Agreement is made this ____ day of March 2006, between Targa and the New Mexico Energy, Minerals and Natural Resources Department (EMNRD). In consideration of the mutual promises contained herein, the parties agree as follows:

1. Targa will pay EMNRD \$_____ for the costs EMNRD expended or will reimburse other fire fighting agencies for efforts to suppress the 92,390 acre grass fire and for Targa's failure to report the fires at the Saunders gas plant and Vada compressor station. Payment shall be made at the executing of this agreement.
2. EMNRD, Forestry Division releases and forever discharges Targa and its officers, employees and agents from any and all claims for cost recovery or criminal citations that EMNRD could bring against Targa for the fire.
3. EMNRD, Oil Conservation Division will not issue notices of violation for Targa's failure to report the fires at its Saunders gas plant and Vada compressor station.

4. This Settlement Agreement is entered into by the parties to resolve a dispute between the parties and is not intended to be construed as an admission of liability or fault by Targa.

5. The undersigned warrant and represent that they have the authority to make and enter into this Settlement Agreement on EMNRD and Targa's behalf.

IN WITNESS WHEREOF we have here onto set our hands this _____ day of March 2006.

Arthur Blazer, Director
Forestry Division
New Mexico Energy, Minerals and
Natural Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505

Mark Fesmire, Director
Oil Conservation Division
New Mexico Energy, Minerals and
Natural Resources Department

Sandra Haug, Director
Administrative Services Division
New Mexico Energy, Minerals and
Natural Resources Department

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Thursday, March 23, 2006 3:43 PM
To: Bada, Cheryl, EMNRD
Cc: Fesmire, Mark, EMNRD; Sanchez, Daniel J., EMNRD
Subject: Targa

On or about February 01, 2005 (Dynergy Midstream Services) now Targa had a main sump fire at the Saunders Gas Plant located in section 34-Ts14s-R33e. This sump is located under the north plant flare.

On February 21, 2006 at Targa's Saunders Gas Plant located in section 34-Ts14s-R33e had a grass fire in close proximity to the plants north flare which burned approximately 30'x150'.

On or about March 05, 2006 Targa Midstream Services who is the owner/operator of the Vada Compressor Station located in section 23-Ts-10S-R33e had a release of condensate(raw natural gasoline) out of one of the plant flares causing a grass fire of approximately 5-10 acres.

On the morning of March 12, 2006 at Targa's Saunders Gas Plant located in section 34-Ts14s-R33e had a grass fire in close proximity to the plants north flare which burned a small area in the northeast part of the plant. Subsequently approximately 2-3 hours later the fire started again outside of the plant fence but still on plant property and burned over 90,000 acres and was named the McDonald fire.

OCD/NMSF investigated this incident on March 16, 2006.

OCD's investigation revealed that Targa failed to report these fires pursuant to OCD rule 116. Other discharge plan issues are still pending.

Pursuant to 19 NMAC 15.C.116.B (Reporting Requirements) Major Release (1)(b)(i) results in fire, and (iii) results in substantial damage in property or the environment must be reported immediate verbal notice and timely written notice.

OCD feels compelled to issue a fine of \$5000 for these violations. If Targa would have reported these fires OCD would have investigated and found deficiencies in Targa's operation which may have prevent the McDonald fire.

Known responses from the Lovington Fire Department

- September 1996 – Cooling Tower Fire
- January 17, 2002 - #6 Cooper Bessemer GMVA-10 Fire
- February 1, 2005 – Main Sump Fire
- July 3, 2005 – Lea County Electric fire – power line south of plant – company property
- ~~February 21, 2006~~ – grass fire – 30' X 150' – company property
- March 5, 2006 – grass fire from Vada flare – 10 acres
- March 12, 2006 – grass fire

Wayne Price
Oil Conservation Div.
1220 S. Saint Francis
Santa Fe New Mexico 87505

phone: 505-476-3487

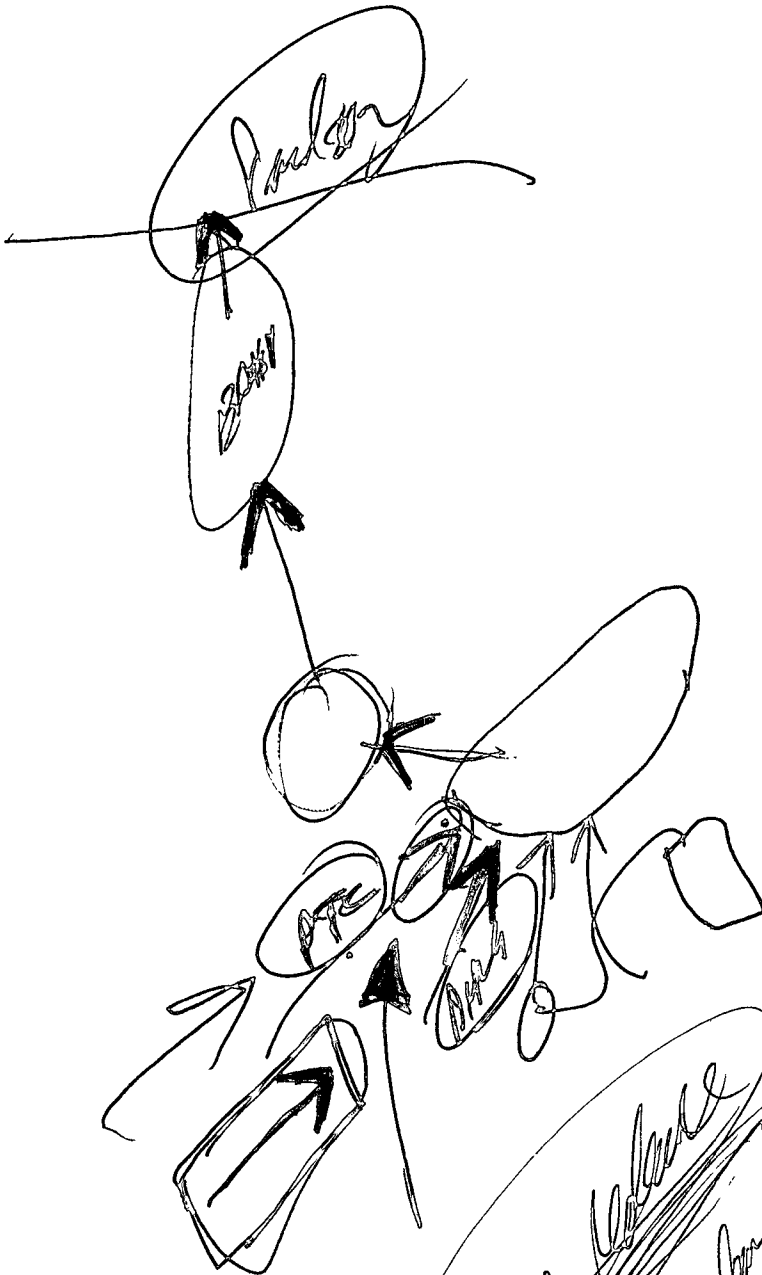
3/27/2006

fax: 505-476-3462

TIA JAPPA

808-396-3221

#231



7/12 (21)
Jm

303-820-5621

Jessie doval

Mike Hatten
3000 80
(671)

~~These contacts
concerning for me~~

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate
District Office in accordance
with Rule 116 on back
side of form

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: Targa Midstream Services L P	Contact: Tim Jordan
Address: PO Box 1689 Lovington, NM 88260	Telephone No. (505) 396-3221
Facility Name: Vada Compressor Station	Facility Type: Compressor Station

Surface Owner: Versado Gas Processors, L. L. C.	Mineral Owner:	Lease No.
----------------------------------------------------	----------------	-----------

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	23	10S	33E					Lea

Latitude 32°47'3.48"N Longitude 103°30'36.3"W

NATURE OF RELEASE

Type of Release: Report of Grass Fire	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: N/A	Date and Hour of Occurrence: 3/5/06 AM	Date and Hour of Discovery: 3/6/06 12:00 PM
Was Immediate Notice Given? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

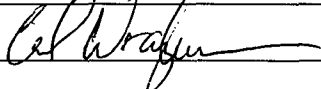
Describe Cause of Problem and Remedial Action Taken. *

The field flare on the inlet side of the compressor station was flaring gas. The field technician observed liquids being expelled from the field flare and noticed grass burning directly east of compressor station. He notified the downstream plant operator and then the Lea County Sheriffs Department of the grass fire who, in turn, notified the Tatum Fire Department. The Tatum Fire Department arrived and extinguished grass fire.

Describe Area Affected and Cleanup Action Taken.*

Approximately 5-10 acres of pastureland were burned. Landowner was notified.

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

Signature: 	<u>OIL CONSERVATION DIVISION</u>		
Printed Name: Cal Wrangham	Approved by District Supervisor:		
Title: ES&H Specialist	Approval Date:	Expiration Date:	
E-mail Address: cwrangham@targaresources.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 3/20/06	Phone: (432) 688-0542		

* Attach Additional Sheets If Necessary

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1625 N. French Dr., Hobbs, NM 88240
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1301 W. Grand Avenue, Artesia, NM 88210
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Energy Minerals and Natural Resources

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Release Notification and Corrective Action

OPERATOR

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Address: PO Box 1689 Lovington, NM 88260	Telephone No. (505) 396-3221
Facility Name: Vada Compressor Station	Facility Type: Compressor Station

Surface Owner: Versado Gas Processors, L. L. C.	Mineral Owner:	Lease No.
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If a Watercourse was Impacted, Describe Fully.*

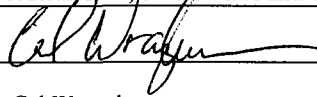
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Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Cal Wrangham	Approved by District Supervisor:		
Title: ES&H Specialist	Approval Date:	Expiration Date:	
E-mail Address: cwrangham@targaresources.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 3/20/06	Phone: (432) 688-0542		

* Attach Additional Sheets If Necessary



TARGA

Targa Midstream Services Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
432.688.0555
www.targaresources.com

March 23, 2006

Wayne Price
Bureau Chief
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

RE: Saunders Gas Processing Plant
Discharge Plan GW-026
Cliché Pit Closure (Lat 33° 03' 36"N, Long 103° 36' 16"W)

2006 MAR 27 PM 12 34

Dear Sir:

A per our conversation on March 16, 2006 Targa Midstream Services L P would like to close the cliché pit located directly NW of the Saunders Plant site. Photos of the area are attached. As you can see in the photos and your knowledge from your recent inspection there are some concrete pieces, construction materials, and household trash items in the pit.

Recently, the facility has been gathering thistles and brush from the plant fences to reduce the fire hazard and temporarily putting this material in the pit. Other than the thistles and brush the current facility management has no knowledge of any plant wastes being disposed of in this pit or low laying area.

Targa proposes to enter the pit with a tractor to move the material around and level it. While doing this we will inspect and assure there are no hazardous or non-hazardous chemicals or plant materials in the area. Upon that inspection Targa will restore the area to the original grade based on the surrounding area.

Upon your approval Targa will notify your office and the District Office of the date the work will begin.

Sincerely,

Cal Wrangham
Targa ES&H Specialist

Cc: Tim Jordan / Saunders Area Manager
Chris Williams / OCD District Manager









TARGA

Targa Midstream Services Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 432.688.0555

facsimile

DATE 3-20-06

TO

NAME: <i>Wayne Price</i> <i>Chris Williams</i>	COMPANY/DEPT: <i>OCD</i>	FAX NO: <i>476-3462</i> <i>393-0720</i>
---------------------------------------------------	--------------------------	--------------------------------------------

FROM

NAME: <i>Cal Wrangham</i>	COMPANY/DEPT: PERMIAN BASIN REGION MIDLAND, TEXAS	PHONE NUMBER 432/688-0542 FAX NO: 432/688-0552
---------------------------	--------------------------------------------------------------------	-----------------------------------------------------------------

NUMBER OF PAGES (INCLUDING COVER) 2

MESSAGE

C-141 for incident at Vada on 3-5-06
Original copy mailed today -

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original message to us at the address above via the United States Postal Service. Please contact the above person if the fax is not legible.

District I
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State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
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Revised October 10, 2003

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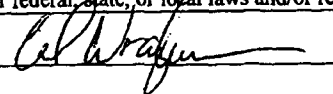
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Signature: 	OIL CONSERVATION DIVISION		
Printed Name: Cal Wrangham	Approved by District Supervisor:		
Title: ES&H Specialist	Approval Date:	Expiration Date:	
E-mail Address: cwrangham@targaresources.com	Conditions of Approval:		Attached <input type="checkbox"/>
Date: 3/20/06	Phone: (432) 688-0542		

* Attach Additional Sheets If Necessary

TRANSACTION REPORT

P. 01

MAR-20-2006 MON 04:08 PM

FOR:

RECEIVE

DATE	START	SENDER	RX TIME	PAGES	TYPE	NOTE	M#	DP
MAR-20	04:07 PM	432 688 0552	1' 07"	2	RECEIVE	OK		



**Targa Midstream Services
Limited Partnership**

6 Desta Dr., Suite 3300
Midland, Texas 79705
432-688-0555
www.targaresources.com

December 20, 2005
Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RECEIVED
DEC 23 2005
OIL CONSERVATION
DIVISION

RE: GW-026
Saunders Plant
Discharge Plan Renewal

Dear Sir:

This letter is to notify the agency as per Condition 8 and 9 of the Renewal Conditions for the Saunders Plant, dated September 29, 2005. The drain system integrity tests will begin on December 27, 2005. The sumps will be drained, cleaned, and visually inspected for cracks and the drain lines to the sumps will be pressure tested to 3-5 psi with an air/water mixture for a 15 minute period to ensure integrity.

Please call with any questions or concerns. (432) 688-0542.

Sincerely,

Cal Wrangham
Targa Midstream Services
Environmental, Safety, and Health

Cc: Chris Williams/ OCD Hobbs
Wayne Price/ OCD Santa Fe
Tim Jordan/ Saunders Area Manager

THE SANTA FE
NEW MEXICAN
Founded 1849

RECEIVED
JUL 19 2005
OIL CONSERVATION
DIVISION

NM OIL CONSERVATION DIV

Attn: Wayne Price

1220 ST. FRANCIS DR

SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689

AD NUMBER: 00128346 ACCOUNT: 00002212

LEGAL NO: 77405 P.O. #: 06-199-050125

337 LINES 1 TIME(S) 148.28

AFFIDAVIT: 5.50

TAX: 11.63

TOTAL: 165.41

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B. Perner, 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 # 77405 a copy of which is hereto attached was published in said newspaper 1 day(s) between 07/15/2005 and 07/15/2005 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 15th day of July, 2005 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ B Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 15th day of July, 2005

Notary Laura E. Harding

Commission Expires: 11/23/07

Amended 7/29/05
w/ni ocd

**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, the following discharge permit application(s) has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**NOTICE OF
PUBLICATION**

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-26) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705,

has submitted a renewal application for the previously approved discharge plan for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil

Conservation Division at the address given above. The discharge permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's web site <http://www.emnrd.state.nm.us/ocd/>. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. 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 there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of July 2005.

**STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION**

SEAL

Mark Fesmire,
Director

Legal #77405
Pub. July 15, 2005

NOTICE OF PUBLICATION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of July 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
Phone 432-688-0555
Fax 432-688-0552
www.dynegy.com



June 13, 2005

Wayne Price
Environmental Engineer
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

**Discharge Plan GW-026 Renewal
Saunders Gas Processing Plant**

Dear Sir:

Dynegy Midstream Services, L. P. would like to renew the Saunders Plant Discharge Plan as required by WQCC Sec. 3106.

Please find the attached the renewal form and a check in the amount of \$100.00, which constitutes the filing fee for the Discharge Plan renewal.

Please call me with any questions, Office (432) 688-0542 Cell (432) 425-7072.

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: Mr. Chris Williams, Hobbs District 1 Office

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Saunders Gas Processing Plant
2. Operator: Dynegy Midstream Services, L. P.
Address: PO Box 1689 Lovington, NM (11 miles W on Hwy 82 and 11 miles N on Hwy 457 from Lovington)
Contact Person: Cal Wrangham Phone: (432) 688-0542
3. Location: SW /4 /4 Section 34 Township 14 South Range 33 East
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site. **See on file at OCD**
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
See on file at OCD
6. Attach a description of all materials stored or used at the facility. **See on file at OCD**
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included. **See on file at OCD**
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **See on file at OCD**
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **See on file at OCD**
10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See on file at OCD**
11. Attach a contingency plan for reporting and clean-up of spills or releases. **See on file at OCD**
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
See on file at OCD
12. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See on file at OCD**

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

Name: Cal Wrangham

Title: ES&H Specialist

Signature: 

Date: June 13, 2005

E-mail Address: cwwr@dynegy.com

Mr. Holt
John Bunch
off the list
page 44

350-7368 ee
Done
Mend

505-268-2661
Koppe

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of July 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555 • Fax 915.688.0552

OIL CONSERVATION DIV.
01 MAY 31 PM 2:24

May 29, 2001

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505



RE: GW-026
Saunders Gas Plant
Discharge Plan Renewal Conditions

Dear Sir:

Dynegy Midstream Services, Limited Partnership has completed the underground lines pressure testing to demonstrate pipe integrity as in renewal condition 9 and sump inspections were done visually as condition 8 states. All documentation including line diagrams and pressure tests is filed at the Saunders Plant Office.

All other conditions were met as described in our correspondence to you on December 27, 2000. Dynegy believes the conditions have been met and this memo should conclude the renewal process.

Please write or call with any questions or concerns. (915) 688-0542.

Sincerely,

Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs District
Saunders Plant Discharge Plan Manual
Clark White/Dynegy
Tim Jordan/Dynegy

Price, Wayne

From: Price, Wayne
Sent: Wednesday, February 07, 2001 3:06 PM
To: 'Cal.Wrangham@dynegy.com'
Subject: RE: Dynegy Discharge Plans

Approved!

From: Cal.Wrangham@dynegy.com[SMTP:Cal.Wrangham@dynegy.com]
Sent: Wednesday, February 07, 2001 2:48 PM
To: WPrice@state.nm.us
Subject: Dynegy Discharge Plans

Because of the resent pending policy changes on used filter disposal Dynegy requests to revise NMOCD Discharge Plans. This includes permit # GW-003, 004, 005, 025, 026, 027, and 029. The Discharge Plans Waste Management Sections list the used filters to be transported and disposed of by Waste Management Inc. at the Lea County landfill. Dynegy would like to utilize E&E Environmental, PO Box 683, Brownfield TX. 79731. E&E will transport the filters to their Childress, Texas facility for processing/recycling. The filters are a non-hazardous waste stream.

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555 • Fax 915.688.0552
www.dynegy.com



January 17, 2001

Mr. Wayne Price
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

DYNEGY

RE: GW-026 and GW-027
Saunders and Vada Gas Plants
Discharge Plan Renewal Conditions

Dear Sir:

The Saunders and Vada facilities will begin underground piping mechanical integrity testing January 22, 2001. This memo is to inform your office of this as required by condition 9 in the Discharge Plan renewal conditions.

Please call with any questions or concerns. (915) 688-0542.

Sincerely,

Cal Wrangham
ES&H Advisor

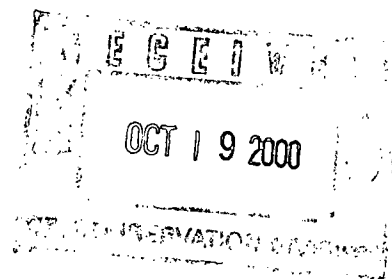
Cc: Chris Williams/ OCD Hobbs
Saunders Discharge Plan Manual
Tim Jordan/Dynegy

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555
Fax 915.688.0552
www.dynegy.com

October 16, 2000

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RE: GW-026
Saunders Plant
Discharge Plan Renewal




DYNEGY

Dear Sir:

Please find attached a check (\$1667.50) for the discharge plan renewal flat fee and the signed approval conditions. I would like to thank you and your staff for the professional and courteous manner in which you have guided us through this process.

Please call with any questions or concerns. (915) 688-0542.

Sincerely,



Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs

Feb. 2000
↓
Current

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
 COUNTY OF LEA)

Joyce Clements being first duly sworn on oath deposes and says that she is Advertising Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterrupted for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Notice of Publication 74-25, 74-26, & 74-27

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement there-

of, for One (1) Day, beginning with the issue of

March 28, 2000 and ending with the issue

of March 28, 2000.

And that the cost of publishing said notice is the sum of

\$ 83.60 which sum has been (Paid) as

Court Costs.

Joyce Clements

Subscribed and sworn to before me this

March 28, 2000.

Debbie Schilling

Debbie Schilling

Notary Public, Lea County, New Mexico

My Commission Expires June 22, 2002

Midland, Texas 79705. If no public hearing is held, the Director will approve the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this Twenty-third (23rd) day of March, 2000.

STATE OF NEW MEXICO
 OIL CONSERVATION DIVISION
 LORI WROTEMBERG, Director
 Published in the Lovington Daily Leader March 28, 2000.

LEGAL NOTICE
 NOTICE OF PUBLICATION
 STATE OF NEW MEXICO
 OIL CONSERVATION DIVISION
 Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Phoenix, Santa Fe, New Mexico 87505-7400 (505) 827-7103.

(GW-25) Dynegy Midstream Services, LP, Cal Wingham, 6 Deata Drive, Suite 3300, Midland, Texas 79705. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m. Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. 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 there is significant public interest.

(GW-26) Dynegy Midstream Services, LP, Cal Wingham, 6 Deata Drive, Suite 3300,

The Santa Fe New Mexican

Since 1849. We Read You.

MAR 30 2000

NM OIL CONSERVATION DIVISION
ATTN: DONNA DOMINGUEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

OIL CONSERVATION DIVISION

AD NUMBER: 139925 ACCOUNT: 56689
LEGAL NO: 67118 P.O.#: 00199000278
280 LINES 1 time(s) at \$ 123.43
AFFIDAVITS: 5.25
TAX: 8.04
TOTAL: 136.72

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B. Perner 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 #67118 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/29/2000 and 03/29/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 29 day of March, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/

Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
28 day of March A.D., 2000.

Notary

Candace R. Duntorf

Commission Expires

11/16/2003

Walter P. ...
APPROVED

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, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131.

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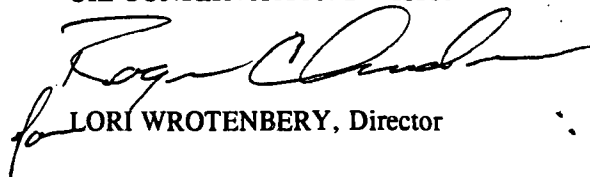
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this Twenty-third (23rd) day of March, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


LORI WROTENBERY, Director

SEAL

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555
Fax 915.688.0552
www.dynegy.com



February 7, 2000

Wayne Price
Environmental Engineer
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

**Discharge Plan GW-026 Renewal
Saunders Gas Processing Plant**

Gentlemen:

Dynegy Midstream Services, L. P. would like to renew the Saunders Plant Discharge Plan as required by WQCC Sec. 3106.

Please find the attached:

- 1) The renewal form and a check in the amount of \$50.00, which constitutes our filing fee for the Discharge Plan renewal.
- 2) The updated Saunders Plant Waste Management Plan which replaces the WMP in the current approved Discharge Plan, Section XIII.
- 3) The updated Spill Prevention Control and Countermeasure Plan which replaces the SPCC Plan in the current approved Discharge Plan, Section XII.

Please call me with any questions, Office (915) 688-0542 Cellular (915) 425-7072.

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

RECEIVED
FEB 22 2000
Environmental Bureau
Oil Conservation Division

Cc: w/o attachments OCD Hobbs District Office

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

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

RECEIVED

☐ New ☒ Renewal ☐ Modification

FFR 22 2000
Environmental Bureau
Oil Conservation Division

1. Type: Saunders Gas Processing Plant
2. Operator: Dynegy Midstream Services, L. P.
Address: PO Box 1689 Lovington, NM (11 miles W on Hwy 82 and 11 miles N on Hwy 457 from Lovington)
Contact Person: Cal Wrangham Phone: (915) 688-0542
3. Location: SW /4 /4 Section 34 Township 14 South Range 33 East
Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site. **See on file at OCD**
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
See on file at OCD
6. Attach a description of all materials stored or used at the facility. **See on file at OCD**
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. **See attached updated Waste Management Plan (this replaces Section IX in current plan)**
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
See attached updated Waste Management Plan (this replaces Section IX in current plan)
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
See attached updated Waste Management Plan (this replaces Section IX in current plan)
10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See on file at OCD**
11. Attach a contingency plan for reporting and clean-up of spills or releases. **See attached updated SPCC Plan (this Replaces Section VIII in current Plan.**
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
See on file at OCD
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See on file at OCD**
14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Cal Wrangham

Title: Permian Basin Region ES&H Advisor

Signature: Cal Wrangham

Date: 2/3/2000

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

Name: Cal Wrangham

Title: Permian Basin Region ES&H Advisor

Signature: Cal Wrangham

Date: 2/3/2000

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PART 1 GENERAL INFORMATION

1. Name of facility: **Versado Gas Processors – New Mexico and Texas Facilities**
2. Type of facility: **Onshore facilities –Natural Gas Processing Plants and associated compressor stations**
3. Location of facility: **See attached Data Sheets**
4. Name and address of owner or operator:

Dynegy Midstream Services, Limited Partnership (operator)

**1000 Louisiana Street
Suite 5800
Houston, Texas 77002**

5. Designated person accountable for oil spill prevention for Dynegy Midstream Services, Limited Partnership:

**Area Managers Mike Hicks – South Versado (Eunice, Monument Area)
Tim Jordan- North Versado (Saunders Area)**

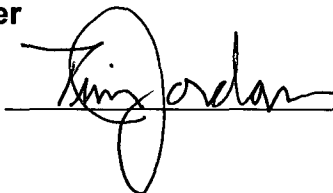
6. Facility experienced a reportable oil spill event during the twelve months prior to January 10, 1974 (effective date of 40 CFR, Part 112). (If YES, complete Attachment #1.): **No**

MANAGEMENT APPROVAL AND COMMITMENT OF MANPOWER

This SPCC Plan will be implemented as herein described. I hereby commit the necessary manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

Area Manager

Signature: _____



Versado gas Processors – New Mexico Facilities

SPCC Plan - Generic Information

Dynegy Midstream Services Limited Partnership

D:\VERSADO - NEW MEXICO FACILITIES SPCC PLAN SECTION 1 GENERAL INFORMATION.DOC

SPCC CERTIFICATION

I hereby certify that I have examined the facilities identified below and on the attached Data Sheets, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.



Russell S. Dykes, P.E.

Printed Name of Registered Professional

A handwritten signature in cursive script that reads "Russell S. Dykes".

Signature of Registered Professional Engineer

Date: October 18, 1999

Registration No.: 55886

State: TX

APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signatures

Versado gas Processors – New Mexico Facilities

SPCC Plan - Generic Information

Dynegy Midstream Services Limited Partnership

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Data Sheets attached:

North Eunice Plant	
Middle Eunice Plant	
South Eunice Plant	Grobe Compressor Station
	Teague Switch Compressor Station
Monument Plant	Buckeye Compressor Station
	Joy Compressor Station
	Skaggs-McGee Compressor Station
Saunders Plant	Bluitt Booster
	Cato Compressor Station
	Clauene Compressor Station
	Dean Compressor Station
	Epperson Compressor Station
	King Compressor Station
	Lehman Compressor Station
	Plains Compressor Station
	Sawyer Compressor Station
	Tokio Compressor Station
	Townsend Compressor Station
	Vada Compressor Station

Versado gas Processors – New Mexico Facilities

SPCC Plan - Generic Information

Dynegy Midstream Services Limited Partnership

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Environmental Incidents / Spill Reporting

If an environmental incident occurs at a Dynegy facility (this could be a fire, an explosion, a release of regulated materials from a tank, etc.), refer to the Dynegy "Safety and Environmental Incident Reporting Procedures" Manual ("Orange Book"), Section X – Environmental Incident Reporting Procedures.

For materials spills and releases:

Federal and State regulations require agency reporting if a release in which more than the "reportable quantity" of a regulated material occurs during a 24-hour period. These regulations require reporting within a limited time period (usually less than 24 hours after the spill occurs). Reportable Quantities are listed in Section X of the "Orange Book". If you fill out a spill report which is to be sent to a state or federal agency, the report should be routed through your regional EHS Advisor before sending it to the applicable agency(s).

For additional information concerning environmental incidents, refer to the "Orange Book" or call your regional EHS advisor or the Dynegy Midstream Services Environmental, Safety and Health Team in Houston:

Name	Telephone
Shankar	(713)507-6753
Bob Cinq-Mars	(713)507-3993
Russell Dykes	(713)767-0072
Mike Howerton	(713)507-3723
Paul Lankford	(713)507-3729
J.D. Morris	(713)507-6752
Kathy Silva	(713)507-3998
Mike Terrell	(713)507-6755

**PART I
GENERAL INFORMATION**

Page 5

Amendment / Periodic Review of SPCC Plans

The owner/operator of a facility is required to review the SPCC Plan at least once every three years. The plan must be amended whenever a change in the facility "materially affects the facility's potential for discharge of oil...", or when new technology provides a more effective means of preventing oil discharge. If the plan is amended (not just reviewed), the amended plan must be recertified by a professional engineer.

The actual text of the regulation is as follows:

40 CFR 112.5 Amendment of Spill Prevention Control and Countermeasure Plans by owners or operators.

(a) Owners or operators of facilities subject to §112.3 (a), (b) or (c) shall amend the SPCC Plan for such facility in accordance with §112.7 whenever there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shore lines. Such amendments shall be fully implemented as soon as possible, but not later than six months after such change occurs.

(b) Notwithstanding compliance with paragraph (a) of this section, owners and operators of facilities subject to §112.3 (a), (b) or (c) shall complete a review and evaluation of the SPCC Plan at least once every three years from the date such facility becomes subject to this part. As a result of this review and evaluation, the owner or operator shall amend the SPCC Plan within six months of the review to include more effective prevention and control technology if:

- (1) Such technology will significantly reduce the likelihood of a spill event from the facility, and
- (2) if such technology has been field-proven at the time of the review.

(c) No amendment to an SPCC Plan shall be effective to satisfy the requirements of this section unless it has been certified by a Professional Engineer in accordance with §112.3(d).

The attached form provides the facility with a means of recording the dates when the plan is reviewed, a space to describe periodic administrative (e.g., name changes, personnel changes, etc.) changes made to the plan and a signature line for the facility manager to attest that the review has been completed (or the administrative change made) and no significant changes were made in the plan. Use the attached form (or additional copies thereof) to record these periodic reviews and / or administrative changes to the plan.

Page 6

Facility

By placing their signature on the form above, the person signing attests that the SPCC Plan review or administrative change described did not result in a change which materially affects the facility's potential for discharge of oil to waters of the United States.

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PART I
GENERAL INFORMATION
Page 7

7. Potential Spills -- Prediction & Control

<u>Source</u>	<u>Major Type of Failure</u>	<u>Total Quantity (bbls)</u>	<u>Rate (bbls/hr)</u>	<u>Direction of Flow*</u>	<u>Secondary Containment</u>
---------------	----------------------------------	--------------------------------------	---------------------------	-------------------------------	----------------------------------

See attached Data Sheets

***See maps on attached data sheets**

Discussion:

See attached Data Sheets

PART I
GENERAL INFORMATION
Page 8

8. Containment or diversionary structures or equipment to prevent oil products from reaching navigable waters are practicable. (If NO, complete Attachment #2.)

Yes, for tanks.

9. Inspections and Records

- A. The required inspections follow written procedures. **Yes**
- B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached.

Written procedures are discussed below. Records of inspections that are signed by the appropriate inspector are in the Facility files.

Discussion:

In order to minimize the potential for spills, all areas used for storage of petroleum material will undergo inspection periodically. Periodic inspections are conducted for visual leaks and/or deficiencies and the results are recorded on an inspection log. All above-ground equipment and facilities as listed are located in such a manner that routine visual checks and maintenance may be performed with little difficulty. All tank levels are gauged prior to pumping product into them. Tanks are visually monitored as well. Conditions needing maintenance such as leaks or defective conditions are reported to the Asset Office. Applicable repairs are initiated promptly. The procedures are as follows:

A. Tank Inspections - Tank inspections include checks for leaks and spills. Sudden deviations in tank volumes will be investigated and their causes determined.

B. Material Dispensing Equipment Inspections - The dispensing hoses, connections, valves, pumps, pipes, and fittings are inspected for damage or wear, such as cracks or leaks, and proper functioning.

PART I
GENERAL INFORMATION
Page 9

C. Secondary Containment Areas Inspections - Secondary containment areas are inspected for deterioration, cracks, leaks or failure.

In addition to the above, the following are inspected but not recorded on the annual inspection log:

D. Safety Equipment Inspections - Fire extinguishers are checked monthly to ensure that the units are charged and accessible.

E. Security Inspections - Gates, fences, lighting, and signs are inspected for damage and proper operation.

10. Personnel, Training, and Spill Prevention Procedures

A. Personnel are properly instructed in the following:

(1) operation and maintenance of equipment to prevent oil discharges, **Yes**

(2) and applicable pollution control laws, rules and regulations. **Yes**

Describe procedures employed for instruction:

All personnel potentially involved with the use of petroleum products are appropriately trained and know to comply with company incident reporting procedures in the event of a spill. Formal training is conducted once a year. New employees are trained by experienced operators prior to assuming duty.

Personnel training includes instruction concerning the proper operation and maintenance of equipment. In particular, this training ensures that all personnel have an adequate understanding of the intent and contents of the SPCC Plan and the spill prevention and response procedures. Employees who are responsible for containing and/or stopping spills have spill response training.

Each employee signs training documentation/sign-off sheets, and a training file is maintained at the Asset Office.

PART I
GENERAL INFORMATION
Page 10

B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. Yes

Describe briefing program:

Training also continues on a regular basis through such means as on-the-job training, regularly scheduled operating and safety meetings, when regulations and/or procedures change, and with annual refresher training. A copy of the SPCC Plan is provided in the control room and the office for operator reference. Emergency phone numbers are provided for plant personnel.

PART II DESIGN AND OPERATING INFORMATION

A. Facility Drainage

1. Drainage from secondary containment areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.). (Note: Flapper-type valves should not be used):

See attached Data Sheets

For dikes that have drains, accumulated storm water in the diked areas will be removed by opening a secured valve on a pipe through the dike if no oil is present. For dikes that do not have drains, the storm water will be allowed to evaporate or percolate into the soil.

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

See attached Data Sheets

3. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of: (a) inspection for pollutants, and (b) method of valving security). (A record of inspection and drainage events is to be maintained on a form similar to Attachment #3):

The presence of hydrocarbons will be identified by the presence of a sheen. Any oil, or water with a sheen of oil, that is collected within a dike, a berm or a low-lying area will be removed by means such as sorbent pads or vacuum trucks to one of the tanks on-site or to a company-approved disposal facility.

For those dikes that have drains, the rain water drains are kept closed and secured except during drainage of storm water. For those berms that have drains, the rain water drains are kept closed except during drainage of storm water. A record of drainage is kept which shows the time of discharge, presence or absence of a sheen, and personnel performing the discharge. Any drainage of water from the dike or berm to the surrounding countryside is done by an SPCC-trained employee.

PART II
ALTERNATE A
Page 12

B. Bulk Storage Tanks

1. Describe tank design, materials of construction, fail-safe engineering features, and if needed, corrosion protection:

See attached Data Sheets

All storage tanks are welded steel, meet API specifications and are surrounded by a containment dike. Each storage tank is equipped with vacuum pressure release valves to prevent rupture of the tanks from collapsing of the tanks due to vacuum while removing liquids.

Tanks are primed and painted to inhibit rust and corrosion. All tank integrity and leak tests performed on tanks and associated piping will be maintained at the Asset Office.

2. Describe secondary containment design, construction materials, and volume:

See attached Data Sheets

Secondary containment is provided for all storage tanks by containment dikes. The dike dimensions are sufficient containment to impound the capacity of the largest tank plus rainfall from a 25-year, 24-hour storm event, unless otherwise indicated on the site-specific Data Sheets. The SPCC tank dike calculations are attached to the site-specific Data Sheets.

3. Describe tank inspection methods, procedures, and record keeping:

See General Information, Inspections and Records, Item 9.

4. Internal heating coil leakage is controlled by one or more of the following control factors:

- a. Monitoring the steam return or exhaust lines for oil:

N/A

Describe the monitoring procedure.

N/A

- b. Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system.

N/A

PART II
ALTERNATE A
Page 13

c. Installing external heating systems. N/A

5. Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event. N/A

Describe method and frequency of observation: N/A

C. Facility Transfer Operations and Pumping

1. Corrosion protection for buried pipelines:

a. Pipelines are wrapped and coated to reduce corrosion. Yes

b. Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. Yes

c. When a pipeline section is exposed, it is examined and corrective action taken as necessary. Yes

2. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. Partial

Describe criteria for determining when to cap or blank-flange:

Product Pipelines are capped or blinded when purged and disconnected from the facility. Marking of in-service lines is done but marking of abandoned lines is not done.

3. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. Yes

Describe pipe support design:

ANSI Code B31.3 design is utilized. Pipe supports and pipes are provided with guide shoes and guides to provide for expansion where applicable. Expansion loops are provided on lines where extraordinary expansion and contraction occur. Other piping is held in place by U-bolts or pipe clamps.

4. Describe procedures for regularly examining all above-ground valves and

PART II
ALTERNATE A
Page 14

pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces):

Inspections of above-ground valves, flanges and pipelines are made by operating personnel as part of their operating procedure.

5. Describe procedures for warning vehicles entering the facility to avoid damaging above-ground piping:

Unauthorized access to the facility is limited. Unauthorized vehicles are not allowed in the Facility. Authorized vehicles are either accompanied by plant personnel or directed to drive in specific areas. Barricades are used to protect piping in high traffic areas.

D. Facility Tank Car & Tank Truck Loading/Unloading Rack

Tank car and tank truck unloading occurs at the facility. (If yes, complete 1 through 5 below.)

See attached Data Sheets

1. Unloading procedures meet the minimum requirements and regulations of the Department of Transportation. **See attached Data Sheets**
2. The unloading area has a quick drainage system. **See attached Data Sheets**
3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the plant. **See attached Data Sheets**

Describe containment system design, construction materials, and volume:

See attached Data Sheets

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. **See attached Data Sheets**

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

See attached Data Sheets

PART II
ALTERNATE A
Page 15

5. Drains and outlets on tank trucks and tank cars are checked for leakage before unloading or departure.

E. Security

1. Plants handling, processing, or storing oil products are fenced. **Yes**
2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. **Yes**
3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. **Yes**
4. Starter controls on all oil product pumps in non-operating or standby status are:
 - a. locked in the off position; **No**
 - b. located at site accessible only to authorized personnel. **Yes**
5. Discussion of items 1 through 4 as appropriate:

The Facility is remotely operated 24 hours per day. The entrance gate is locked unless personnel are working at the site. Likewise, all storage valves are considered operative 24 hours per day and are not locked.

6. Discussion of lighting around the facility:

The area is adequately lighted such that problems and intruders can easily be detected.

NOT APPLICABLE

**SPCC PLAN, ATTACHMENT #1
SPILL HISTORY**

(Complete this form for any reportable spill(s) which has (have) occurred from this facility during the twelve months prior to January 10, 1974, into _____ navigable water.)

1. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

2. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

Versado gas Processors – New Mexico Facilities

SPCC Plan - Generic Information

Dynegy Midstream Services Limited Partnership

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**SPCC PLAN, ATTACHMENT #2
OIL SPILL CONTINGENCY PLANS AND
WRITTEN COMMITMENT OF MANPOWER**

Secondary containment or diversionary structures are impracticable for the following reasons (attach additional pages if necessary):

A spill in the unloading areas would be caught immediately since the driver/gauger is in attendance during the entire loading procedure. Since the Facility has control over when unloading may occur, the Facility has adopted a policy that product won't be unloaded in a driving 25-year storm event, when the berm is standing full of rainwater.

The no-spills history of these sites supports the conclusion that safe operating practices are effective at these sites. Potential spills at the loading/unloading areas are addressed by a strong Spill Response Plan. Alleviation of a possible spill relies on experienced and capable operators to prevent premature vehicular departure before disconnection of transfer lines. Drains and outlets on tank trucks are checked for leakage before loading/unloading or departure. Equipment and hoses are inspected for deterioration, frays, leaks, breaks, etc., and qualified personnel are present during loading and unloading to respond to any spill of material. The qualified person ensures that the hand break is set and that the wheels are chocked. He also ensures that no smoking or other ignition sources are present in the area.

Company personnel have vehicles equipped with two-way radio communication systems, which facilitates proper implementation of the SPCC plan by allowing immediate spill reporting. All Facilities are serviced by an all-weather road whereby ample manpower and equipment may be promptly dispatched to contain or divert any possible oil spill. Equipment and manpower is available within two hours' notice to effectively dam up, divert, and clean up spills that may occur. The names and telephone numbers of contractors with proper spill control equipment are listed in the Spill Response Plan.

A strong oil spill contingency plan is attached?

Spill Response Plan is at the Asset Office.

A written commitment of manpower is attached?

Yes, See first page of General SPCC Plan.

EXAMPLE - ONLY

**SPCC PLAN, ATTACHMENT #3
ONSHORE FACILITY BULK STORAGE TANKS
DRAINAGE SYSTEM**

Inspection Procedure:

Record of drainage, bypassing, inspection, and oil removal from secondary containment:

<u>Date of Drainage</u>	<u>Date of Bypassing</u>		<u>Date of Inspection</u>	<u>Oil Removal</u>	<u>Supervisor's or Inspector's Signature</u>
	<u>Open</u>	<u>Closed</u>			
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**Saunders Plant
DATA SHEET**

**PART I
GENERAL INFORMATION**

1. Name of facility: Saunders Plant
3. Location of facility: 11 mi NW of Saunders, Lea County, New Mexico.
7. Potential Spills -- Prediction & Control: See Table 1.

Discussion:

The map referred to in the Generic SPCC Plan is attached here as Figure 1.

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable: Yes, for tanks.

**PART II
DESIGN AND OPERATING INFORMATION**

A. Facility Drainage

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

Drainage from undiked areas generally flows to the southeast. Any oil released to this area will be absorbed with booms or other similar equipment.

B. Bulk Storage Tanks

2. Describe secondary containment design, construction materials, and volume:

All tanks within the plant are located inside concrete or earth secondary containment structures. Containment structures are generally designed to hold the capacity of the largest tank within the structure plus excess capacity for the 25-year, 24-hour rainfall event. Dimensions of all containment structures are listed in Table 1. Capacities of these structures are calculated in Table 2.

D. Facility Tank Car & Tank Truck Unloading Rack
Tank car and tank truck unloading occurs at the facility.

Yes

1. Unloading procedures meet the minimum requirements and regulations of the Department of Transportation

Yes

2. The unloading area has a quick drainage system.

N/A

3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the Facility: N/A

Describe containment system design, construction materials, and volume:

N/A

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. Yes, signs are provided at each facility and contractors are required to follow the following procedure.

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

- Contractors are responsible for wearing appropriate Personal Protective Equipment (PPE) required by facility (hard hat, safety glasses, fire retardant clothing). If driver is unfamiliar with the product being loaded, obtain a Material Safety Data Sheet (MSDS) from Dynegy.
- Truck driver to call local Dynegy personnel before beginning loading/unloading operation described below.
- Driver pulls truck to designated loading/unloading area with approval from local Dynegy personnel.
- With truck shut down, driver will attach ground cable and chock wheels.
- Driver will visually inspect hoses for cracks or defects. If no defects are noted, driver will attach hoses and assure that connections are secure.
- Record meter reading (where applicable) or gauge tank level prior to loading or unloading.
- Remove padlocks from valves where applicable.
- Open valves required to load or unload.
After the tank is full (or empty) gauge the tank (or read the meter). Record the readings and reverse the procedure above.
- Driver to fill out appropriate DOT paperwork and provide receipt ticket/copy of paperwork to Dynegy.
- If a spill occurs during the loading/unloading operation, call the local Dynegy representative immediately at the emergency number shown on the facility sign.

5. Drains and outlets on tank trucks and tank cars are checked for leakage before unloading or departure. Yes

Attachments:
Site Plan – Figure 1

**Table 1 – Potential Spills – Prediction and Control
Figures 2-8 (Tank Photographs)
Applicability of the Substantial Harm Criteria
Table 2 - Dike Calculations.**

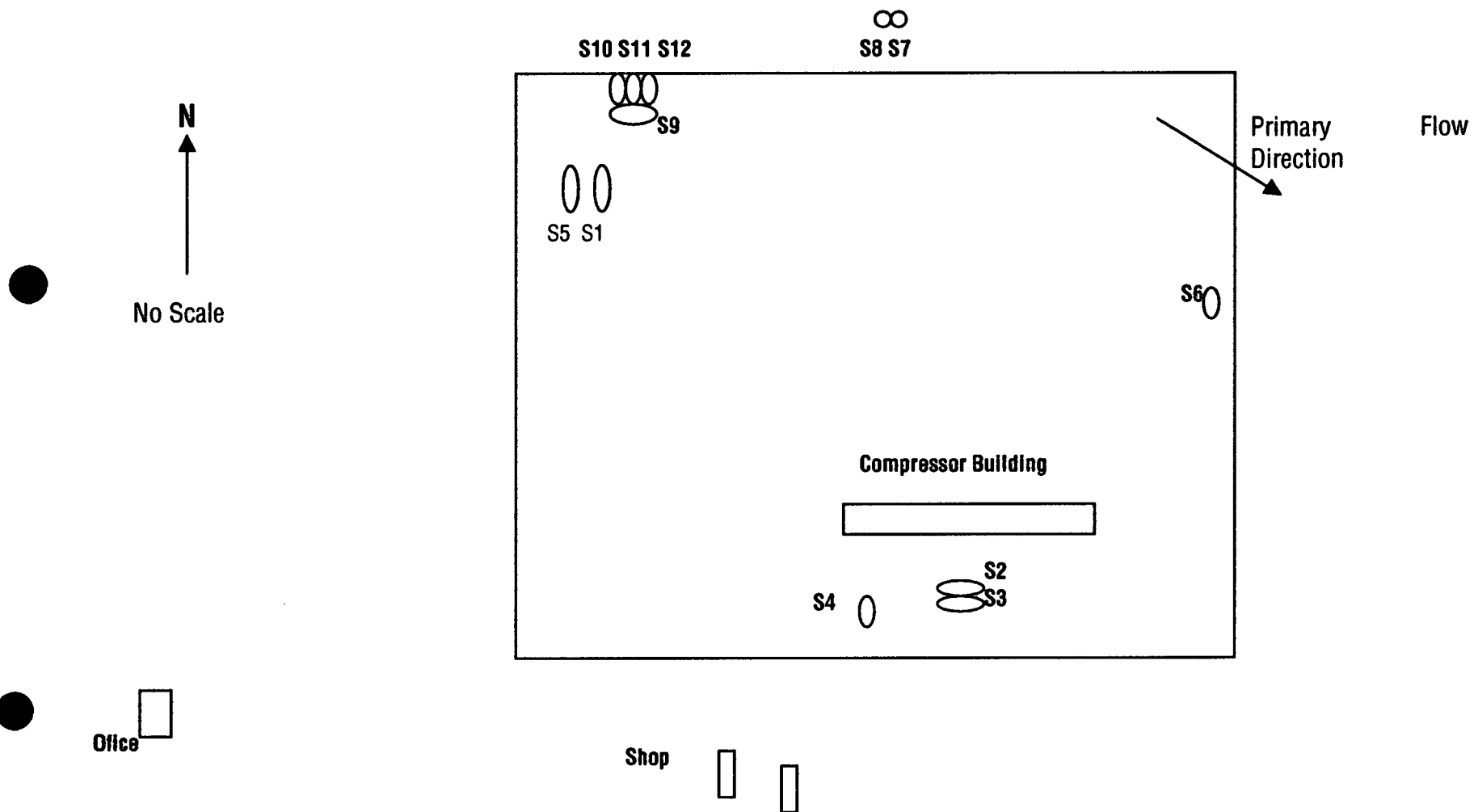


Figure 1
Saunders, New Mexico Plant
Site Plan

Table 1
Potential Spills – Prediction and Control

Vessel Number	Contents	Major Type of Failure	Total Quantity (gal)	Direction of Flow	Secondary Containment	Figure No.
S1	MEA	Overfill / rupture	8,862	Low Area	None	3
S2	Lube oil	Overfill / rupture	8,862	Low Area	Concrete dike 19'6" x 52' x 1'4"	4
S3	Lube oil	Overfill / rupture	8,862	Low Area	Concrete dike 19'6" x 52' x 1'4"	4
S4	Varsol	Overfill / rupture	1,253	SE	Concrete dike 9' x 12' x 1'4"	5
S5	Heating oil	Overfill / rupture	29,988	Low area	None	2
S6	Methanol	Overfill / rupture	1,000	NE	Fiberglass dike 5' x 20' x 3'	7
S7	Oil/water separator	Overfill / rupture	21,000	S	Earthen dike 51' x 111' x 2'	8
S8	Oil/water separator	Overfill / rupture	42,000	S	Earthen dike 51' x 111' x 2'	8
S9	Gasoline	Overfill / rupture	2,000	SE	Concrete dike 21' x 21' x 1'4"	6
S10	Diesel	Overfill / rupture	600	SE	Concrete dike 21' x 21' x 1'4"	6
S11	Diesel	Overfill / rupture	600	SE	Concrete dike 21' x 21' x 1'4"	6
S12	Diesel	Overfill / rupture	600	SE	None	6

Applicability of Substantial Harm Criteria

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? **No**
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? **No**
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **No**
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

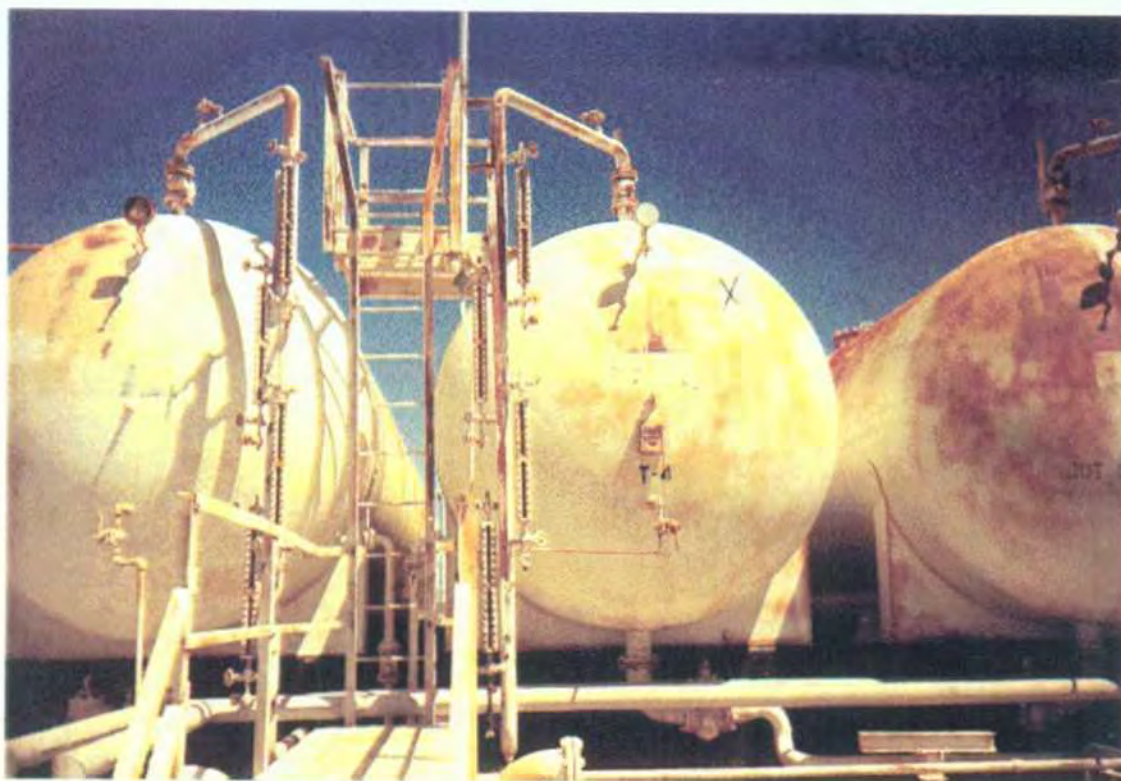


Figure 2 – S5



Figure 3 – S1



Figure 4 – S2 (left) and S3 (right)



Figure 5 – S4



Figure 6 – S9 (left), S-10 (bg), S-11 (middle) and S-12 (fg)

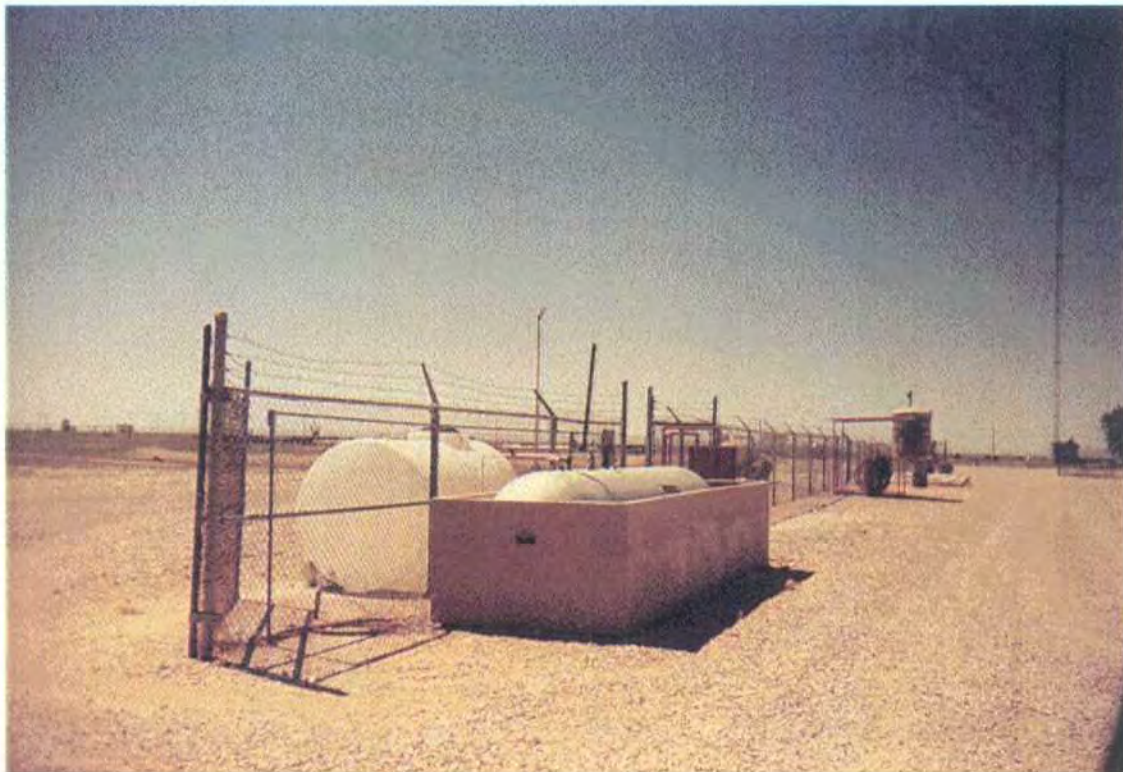


Figure 7 – S6



Figure 8 - S7 (center) and S8 (left)

Table 2
Dike Calculations
Saunders Plant

Tank / Dike Combination	Dike Full Storage Volume (see Table 1 for dimensions), gal.	Largest Tank capacity (gal)	Available Dike Full Precipitation Storage (in.)
S2, S3	15,583	8,862	8.6
S4	1,683	504	12.6
S6	2,244	1,000	19.9
S7, S8	49,846	42,000	3.8
S9, S10, S11	2,524	2,000	3.7

After examination on the ground, it was determined that the low areas mentioned above for containment of tanks S-1 and S-5 are adequate to ensure that no oil will leave the property from a full tank.

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, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-26) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

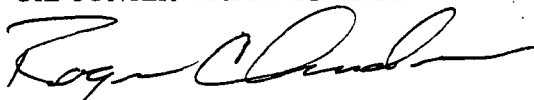
(GW-27) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Vada Compressor Station located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. 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 there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this Twenty-third (23rd) day of March, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



LORI WROTENBERY, Director

SEAL



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

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

Memorandum of Meeting or Conversation

Telephone X

Personal

E-Mail X

Time: 9:15 am

Date: January 7, 2000

Originating Party: Wayne Price-OCD

Other Parties: Cal Wrangham -Dynegy Midstream Services,LP
915-688-0542, fax 915-688-0552, E-Mail klee.dynegy.com

Subject: Discharge Plan Renewal Notice for the following Facilities:

GW-018 Bluitt expires 7/31/2000

GW-025 Monument expires 7/31/2000


GW-026 Saunders expires 7/31/2000

GW-027 Vada expires 7/31/2000

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with \$50.00 filing fee for the above listed facilities.

Conclusions or Agreements:

Signed: 

CC: E-Mail Dynegy

Price, Wayne

From: KLEE@dynegy.com[SMTP:KLEE@dynegy.com]
Sent: Friday, January 07, 2000 11:36 AM
Subject: RE: Discharge Plan Renewal Notice

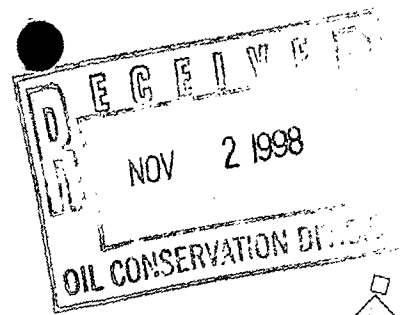
Return Receipt

Your RE: Discharge Plan Renewal Notice
document:

was received Johnnie Leeson/NGCCorp
by:

at: 12:36:53 PM Today

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, Texas 79705
Phone 915.688.0555
Fax 915.688.0552
www.dynegy.com



DYNEGY

October 27, 1998

State of New Mexico
Energy, Minerals and Natural Resources Dept.
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Attn. Mr. Roger C. Anderson
Environmental Bureau Chief

Dear Sir:

Effective July 1, 1998, Versado Gas Processors, L.L.C. was formed as a joint venture of Dynegy Midstream Services, Limited Partnership and Texaco Exploration and Production. Dynegy Midstream Services, Limited Partnership will serve as the operator of the facilities listed on the attached table. The Table lists the previous owner, new owner, previous operator, and plan/administrative numbers.

Dynegy Midstream Services, Limited Partnership is the new name for Warren Petroleum Company, Limited Partnership. This is a name change only. Warren's parent company NGC Corporation has changed its name to Dynegy Inc. effective June 6, 1998. Concurrent with this change, Warren Petroleum Company, Limited Partnership has changed its name to Dynegy Midstream Services, Limited Partnership.

Please feel free to contact me at (915) 688-0542.

Sincerely,

Cal Wrangham
Permian Basin ES&H Advisor

Cc C. Williams-OCD District 1 Supervisor, Hobbs, NM
C White- Midland
M. Hicks- Eunice
T Jordan- Saunders

**NMOCD DISCHARGE PLANS, ANNUAL STORAGE WELL REPORTS,
AND SWD ADMINISTRATIVE ORDERS**

FACILITY	PREVIOUS OWNER	NEW OWNER	NEW OPERATOR	UNIT NUMBERS
South Eunice Natural Gas Plant	Texaco Exploration and Production Inc.	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GRW-03
Eunice Gas Processing Plant	Warren Petroleum Company, Limited Partnership	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GW-05, and SWD 1.
Eunice North Gas Processing Plant	Texaco Exploration and Production Inc.	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GRW-04
Monument Gas Plant	Warren Petroleum Company, Limited Partnership	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GW-25, SWD 561, Propane Storage Well 1, and LPG Storage Well 2.
Saunders Gas Processing Plant	Warren Petroleum Company, Limited Partnership	Versado Gas Processors, L.L.C.	Dynegy Midstream Services, Limited Partnership	Discharge Plan GW-26, SWD 225



WARREN PETROLEUM
COMPANY, L.P.

An NGC Company

13430 Northwest Freeway
Suite 1200
Houston, TX 77040-6095

September 20, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Attn.: Mr. Roger C. Anderson
Environmental Bureau Chief

Re: **TRANSFER OF DISCHARGE PLANS,
SWD ADMINISTRATIVE ORDERS, and
ANNUAL LPG STORAGE WELL REPORTS
WARREN PETROLEUM COMPANY**

Dear Ladies and Gentlemen:

This is to confirm that the merger between Chevron USA Inc.'s Warren Petroleum Company Division and NGC Corporation was completed on August 31, 1996. Effective September 1, 1996, Warren Petroleum Company, Limited Partnership, will be responsible for compliance with the discharge plans, SWD administrative orders and annual storage well reports referenced in the attached letter.

If you have any questions, please call J. Dee Morris at 713-507-6752.

Very truly yours,

Hans Schuster
Vice President - Technical Services

Attachment

xc: Mr. Jerry Sexton
NMOCD District 1
PO Box 1980
Hobbs, NM 88241-1980

Mr. Bob Boyd
New Mexico



Warren

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

R. L. Langley
Manager, Health, Environment
and Loss Prevention
Phone 918 560 4471
Fax 918 560 4544

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 27, 1996

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Attn.: Mr. Roger C. Anderson
Environmental Bureau Chief

**Re: TRANSFER OF DISCHARGE PLANS,
SWD ADMINISTRATIVE ORDERS, and
ANNUAL LPG STORAGE WELL REPORTS
WARREN PETROLEUM COMPANY**

Dear Ladies and Gentlemen:

This is to advise you that on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

Warren Petroleum Company, a Division of Chevron USA Inc., and NGC Corporation agree that on the merger closing, the responsibility for compliance with the Discharge Plans, the SWD Administrative Orders, and the filing of the Annual Storage Well Reports listed on the Attachment will shift from Warren Petroleum Company, a Division of Chevron USA Inc., to Warren LP. Warren LP will be liable for compliance effective the merger close date forward.

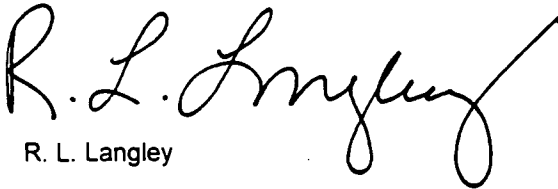
New Mexico Oil Conservation Division
Attn.: Mr. Roger C. Anderson
August 27, 1996

The new address for the home office will change on September 1, 1996 to:

NGC Corporation
Warren Petroleum Company, Limited Partnership
13430 Northwest Freeway
Suite 1200
Houston, TX 77040
Attn.: J. Dee Morris
Environmental Manager

If you have any questions, please call me or J. Dee Morris at 918-560-4114.

Very truly yours,



R. L. Langley

Attachment

xc: Mr. Jerry Sexton
NMOCD District 1
PO Box 1980
Hobbs, NM 88241-1980

Mr. Bob Boyd
New Mexico

New Mexico Oil Conservation Division
Attn.: Mr. Roger C. Anderson
August 27, 1996

ATTACHMENT

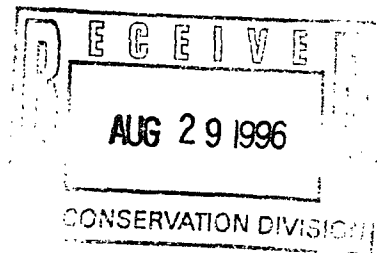
Warren Petroleum Company
a division of Chevron USA Inc.

Discharge Plans, Annual Storage Well Reports and SWD Administrative Orders

BLUITT PLANT	NMOCD Discharge Plan GW-18 (7/5/95)
EUNICE PLANT	NMOCD Discharge Plan GW-05 (5/96)
MONUMENT PLANT	NMOCD - Discharge Plan GW-25 (7/5/95)
MONUMENT PLANT	NMOCD Administrative Order SWD-561 (6/16/94)
MONUMENT PLANT	NMOCD Annual Report for Propane Storage Well #1
MONUMENT PLANT	NMOCD Annual Report for LPG Storage Well #2
SAUNDERS PLANT	NMOCD Discharge Plan GW-26 (7/5/95)
SAUNDERS PLANT	NMOCD Administrative Order SWD-255 (7/13/93)
VADA PLANT	NMOCD Discharge Plan GW-27 (7/5/95)



Warren



Warren Petroleum Company

P. O. Box 1589
Tulsa, OK 74102

D. D. Dunlap

Vice President,
Operations

Phone 918 560 4050

Fax 918 560 4304

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 23, 1996

United States Environmental Protection Agency
Stormwater Notice of Intent/Termination
401 M Street, SW
Washington, DC 20460

Attn.: Mr. Jon D. Klaff

**Re: SUPPLEMENTAL FILING TO AUTOMATIC TRANSFER OF NPDES PERMITS
DATED JULY 29, 1996**

Dear Ladies and Gentlemen:

Warren Petroleum Company filed for Automatic Transfer of NPDES Permits on July 29, 1996 since on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

In response to our July 29 letter, we received information on August 14, 1996 from Jon D. Klaff of the Storm Water Notice of Intent Processing Center that further information is required so that the permits may be transferred. Mr. Klaff starred 38 items on our list of transferring NPDES Permits that needed more information. Please note that this list has been updated and the 38 starred items have been carried over on the new Attachment for ease of identification. Three additional Notices of Termination are also included for recently completed projects, bringing the total to 41 items.

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
August 23, 1996

If you have any questions, please contact Bob Langley at 918-560-4471 or J. Dee Morris at 918-560-4114.

Very truly yours,



D. D. Dunlap

Attachment
cc without forms:

Jane Saginaw, Regional Administrator
United States Environmental Protection Agency
Region VI Office
1445 Ross Avenue
Dallas, Texas 75202-2733

Mr. Dale Givens, Secretary
Louisiana Dept. of Environmental Quality
Office of Water Resources
PO Box 82215
Baton Rouge, LA 70884-2215

Mr. Jerry W. Mullican, Director of UIC
Texas Railroad Commission
Oil & Gas Division
PO Box 12967
Austin, TX 78711-2967

Mr. Roger Anderson, Environmental Bureau Chief
New Mexico Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504



Warren

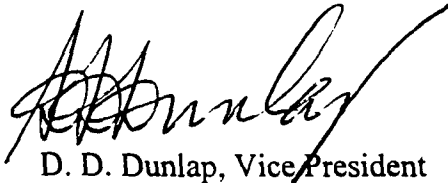
Tulsa, OK
August 2, 1995

**MEMO TO FILE
LETTER OF AUTHORIZATION**

To Whom It May Concern:

Please be advised that effective July 1, 1992, R. L. Langley was appointed Manager -Health, Environment and Loss Prevention for Warren Petroleum Company. In my absence, the incumbent in this position is Warren's duly authorized representative to verify by signature any appropriate permit required reporting or to provide agency required information.

If you have any questions or comments regarding this, please contact L.L. Johnson, Environmental Specialist, Warren's Health, Environment and Loss Prevention.



D. D. Dunlap, Vice President
Operations

DDD/LLJ/lj

xc: L. L. Johnson
C. A. McCartney
File: VII.A.4.b.(4)

ATTACHMENT
Warren Petroleum Company
(a division of Chevron USA Inc.)
NPDES Permits

ABILENE LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00F771 (9/16/94)*(NOT attached)(NOI attached)(1)

BLUITT PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A117
(8/13/93)*(NOT filed 12/7/95)(2)

BRIDGEPORT LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00F773 (9/16/94)*(NOT attached)(NOI attached)(3)

CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C292
(12/31/92) (plant)*(NOT attached)(NOI attached)(4)

CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00D737
(12/31/92) (Pipeline)*(NOT filed 4/7/95)(5)

CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00D738
(12/31/92) (Pipeline)*(NOT filed 4/7/95)(6)

CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10G035
(5/9/94) (Pipeline)*(NOT filed 4/7/95)(7)

CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10G036
(5/9/94) (Pipeline)*(NOT filed 4/7/95)(8)

CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10H339
(11/18/93) (Pipeline)*(NOT filed 4/7/95)(9)

CANADIAN PLANT, TX USEPA-NPDES App. No. TX0113204 (02/24/95)

CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification TXR00G271-EIPaso/No.
Natural (PIPELINE) (04/07/95)*(NOT filed 7/19/95)(10)

CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification TXR10P104: Red Deer
(PIPELINE) (06/06/95)*(NOT attached)(11)

CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification-TXR10M897-Cree
Flowers (PIPELINE) (01/17/95)*(NOT filed 7/19/95)(12)

EUNICE PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR00A189
(12/31/92)*(NOT filed 3/10/93)(13)

EUNICE PLANT, NM USEPA - Stormwater General Permit Notification NMR10A408, (PIPELINE)
Const. (06/06/95)*(NOT attached)(14)

FASHING PLANT, TX USEPA - National Pollutant Discharge Elimination System (NPDES) Permit
TX0086720 (5/19/82)

FASHING PLANT, TX USEPA Renewed NPDES Permit (8/18/87) permit # TX0086720

GLADEWATER LPG TRANSPORT, TX USEPA - NPDES No. TX0112712 Administratively
Complete Application (8/29/94)

GLADEWATER LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00F774 (9/16/94)*(NOT attached)(NOI attached)(15)

MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit No. TXR00F913, SW
Royalties NXS (PIPELINE) (11/30/94)*(NOT attached)(16)

MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice No. TXR10N685,
Tiger #1 (PIPELINE)(02/15/95)*(NOT attached)(17)

MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No. TXR10M935,
Sand Hills to Monahans (PIPELINE) (01/17/95)*(NOT attached)(18)

MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No. TXR10P710 (7/7/95)(NOT attached)(39)

MONT BELVIEU PLANT, TX USEPA - NPDES Application No. TX0002887 deemed complete (9/23/88) and (5/3/96)

MONT BELVIEU PLANT, TX USEPA TX0111414 Discharge Permit Application Complete (6/14/93)

MONT BELVIEU PLANT, TX USEPA - National Pollutant Discharge Elimination System (NPDES) Permit TX0002887 (5/15/75)

MONT BELVIEU PLANT, TX USEPA Stormwater General Permit Notification TXR00C294(12/31/92)*(NOT attached)(19)

MONT BELVIEU TERMINAL, TX USEPA - Stormwater General Permit Notification (NOI) TXR00E567 (12/31/92)*(NOT attached)(NOI attached)(20)

MONT BELVIEU TERMINAL, TX USEPA NPDES- TXG340278 (received 9/28/88)

MONUMENT PLANT, NM USEPA - Stormwater General Permit Notification No. NMR10A327, Joy Compressor Station (PIPELINE) (01/17/95)*(NOT filed 9/26/95)(21)

NO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C289 (12/31/92)*(NOT attached)(NOI attached)(22)

SAND HILLS PLANT, TX USEPA - NPDES - NOI approved (Stormwater) Wolfcamp (PIPELINE) (3/30/93) Permit TXR10D572*(NOT filed 4/13/95)(23)

SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10Q150, Meridian (PIPELINE) 1995 Upgrade (08/09/95)*(NOT attached)(24)

SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10M664, King Mt. Comp. Sta. (PIPELINE) (11/30/94)*(NOT filed 4/13/95)(25)

SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S520, Wolfcamp (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(26)

SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S521, Gomez (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(27)

SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10T722, Crawar (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(28)

SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10U246, CG-25 Suction (PIPELINE) (5/21/96)*(NOT attached)(29)

SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10V341, Grayburg 6" Upgrade (7/19/96)(NOT attached)(40)

SAUNDERS PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A084 (5/21/93)*(NOT filed 4/7/95)(30)

SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N440, Beulah Hazlip (PIPELINE) tie-in (01/17/95)*(NOT attached)(31)

SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N441, J. H. Lawrence Upgrade (01/17/95)*(NOT attached)(32)

SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N442, Shell-Hagerman (PIPELINE) (01/17/95)*(NOT filed 6/3/95)(33)

SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N443, M/b N Low Pressure (PIPELINE) (01/17/95)*(NOT attached)(34)

MONAHANS PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10P103, Chevron Estes Gas (PIPELINE) (06/06/95)*(NOT attached)(35)

SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10T942, Chevron-Cullar (PIPELINE) (5/21/96)*(NOT attached)(36)

SO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C290 (12/31/92)*(NOT filed 4/7/95)(37))

TONKAWA PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C293
(12/31/92)*(NOT attached)(NOI attached)(38)
VENICE DELTA GATHERING STATION, LA - NPDES Permit # LA0054917 (4/12/78)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit #
LAG330050 (10/21/93)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit #
LAG330089 (1/24/95)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit #
LAG290000 (1/9/95)
VENICE PLANT, LA USEPA - NPDES Permit No. LA003867 (10/24/83)
VENICE PLANT, LA USEPA - NPDES Permit LA0003867 (6/3/83) and (9/23/83)
WARRENGAS TERMINAL, TX USEPA - General Permit TXG340285 (8/27/87)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0063339 (9/22/88)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0107361 (5/8/91)
WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0103403 (4/25/88)
YSCLOSKEY PLANT, LA USEPA - NPDES Permit # LA0001562 (Originally issued to Shell
Western E&P Inc.) (4/6/79)
SAUNDERS PLANT, NM - USEPA - Stormwater General Permit Notification (NOI) TXR10V530
(7/19/96) (NOT attached)(41)

**GENERAL PERMIT
STORMWATER PERMITS
EPA FORM 3510-6 (6-92) FILINGS**

Industrial Facility		Individual Filings Construction - Dependent		
Facility	October 1, 1992 Intent For Coverage NPDES General Permit For Stormwater Discharges	NOI Filing Date	Activity	NOT Filing Date
Northern Area				
Bluitt	None			-
Bluitt Interconnect Pipeline (2)	None	6/3/93	Pipeline NMR10A117	12/7/95
Canadian (4)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C292	NOT-8/21/96 NOI-8/22/96
Canadian Pipeline Const. (5)	10/1/92 Filing		Pipeline TXR00D737	4/07/95
Canadian Pipeline (Bracken) (6)	None	11/23/92	Pipeline TXR00D738	4/07/95
Canadian Bracken 1-58 (8)	None	7/21/93	Pipeline TXR10G036	4/07/95
Canadian Alpar 1-95 (7)	None	7/21/93	Pipeline TXR10G035	4/07/95
Canadian Pipeline 1-49 (9)	None	10/13/93	Pipeline TXR10H339	4/07/95
Canadian Pipeline ElPas/No.Nat.(10)	None	7/23/94 and 3/3/95	Pipeline TXR00G271	7/19/95
Canadian Cree Flowers P/L (12)	None	10/28/94	Pipeline TXR10M897	7/19/95
Canadian Red Deer P/L (11)	None	4/13/95	Pipeline TXR10P104	8/21/96
Eunice (13)	10/1/92 Filing		Gen. Pmt. Cvg. NMR00A189	3/10/93
Eunice P/L Construction Project (14)	None	5/02/95	Pipeline-NMR10A408	8/21/96
Leedey	None			-
Mocane	None			-
Monument (21)	None			-
Joy Compressor Sta. Pjt.	None	11/4/94	Pipeline NMR10A327	9/26/95
Saunders	None			-
NGPL Interconnect Pipeline (30)	None	4/2/93	Pipeline NMR10A084	4/07/95
Crosstimbers Pipeline Project (41)	None	5/31/96	Pipeline TXR10V530	8/21/96
North Sherman (22)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C289	NOT-8/21/96 NOI-8/22/96
South Sherman (37)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C290	4/7/95
Chevron Cullar Pipeline (36)	None	10/18/94	Pipeline TXR10T942	8/21/96

M&B North L.P. Pipeline (34)	None	11/29/94	Pipeline TXR10N443	8/21/96
J. H. Lawrence Pipeline Upgrade East/Eagle Oil & Gas (32)	None	11/29/94	Pipeline TXR10N441	8/21/96
Shell Hagerman Pipeline (33)	None	11/29/94	Pipeline TXR10N442	6/03/95
Beulah Hazlip Pipeline (31)	None	11/29/94	Pipeline TXR10N440	8/21/96
Tonkawa (38)	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C293	NOT-8/21/96 NOI-8/22/96
Vada	None			-
Southern Area				
Como	10/1/92 Filing WPC/11/17/95 Valence		Gen. Pmt. Cvg. TXR00C287	12/6/95
Fashing	None			-
Johnson Bayou	None			-
Mermentau	10/1/92 Filing		Gen. Pmt. Cvg. LAR00A473	3/11/93
Monahans	None			-
Monahans S. W. Royalties NXS No. 1 Pipeline (16)	None	10/13/94	Pipeline TXR00F913	8/21/96
Sand Hills to Monahans PL (18)	None	11/4/94	Pipeline TXR10M935	8/21/96
Monahans Tiger #1 Pipeline (17)	None	1/6/95	Pipeline TXR10N685	8/21/96
Monahans Chevron Estes P/L (35)	None	4/13/95	Pipeline TXR10P103	8/21/96
Monahans Worsham P/L (39)	None	5/26/95	Pipeline TXR10P710	8/21/96
Moore's Orchard	None			-
Puckett	None			-
Sand Hills/Azalea	None			-
Sand Hills King Mt. Com. Sta.(25)	None	9/28/94	Pipeline TXR10M664	4/13/95
Sand Hills Wolfcamp PL (23)	None	2/26/93	Pipeline TXR10D572	4/13/95
Meridian PL Upgrade 1995 (24)	None	6/20/95	Pipeline TXR10Q150	8/22/96
Sand Hills Wolfcamp Pipeline (26)	None	12/20/95	Pipeline TXR10S520	4/5/96
Sand Hills Gomez Pipeline (27)	None	12/20/95	Pipeline TXR10S521	4/5/96
Sand Hills Crawar Pipeline (28)	None	1/22/96	Pipeline TXR10T722	4/5/96
Sand Hills CG 25 Suction PL (29)	None	3/14/96	Pipeline TXR10U246	8/21/96
Sand Hills Grayburg 6" Upg. (40)	None	4/23/96	Pipeline TXR10V341	8/21/96
Venice	None			-
Vermilion	None			-

Waddell	None			-
Worsham	None			-
Yscloskey	None			-
<u>Houston Area</u>				
Mont Belvieu Plant	None			-
MBP Isom Unit Construction (19)	10/1/92 Filing		ISOM TXR00C294	8/21/96
Mont Belvieu Terminal (20)	None	6/16/93	EPA Gen. Pmt. Number TXG340278 TXR00E567	TXR00E567 NOT-8/21/96 NOI-8/22/96
Port Arthur Terminal	None			-
Warrengas Terminal	None			-
<u>Inland And Marine Operations</u>				
<u>Terminals</u>				
Calvert City	None			-
Greenville	10/1/92 Filing		Gen. Pmt. Cvg. MSR000852	
Hattiesburg	10/1/92 Filing		Gen. Pmt. Cvg. MSR000853	
Port Everglades	10/1/92 Filing		Gen. Pmt. Cvg. FLR00A629	
Tampa	10/1/92 Filing		Gen. Pmt. Cvg. FLR00A630	
Venice	None			
Petal Gas Storage Co.	None	3/3/93	Pipeline & Appurtenances MSR100103	
<u>LPG Transports</u>				
Abilene (1)	None	7/23/94	LPG TK. Wash. TXR00F771	NOT-8/21/96 NOI-8/22/96
Breckenridge	None			-
Bridgeport (3)	None	7/23/94	LPG TK. Wash. TXR00F773	NOT-8/21/96 NOI-8/22/96

LPG Transports (cont.)			LPG TK. Wash. TXR00F774	NOT-8/21/96 NOI-8/22/96
Gladewater (15)	None	7/23/94		-
Greenville	None			-
Mont Blevieu	None			
Closed/Sold Facilities (Including Dismantling)				
Breckenridge Plant	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C286	12/11/92
South Sherman Comp. Sta.	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C290	4/07/95
Maggie Harris Comp. Sta.	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C288	12/11/92
Shackelford Plant	10/1/92 Filing		Gen. Pmt. Cvg. TXR00C291	12/11/92
Kingfisher Plant	10/1/92 Filing		Gen. Pmt. Cvg. OKR00A724	3/30/93
Knox Plant	10/1/92 Filing		Gen. Pmt. Cvg. OKR00A725	4/07/95
Gulf McKinney Comp. Sta.	10/1/92 Filing		Gen. Pmt. Cvg. OKR00A726	4/07/95
North Snyder Plant (Demolition)	10/1/92 Filing		Demolition TXR00C295	4/07/95
Krotz Springs Plant (Demolition)	10/1/92 Filing		Demolition LAR00A472	4/07/95



Warren

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

D. D. Dunlap
Vice President,
Operations
Phone 918 560 4050
Fax 918 560 4304

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 22, 1996

USEPA Region VI Office
1445 Ross Avenue
Dallas, Texas 75202-2733

Attn.: Mr. Fred Woods
Enforcement Division

**Re: TRANSFER OF EPA GENERATOR NUMBERS
WARREN PETROLEUM COMPANY**

Dear Ladies and Gentlemen:

This is to advise you that on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

Warren Petroleum Company, a Division of Chevron USA Inc., had been issued EPA Generator Numbers over the years. Those Generator Numbers that were assigned to assets that will be transferred into Warren LP are listed in the Attachment. Most of these numbers were obtained in 1980 and were protective filings. We have since determined that most of our sites are non-handlers of hazardous waste.

United States Environmental Protection Agency
Attn.: Mr. Fred Woods
August 22, 1996

RECEIVED

AUG 26 1996

Environmental Bureau
Oil Conservation Division

The new address for the home office will change on September 1, 1996 to:

NGC Corporation
Warren Petroleum Company, Limited Partnership
13430 Northwest Freeway
Suite 1200
Houston, TX 77040
Attn.: J. Dee Morris
Environmental Manager

If you have any questions, please call Bob Langley at 918-560-4471 or J. Dee Morris at 918-560-4114.

Very truly yours,



D. D. Dunlap

xc: Texas Natural Resource Conservation Commission
PO Box 13087
Austin, TX 7871111-3087

Texas Railroad Commission
PO Box 12967 - Capitol Station
Austin, TX 78711-2967
Attn.: Jerry Mullican

New Mexico Environmental Department
Water and Waste Management Division
2048 Galisteo
Santa Fe, NM 87505

New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505
Attn.: Roger C. Anderson

Oklahoma Department of Environmental Quality
4545 N. Lincoln Blvd., Suite 250
Oklahoma City, OK 73105-3483
Attn.: Al Colter

Louisiana Department of Environmental Quality
Office of Solid and Hazardous Waste
7290 Bluebonnet Road
Baton Rouge, LA 70810

ATTACHMENT
 Warren Petroleum Company
 (a division of Chevron USA Inc.)
 EPA Generator Numbers/State Registration Numbers

Bluitt Plant	EPA Generator # NMD000719385	
Breckenridge Plant	EPA Generator # TXD026092395	TNRCC # 35978
Canadian Plant	EPA Generator # TX0087499539	TNRCC # 35979
Eunice Plant	EPA Generator # NMD008001307	
Fashing Plant	EPA Generator # TXD008130031	TNRCC # 35984
Kingfisher Plant	EPA Generator # OKD000729137	
Leedey Plant	EPA Generator # OKD000729145	
McLean Plant	EPA Generator # TXD071669816	TNRCC # 35987
Monahans Plant	EPA Generator # TXD026858373	TNRCC # 36000
Mont Belvieu Plant	EPA Generator # TXD980625974	TNRCC # 31048
Mont Belvieu Terminal	EPA Generator # TXD070886205	
Monument Plant	EPA Generator # NMD000709303	
Moore's Orchard Plant	EPA Generator # TXD073899627	
Sand Hills Plant	EPA Generator # TXD000835090	TNRCC # 36003
Saunders Plant	EPA Generator # NMD000804138	
Shackelford Plant	EPA Generator # TXD000835280	
Tonkawa Plant	EPA Generator # TXT490010865	TNRCC # 35999
Vada Plant	EPA Generator # NMD000709287	
Venice Plant	EPA Generator # LAD041514811	LDEQ # GD-075-1635
Waddell Compressors	EPA Generator # TXD060169448	TNRCC # 35996
Warrengas Terminal	EPA Generator # TXD000835082	TNRCC # 35997
Worsham Plant	EPA Generator # TXD000835298	TNRCC # 36002



Warren

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

D. D. Dunlap
Vice President,
Operations
Phone 918 560 4050
Fax 918 560 4304

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 29, 1996

United States Environmental Protection Agency
Region VI Office
1445 Ross Avenue
Dallas, Texas 75202-2733

Attn.: Ms. Jane Saginaw
Regional Administrator

RECEIVED

AUG 19 1996

Environmental Bureau
Oil Conservation Division

**Re: AUTOMATIC TRANSFER OF NPDES PERMITS
WARREN PETROLEUM COMPANY**

Dear Ladies and Gentlemen:

This is to advise you that on or about August 31, 1996, Chevron USA Inc. intends to contribute its Warren Petroleum Company division to a new company ("Newco") into which NGC Corporation will merge. Newco will change its name to NGC Corporation. NGC Corporation intends to contribute most of the former Warren Petroleum Company division assets and obligations to an indirect subsidiary to be named Warren Petroleum Company, Limited Partnership, a Delaware limited partnership ("Warren LP").

We trust that the transfer of our NPDES permits may be accomplished automatically according to 40 CFR 122.61 (b), which allows that any NPDES permit may be automatically transferred to a new permittee if:

1. The current permittee notifies the Director at least 30 days in advance of the proposed transfer date;
2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them; and
3. The Director does not notify the existing permittee and the proposed new permittee of his or her intent to modify or revoke and reissue the permit.

Our transfer date will be dependent upon approval of the merger by appropriate governmental agencies. We anticipate such approvals will be obtained and the merger will take place or close on or about August 31, 1996.

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
7/29/96

Warren Petroleum Company, a Division of Chevron USA Inc., and NGC Corporation agree that on the merger closing, the responsibility for compliance with the NPDES permits listed on the Attachment will shift from Warren Petroleum Company, a Division of Chevron USA Inc., to Warren LP. Warren LP will be liable for permit compliance effective the merger close date forward.

We don't anticipate that you will want to modify, revoke or reissue any of the NPDES permits listed on the Attachment before the merger close date.

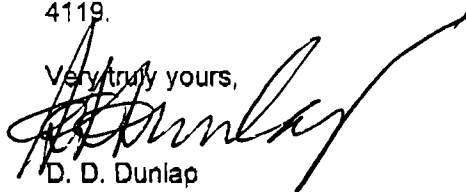
The new address for the home office will change on September 1, 1996 to:


NGC Corporation
Warren Petroleum Company, Limited Partnership
PO Box 4777
Houston, Texas 77210-4777

Street:
1000 Louisiana Street
Houston, Texas 77002

If you have any questions, please call Bob Langley at 918-560-4471 or J. Dee Morris at 918-560-4119.

Very truly yours,


D. D. Dunlap
Vice President, Operations
Warren Petroleum Company
(a division of Chevron USA Inc.)


Ralph Neumann
Vice President, Technical Services
Trident NGL, Inc.
(a NGC Corporation)

Attachment

cc: United States Environmental Protection Agency
Stormwater Notice of Intent/Termination
401 M Street, SW
Washington, DC 20460

Mr. Dale Givens, Secretary
Louisiana Dept. of Environmental Quality
Office of Water Resources
PO Box 82215
Baton Rouge, LA 70884-2215

Mr. Jerry W. Mullican, Director of UIC
Texas Railroad Commission
Oil & Gas Division
PO Box 12967
Austin, TX 78711-2967

Mr. Roger Anderson, Environmental Bureau Chief
New Mexico Oil Conservation Division
PO Box 2088
State Land Office Building
Santa Fe, NM 87504

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
7/29/96

ATTACHMENT
Warren Petroleum Company
(a division of Chevron USA Inc.)
NPDES Permits

ABILENE LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00F771 (9/16/94)
BLUITT PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A117 (8/13/93)
BRIDGEPORT LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00F773 (9/16/94)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C292
(12/31/92) (plant)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00D737
(12/31/92) (Pipeline)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00D738
(12/31/92) (Pipeline)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10G035
(5/9/94) (Pipeline)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10G036
(5/9/94) (Pipeline)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10H339
(11/18/93) (Pipeline)
CANADIAN PLANT, TX USEPA-NPDES App. No. TX0113204 (02/24/95)
CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification TXR00G271-EIPaso/No.
Natural (PIPELINE) (04/07/95)
CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification TXR10P104: Red Deer
(PIPELINE) (06/06/95)
CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification-TXR10M897-Cree
Flowers (PIPELINE) (01/17/95)
EUNICE PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR00A189
(12/31/92)
EUNICE PLANT, NM USEPA - Stormwater General Permit Notification NMR10A408, (PIPELINE)
Const. (06/06/95)
FASHING PLANT, TX USEPA - National Pollutant Discharge Elimination System (NPDES) Permit
TX0086720 (5/19/82)
FASHING PLANT, TX USEPA Renewed NPDES Permit (8/18/87) permit # TX0086720
GLADEWATER LPG TRANSPORT, TX USEPA - NPDES No. TX0112712 Administratively
Complete Application (8/29/94)
GLADEWATER LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00F774 (9/16/94)
MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit No. TXR00F913, SW
Royalties NXS (PIPELINE) (11/30/94)
MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice No. TXR10N685,
Tiger #1 (PIPELINE)(02/15/95)
MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No. TXR10M935,
Sand Hills to Monahans (PIPELINE) (01/17/95)
MONT BELVIEU PLANT, TX USEPA - NPDES Application No. TX0002887 deemed complete
(9/23/88) and (5/3/96)

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
7/29/96

MONT BELVIEU PLANT, TX USEPA TX0111414 Discharge Permit Application Complete (6/14/93)
MONT BELVIEU PLANT, TX USEPA - National Pollutant Discharge Elimination System (NPDES)
Permit TX0002887 (5/15/75)
MONT BELVIEU PLANT, TX USEPA Stormwater General Permit Notification
TXR00C294(12/31/92)
MONT BELVIEU TERMINAL, TX USEPA - Stormwater General Permit Notification (NOI)
TXR00E567 (12/31/92)
MONT BELVIEU TERMINAL, TX USEPA NPDES- TXG340278 (received 9/28/88)
MONUMENT PLANT, NM USEPA - Stormwater General Permit Notification No. NMR10A327, Joy
Compressor Station (PIPELINE) (01/17/95)
NO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C289
(12/31/92)
SAND HILLS PLANT, TX USEPA - NPDES - NOI approved (Stormwater) Wolfcamp (PIPELINE)
(3/30/93) Permit TXR10D572
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10Q150,
Meridian (PIPELINE) 1995 Upgrade (08/09/95)
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10M664, King
Mt. Comp. Sta. (PIPELINE) (11/30/94)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S520,
Wolfcamp (PIPELINE) (4/5/96)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S521, Gomez
(PIPELINE) (4/5/96)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10T722, Crawar
(PIPELINE) (4/5/96)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10U246, CG-25
Suction (PIPELINE) (5/21/96)
SAUNDERS PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A084
(5/21/93)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N440, Beulah
Hazlip (PIPELINE) tie-in (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N441, J. H.
Lawrence Upgrade (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N442, Shell-
Hagerman (PIPELINE) (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N443, M/b N
Low Pressure (PIPELINE) (01/17/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10P103,
Chevron Estes Gas (PIPELINE) (06/06/95)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10T942,
Chevron-Cullar (PIPELINE) (5/21/96)
SO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C290
(12/31/92)
TONKAWA PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C293
(12/31/92)
VENICE DELTA GATHERING STATION, LA - NPDES Permit # LA0054917 (4/12/78)
VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit #
LAG330050 (10/21/93)

U. S. Environmental Protection Agency
Attn.: Ms. Jane Saginaw
7/29/96

VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit #
LAG330089 (1/24/95)

VENICE DELTA GATHERING STATION & VENICE STABILIZING PLANT, LA - NPDES Permit #
LAG290000 (1/9/95)

VENICE PLANT, LA USEPA - NPDES Permit No. LA003867 (10/24/83)

VENICE PLANT, LA USEPA - NPDES Permit LA0003867 (6/3/83) and (9/23/83)

WARRENGAS TERMINAL, TX USEPA - General Permit TXG340285 (8/27/87)

WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0063339 (9/22/88)

WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0107361 (5/8/91)

WARRENGAS TERMINAL, TX USEPA - NPDES Application No. TX0103403 (4/25/88)

YSCLOSKEY PLANT, LA USEPA - NPDES Permit # LA0001562 (Originally issued to Shell
Western E&P Inc.) (4/6/79)

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 5/15/96
or cash received on _____ in the amount of \$ 5152.50

from Warren Pet
for Saunders GP GW-026
Vada GP GW-027 Blunt GP GW-018
(Filing Name) (GP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: P. Anderson Date: 5/17/96

Received in ASD by: M. Ayik Date: 5-20-96

Filing Fee ☒ New Facility _____ Renewal ☒

Modification _____ Other _____
(Specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____



Warren

Warren Petroleum Company
P.O. Box 1589
Tulsa, OK 74102-1589

No. [REDACTED]

5/15/96

Pay to
order of
NMED - Water Quality Management
c/o Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Amount \$ **5,152.50**

Norwest Bank Montana, N.A.
175 North 27th Street, Billings, MT 59101

Diana Edson
Angela J. Delma
Two signatures required if \$1,500.00 or more

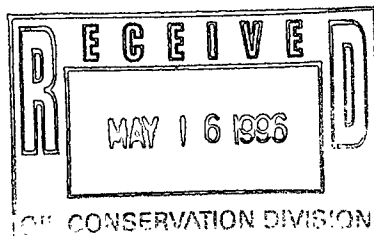
104

Description	Amount
Discharge Plan Renewal Fee - Saunders, Vada, Bluit	5,152.50

SAP Document Number							

Dr. Cr.	Account	Amount	Cost Center	Order	Product	Product	UOM
Allocation							
Text							

May 15, 1996



Warren

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102
1350 South Boulder
Tulsa, OK 74119

Manufacturing Department
Health, Environment and
Loss Prevention
Phone 918 560 4138
Fax 918 560 4544

Mr. William J. LeMay, Director
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Attention: Mark Ashley

DISCHARGE PLAN FEE
SAUNDERS GAS PROCESSING PLANT-GW 26
VADA GAS PROCESSING PLANT-GW 27
BLUITT TREATING FACILITY-GW 18

Gentlemen:

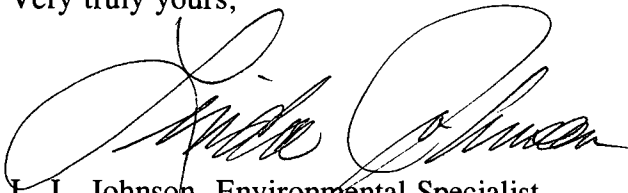
I have attached a check in the amount of \$5,152.50 for payment of the subject fee. This total is reached as follows:

<u>FACILITY</u>	<u>DISCHARGE PLAN RENEWAL FEE (\$)</u>	<u>RENEWAL FILING FEE (\$)</u>	<u>TOTAL</u>
SAUNDERS	1,667.50	50.00	1,717.50
VADA	1,667.50	50.00	1,717.50
BLUITT	1,667.50	50.00	1,717.50
<u>GRAND TOTAL</u>	5,002.50	150.00	5,152.50

William J. LeMay
Page 2-May 15, 1996

If you find that you have any questions, or need further information, please contact me at
(918) 560-4138.

Very truly yours,

A handwritten signature in black ink, appearing to read "L. L. Johnson", written over a horizontal line.

L. L. Johnson, Environmental Specialist
Environmental Protection

xc: K. A. Peterson, Tulsa
J. R. Boyd, Saunders
D. E. Wallis, Monument
Plant File: IX.B.
Tulsa File: NM Fees Paid in 1996



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

July 5, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-736

Mr. Ken Stinson
Environmental Specialist
Warren Petroleum Company
P.O. Box 67
Monument, NM 88265

**RE: Discharge Plan Renewal GW-26
Saunders Gas Processing Plant
Lea County, New Mexico**

Dear Mr. Stinson:

The discharge plan renewal GW-26 for the Warren Petroleum Company Saunders Gas Processing Plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The renewal application consists of the original discharge plan as approved July 31, 1985, the renewal dated October 29, 1990, and the renewal application dated April 26, 1995.

The discharge plan renewal was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve you of liability should your operation result in pollution of surface water, ground water, or the environment.

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

Mr. Ken Stinson

July 5, 1995

Page 2

Please note that Section 3-104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

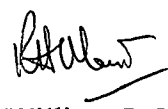
Pursuant to Section 3-109.G.4., this plan is for a period of five (5) years. This approval will expire on July 31, 2000, and you should submit an application for renewal six months before this date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the Warren Petroleum Company Saunders Gas Processing Plant is subject to WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee, or sixteen-hundred sixty-seven dollars and fifty cents (\$1667.50) for gas plants. The New Mexico Oil Conservation Division (OCD) has not received your filing fee or flat fee. The fifty (50) dollar filing fee is due upon receipt of this approval. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

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

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

Sincerely,

by  Deputy Director
William J. LeMay
Director

WJL/mwa
Attachment

xc: Jerry Sexton, OCD Hobbs Office
Wayne Price, OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-26 RENEWAL
WARREN PETROLEUM COMPANY
SAUNDERS GAS PROCESSING PLANT
DISCHARGE PLAN REQUIREMENTS
(July 5, 1995)

1. Payment of Discharge Plan Fees: The fifty (50) dollar filing fee and the sixteen-hundred sixty-seven dollars and fifty cents (\$1,667.50) flat fee shall be submitted upon receipt of this approval. The flat fee of sixteen-hundred sixty-seven dollars and fifty cents (\$1667.50) may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Sump Inspection: All pre-existing single-lined sumps at this facility will be cleaned and visually inspected on an annual basis. The inspection will coincide with the annual scheduled plant shutdown.

Any new or rebuilt sumps or below-grade tanks will incorporate leak detection in their designs and will be approved by the OCD prior to installation.

4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
5. Above Grade Tanks: All above ground tanks (saddle tanks) will be on impermeable pad and curb type containment.
6. Pressure Testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
7. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and Hobbs District Offices pursuant to WQCC Rule 1-203 and OCD Rule 116.
8. Pads: All compressor pads will have lips or curb type containment installed to prevent contaminants from running onto the ground surface.

All containment areas must remain free of any sediments and/or fluids. Routine inspections will be made of all such areas and any sediments and/or fluids found will be removed and disposed of at an approved facility.

Mr. Ken Stinson
July 5, 1995
Page 4

9. Emergency Hot Oil Dump: Please submit a plan, for approval, to the OCD by August 15, 1995 for closure of the dump.
10. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

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MAY - 5 1995

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USFWS - NMESO

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-018) - Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Bluit Gas Processing Plant located in the NE/4, Section 15, Township 8 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 19,500 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 5200 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 1400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharge

(GW-026) - Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-027) - Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Vada Gas Processing Plant located Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 1,380 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 14,890 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental

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(GW-025) - Warren Petroleum Company, Ken Gilson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Bluff Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,000 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 5,111 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 1,400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges.

(GW-027) - Warren Petroleum Company, Ken Gilson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Bluff Gas Processing Plant located Section 22, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,000 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 5,111 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 1,400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges.

(GW-031) - Warren Petroleum Company, Ken Gilson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Bluff Gas Processing Plant located Section 12, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,000 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 5,111 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 1,400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges.

STATE OF NEW MEXICO

County of Bernalillo

SS

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being of the 12 day of May 1995, and the subsequent consecutive publications on _____, 1995.

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 15 day of May 1995

PRICE 100.47
Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER 580938

OK

OIL CONSERVATION DIVISION

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(GW-026)-Warren Petroleum Company, Ken Sinsón, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process waste water is disposed of in an OCD approved Class II Injection well. The waste water has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-027)-Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Vada Gas Processing Plant located Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 1,380 gallons per day of process waste water is disposed of in an OCD approved Class II Injection well. The waste water has a total dissolved solids concentration of approximately 14,890 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-031) - U.S. Department of Energy, Fenton Hill Geothermal Facility, Lerry Kirkman, Acting Area Manager, Albuquerque Operations, Los Alamos Area Office, Los Alamos, New Mexico 87544, has submitted a discharge plan renewal application for their Fenton Hill Geothermal Facility located in the NE/4, Section 13, Township 19 North, Range 2 East, NMPM, Sandoval county, New Mexico. Water from a geothermal loop is discharged to a double-lined service pond equipped with leak detection during periods of emergency venting or during periods when maintenance operations on the geothermal loop require a discharge of water from the loop. The discharge to the pond will be temporary as the water will be reinjected to the geothermal loop when normal operating conditions are attained. The water from the geothermal loop has a total dissolved solids concentration of approximately 3,200 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 370 feet with a total dissolved solids concentration of approximately 240 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

RECEIVED

aXXXXXXXXXXXXX XXXXXXXXX

.....XXXXXXXXXXXXXXXXXXXX

entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, on XXXXXXXXXXXXXXXXXXXX

same day or type: for one (1) day

~~CONFIDENTIAL~~ beginning with the issue of

May 9 19 95

and ending with the issue of

May 9 1995

And that the cost of publishing said notice is the sum of \$ 75.60

which sum has been (Paid) (Amount) as Court Costs

George Clemens

Subscribed and sworn to before me this 22nd

day of May 19 95

Jean Senier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28 19 98

STATE OF NEW MEXICO

IN THE _____ COURT
AFFIDAVIT OF PUBLICATION

COUNTY OF LOS ALAMOS

STATE OF NEW MEXICO)

) SS.

COUNTY OF LOS ALAMOS)

NOTICE OF PUBLICATION

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

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its

THE LOS ALAMOS MONITOR
LOS ALAMOS, NEW MEXICO

Evelyn Vigil, being duly sworn, declares and says that she is the Editor of the Los Alamos Monitor, a newspaper published and having a general fully paid circulation and second-class postal privilege in the County of Los Alamos, State of New Mexico.

Affiant further states that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 14-11 N.M.S.A, 1978 Compilation and was so qualified at the time of all publications in reference hereto.

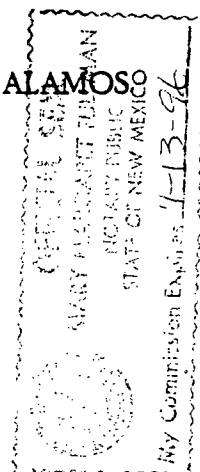
Affiant further states that the publication, a copy of which hereto affixed, was published in said paper, in the regular and entire issue of each number of the paper, during the period and time of publication and that the notice was published in the newspaper proper and not in a supplement, for one (1) consecutive weeks, the first publication being on the 9th day of May, 1995, and the subsequent consecutive publications on

_____ and _____, 19____.

Subscribed and sworn before me this 15th day of May, 1995.

Mary Margaret Fullman
Notary Public

My Commission Expires: November 13, 1996



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If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVI-
SION

/s/William J. Lemay, Director
WILLIAM J. LEMAY, Director

SEAL

Publication Date: May 9,
1995.

subsequent consecutive publications on

and

19

Subscribed and sworn before me this
day of May, 1995.

May Margaret Fullman
Notary Public

My Commission Expires: November 13, 1996

Los Alamos Monitor
256 D.P. Rd
Los Alamos, NM 87544
(505) 662-4185

Energy, Min.&Nat. Resources
Sally E. Martinez
2040 S. Pacheco
Santa Fe, NM 87505

505-827-7131

CLASSIFIED ADVERTISING INVOICE

START DATE: 05/09/95
END DATE: 05/09/95
NUMBER OF INSERTIONS: 1
NUMBER OF WORDS: 273
AD CHARGE: 104.24
REMARK:

CLASSIFICATION: 101 LEGALS

FIRST LINE OF AD TEXT: NOTICE OF PUBLICATIO

TOTAL DUE: \$ 104.24

TO PLACE A CLASSIFIED AD OR IF YOU HAVE A PROBLEM WITH THIS INVOICE
PLEASE CONTACT MARY MARGARET FULLMAN (505) 662-5933. OFFICE HOURS ARE FROM
8:00 TO 5:30.



Warren

April 25, 1995

Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, N.M. 87505

RECEIVED

APR 26 1995

Environmental Bureau
Oil Conservation Division

**Re: Discharge Plan Renewal Application for
Saunders, Vada & Bluitt Plants in Lea &
Roosevelt Counties, New Mexico**

Dear Mr. Ashley:

Please find enclosed a copy of the Bluitt Discharge Plan submitted for your approval. You can see that this plan is not in the same format as other Warren Petroleum Discharge Plans with which you are familiar. This is in an effort to remove some of the unnecessary material from the plan as I discussed with Roger Anderson and yourself in March. This plant is new to Warren Petroleum and previously was owned and operated by Trident Corporation. We have for the past one and one half years operated under their NMOC approved plan. There should be nothing we have not discussed on your site visit in March in this plan. If I might provide any other information please let me know.

I have not included copies of Saunders (GW-26) and Vada (GW-27) because I knew that you already had copies of these plans and, as we discussed there will be no changes in these plans except for the removal of the Waste Management Section and referencing this to the Warren Petroleum General file in your office as we decided on my March visit to your office. However, please accept this as application for approval of these plans.

I am in the process of developing a letter to you addressing the requirements for approval of these plans as we discussed on your site visits. I am coordinating this with Wayne Price of your Hobbs office to ensure that I do not overlook anything. One item that we agreed to on an informal basis was testing of wastewater that is injected into Warren owned disposal wells. As I recall this was to be completed in May. This testing is underway and I will provide you with copies of the results as soon as they are available.

I enjoyed your visit and look forward to working with you on a frequent basis. As always, it is a pleasure, both personally and professionally to work with the NMOC.

Sincerely,

Ken Stinson
Environmental Specialist



Recycled
Recyclable

NOTICE OF PUBLICATION

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

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discharges to the surface will be managed.

(GW-031) - U.S. Department of Energy, Fenton Hill Geothermal Facility, Larry Kirkman, Acting Area Manger, Albuquerque Operations, Los Alamos Area Office, Los Alamos, New Mexico 87544, has submitted a discharge plan renewal application for their Fenton Hill Geothermal Facility located in the NE/4, Section 13, Township 19 North, Range 2 East, NMPM, Sandoval County, New Mexico. Water from a geothermal loop is discharged to a double-lined service pond equipped with leak detection during periods of emergency venting or during periods when maintenance operations on the geothermal loop require a discharge of water from the loop. The discharge to the pond will be temporary as the water will be reinjected to the geothermal loop when normal operating conditions are attained. The water from the geothermal loop has a total dissolved solids concentration of approximately 3,200 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 370 feet with a total dissolved solids concentration of approximately 240 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

A handwritten signature in dark ink, appearing to read "William J. Lemay", followed by the initials "WJL" in a stylized script.

WILLIAM J. LEMAY, Director

SEAL

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505



January 11, 1995

CERTIFIED MAIL

RETURN RECEIPT NO. Z-765-962-792

Mr. Ken Stinson
Warren Petroleum Company
P.O. Box 1589
Tulsa, OK 74102

**RE: Discharge Plan Renewal
Bluitt, Monument, Saunders, and Vada Gas Plants**

Dear Mr. Stinson:

On June 15, 1994, Warren Petroleum Company received, via certified mail, notice from the New Mexico Oil Conservation Division (OCD) that the following discharge plans would expire on the noted dates. As of this date (January 11, 1995), the OCD has not received renewal applications from Warren Petroleum Company for the following plants.

- Bluitt Gas Plant, GW-018, located in Section 15, Township 8 South, Range 36 East, NMPM, Roosevelt County, New Mexico will expire on June 10, 1995.
- Monument Gas Plant, GW-025, located in Section 36, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico will expire on July 31, 1995.
- Saunders Gas Plant, GW-026, located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico will expire on July 31, 1995.
- Vada Gas Plant, GW-027, located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico will expire on July 31, 1995.

If you wish to renew operations at these facilities, discharge plan applications shall be submitted and approved by the OCD prior to the noted expiration dates. The applications shall follow the Water Quality Control Commission Regulations and the OCD's Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants delivered to you with the OCD's June 15, 1994 renewal notice letter.

VILLAGRA BUILDING - 408 Gallisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

Oil Conservation
827-7131

Mr. Ken Stinson
January 11, 1995
Page 2

If there are any questions on this matter, please contact Mark Ashley at (505) 827-7155.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Hobbs Office



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



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

June 15, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P 111 334 316

Mr. Ken Stinson
Warren Petroleum Company
P.O. Box 1589
Tulsa, OK 74102

**RE: Discharge Plan Renewals
Bluitt, Monument, Saunders and Vada Gas Plants**

Dear Mr. Stinson,

The following discharge plans were required and submitted to the Oil Conservation Division (OCD) pursuant to Water Quality Control Commission (WQCC) regulations and were approved for a period of five years. These approvals will expire on the noted dates.

- The discharge plan for the Bluitt Gas Plant, GW-018, located in Section 15, Township 8 South, Range 36 East, NMPM, Roosevelt County, New Mexico, will expire on June 10, 1995.
- The discharge plan for the Monument Gas Plant, GW-025, located in Section 36, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico, will expire on July 31, 1995.
- The discharge plan for the Saunders Gas Plant, GW-026, located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico, will expire on July 31, 1995.
- The discharge plan for the Vada Gas Plant, GW-027, located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico, will expire on July 31, 1995.

If these facilities continue to have potential or actual effluent

Mr. Ken Stinson
June 15, 1994
Page 2

or leachate discharges and you wish to continue operation, you must renew your discharge plans. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in you system, and if so, please include these modifications in your applications for renewal.

Note that the completed and signed applications form must be submitted with your discharge plant renewal requests.

If you no longer have any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact me at (505)827-5812.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

RCA/rlm

xc: OCD Hobbs Office

MEMORANDUM OF MEETING OR CONVERSATION



Telephone



Personal

Time

8:15 AM

Date

3-29-93

Originating Party

Ken Stinson (Environ. Specialist)

Warren Petroleum

Other Parties

C. EUSTICE

Subject

REQUESTED MODIFICATIONS TO WARREN'S SAUNDERS GAS PLANT
IN LEA CO.

Discussion

I informed Ken that the OCD would classify this as a major modification due to the request for the landfarm. Ken stated he wanted to discuss the landfarm request w/ Warren Management to make sure they wanted to pursue this. Warren proposed also to send amine reclaimer bottoms to their Class II injection well at the plant and to ~~be~~ send lube oil contaminated sludge from their engine room compressors to a reclaimer. These latter two requests would not require a modification but would simply be included in the existing plan. The landfarm would require filing fee and plat fee and public notice.

Conclusions or Agreements

Ken told me he would discuss this w/ management to see if they wanted to pursue the landfarm & would call me Weds 3-31-93 about it. He asked for verbal approval to take and inject amine bottoms now, RCA gave them approval to be followed w/ a letter.

Distribution

Signed

C. Stinson

(Continued)

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal

Time
8:15 AM

Date
3-29-93

Originating Party

Ken Stinson

Other Parties

C. Eustice

Subject Saunders GP, Warren Petroleum

Discussion during the discussion about the requests for modification to the existing DP, Ken stated J. Sexton had previously given Warren permission to take and spread engine room sludge on location.

I asked Ken to provide us w/ the approval letter.

Conclusions or Agreements He agreed to on Weds w/ he calls.

Distribution

Signed

C. Eustice



Warren Petroleum Company

A Division of Chevron U.S.A. Inc.
P.O. Box 1589, Tulsa, OK 74102

OIL CONSERVATION DIVISION
RECEIVED

'93 MAR 15 AM 9 15

March 8, 1993

Kathy Brown
Oil Conservation Division
State Office Building
Santa Fe, New Mexico, 87501

Dear Ms. Brown:

? In our phone conversation of March the second you indicated to me that the addition of the bottoms off of an amine reclaimer would be a minor modification to a discharge permit. Please accept this letter as application for such modification. This waste is proposed to be disposed of in an onsite class II injection well at Warren Petroleums Saunders Plant, located NE of Lovington, N.M. I have included the testing results for this waste as preformed by Southwest Labs in Midland, Texas. The volume for this waste is unknown at the present time, but is expected to be a low volume as this reclaimer should produce the same approximate volume of waste as other reclaimers Warren operates.

Warren would also like to further amend the Saunders Discharge Plan to reflect the addition of waste oil from engine room compressors to our scrubber oil which is sold to be reclaimed, and the sludge from the engine room floor which we propose to landfarm on the plant site and treat to TPH standards. We did not discuss these additions to the discharge plan but if you require any information please contact me at 505-393-2823. Please address any correspondence to Ken Stinson, P.O. Box 67, Monument, N.M. 88265.

will need specifics
major modif subject:
filling bee, flat bee

Ken Stinson
Environmental Specialist



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

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

October 29, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-351

Ms. L. T. Reed, Senior Engineer
Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-26
Saunders Gas Processing Plant
Lea County, New Mexico

Dear Ms. Reed:

The ground water discharge plan renewal (GW-26) for the Warren Petroleum Company Saunders Gas Processing Plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico is hereby approved. The renewal application consists of the original discharge plan as approved July 31, 1985, the renewal application dated August 27, 1990, and materials dated October 5, 1990, submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3-109.A., please note Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

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

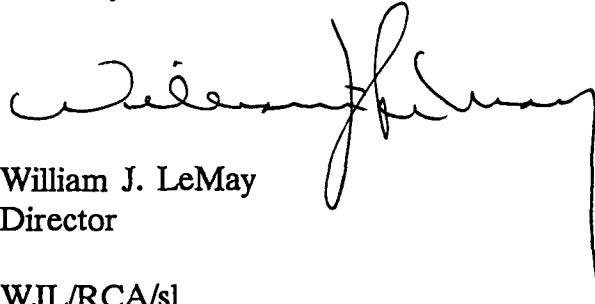
Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharge must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Mr. L. T. Reed
October 29, 1990
Page -2-

Pursuant to Section 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire July 31, 1995 and you should submit an application for renewal in ample time before that date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan renewal.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'William J. LeMay', with a long horizontal flourish extending to the right.

William J. LeMay
Director

WJL/RCA/sl

cc: OCD Hobbs Office



UNITED STATES
DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE

Ecological Services

Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

OIL CONSERVATION DIVISION
RECEIVED
'90 OCT 22 AM 8 50

October 17, 1990

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2008

Dear Mr. Lemay:

This responds to your public notice published on September 28, 1990, in which two injection well permit renewals and one permit modification for groundwater discharge were described. Our comments refer to the following permits.

(GW-26) - Warren Petroleum Company, Saunders Gas Processing Plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico.

(GW-27) - Warren Petroleum Company, Vada Gas Processing Plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico.

(GW-51) - Meridian Oil Gathering, Inc., Val Verde Gas Processing Plant located in Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico.

Wetlands, riparian vegetation and other sensitive wildlife habitat on or near the sites should be protected. Our concern with injection wells is the potential impact to fish and wildlife through leakage and other discharges. We also recommend that any open pits or tanks be covered or screened to prevent accessibility to wildlife. If impacts cannot be avoided, a mitigation plan should be developed to compensate for fish, wildlife and habitat losses.

If you have any questions concerning our comments, please contact Thomas O'Brien or Joel Lusk at (505) 883-7877.

Sincerely,


John C. Peterson
Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, Environment Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife
Enhancement, Albuquerque, New Mexico



Warren Petroleum Company

A Division of Chevron U.S.A. Inc.
P.O. Box 1689, Lovington, NM 88260

OIL CONSERVATION DIVISION
RECEIVED

October 5, 1990

'90 OCT 9 AM 9 17

Manufacturing Department

William J. LeMay, Director
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87504-2088

Attn: Roger C. Anderson
Environmental Engineer

SAUNDERS GAS PROCESSING PLANT
LEA COUNTY, NEW MEXICO
DISCHARGE PLAN GW-27

Dear Mr. Anderson:

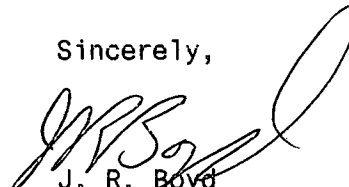
This letter will serve as notification that the items listed below were completed at the subject facility as of October 3, 1990.

- Compressor tubing was repaired for leaks.
- Installed curb at lube oil tanks. Dikes at waste water and oil tanks were inspected and found satisfactory.
- Bucket under the hot oil overflow is maintained as empty.
- The sumps were inspected for leaks.
- The underground drain lines were tested for leaks.
- The pump area was cleaned up.
- Diesel and unleaded gasoline tanks were diked.

These items have been incorporated into the Facility Discharge Plan. In addition, the Spill Prevention Control and Countermeasure Plan for this facility has been modified to include a PCB Spill Countermeasure Plan.

If you find that you have any questions, or need further information, please contact me at (505) 396-3221 or Linda Johnson at (918) 560-4138.

Sincerely,



J. R. Boyd
Plant Manager

JRB:REE:eb

cc: B. G. Schulz
L. L. Johnson

File: VII.B.3.d.(A)

Submit 4 Copies
to Appropriate
District Office

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

State of New Mexico
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

RECEIVED

Form C-134
Aug. 1, 1989

AUG 23 1989

OIL CONSERVATION DIV.
SANTA FE

Permit No. H-17

(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952 FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule 711(I)

Operator Name: Warren Petroleum Company, A Division of Chevron U.S.A., Inc.

Operator Address: P. O. Box 1689, Lovington, NM 88260

Lease or Facility Name Saunders Plant Location M 34 T14S R33E
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: 25 ft. x 35 ft.

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

☒ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

This is an emergency pit for dumping the hot oil heaters in the event of a fire.

It remains empty at all times.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Pit would be emptied by vacuum truck within 24 hours maximum.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures:

AUG 31 1989

OIL CONSERVATION DIV.
SANTA FE

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature [Signature] Title Plant Manager Date 8-22-89

Printed Name S. T. Wilson Telephone No. 505/396-3221

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected _____

Inspected by _____

Approved by _____

Title _____

Date _____

ORIGINAL SIGNED BY JERRY SEXTON,
DISTRICT I SUPERVISOR

AUG 30 1989

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Notice Of Publication

and numbered in the
..... Court of Lea
County, New Mexico, was published in a regular and
entire issue of THE LOVINGTON DAILY LEADER and
not in any supplement thereof, once each week on the
same day of the week, for one (1)

consecutive weeks, beginning with the issue of

September 27, 1990

and ending with the issue of

September 27, 1990

And that the cost of publishing said notice is the
sum of \$ 29.12

which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 16th
day of October, 1990

Ms. Jean Serice

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1994

LEGAL NOTICE NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERAL AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-26) Warren Petroleum Company, J. R. Boyd, Plant Manager, P. O. Box 1589, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Saunders Gas Processing Plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be managed.

(GW-27) - Warren Petroleum Company, J. R. Bayd, Plant Manager, P. O. Box 1589, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Vada Gas Processing Plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 1380 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 14,890 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 19th day of September, 1990. To be published on or before September 28, 1990.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

SEAL

Published in the Lovington Daily Leader September 27, 1990.

STATE OF NEW MEXICO
 COUNTY OF BERNALILLO

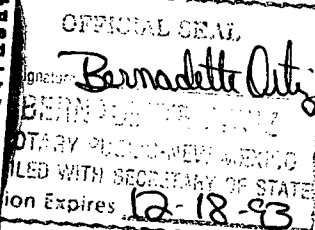
STATE OF NEW MEXICO
 ENERGY, MINERALS AND
 NATURAL RESOURCES
 DEPARTMENT

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STATE OF NEW MEXICO
 CONSERVATION DIVISION
 William J. LeMay
 Director
 September 29, 1990



EDJ-15-B (R-12/89)

NAT'L ADV. MGR. being duly sworn declares and says that he is of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

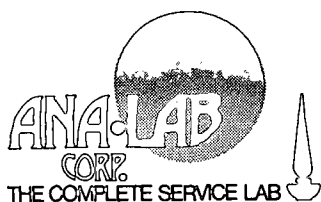
for 1 times, the first publication being on the 29 day of Sept 1990, and the subsequent consecutive publications on Sept 1990.

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 1 day of Oct 1990.

PRICE \$28.84

Statement to come at end of month.

ACCOUNT NUMBER C81184



2600 DUDLEY ROAD — KILGORE, TEXAS 75662 — 214/984-0551

Analytical Chemistry • Waste Treatment & Disposal • Equipment Sales

07/23/90

Environmental Bureau NM Oil D.
PO Box 2088
Santa Fe, NM 87504

RECEIVED

AUG 03 1990

OIL CONSERVATION DIV.
SANTA FE

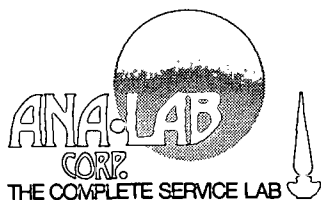
Sample Identification: Warren- Cooling Tower
Collected By: Roger Anderson
Date & Time Taken: 03/13/90 1400
On Site Data: 9003131400
Other:

Sampling Conditions Dipped Water Temp. 21oC Conductivity 1280 Grab

Lab Sample Number: 162258 Received: 03/21/90 Client: SNM1

PARAMETER	RESULTS	UNITS	TIME	DATE	METHOD	BY
Acrolein	(100	ug/l	0736	03/31/90	EPA Method 8240	PH
Acrylonitrile	(100	ug/l	0736	03/31/90	EPA Method 8240	PH
Benzene	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
Bromoform	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
Bromomethane	(10	ug/l	0736	03/31/90	EPA Method 8240	PH
Carbon Tetrachloride	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
Chlorobenzene	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
Chloroethane	(10	ug/l	0736	03/31/90	EPA Method 8240	PH
2-Chloroethylvinyl ether	(10	ug/l	0736	03/31/90	EPA Method 8240	PH
Chloroform	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
Chloromethane	(10	ug/l	0736	03/31/90	EPA Method 8240	PH
Dibromochloromethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
Bromodichloromethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
1,1-Dichloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PH
1,2-Dichloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PH

continued



2600 DUDLEY ROAD — KILGORE, TEXAS 75142-0551

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Analytical Chemistry • Waste Treatment & Disposal • Equipment Sales

AUG 03 1990

OIL CONSERVATION DIV.
SANTA FE

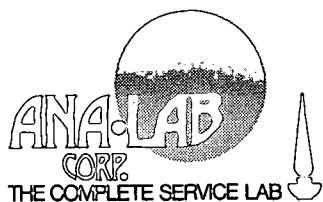
Lab Sample Number:

162258 Continued

Page 2

PARAMETER	RESULTS	UNITS	TIME	DATE	METHOD	BY
1,1-Dichloroethene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
trans-1,2-Dichloroethene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
1,2-Dichloropropane	45	ug/l	0736	03/31/90	EPA Method 8240	PM
cis-1,3-Dichloropropene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Ethyl benzene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Methylene Chloride	45	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1,2,2-Tetrachloroethane	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Tetrachloroethene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Toluene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1,1-Trichloroethane	45	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1,2-Trichloroethane	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Trichloroethene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Vinyl Chloride	110	ug/l	0736	03/31/90	EPA Method 8240	PM
trans-1,3-Dichloropropene	45	ug/l	0736	03/31/90	EPA Method 8240	PM
Iron	.3	mg/l	0935	06/04/90	EPA Method 236.1	CD
Alkalinity	70	mg/l	1200	04/03/90	EPA Method 310.1	DFK
Cation-Anion Balance	3.4	% Dif-	0900	06/08/90	ference	NT
Carbonate	1.5	mg/l	1500	04/17/90	APHA Method 263	DFK
Chloride	160	mg/l	0900	03/22/90	EPA Method 325.3	SH
Specific Conductance	1600	Micromhos	2000	03/23/90	EPA Method 120.1	KLH
Bicarbonate	70	mg/l	1500	04/17/90	APHA Method 263	DFK

continued



2600 DUDLEY ROAD — KILGORE, TEXAS 75662 — 214/984-0551

Analytical Chemistry • Waste Treatment & Disposal • Equipment Sales

RECEIVED

Lab Sample Number: 162258 Continued

AUG 03 1990

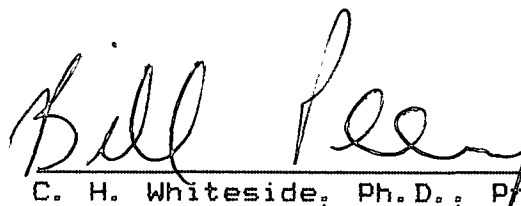
Page 3

OIL CONSERVATION DIV.
SANTA FE

PARAMETER	RESULTS	UNITS	TIME	DATE	METHOD	BY
Sulfate	500	mg/l	1330	04/19/90	EPA Method 375.4	DFK
Total Dissolved Solids	980	mg/l	1200	04/12/90	EPA Method 160.1	DFK
pH	7.7	SU		03/22/90	EPA Method 150.1	LB
Calcium	200	mg/l	2345	05/29/90	EPA Method 215.1	GK
Chromium	1.05	mg/l	0830	03/29/90	EPA Method 218.1	MR
Potassium	20	mg/l	1120	04/13/90	EPA Method 258.1	G06
Magnesium	32	mg/l	1745	04/27/90	EPA Method 242.1	GK
Sodium	80	mg/l	2200	03/29/90	EPA Method 273.1	GK

Quality Assurance for Sample Number 162258

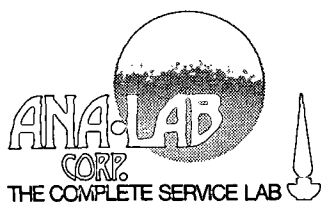
Sample #	Description	Result	Units	Dup/Std Value	Spk Conc.	Percent	Time	Date	By
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C. H. Whiteside, Ph.D., President

RECEIVED

AUG 03 1990

OIL CONSERVATION DIV.
SANTA FE



2600 DUDLEY ROAD — KILGORE, TEXAS 75662 — 214/984-0551

Analytical Chemistry • Waste Treatment & Disposal • Equipment Sales



06/08/9

Environmental Bureau NM Oil D.
PO Box 2088
Santa Fe, NM 87504

Sample Identification: Warren- Cooling Tower
Collected By: Roger Anderson
Date & Time Taken: 03/13/90 1400
On Site Data: 9003131400
Other: Sampling Conditions Dipped Water Temp. 21oC Conductivity 1200 Grab

Saunders

Lab Sample Number: 162258 Received: 03/21/90

PARAMETER	RESULTS	UNITS	TIME	DATE	METHOD	BY
Arocluin	(100	ug/l	0736	03/31/90	EPA Method 8240	PM
Acrylonitrile	(100	ug/l	0736	03/31/90	EPA Method 8240	PM
Benzene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Bromoform	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Bromomethane	(10	ug/l	0736	03/31/90	EPA Method 8240	PM
Carbon Tetrachloride	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Chlorobenzene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Chloroethane	(10	ug/l	0736	03/31/90	EPA Method 8240	PM
2-Chloroethylvinyl ether	(10	ug/l	0736	03/31/90	EPA Method 8240	PM
Chloroform	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Chloromethane	(10	ug/l	0736	03/31/90	EPA Method 8240	PM
Dibromochloromethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Bromodichloromethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1-Dichloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,2-Dichloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1-Dichloroethene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM

continued



2600 DUDLEY ROAD — KILGORE, TEXAS 75662 — 214/984-0551

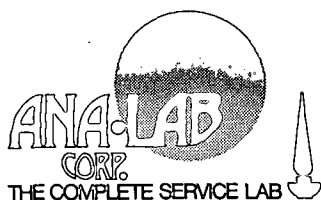
Analytical Chemistry • Waste Treatment & Disposal • Equipment Sales

Lab Sample Number: 162258 Continued

Page 2

PARAMETER	RESULTS	UNITS	TIME	DATE	METHOD	BY
trans-1,2-Dichloroethene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,2-Dichloropropane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
cis-1,3-Dichloropropene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Ethyl benzene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Methylene Chloride	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1,2,2-Tetrachloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Tetrachloroethene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Toluene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1,1-Trichloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
1,1,2-Trichloroethane	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Trichloroethene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Vinyl Chloride	(10	ug/l	0736	03/31/90	EPA Method 8240	PM
trans-1,3-Dichloropropene	(5	ug/l	0736	03/31/90	EPA Method 8240	PM
Iron	.3	mg/l	0935	06/04/90	EPA Method 236.1	CD
Alkalinity	70	mg/l	1200	04/03/90	EPA Method 310.1	DFK
Cation-Anion Balance	3.4	% Dif-	0900	06/08/90	ference	NT
Carbonate	(.5	mg/l	1500	04/17/90	APHA Method 263	DFK
Chloride	160	mg/l	0900	03/22/90	EPA Method 325.3	SW
Specific Conductance	1600	Micromhos	2000	03/23/90	EPA Method 120.1	KLM
Bicarbonate	70	mg/l	1500	04/17/90	APHA Method 263	DFK
Sulfate	500	mg/l	1330	04/19/90	EPA Method 375.4	DFK

continued



2600 DUDLEY ROAD — KILGORE, TEXAS 75662 — 214/984-0551

Analytical Chemistry • Waste Treatment & Disposal • Equipment Sales

Lab Sample Number: 162258 Continued

Page 3

PARAMETER	RESULTS	UNITS	TIME	DATE	METHOD	BY
Total Dissolved Solids	980	mg/l	1200	04/12/90	EPA Method 160.1	DFK
pH	7.7	SI		03/22/90	EPA Method 150.1	LB
Calcium	260	mg/l	2345	05/29/90	EPA Method 215.1	GK
Chromium	1.05	mg/l	0830	03/29/90	EPA Method 218.1	MR
Potassium	20	mg/l	1120	04/13/90	EPA Method 258.1	GOG
Magnesium	32	mg/l	1745	04/27/90	EPA Method 242.1	GK
Sodium	80	mg/l	2200	03/29/90	EPA Method 273.1	GK

Quality Assurance for Sample Number 162258

Sample #	Description	Result	Units	Dup/Std Value	Spk Conc.	Percent	Time	Date	By
Alkalinity									
	Standard	101	mg/l	100		101	1200	04/03/90	DFK
	Standard		mg/l			100	1200	04/03/90	DFK
162258	Duplicate	70	mg/l	69		101	1200	04/03/90	DFK
162258	Spike		mg/l		100	100	1200	04/03/90	DFK
Total Dissolved Solids									
	Standard	996	mg/l	1000		100	1200	04/12/90	DFK
163043	Duplicate	136	mg/l	132		103	1200	04/12/90	DFK
Potassium									
161990	Duplicate	156	mg/l	152		103	1120	04/13/90	GOG
162258	Duplicate	25	mg/l	23		108	1120	04/13/90	GOG
162261	Duplicate	4200	mg/l	4200		100	1120	04/13/90	GOG
162261	Spike		mg/l		.50	108	1120	04/13/90	GOG


C. H. Whiteside, Ph.D., President



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

ANALYSIS REQUEST FORM

Contract Lab Una LabContract No. 78-521.07-013OCD Sample No. 9003131400

Collection Date	Collection Time	Collected by—Person/Agency	
3/13/90	1400	Anderson/Olson	OCD
SITE INFORMATION			
Sample location <u>Warren Pet - Saunders Gas Plant</u>			
Collection Site Description <u>Cooling tower basin</u>			
			Township, Range, Section, Tract: + + +

SEND
FINAL
REPORT
TO ↓ENVIRONMENTAL BUREAU
NM OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

SAMPLE FIELD TREATMENT — Check proper boxes

No. of samples submitted: 4 Vials + 2 plastic

- ☒ NF: Whole sample (Non-filtered)
☐ F: Filtered in field with 0.45 μ membrane filter
☐ PF: Pre-filtered w/45 μ membrane filter

- 4/1 ☒ NA: No acid added
☐ A: HCL
☐ A: 2ml H₂SO₄/L added
1 ☒ A: 5ml conc. HNO₃ added
☐ A: 4ml fuming HNO₃ added

FIELD COMMENTS:

SAMPLING CONDITIONS <input type="checkbox"/> Bailed <input type="checkbox"/> Pump <input checked="" type="checkbox"/> Dipped <input type="checkbox"/> Tap	Water level	—
	Discharge	—
	Sample type	<u>Grab</u>
	Conductivity (Uncorrected)	<u>1280</u> "mho
pH(00400) <u>7.3</u>	Conductivity at 25° C	<u>4</u> mho
Water Temp. (00010) <u>21° C</u>		

LAB ANALYSIS REQUESTED:

ITEM	DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOD
<input checked="" type="checkbox"/> 001	VOA	8020	<input type="checkbox"/> 013	PHENOL	604	<input type="checkbox"/> 026	Cd	7130
<input type="checkbox"/> 002	VOA	602	<input type="checkbox"/> 014	VOC	8240	<input type="checkbox"/> 027	Pb	7421
<input checked="" type="checkbox"/> 003	VOH	8010	<input type="checkbox"/> 015	VOC	624	<input type="checkbox"/> 028	Hg(L)	7470
<input type="checkbox"/> 004	VOH	601	<input type="checkbox"/> 016	SVOC	8250	<input type="checkbox"/> 031	Se	7740
<input type="checkbox"/> 005	SUITE	8010-8020	<input type="checkbox"/> 017	SVOC	625	<input checked="" type="checkbox"/> 032	ICAP	6010
<input type="checkbox"/> 006	SUITE	601-602	<input type="checkbox"/> 018	VOC	8260	<input checked="" type="checkbox"/> 033	CATIONS/ANIONS	
<input type="checkbox"/> 007	HEADSPACE		<input type="checkbox"/> 019	SVOC	8270	<input type="checkbox"/> 034	N SUITE	
<input type="checkbox"/> 008	PAH	8100	<input type="checkbox"/> 020	O&G	9070	<input type="checkbox"/> 035	NITRATE	
<input type="checkbox"/> 009	PAH	610	<input type="checkbox"/> 022	AS	7060	<input type="checkbox"/> 036	NITRITE	
<input type="checkbox"/> 010	PCB	8080	<input type="checkbox"/> 023	Ba	7080	<input type="checkbox"/> 037	AMMONIA	
<input type="checkbox"/> 011	PCB	608	<input checked="" type="checkbox"/> 024	Cr	7190	<input type="checkbox"/> 038	TKN	
<input type="checkbox"/> 012	PHENOL	8040	<input type="checkbox"/> 025	Cr6	7198	<input type="checkbox"/>	OTHER	



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

GARREY CARRUTHERS
GOVERNOR

January 5, 1990

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-159

Ms. L. T. Reed
Senior Engineer
WARREN PETROLEUM COMPANY
P. O. Box 1589
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-26
Saunders Gas Processing Plant
Lea County, New Mexico

Dear Ms. Reed:

On July 31, 1985, the ground water discharge plan, GW-26 for the Saunders Gas Processing Plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on July 31, 1990.

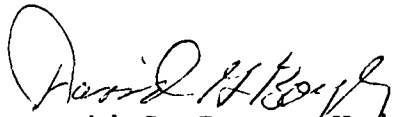
If your facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application.

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

Please note that all gas plants, refineries and compressor stations in excess of 25 years of age will be required to submit plans for, or the results of, an underground drainline testing program as a requirement for discharge plan renewal.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5884.

Sincerely,

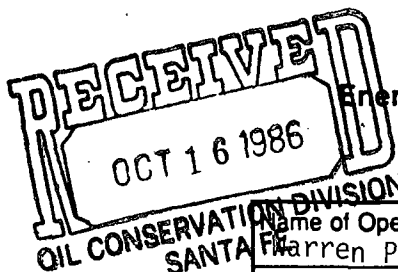


David G. Boyer, Hydrogeologist
Environmental Bureau Chief

DGB/sl

Enclosure

cc: OCD Hobbs Office



State of New Mexico
Energy and Minerals Department

OIL CONSERVATION DIVISION
P. O. Box 2088
Santa Fe, New Mexico 87501

NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS

Name of Operator Warren Petroleum Co.					Address P. O. Box 1689, Lovington, N.M. 88260					
Report Of	Fire	Break	Spill	Leak X	Blowout	Other*				
Type of Facility	Drig Well	Prod Well	Tank Btty	Pipe Line X	Gaso Pint	Oil Rty	Other*			
Name of Facility Saunders Plant										
Location of Facility (Quarter/Quarter Section or Footage Description) SW 1/4					Sec. 9	Twp. 16S	Rge. 37E	County Lea		
Distance and Direction from Nearest Town or Prominent Landmark 5 miles East of Lovington, N.M.										
Date and Hour of Occurrence 10-14-86 at 3:30 pm				Date and Hour of Discovery 10-14-86 at 3:30 pm						
Was Immediate Notice Given?		Yes	No	Not Required X	If Yes, To Whom					
By Whom				Date and Hour						
Type of Fluid Lost Oil				Quantity Of Loss	20	BO BW	Volume Recovered	N/A	BO BW	
Did Any Fluids Reach A Watercourse?		Yes	No X	Quantity						
If Yes. Describe Fully**										
Describe Cause of Problem and Remedial Action Taken** The pipeline pulled in two. The line was uncovered and repaired.										
Describe Area Affected and Cleanup Action Taken** 150' circle of range land. The spill was covered with sand.										
Description of Area		Farming	Grazing X	Urban	Other*					
Surface Conditions		Sandy	Sandy Loam	Clay	Rocky X	Wet	Dry X	Snow		
Describe General Conditions Prevailing (Temperature, Precipitation, Etc.)** 65°F., dry, moderately windy.										
I Hereby Certify That the Information Above is True and Complete to the Best of My Knowledge and Belief										
Signed					Title		Plant Manager		Date	10-15-86

*Specify

**Attach Additional Sheets If Necessary

cc L. T. Reed, Tulsa

NM-5

Chevron

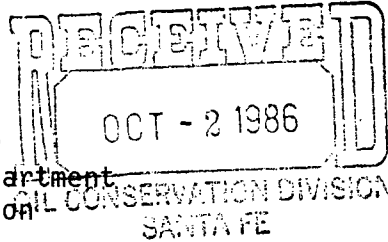


Warren Petroleum Company

A Division of Chevron U.S.A. Inc.
P.O. Box 1589, Tulsa, OK 74102

Manufacturing Department

September 29, 1986



R. L. Stamets, Director
Energy and Minerals Department
Oil Conservation Division
State of New Mexico
P. O. Box 2088
Santa Fe, New Mexico

Attention: David G. Boyer
Hydrogeologist

Gentlemen:

Re: Warren Petroleum Company
Division of Chevron U.S.A. Inc.
Eunice (GW-5), Monument (GW-25), Saunders (GW-26)
Vada (GW-27) Gas Processing Plants
Lea County, New Mexico

Attached is material which we have added to the subject discharge plans. This information consists of a waste management plan for all of the facilities and a description of the emergency pit for our Saunders Plant

If you find that you have any questions or need additional information, please call Linda Johnson or me at (918) 560-4138.

Very truly yours,

WARREN PETROLEUM COMPANY

L. T. Reed
Lead Engineer

LTR/LLJ/ar
Attachment

WASTE MANAGEMENT PLAN

SAUNDERS GAS PROCESSING PLANT

This Waste Management Plan has been developed to meet Corporate and Governmental requirements concerning disposal of various operating materials at the end of its useful life.

At the present time, the Saunders Plant does not generate any RCRA hazardous wastes. If or when it should be determined a hazardous waste exists, it will be disposed of according to RCRA standards with documentation and proper manifests in an approved hazardous waste disposal site. Formal contracts will be negotiated and disposal site inspections will be performed.

1. The following list shows the types, expected amounts, and source of wastes which are generated at the Saunders Plant.


<u>TYPE</u>	<u>EXPECTED AMOUNT</u>	<u>SOURCE</u>
Filter Cartridges	1,600/year	Oil Filters, Dehydrator Dust Filters, Air Filters, Amine Filters
Process Waste Water	135,000/yr.	Cooling Tower Blowdown, Wash Water, Produced Water, Brine Water
Plant Trash	15 Tons/yr.	Office Trash, Wood, Cardboard, Miscellaneous
Cooling Tower Basin Sludge	6 Tons/yr.	Cooling Tower
Sump & Tank Bottoms	100 Bbls/yr.	Scrubber Oil Tanks, Plant Sumps
Iron Sponge	1,500 lb/yr.	Iron Sponge Treater
Steel Drums	24 year	Chemical & Oil Drums
Concrete	5 Tons/yr.	Miscellaneous Foundations and Sidewalks
Molecular Sieve	2 Tons/yr.	Gas Dehydrator
Ion Exchange Resin	100 Lb/year	Water Softeners
Selica Gel	120 Lb/year	Instrument Air Dehydrator
Scrap Metal	7 Tons/year	Various
Used Oil	1,500 Bbls/yr.	Engines
Spent Charcoal	5,000 Lb/year	Amine Filter
Solvent	2,000 gal/year	cleaning Fluid

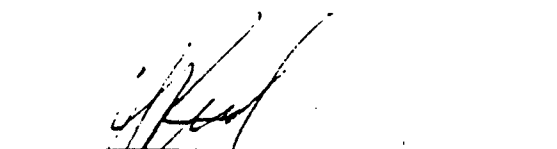
- 1a. If asbestos or PCB's are encountered, they will be tagged and when necessary disposed of according to approved methods.
2. For the listed wastes, operating procedures are followed to minimize the amounts generated; such as steel drums are exchanged with the vendor, molecular sieve is regenerated if practical, etc.
3. All wastes listed in No. 1 have been properly classified as hazardous or non-hazardous. If a waste cannot be positively identified as hazardous or non-hazardous, then the Warren Petroleum Environmental Affairs Department will be contacted to recommend an outside company to do testing and analysis.
4. The necessary safety precautions for handling each waste listed in No. 1 above should be taken to avoid adverse health affects. The Safety Department and Environmental Department are contacted when specific precautions are needed. Reference to the Material Safety Data Sheets (MSDS) is made concerning proper handling of all products.
5. Potential for waste recycling is considered when the use of wastes is feasible in alternative processes, such as re-injecting water into a producing formation for enhanced oil recovery.
6. Following is the proper disposal methods in use for each of the waste items listed in No. 1:

<u>TYPE</u>	<u>DISPOSAL METHOD</u>
Filters	Waste Control of New Mexico
Process Waste Water	Injected into either the Saunders or Gillespie Disposal Well. If Necessary water may be trucked to a permitted disposal well.

6. Contd.

<u>TYPE</u>	<u>DISPOSAL METHOD</u>
Plant Trash	Waste Control of New Mexico
Cooling Tower Basin Sludge	Dehydrated and trucked to Lovington Landfill upon approval of landfill.
Sump & Tank Bottoms	Vacuum trucked to treating plant
Iron Sponge	Buried on site after neutralization
Steel Drums	Rinsed, crushed and sold to scrap dealer (those that are not return- able)
Concrete	Disposed of on site
Molecular Sieve	Buried on site
Ion Exchange Resin	Buried on site
Silica Gel	Buried on site
Scrap Metal	Sold to scrap dealer
Used Oil	Added to scrubber oil sales
Spent Charcoal	Buried on site
Solvent	Added to scrubber oil sales


Plant Manager Approval


Environmental Department Approval

EMERGENCY PIT

A dry, emergency pit exists at the Saunders Plant. The pit would be used to contain oil from the heaters in the event of a leak in the heaters. After the emergency, the pit would be cleared; any oil would be recovered and contaminated soil would be disked into the ground.



TONEY ANAYA
GOVERNOR

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

50 YEARS



1935 - 1985

October 18, 1985

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Warren Petroleum Co.
P.O. Box 1589
Tulsa, OK 74102

Attention: Ms. L. T. Reed

Re: Discharge Plans for Monument
(GW-25), Saunders (GW-26)
and Vada (GW-27) Gas Processing
Plants - Lea County, NM

Dear Ms. Reed:

The information that was stipulated for approval of the subject discharge plans has been reviewed and accepted by OCD. The above-listed discharge plans are hereby approved for a period of five years. This approval will expire July 31, 1990, and you should submit an application for new approval in ample time before that date.

Hydrostatic tests on the Saunders underground wastewater piping will be required for discharge plan renewal in 1990. Hydrostatic tests of underground wastewater piping at the Vada plant will not be required until 1995.

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

Sincerely,

R. L. STAMETS
Director

RLS/JB/dp

cc: Oil Conservation Division - Hobbs



Warren Petroleum Company

A Division of Chevron U.S.A. Inc.

P.O. Box 1589, Tulsa, OK 74102

Manufacturing Department

OIL CONSERVATION DIVISION

OCT 17 1985

RECEIVED

October 14, 1985

R. L. Stamets
State of New Mexico
Oil Conservation Division
Energy and Minerals Department
P.O. Box 2088
Santa Fe, New Mexico 87501

Attn: Philip Baca

RE: Discharge Plans for Monument (GW-25), Saunders (GW-26) and
Vada (GW-27) Gas Processing Plants - Lea County, New Mexico

Dear Mr. Baca:

With regard to the subject discharge plans, the following information is submitted in accordance with your request of July 31, 1985.

The discharge plans were conditionally approved pending submittal of the requested information by October 18, 1985.

As such, attached please find a drawing for each of the subject plants showing the underground waste water pipelines. The approximate age, material, thickness and pipe diameter are indicated. Steel pipelines are connected by welding; polyethylene lines are joined by butt fusion; PVC pipe is installed using PVC contact cement.

The majority of the disposal of solid waste not governed by the Resource Conservation and Recovery Act (non-RCRA solid waste) at the Monument Plant is by a solid refuse collector, Waste Control of New Mexico. The remainder of the solid waste is disposed of at the plant site. It consists mostly of lumber, scrap metal, rock, debris, etc. All non-RCRA solid waste is removed from the Saunders and Vada Plants by Waste Control of New Mexico, Inc.

Philip Baca
Page 2

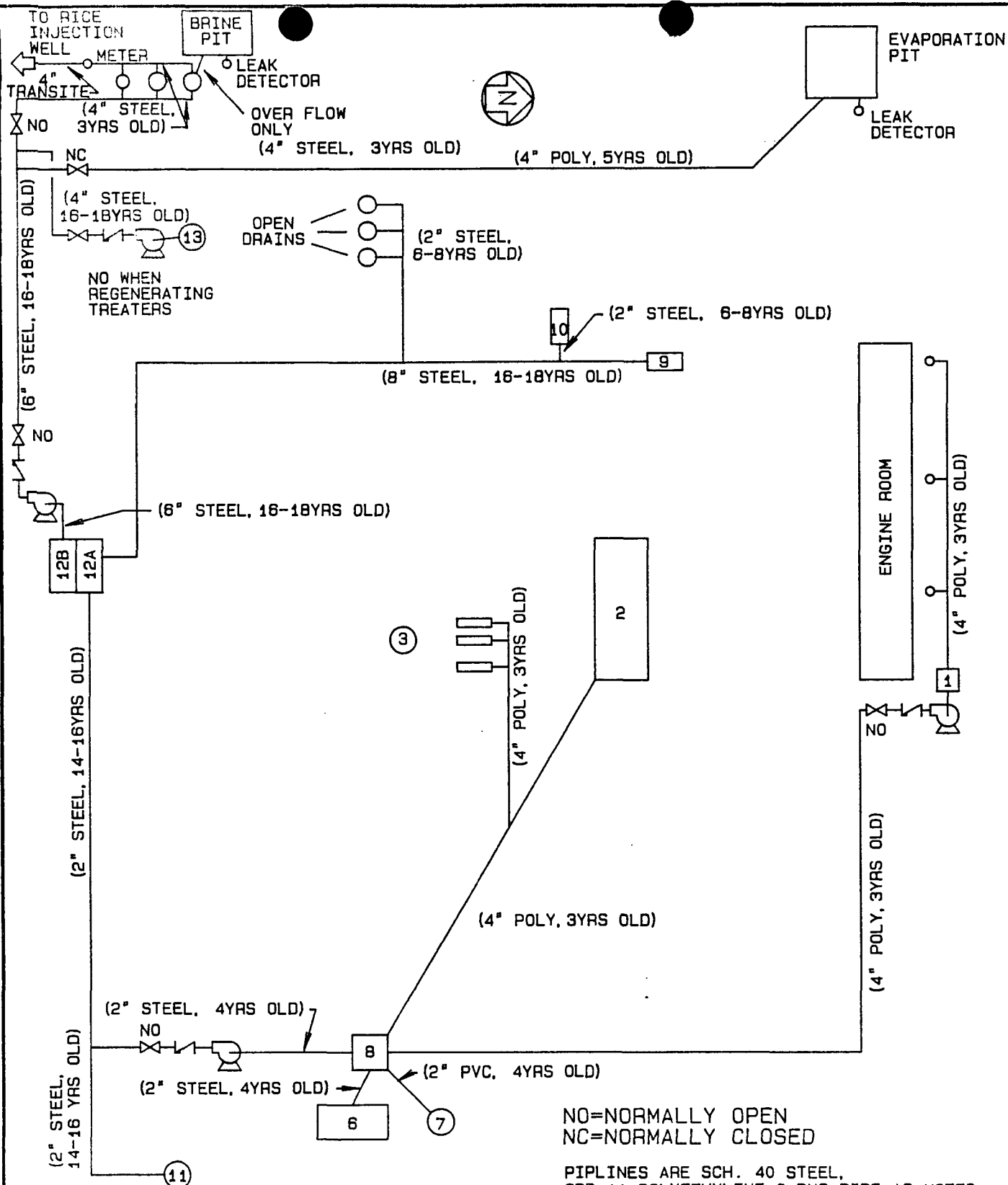
The information provided herein is in answer to your letter of July 31, 1985 as we have interpreted your questions. If you find that you need further information, please feel free to contact Linda Johnson or myself at (918) 560-4138.

Very truly yours,



for
L. T. Reed, Director
Environmental Affairs

LLJ/cd



- LEGEND**
- 1-NORTH ENGINE ROOM SUMP
 - 2-COOLING TOWER
 - 3-CONDENSORS
 - 4-BOILER
 - 5-BOILER
 - 6-BOILER
 - 7-H₂S SCRUBBER
 - 8-EAST SUMP
 - 9-SOUTH ENGINE ROOM SUMP
 - 10-CONDENSORS
 - 11-CONDENSATE TANK
 - 12A-SKIMMER
 - 12B-SOUTH SUMP
 - 13-ZEOLITE H₂O TREATER

THICKNESS

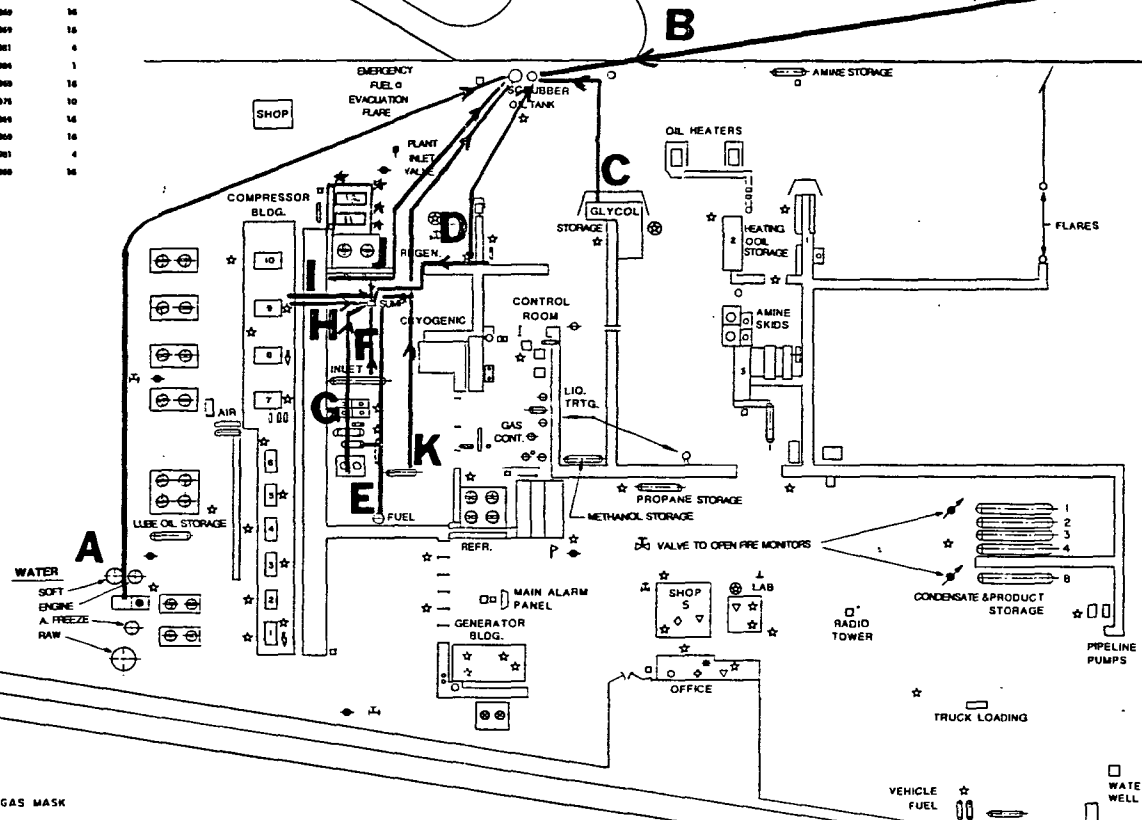
STEEL 2"=0.154"
 STEEL 4"=0.237"
 STEEL 6"=0.280"
 STEEL 8"=0.322"
 POLY 4"=0.409"
 PVC 2"=0.300"
 TRANS. 4"=RICE LINE

NO=NORMALLY OPEN
 NC=NORMALLY CLOSED

PIPLINES ARE SCH. 40 STEEL,
 SDR-11 POLYETHYLENE & PVC PIPE AS NOTED

NO. OF UNITS REQUIRED THUS			NO-AFE NO.
WARREN PETROLEUM COMPANY A DIVISION OF GULF OIL CORPORATION			
WASTE WATER SYSTEM LAYOUT			
PLANT 118 MONUMENT-45			LEA, COUNTY, NM.
DRAWN	HPK	DATE 10/11/85	SCALE NONE
CHECKED	LLJ	DATE 10/11/85	DRAWING NO.
APPR.	PDA	DATE 10/11/85	118-1001-0

ITEM	SOURCE	SIZE	MATERIAL	UNIT PRICE	CONNECTIONS	YEAR	AGE
A	Water sump tank	2' x 20' x 1'	Polyethylene	0.215	Fixed	1984	1
B	Field Scrubber	1' x 52" x 30"	Steel	0.179	Up/down	1989	16
C	Allyol tank	1' x 52" x 30"	Steel	0.179	Up/down	1989	16
D	Hydro Filler	1' x 52" x 30"	Steel	0.179	Up/down	1981	4
E	Fuel Scrubber	1' x 52" x 30"	Steel	0.179	Up/down	1986	1
F	Isolac Scrubber	1' x 52" x 30"	Steel	0.179	Up/down	1989	16
G	Scrubber Drains	1' x 52" x 30"	Steel	0.199	Up/down	1976	10
H	Engine Room	4' x 52" x 40"	Steel	0.257	Up/down	1980	16
I	Engine Room	12' x 52" x 30"	Steel	0.235	Up/down	1980	16
J	Recompressors	1' x 52" x 30"	Steel	0.179	Up/down	1981	4
K	3rd Stage	1' x 52" x 30"	Steel	0.179	Up/down	1980	16



LEGEND

- | | | |
|--------------------------------|---------------------------------|--------------------------|
| ● HYDRANT | ◇ GAS MASK | ● FIRE PUMP |
| ● HYDRANT WITH MONITOR | ○ OXYGEN MASK | ↓ FIRE BLANKET |
| ● MONITOR | ▽ SHOWER, EYEWASH | S FIRE SUIT |
| ☆ FIRE EXTINGUISHER | □ EMERGENCY WHISTLE | ○ FIRE SUIT W/RESPIRATOR |
| ⊕ WHEEL UNIT FIRE EXTINGUISHER | ⊥ FOAM | 💡 SMOKE DETECTORS |
| * FIRE EXTINGUISHER - WATER | ⚡ PLANT SHUT - DOWN VALVES | ⬢ FIRST AID STATION |
| 🚒 FIRE HOSE CART | ▽ H ₂ S GAS DETECTOR | ☐ SHUTDOWN STATION |
| ⊙ FIRE PLUG W/MONITOR | ◇ EMERGENCY OXYGEN | |
| ⊙ FIRE PLUG | ▷ AIR SOCK | |

VADA PLANT 139
-EMERGENCY EQUIPMENT LAYOUT

[illegible]



TONEY ANAYA
GOVERNOR

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

July 31, 1985

50 YEARS



1935 - 1985

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Warren Petroleum Co.
P. O. Box 1589
Tulsa, Oklahoma 74102

Attention: Ms. L. T. Reed

Dear Ms. Reed:

The following discharge plans have been reviewed by OCD:

- Warren Petroleum Co.'s Monument gas processing plant located in the SW/4 of Section 36, Township 19 South, Range 36 East, NW/4 of Section 36, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico.
- Warren Petroleum Co.'s Saunders gas processing plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico.
- Warren Petroleum Co.'s Vada gas processing plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico.

The above-listed discharge plans for Warren Petroleum Co.'s Monument (GW-25), Saunders (GW-26), and Vada (GW-27) gas processing plants are hereby approved with the following conditions:

1. Within sixty (60) days of receipt of this letter, the following information concerning any underground wastewater piping for all three plants must be provided:

- A drawing indicating all underground wastewater pipelines for each plant.

- The approximate age and diameter of all underground wastewater pipelines.
- The material specifications and thickness for all underground wastewater pipelines.
- The installation method (e.g. welded, bell and spigot, etc...) for all underground wastewater pipelines.

The information requested is necessary to evaluate the potential for the underground piping to leak and possibly contaminate the groundwater.

2. Within sixty (60) days of receipt of this letter, submit information on the methods for disposal of non-RCRA solid waste disposal including domestic and industrial refuse (e.g., spent catalyst, etc...). This information is required to assure that such disposal methods will not create the potential for groundwater contamination.

The approved discharge plans consist of the plan dated March 1, 1985 and the materials dated May 13, 1985 and July 9, 1985, submitted as supplements to the discharge plan.

The discharge plan was submitted pursuant to Section 3-106 of the NM Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

There will be no routine monitoring or reporting requirements.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C., you are required to notify the director of the facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants.

Pursuant to Subsection 3-109.G.4., this plan approval is for a period of five years. This approval will expire July 31, 1990, and you should submit an application for new approval in ample time before that date.

Please be aware that pending evaluation of the wastewater piping information requested in this letter, submittal of results of hydrostatic tests on the plants' underground wastewater piping may be required for discharge plan renewal. You will be notified of this within ninety (90) days of OCD's receipt of the information requested in this letter.

On behalf of the staff of the Oil Conservation Division, I wish to thank you (and your staff and/or consultants) for your cooperation during this discharge plan review.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Stamets", written in dark ink.

R. L. STAMETS,
Director

RLS/PB/dr

cc: Oil Conservation Division - Hobbs



Warren Petroleum Company

A Division of Chevron U.S.A. Inc.
P.O. Box 1589, Tulsa, OK 74102

Manufacturing Department

July 9, 1985

Mr. Philip L. Baca
Environmental Engineering Specialist
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

RE: Monument, Saunders and Vada Discharge Plans -
Information Requested for Continued Review Process

Dear Mr. Baca:

The attached information is provided as you requested in your letter of
May 17, 1985.

If you have any questions or need further information, please contact Linda
Johnson or me at (918) 560-4138.

Very truly yours,

L. T. Reed, Director
Environmental Affairs

LTR/LLJ/dm

Attachment

INFORMATION REQUESTED
FOR
CONTINUED EVALUATION
OF
DISCHARGE PLANS
FOR
MONUMENT, SAUNDERS & VADA
GAS PROCESSING PLANTS

PART A (1): CHEMICAL ANALYSES.

Additional Chemical analyses for the Monument, Saunders and Vada Plants are attached

Concerning the January 30, 1985 chemical analysis submitted as Appendix B with our updated discharge plans of March 1, 1985, it is our understanding that the specific conductance and total dissolved solids for the Monument and Saunders plants, as well as the ratio between the two parameters, are within expected ranges. For the Vada Plant, the pH and alkalinity are the first indications that amine entered the waste water. Amine has a low specific conductance but a high total dissolved solid calculated count.

PART A (2): SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN - PART II, ALTERNATE A.

- (a) All pipeline safety regulations are administered through the New Mexico Corporation Commission as well as the U.S. Department of Transportation. As such, Warren works directly with those agencies with regard to pipeline field and reporting matters.
- (b) The term vaporization, used to describe hydrocarbon compounds, is used as a general term to indicate the quality of the material mentioned.

A discharge or spill, as defined by federal and state regulations, is at hand when there is a reasonable probability that the discharged material will reach surface, or subsurface water. Warren has had no spills from delivery lines.

Please note that there is an excess flow valve which will shut off product flow if there is any failure in the connection.

PART A (3): DISPOSAL METHODS

Warren works directly with the U.S. Environmental Protection Agency, Region VI Office and the New Mexico Environmental Improvement Division for continued compliance with Resource Conservation and Recovery Act (RCRA) regulations.

PART B (1): MONUMENT PLANT SPILL PLAN

- (a) Any water removed from diked area by vacuum truck is hauled from the plant by Oil Processing Company who in turn reclaims the oil and disposes of the remaining waste water into an approved injection well. Pure rainwater is allowed to evaporate from the plant yard.
- (b) As stated in Section I, Part A (5) of the March 1, 1985 Updated Discharge Plans, plant inspections are made at a minimum of three times per day, and most of the time, it is made once every four hours. Any leaks are found and repaired as soon as possible. When tanks are in need of repair, they are either reworked or replaced. Since this method has proved successful in that no spills have occurred from the storage tanks, any other, more formal, means for corrosion checks are not deemed necessary at this time. If we do suspect a problem, a thickness test is run on the tank.

PART B (2) SCHEMATIC OF WASTEWATER SYSTEM FOR MONUMENT PLANT

Attached please find a revised schematic of the Monument Plant Wastewater System.

PART B (3) ACCUMULATION OF SLUDGE FOR MONUMENT PLANT

There has been no accumulation of sludge in the skimmers. Any particles are apparently held in suspension and removed by vacuum.

PART B (4) EVAPORATION PIT LINING MATERIALS FOR MONUMENT PLANT

The lining materials used for the evaporation pit are 36 mil chlorinated polyethylene (CPE) laminate and 30 mil CPE.

PART B (5): EVAPORATION PIT/BRINE PIT AT THE MONUMENT PLANT

The Evaporation Pit is located 1200 feet to the northwest of the amine coolers. The Brine Pit is located 1300 feet to the southwest of the amine coolers. The evaporation pond is usually dry. The brine pond contains only enough water to prevent wind damage to the liner. A plot plan is attached showing these directions from the amine coolers.

PART B (6): SUMP/PUMP INFORMATION FOR THE MONUMENT PLANT

The capacity of each sump is as follows:

North Engine Room Sump 7,200 gallons
South Engine Room Sump 10,200 gallons
East Sump 13,400 gallons
South Sump 11,300 gallons

The capacity of the sump into which all effluent flows is 520 BBLs stored in three tanks. Any overflow would go to the brine pit. The effluent in the tanks is then sent to the Rice Engineering well by gravity feed. There is no pump on the discharge line to Rice Engineering. The sump capacities upstream of the three tanks are listed above. We do not have pump curves for the two pumps that deliver effluent to the three tanks.

PART B (7): MINIMUM FREEBOARD-MONUMENT PLANT

For the Evaporation Pond, the freeboard would be at least two feet beneath the top of the level.

The freeboard for the Brine Pond would be at least two feet beneath the top of the level.

PART C (1): SAUNDERS PLANT EFFLUENT

The Saunders Plant has experienced no process changes that would cause a variance in the quality of the plant effluent from the two dates you question which are February 23, 1983 and January 30, 1985. An evaluation of, and a comparison between, the two samples must be made in light of the fact that the samples are waste water and by that nature, the components will vary. A comparison of each sample with the background analysis will provide further information.

We stated in our March 1, 1985 Update For Discharge Plans along with the January 30, 1985 analyses that to obtain highly consistent analyses of the effluent would be difficult due to the several sources throughout each plant which combine to provide the whole.

PART C (2): SAUNDERS PLANT CONDENSATE

The condensate is held in the storage tank at a pressure of 210 psig. The major constituents of the condensate are: methane (1%), ethane (35%), propane (28%), butanes (17%), pentanes (8%), hexane (11%).

PART C (3): SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN-PART II, ALTERNATE A FOR THE SAUNDERS PLANT.

(a) Sludge accumulation is very slow. When necessary, any sludge is hauled by Gandy vacuum truck to their approved treatment site.

- (b) The same information found in PART B(1)(b) regarding tank inspection procedures applies to the Saunders Plant.

The stored acid is 98% sulfuric acid.

(c) CONDENSATE AT THE SAUNDERS PLANT

Condensate at the Saunders Plant is removed by pipeline. Please refer to PART A (2)(b) for further information.

PART C (4): AVERAGE DISCHARGE RATE FROM THE SAUNDERS PLANT

The average discharge rate for the Saunders Plant is 450 bbls/day. Measurement is by meter.

PART D (1): NATURE OF CONDENSATE FOR THE VADA PLANT

The nature of the condensate at the Vada Plant would be similar to that at the Saunders Plant.

PART D (2): VADA SPILL PLAN

- (a) The underground tank is visually checked for leaks when it is emptied by vacuum truck. Please refer to PART B(1)(b) for information regarding tank inspections.

- (b) Please refer to PART A(2)(b).

PART D (3): VADA EFFLUENT

The open drains are at a higher elevation than the main plant sumps, therefore, there could be no backflow. The main sump pump has a capacity of 125 gpm. The portable gasoline back-up pump has a capacity of approximately 60 gpm. Should the main pump ever fail, a vacuum truck would be called out to maintain an acceptable level within the sump.

The current average discharge rate for the Vada plant is 30 BBLs/day. Measurement is by tank strapping.

PART D (4): SLUDGE ACCUMULATION AT THE VADA PLANT

Any sludge accumulation is removed by vacuum truck for disposal at Gandy's approved site.

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JUNE 27, 1985

WARREN PETROLEUM COMPANY
P.O. BOX 1589
TULSA, OKLAHOMA 74102

REPORT OF ANALYSIS

IDENTIFICATION: W.P.C. VADA
10:00 AM 6-6-85

	MG/L
PHENOLS -----	13
BENZENE -----	19.0
TOLUENE -----	12.0
ORTHOXYLENE AND PARAXYLENE -----	0.74
METAXYLENE -----	0.79
ALUMINUM -----	0.02
ARSENIC -----	0.006
BORON -----	1.8
CADMIUM -----	0.0006
MOLYBDENUM -----	0.01
NICKEL -----	0.05

LAB. NO. M23-3541

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JUNE 27, 1985

WARREN PETROLEUM COMPANY
P.O. BOX 1589
TULSA, OKLAHOMA 74102

REPORT OF ANALYSIS

IDENTIFICATION: W.P.C. SAUNDERS
11:00 AM 6-6-85

	MG/L
PHENOLS -----	1.3
BENZENE -----	13.0
TOLUENE -----	16.0
ORTHOXYLENE AND PARAXYLENE -----	3.7
METAXYLENE -----	4.6
ALUMINUM -----	0.04
ARSENIC -----	0.029
BORON -----	0.74
CADMIUM -----	<0.0001
MOLYBDENUM -----	0.03
NICKEL -----	0.02

LAB. NO. M23-3540

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JUNE 27, 1985

JUL 2 1985

WARREN PETROLEUM COMPANY
P.O. BOX 1589
TULSA, OKLAHOMA 74102

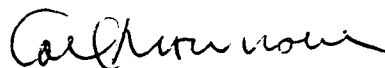
REPORT OF ANALYSIS

IDENTIFICATION: W.P.C. MONUMENT
2:00 PM 6-6-85

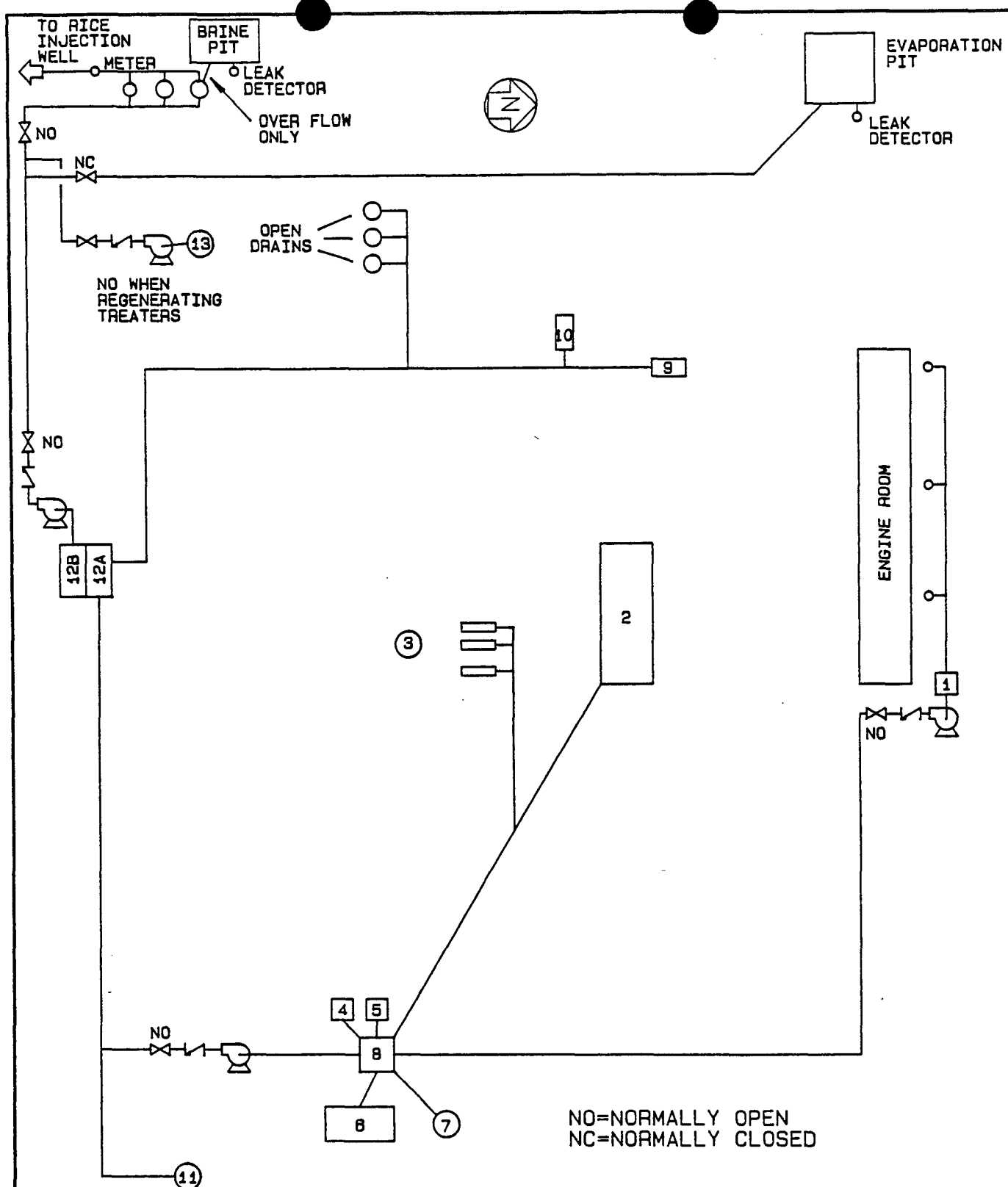
	MG/L
PHENOLS -----	0.08
BENZENE -----	0.12
TOLUENE -----	0.33
ORTHOXYLENE AND PARAXYLENE -----	0.60
METAXYLENE -----	0.66
ALUMINUM -----	0.50
ARSENIC -----	0.018
BORON -----	0.56
CADMIUM -----	<0.0001
MOLYBDENUM -----	0.01
NICKEL -----	<0.01

LAB. NO. M23-3539

RESPECTFULLY SUBMITTED,



CARL F. CROWNOVER

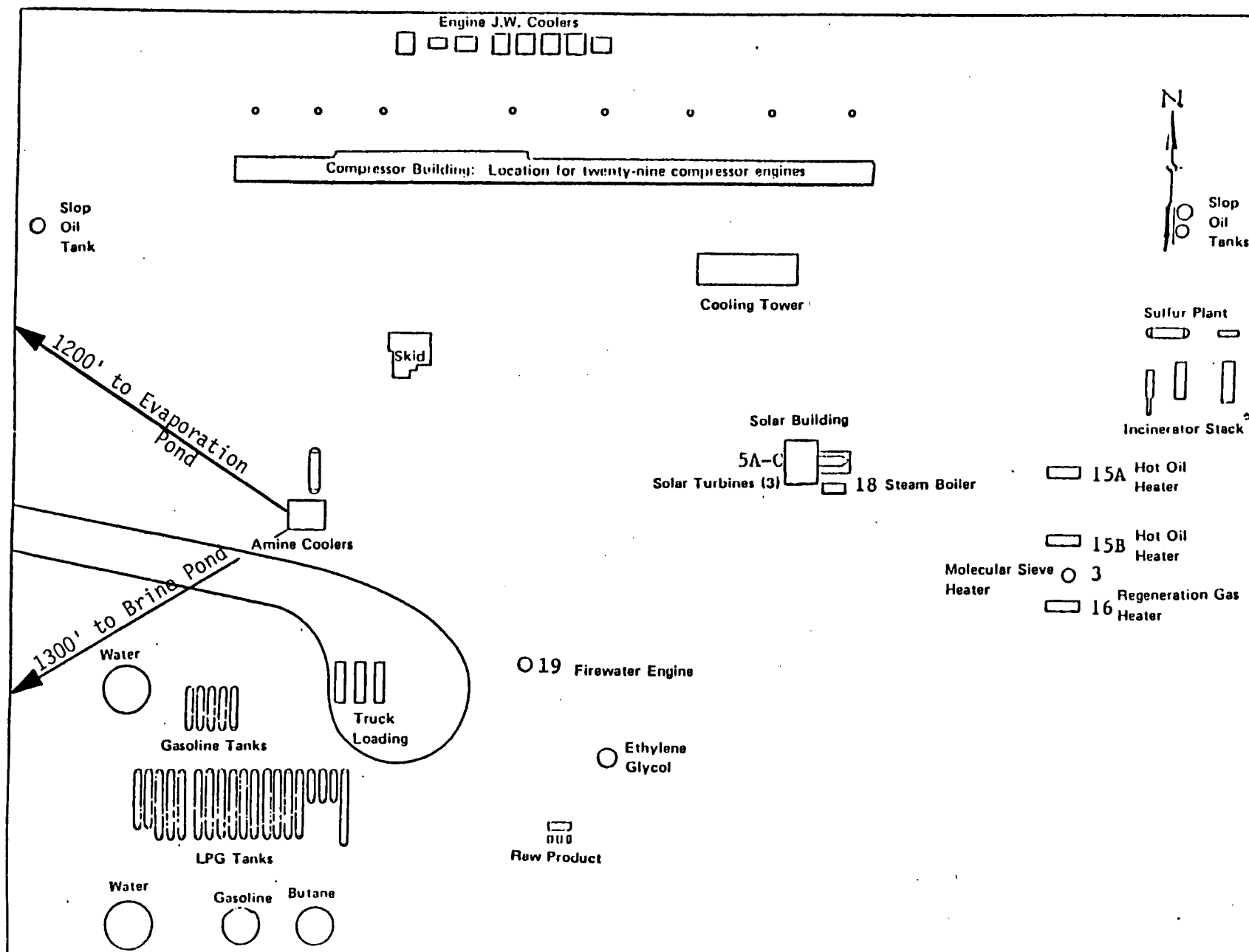


NO=NORMALLY OPEN
NC=NORMALLY CLOSED

LEGEND

- 1-NORTH ENGINE ROOM SUMP
- 2-COOLING TOWER
- 3-CONDENSORS
- 4-BOILER
- 5-BOILER
- 6-BOILER
- 7-H. S. SCRUBBER
- 8-EAST SUMP
- 8-SOUTH ENGINE ROOM SUMP
- 10-CONDENSORS
- 11-CONDENSATE TANK
- 12A-SKIMMER
- 12B-SOUTH SUMP
- 13-ZEOLITE H₂O TREATER

NO. OF UNITS REQUIRED THIS			NO-AFE NO.
WARREN PETROLEUM COMPANY A DIVISION OF GULF OIL CORPORATION			
WASTE WATER SYSTEM LAYOUT PLANT 118 MONUMENT LEA, COUNTY, NM.			
DRAWN	HPK	DATE 8/25/85	SCALE NONE
CHECKED	LLJ	DATE 8/25/85	DRAWING NO.
APPR.	PDA	DATE 8/25/85	118-1001-0



WARREN PETROLEUM COMPANY
MONUMENT PLANT
PLOT PLAN

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION
SANTA FE, NEW MEXICO

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission regulations, Warren Petroleum Co., L. T. Reed, Authorized Agent, P.O. Box 1589, Tulsa, Oklahoma 74102, has submitted for approval the following discharge plans to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501 (505) 827-5800.

Warren Petroleum Co., Monument Gas Processing Plant (SW/4 Section 36, Township 19 South, Range 36 East, NW/4 Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico) proposes to continue disposing of approximately 50,000 gallons per day of industrial wastewater into a commercial Class II injection well currently operating near the plant. The wastewater is transported to the injection well via pipeline. In the event of an emergency shutdown at the injection well, a lined pond with a leak detection system and a capacity of approximately one million gallons will be used to contain the wastewater temporarily. The wastewater is composed of effluents from cooling towers and process vessels. The wastewater has a total dissolved solids concentration of approximately 2800 mg/l. The ground water most likely to be affected by any non-injection discharges is at depths of 35 to 60 feet with total dissolved solids concentrations ranging from 500 to 3000 mg/l.

Warren Petroleum Co., Saunders Gas Processing Plant (SW/4 Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico) proposes to continue disposing of approximately 25,000 gallons per day of industrial wastewater into a commercial Class II injection well currently operating near the plant. The wastewater is transported to the injection well via pipeline. In the event of an emergency shutdown at the injection well, the wastewater will be stored in four tanks with a total combined capacity of approximately 100,000 gallons until the wastewater can be transported by truck to an approved disposal site. The wastewater is composed of effluents from cooling towers and process vessels. The wastewater has a total dissolved solids concentration range of 3,800 to 10,000 mg/l. The ground water most likely to be affected by any non-injection discharges is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l.

Warren Petroleum Co., Vada Gas Processing Plant (NW/4 Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico), proposes to continue disposing of approximately 630 gallons per day of industrial wastewater into two storage tanks with a total combined capacity of approximately 12,000 gallons. From the tanks, the wastewater is transported via truck to an approved disposal site. The wastewater has a total dissolved solids concentration of approximately

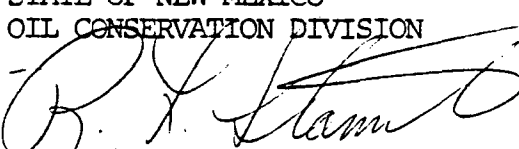
15,000 mg/l. The ground water most likely to be affected is at a depth of approximately 35 feet with an estimated total dissolved solids concentration of 1000 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by an interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed plan based on information available. If a public hearing is held, the Director will approve or disapprove the proposed plan based on information in the plan and information submitted at the hearing.

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of May, 1985.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


R. L. STAMETS
Director

S E A L

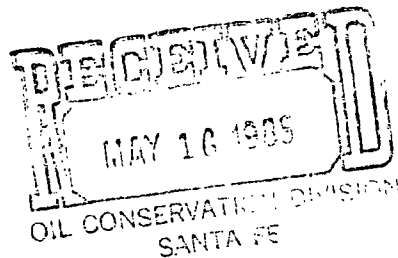


Warren Petroleum Company

A Division of Gulf Oil Corporation
P.O. Box 1589, Tulsa, OK 74102

May 13, 1985

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501



Attn: Philip L. Baca
Environmental Engineer

Re: Monument, Saunders and Vada Discharge Plans -
Information Requested for Continued Review Process

Dear Mr. Baca:

According to your request of May 3, 1985, the following information is offered so that the public notification of our subject Discharge Plans can be completed by your agency. This material was given to you by telephone on May 13, 1985.

The effluent disposal rate for our Monument Plant is 1200 barrels per day. The evaporation pond is usually dry. The brine pond contains only enough water to prevent wind damage to the liner.

For our Saunders Plant, the amount of total dissolved solids in the effluent will vary due to the fact that several sources combine to form the waste water. Waste water analyses have shown a range of total dissolved solids from 3881 ppm to 10,589 ppm.

For the Vada Plant, the amount of discharge to the API holding tanks is 15 barrels per day; the actual combined storage for the two tanks is 300 bbls. The maximum capacity of the west tank is 300 bbls; for the east tank is 210 bbls.

We are currently gathering information to answer your letter of April 1, 1985. If in the meantime, you find that you have any questions or need further information, please contact Linda Johnson or me at (918) 560-4138.

Very truly, your,

L. T. Reed, Director
Environmental Affairs

STATE OF
NEW MEXICO

OIL
CONSERVATION
DIVISION



MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time 8³⁰ am

Date 5/13/85

Originating Party

Other Parties

L. Johnson - Warren Pet. Co.

P. Baca - OGD

Subject Information requested by P. Baca in phone conversation of 5/3/85.

Discussion Ms. Johnson conveyed the following info. to me so that a Public Notice could be drafted:

~~U. Saunders~~ Monument Plant: TDS ranges from 3,881 to 10,589

Monument Plant: Brine Pond has water added to it to protect membrane & evap. pond is usually dry. Effluent rate is 1200 BBL/Day.

Vada Plant: API tanks combined capacity is 300 BBL. Effluent rate is 15 BBL/Day

Conclusions or Agreements

P. Baca will prepare Public Notice for Publication

Distribution

Signed

Philip L. Baca



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time <u>9:45</u> am	Date <u>5-3-85</u>
---------------------------------------------------------------------------------	---------------------	--------------------

<u>Originating Party</u>	<u>Other Parties</u>
<u>P. Baca - OCD</u>	<u>Warren Pet. Co. - L. Johnson</u>

Subject Advertisement information for Warren's Monument
Saunders, and Vada discharge plans.

Discussion I informed Ms. Johnson we needed information on the Monument ponds (lined), Saunders effluent (accurate TDS), Vada effluent rate, and Vada holding tank capacity. I also informed her on our sampling and preserving techniques for water sampling. I told her that we need to have the information requested in the OCD letter of 4-1-85 by 6-7-85.

Conclusions or Agreements Ms. Johnson will phone in the information requested for the advertisement and will submit the additional requested information by June 7, 1985.

Distribution

Signed

Philip L. Baca



TONEY ANAYA
GOVERNOR

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

50 YEARS



1935 - 1985

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

April 1, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Warren Petroleum Company
P.O. Box 1589
Tulsa, OK 74102

Attention: Ms. L. T. Reed

Re: Discharge Plans for
Monument, Saunders,
and Vada Plants

Dear Ms. Reed:

We have received your updated discharge plans dated March 1, 1985, for the Warren Petroleum Co. Monument, Saunders, and Vada gas processing plants. To continue with the review process, we must request the following information:

A. Information needed for the Monument, Saunders, and Vada Plants:

1. The Chemical analysis of the effluent streams for all three plants lacked an analysis for several constituents. Please obtain water samples of the effluent stream for each plant and have them analyzed for phenols, aluminum (Al), boron (B), molybdenum (Mo), nickel (Ni), arsenic (As), cadmium (Cd), benzene, toluene, and meta-, ortho-, and para-xylenes. In a phone conversation with Ms. L. Johnson on 3/22/85, it was indicated that Warren Petroleum Co. had been quoted a price of \$1,000 per plant for an analysis for benzene, toluene, and the xylenes. This price seems to be very high as prices generally range from \$75-\$100 per sample for the same scan using gas chromatograph analysis (this price range is based upon our own experience with the State Laboratory and with private laboratories). The analysis for Al, B, Mo, Ni, As, and Cd can probably all be done with one ICAP Scan. The

analysis for phenols can be done by colorimetric /distillation methods. The water analysis submitted with the discharge plan had a specific conductance with a value smaller than the value for the total dissolved solids for each plant. Please comment as this is an unusual phenomenon. Please describe the method used for collecting the samples and indicate whether or not the samples were filtered and/or acidified.

2. The following questions pertain to the Spill Prevention Control Countermeasure Plan, Part II, Alternate A:

a. In Sections C.1. a & b you indicate that buried pipelines are wrapped, coated, and cathodically protected to reduce corrosion. Please submit a drawing showing all buried pipelines and the location of the sacrificial anodes used for cathodic protection. Please submit information on the materials of construction for the pipe and sacrificial anodes. Also state the nature of the wrapping material and pipe coating. How old are the buried pipelines?

b. In Section D.3 you state that the products loaded and unloaded at the facilities are gaseous at atmospheric conditions. What about the gasoline tanks at the Monument plant and the condensate tanks at the Saunders and Vada plants? Have "flash evaporation" calculations been made for these fluids to prove immediate vaporization? Are "quick disconnect" fittings (e.g., Kanvalok or Snap-tite) used on transfer lines to minimize spills from delivery lines?

3. Appendix D gives a good process description of the gas processing industry. Please indicate the methods used for the three N.M. plants in question. If a molecular sieve dehydration system is used, please indicate the frequency and disposal methods used for replacing the spent dessicant, and the type of dessicant used.

B. Information need for the Monument Plant:

1. The following questions pertain to the Spill Prevention and Countermeasure Plan, Part II, Alternate A included in Appendix C.

a. When a vacuum truck picks up water from

diked areas, where is the water disposed of?
Where is the pure rainwater drained to? (Ref.
Section A.1 and A.3)

b. In Section B.3, you indicate that tanks are externally inspected for rust, corrosion, and leaks. What is the frequency of such an inspection and what is the method of inspection? Please comment on the possibility of checking for internal corrosion (e.g., using ultrasonics) for tanks that contain corrosive substances.

2. The schematic of the wastewater system for the Monument plant included in Part V of the Spill Prevention and Countermeasure Plan is a bit confusing. Please clarify the schematic by submitting the following information:

a. Indicate the flow path directions; I believe the drawings for the pumps near items 14B and 15 are backwards.

b. Label normally open and normally closed valves.

c. Include any paths that deposit effluent in the slop oil tanks; e.g., from skimmers 14A and 2.

d. Locate any check valves that are in the system to prevent backflow.

3. Does any sludge accumulate in the skimmers? If so, how and where is it disposed of?

4. Provide information on the lining materials used for the evaporation pit.

5. Please locate the evaporation and brine pits on the plot plan for the Monument plant included in Appendix G. Your discharge plan infers that both pits are generally dry, is this a correct assumption?

6. What is the capacity of the sump to which all the effluent flows prior to being pumped to the injection well? Provide pump specifications for the pump used to transport effluent to the injection well; a pump curve with the operating point indicated will be sufficient.

7. What is the minimum freeboard allowed in the evaporation and brine pits?

C. Information needed for the Saunders Plant:

1. The chemical analysis for the effluent submitted with this discharge plan varies significantly with the analysis submitted with your injection well application (SWD-255). The analysis for the discharge plan and injection well application are attached for your inspection. Have any process changes been made that would explain such a change?

2. At what pressure is the condensate held in the storage tank? What are the major constituents of the condensate?

3. The following questions concern Part II, Alternate A of your Spill Prevention Control and Countermeasure Plan:

a. Section A.2 indicates that oil and water are separated in the storage tank. Does any sludge accumulate in this tank, and if so, how and where is it disposed of?

b. In Section B.3 you state that no internal tank inspections are made since no corrosive products are stored; however, the effluent wastewater is probably mildly corrosive (on the order of 0.01 in./yr. for steel) and the acid is most definitely corrosive. Please comment on the possibility of a routine check for internal corrosion (e.g., using ultrasonic methods) on the wastewater and acid storage tanks. What type of acid is stored and what is its concentration?

c. Section D.3. states that products loaded/unloaded will vaporize at atmospheric pressure. Does the condensate tank ever unload its contents to a carrier? What is the method of unloading? Are hoses with "quick disconnect" fittings (e.g., "Kanvalok" or "Snaptite") used to help prevent spills from the delivery hose?

4. Is the average discharge rate from the plant still 450 barrels/day? How was this measured?

D. Information needed for the Vada plant:

1. Is the condensate at this plant similar in nature to the condensate at the Saunder plant?

2. The following questions pertain to Part II, Alternate A of the Spill Prevention and Countermeasure Plan:

a. How is the buried tank for the generator sump checked for leaks? Please comment on the possibility of checking for internal corrosion in the scrubber oil tanks and generator sump.

b. If complete condensate vaporization can't be shown, please comment on the methods used (i.e., type of delivery hose and fittings) to prevent spills during condensate loading to a tanker truck.

3. In the wastewater system schematic included in Appendix H, does the design for the open drains (#8 on schematic) include provisions to prevent backflow onto the ground should a flow surge or plug-up occur at the main plant sump (#7 on schematic)? What is the capacity of the main plant sump pump? What is the capacity of the back-up pump? What is the plant effluent discharge rate? How was this rate measured?

4. Does any sludge accumulate in the sumps or scrubber oil tanks? If so, how is this removed and where is it disposed of?

Your cooperation in this effort is greatly appreciated. If you have any questions concerning this letter, or the discharge plan review process, please feel free to call me at (505) 827-5812.

Sincerely,

PHILIP L. BACA
Environmental Engineer

PLB/dp

Enc.

cc: R. L. Stamets, Director
J. Sexton, OCD Hobbs Office



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

December 28, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Warren Petroleum Co.
P.O. Box 1589
Tulsa, OK 74102

Attention: Ms. L. T. Reed

Dear Ms. Reed:


We have received your letter dated December 17, 1984, requesting an extension to operate the Vada, Monument and Saunders gas processing plants without approved discharge plans. By your letter, we understand that the information requested by OCD will be submitted by March 1, 1985.

Pursuant to Section 3-106.A. of the New Mexico Water Quality Control Commission Regulations and for good cause shown, Warren Petroleum Co. is hereby granted its request for an extension until June 30, 1985, to operate the Vada, Monument, and Saunders gas processing plants without approved discharge plans provided that all information requested by the OCD in a letter dated November 6, 1984, and phone conversation with Ms. L. Johnson on December 21, 1984, is submitted by March 1, 1985.

It is our understanding that operations at the Snyder Ranch Plant were discontinued on July 2, 1984. Therefore, a discharge plan for the plant will not be required at this time; however, upon resumption of operations, the OCD must be notified and a discharge plan must be submitted within 120 days of resumption, unless a request for an extension is granted.

If you have any questions on this extension, or on the discharge plan process, please feel free to contact Dave Boyer or Phil Baca at (505) 827-5812.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. L. Stamets", written over a horizontal line.

R. L. STAMETS
Director

RLS/PB/dp

cc: OCD-Hobbs



OIL
CONSERVATION
DIVISION

STATE OF
NEW MEXICO

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal Time 11:30 Date 12/21/84

Originating Party

Other Parties

ACD - (P. Baca)

Warren Petroleum -
(Linda Johnson)

Subject

D.P. For Monument, Saunders, and Vada
Gas Processing Plants

Discussion

Expanded information on what was needed
for water analysis. Outlined what we needed
from WQCC 3-103 and added ethylbenzene,
p, m, o-xylenes. Told her we also needed anal-
ysis of water in brine pond.

Conclusions or Agreements

Distribution

Signed

P. L. Baca

NR

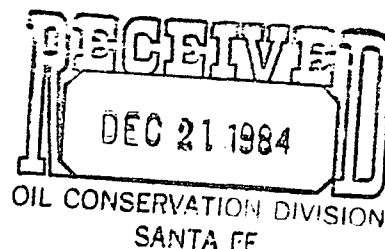
Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1589
Tulsa, Oklahoma 74102

December 17, 1984

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
Box 2088
State Land Office Building
Santa Fe, New Mexico 87501



Attn: Philip L. Baca, Environmental Engineer

Re: Discharge Plans for Vada, Monument, Saunders, and Snyder Ranch


Dear Mr. Baca:

We are gathering the information that you requested in your letter of November 6, 1984 for the referenced discharge plans and plan to have it to you by March 1, 1985. We would appreciate your approval of this time schedule and your approval of our operating the Vada, Monument, and Saunders Gas Processing Plants without approved discharge plans until we can get this information to you.

The operation of the Snyder Ranch Plant discontinued on July 2, 1984, therefore, we will not be submitting a discharge plan for the Snyder Ranch Gas Processing Plant at this time.

We appreciate your help in compiling these plans. Please feel free to call me or Linda Johnson at (918) 560-4119 if you have any questions.

Very truly yours,


L. T. Reed, Director
Environmental Affairs



A DIVISION OF GULF OIL CORPORATION



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

December 14, 1984

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Warren Petroleum Co.
P. O. Box 1589
Tulsa, Oklahoma 74102

Attention: Ms. L. T. Reed

Dear Ms. Reed:

Please find enclosed a copy of the New Mexico Water Quality Control Commission regulations as amended through November 17, 1983. Please note Section 3-106 of the regulations which outlines the time limits, time extension allowances, and information required for discharge plans.

As per our phone conversation of December 13, we look forward to receiving a request for time extensions with respect to submitting revised discharge plans and for discharging without approved discharge plans at your Monument, Saunders, Vada, and Snyder Ranch plants. If possible, please include a schedule for submitting the plans with your request for an extension.

Please feel free to call me at (505) 827-5812 if you have any questions concerning the discharge plans.

Sincerely,

Philip L. Baca

PHILIP L. BACA
Environmental Engineer

PLB/dr

enc.



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

November 6, 1984

SAUNDERS T 14S
R 33E

Warren Petroleum Company
P.O. Box 1589
Tulsa, Oklahoma 74102

Sec. 34

Elevation 4200'

Attention: Mr. L. T. Reed

Dear Sir:

We have received your updated discharge plans for the Warren Petroleum Company Monument, Saunders, and Vada gas processing plants. To continue with the review process, we must request the following information:

A. Information needed for the Monument, Saunders, and Vada discharge plans.

1) Topographic maps of plant sites.

2) Chemical Analysis of plant effluent stream. Should include analysis for TDS, ph, major cations/anions, heavy metals, hydrocarbons (i.e. benzene, phenols, toluene). Give a brief description of sampling technique. Indicate whether or not (and why) major fluctuations in the results can be expected.

Same as Monument

3) Description of waste oil disposal (from equipment or process), if any.

4) Description of procedures addressing containment and clean-up in case of spills. See comments in App. C

5) Description of inspection procedures (and frequency) for leaks in piping and equipment.

6) A brief description of the plant process; a process flow diagram would be helpful.

7) Describe site characteristics:

- Hydrologic Features: Provide the name, description, and location of any bodies of water, streams (indicate perennial or intermittent), other water courses (arroyos, canals, drains, etc.), and ground water discharge sites (water wells, seeps, springs, swamps) within one mile of the outside perimeter of the facility. For water wells, specify use of water. Provide the depth to, and total dissolved solids concentration (in mg/l) of the ground water most likely to be affected, and direction of flow, if known. Include any sources of information or methods of deriving information.

- Geologic Description: Include soil type(s), name of aquifer(s), aquifer material (e.g. alluvium, basalt, etc.), and depth to rock at base of alluvium (if available).

- Flood Protection: Provide information on flooding potential and protection measures (curbs, berms, channels, etc.), if applicable.

B. Information needed for the Monument discharge plan only:

- 1) Contingency plan in the event of a shut-down at the injection well.
- 2) Status of old evaporation pit. Is it filled in? If not, will it ever be used as part of a contingency plan? If so, please send construction details.
- 3) Is overflow to brine pit allowed to evaporate, or is it pumped to the injection well during periods of low effluent flow from the production area?
- 4) Provide a plant layout similar to that provided in the Vada plant discharge plan.

C. Information needed for the Saunders discharge plan only:

- ✓1) Status of the retention ponds. Are they filled in, or will they be used as part of a contingency plan? If so, please send construction details.

- ✓2) Describe the contingency plan in the event of a shut-down at the Gillespie injection well. *See comments*
- ✓3) Provide a schematic diagram of the waste water disposal system (similar to that submitted for the Monument plant) including process waste lines and plant drainage.
- ✓4) Provide a plant layout similar to that provided for the Vada plant discharge plan.
- ✓5) Describe the disposition, volume, and materials of construction for the four surge tanks.
- ✓6) Is there a periodic inspection of the polyethylene pipeline to the Gillespie injection well? Is there a periodic inspection of the check valve? At what depth below the lease road is the pipeline to the Gillespie well? What measures were taken to prevent fractures in the pipeline due to heavy (mass) road traffic? *See comments?*

D. Information needed for the Vada discharge plan only:

- 1) Provide a schematic diagram of the waste water disposal system (similar to that submitted for the Monument plant) including process waste lines and drainage.
- 2) Is the area around the API tanks curbed? Is there a level indicator for the tanks?
- 3) Provide the quantity of effluent discharged and method of measurement.
- 4) Describe sump construction; provide drawings, if available.
- 5) Describe a contingency plan in the event of a tank shut-down (i.e. leaks, filled to capacity, etc.) or sump pump shut-down.

Note:
Old D.P.
Indicates Discharge of
450 Bbl/day to
600 Bbl/day to
Gillespie Well 10 Bbl/day

Your continued cooperation in this effort will greatly expedite the review process. If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely,

Philip L. Baca

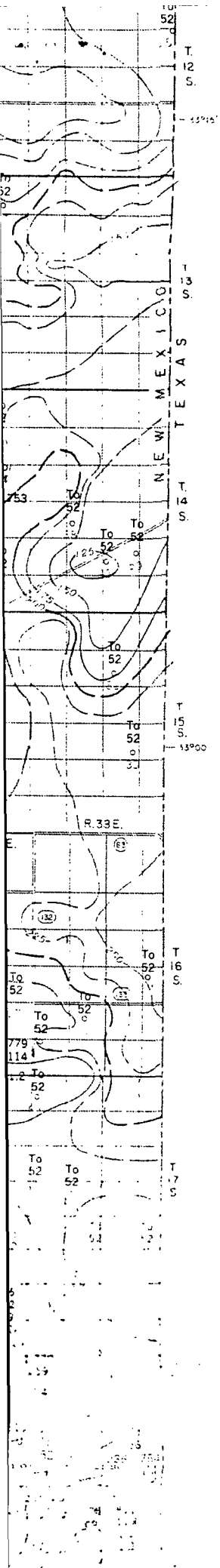
PHILIP L. BACA
Environmental Engineering
Specialist

PLB/dp

cc: R. L. Stamets, Director
D. G. Boyer



EXPLANATION ON
NEXT Pg.



Grayburg formation and San Andres limestone, undivided
Sandy dolomite with interbedded dolomitic sand; porous white limestone;
known only from logs of oil wells

PIPI
Limestone

White to light gray crystalline limestone with vuggy porosity and occasional green shale partings; known only from logs of oil wells

pPd
Dolomite

Sandy porous dolomite and vuggy crystalline dolomite; known only from logs of oil wells

PRE-PENNSYLVANIAN AND PERMIAN
PENNSYLVANIAN
PERMIAN
CARBONIFEROUS
PRE-MESOZOIC

Water well Oil and gas well location near center of field Spring

Aquifer ——— To ——— Year sampled
57
Hardness as CaCO_3 (ppm) — 198 543 — Specific conductance (micromhos at 25°C)
Chloride (ppm) — 45 91 — Sulfate (ppm)
1.2 — Fluoride (ppm)
150 1.5 — Sodium-adsorption ratio

Depth to water, in feet, below land surface datum. Static-level measurement unless the figure is followed by the capital letter "P" which indicates that the measurement was made while the well was being pumped.

Data are grouped around the source-of-water symbol. Undetermined information is noted by the absence from the designed position in the group of data.

Line connecting points of approximately equal depth to water below land-surface datum as of 1952

Dashed where inferred; interval 25 feet

Line connecting points of approximately equal saturated thickness of the deposits of Cenozoic age as of 1952

Dashed where inferred; interval 25 feet

Approximate boundary of bedrock highs that interrupt the water table in the deposits of Cenozoic age

range and the maximum allowable concentration in ground water for the contaminants specified unless the existing condition exceeds the standard or unless otherwise provided in Subsection 3-109.D. or Section 3-110. When an existing pH or concentration of any water contaminant exceeds the standard specified in Subsection A, B, or C, the existing pH or concentration shall be the allowable limit, provided that the discharge at such concentrations will not result in concentrations at any place of withdrawal for present or reasonably foreseeable future use in excess of the standards of this section.

These standards shall apply to the dissolved portion of the contaminants specified with a definition of dissolved being that given in the publication "Methods for Chemical Analysis of Water and Waste of the U.S. Environmental Protection Agency," with the exception that standards for mercury and the organic compounds shall apply to the total unfiltered concentrations of the contaminants.

A. Human Health Standards—Ground water shall meet the standards of Section A and B unless otherwise provided.

Arsenic (As)	0.1 mg/l
Barium (Ba)	1.0 mg/l 0.05
Cadmium (Cd)	0.01 mg/l
Chromium (Cr)	0.05 mg/l 0.3
Cyanide (CN)	0.2 mg/l
Fluoride (F)	1.6 mg/l
Lead (Pb)	0.05 mg/l 0.04
Total Mercury (Hg)	0.002 mg/l
Nitrate (NO ₃ as N)	10.0 mg/l
Selenium (Se)	0.05 mg/l
Silver (Ag)	0.05 mg/l
Uranium (U)	5.0 mg/l
Radioactivity: Combined	
Radium-226 and Radium-228	30.0 pCi/l
Benzene	0.01 mg/l
Polychlorinated biphenyls (PCB's)	0.001 mg/l
Toluene	15.0 mg/l
Carbon Tetrachloride	0.01 mg/l
1, 2-dichloroethane (EDC)	0.02 mg/l
1, 1-dichloroethylene (1, 1-DCE)	0.005 mg/l
1, 1, 2, 2-tetrachloroethylene (PCE)	0.02 mg/l
1, 1, 2-trichloroethylene (TCE)	0.1 mg/l

B. Other Standards for Domestic Water Supply

Chloride (Cl)	250. mg/l 364
Copper (Cu)	1.0 mg/l 0.08
Iron (Fe)	1.0 mg/l 1.10
Manganese (Mn)	0.2 mg/l
Phenols	0.005 mg/l
Sulfate (SO ₄)	500. mg/l 1927
Total Dissolved Solids (TDS)	1000. mg/l 3881
Zinc (Zn)	10.0 mg/l Nil
pH	between 6 and 9 8.03

C. Standards for Irrigation Use - Ground water shall meet the standards of subsections A, B, and C unless otherwise provided.

Aluminum (Al)	5.0 mg/l
Boron (B)	0.75 mg/l
Cobalt (Co)	0.05 mg/l Nil
Molybdenum (Mo)	1.0 mg/l
Nickel (Ni)	0.2 mg/l

3-104. DISCHARGE PLAN REQUIRED.--Unless otherwise provided by these regulations, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless he is discharging pursuant to a discharge plan approved by the director. When a plan has been approved, discharges must be consistent with the terms and conditions of the plan.

3-105. EXEMPTIONS FROM DISCHARGE PLAN REQUIREMENT.--Sections 3-104 and 3-106 of these regulations do not apply to the following:

A. Effluent or leachate which conforms to all the listed numerical standards of Section 3-103 and has a total nitrogen concentration of 10 mg/l or less, and does not contain any toxic pollutant. To determine conformance, samples may be taken by the agency before the effluent or leachate is discharged so that it may move directly or indirectly into ground water; provided that if the discharge is by seepage through non-natural or altered natural materials, the agency may take samples of the solution before or after seepage. If for any reason the agency does not have access to obtain the appropriate samples, this exemption shall not apply.

B. Effluent which is discharged from a sewerage system used only for disposal of household and other domestic waste which receives 2,000 gallons or less of liquid waste per day;



P. O. BOX 1499

HOBBS, NEW MEXICO 88240

707 NORTH LEECH

PHO. (505) 393-7751

WATER ANALYSIS REPORT

(Expressed in ppm Unless Indicated Otherwise)

ATTN: Mr. Forrest Noah

FOR: Warren Petroleum Company

PLANT: Saunders

LOCATION: Tatum, NM

SAMPLE SOURCE:

	Waste		
	Water		
pH	9.02	8.03	
Pheno. Alkalinity (CaCO ₃)	268	111	
Total Alkalinity (CaCO ₃)	348	256	
Bicarbonate (HCO ₃)	0	312	
Carbonate (CO ₃)	155	111	
Hydroxide (OH)	64	111	
Total Hardness (CaCO ₃)	2500	1368	
Calcium (CaCO ₃)	1300	416	
Magnesium (CaCO ₃)	1200	328	
Chloride (Cl)	4700	364	
Sulfate (SO ₄)	1867	1927	
Total Phosphate (PO ₄)		13.3	
Orthophosphate (PO ₄)		11.9	
Polyphosphate (PO ₄)		1.4	
Silica (SiO ₂)		112.4	
Iron (Fe)	NIL	1.10	
Chromate (CrO ₄)			
Specific Conductance (MMHOS)	13990	1705	
Chloride Concentrations			
Hardness Concentrations			
Sulfide (S)	NIL		
Barium (Ba +2)	0.2	.05	
Sodium (Na+) (Calc)	2995	657	
Total Dissolved Solids	10589	3881	

This is the analysis
of the waste water
submitted with the
injection well appl.

DATE SAMPLED:

DATE SUBMITTED:

DATE ANALYZED:

It has some sig.
differences compared
to the D.P.

(File SWD-255)

Both Analyses are
from the same lab.

Values from D.P.
Water Analysis

Ca as CaCO₃ → 1040

Mg as Mg → 78.7

Si (CaCO₃) → 187.7

REMARKS: Here is the analysis for the sample you requested. If we may be of further service,
please call.

Thank-you,

Richard L. Maddux

Richard L. Maddux

cc: Scott Wilson

Eddie Slavens

Attachment C-108 VII (b)

Info Needed For Saunders Plant -

1. ☒ Further chemical analysis on effluent. Same as monument. Comment on difference w/ SWD-255 analysis.
 except →
2. The following questions concern Part I of your spill prevention control and countermeasure plan:
- a.) you indicate that the pressurized condensate holding tank does ^{most of} not need secondary containment because the contents would be vaporizing if there was a tank rupture. Have any "flash evaporation" calculations been made to verify this? At what pressure are the contents held in the vessel? What are the major chemical constituents of the condensate?
3. The following questions concern Part II, Alternate A of your spill prevention control and countermeasure plan:
- a.) Section A.2 states that oil and water are separated in the storage tank. Does any sludge accumulate in this tank, and if so, how is it disposed of?
- b.) In section B.3 you state that no internal tank inspections are made since no corrosive products are stored; however, the effluent wastewater is probably mildly corrosive (on the order of 0.01 in/yr) and the acid is most definitely corrosive. Please comment on the possibility of a routine check for internal corrosion (e.g., yearly ultrasonic check) on

the wastewater and acid storage tanks.

✓ [C] In section C.1 mention is made of coating and wrapping as well as cathodic protection for underground pipes. Make request same as for Monument plant.

✓ [D] Section D.3 states that products loaded/unloaded at the facility will vaporize at atm. pressure. Does the condensate tank ever unload its contents to a carrier? What is the method of unloading? Are hoses with quick-disconnect fittings (e.g., "Kanvalok" or "Smartite") used to help prevent spill from the delivery hose?

✓ [E] Section E.1 Discuss the possibility of locking some stg tank valves? (Ask about type of valves; ball, butterfly, etc. . .)

✓ [F] Ask about discharge rates for all plants (except-
ation.

Warren Petroleum Company

MANUFACTURING DEPARTMENT

May 25, 1984

P. O. Box 1589
Tulsa, Oklahoma 74102

Oil Conservation Division
Energy and Minerals Department
State of New Mexico
P. O. Box 2088
Santa Fe, New Mexico 87501

Attn: Mr. Joe E. Ramey, Director

Re: Discharge Plans for Monument, Saunders and Vada Gas
Processing Plants

Dear Mr. Ramey:

This letter is to confirm our recent conversation with regard to
the subject information.

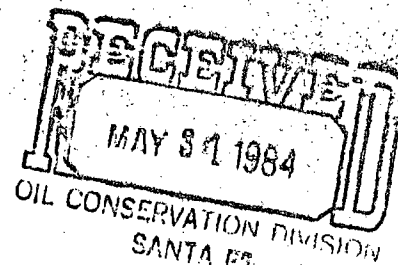
Warren expects to submit further details for the Discharge Plans
as you requested in your letters of February 23 and 24, 1984, on
or before December 30, 1984. *Sept 30, 1984 submission date*

If you have any questions or need further information, please
contact Linda Johnson or me at (918) 560-4119.

Very truly yours,

L. T. Reed
L. T. Reed, Director
Environmental Affairs

LTR:am



A DIVISION OF GULF OIL CORPORATION



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONY ANAYA
GOVERNOR

February 23, 1984

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

Attention: Mr. J. E. Moody

Gentlemen:

I have reviewed materials submitted for discharge plans for your Monument and Saunders Gasoline Plants and find them insufficient in numerous details that will be necessary before approval can be considered. Instead of trying to list all the items necessary, I am attaching a copy of an approved discharge plan that was submitted by El Paso Natural Gas Company. This plan certainly covers all areas of operation that should be addressed in a discharge plan.

Please look this over with the idea that Warren would submit similar plans for the Monument and Saunders plants within 90 days.

I would request that you return the El Paso plan by March 15, 1984. If you would like to meet and discuss your discharge plans, let me know and we can arrange a convenient time.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

enc.

To: Oscar Simpson

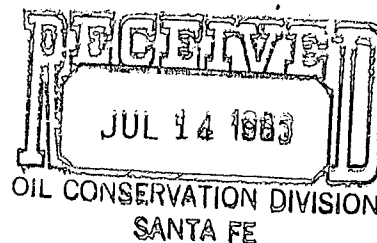
Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

July 8, 1983

Mr. Charles Gillespie
P.O. Box 8
Midland, TX 79701



Re: Saunders Salt Water Disposal.
Saunders Field, Lea County, NM

Dear Sir:

The following is the Warren Petroleum Company, Saunders Plant #146 waste water report for the month of June, 1983.

June - 1922 BBLs.

If further information is needed, please advise.

Yours truly,

WARREN PETROLEUM COMPANY

F. C. Noah

F. C. Noah
Plant Manager

FCN/rw

XC: New Mexico Oil Conservation Commission
Hobbs, NM



DANIEL S. NUTTER

REGISTERED PETROLEUM ENGINEER

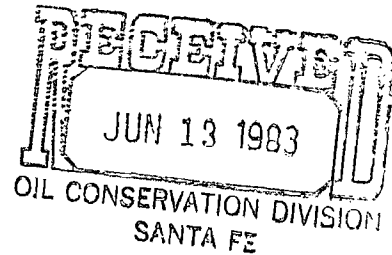
PETROLEUM CONSULTATION AND STATE AND FEDERAL REGULATORY SERVICES

105 EAST ALICANTE

SANTA FE, NEW MEXICO 87501

PHONE (505) 982-0757

June 13, 1983



Mr. Joe D. Ramey
Division Director
Oil Conservation Division
New Mexico Energy and Minerals Department
Post Office Box 2088
Santa Fe, New Mexico 87501

RE: Amendment, Administrative
Order SWD-255

Dear Mr. Ramey:

Pursuant to authority granted by you in Administrative Order SWD-255, Warren Petroleum Company, a Division of Gulf Oil Corporation, re-entered the Gulf Oil Corporation Maud Saunders Well No. 4, located in Unit L of Section 34, Township 14 South, Range 33 East, NMPM, Saunders Field, Lea County, New Mexico, and attempted to convert the well to water disposal purposes in the authorized interval from the 8 5/8-inch casing shoe at 4280 feet to the top of the old 5 1/2-inch casing stub at 4597 feet.

The well would not take water at reasonable pressures, however, in the authorized interval, and on May 27, 1983, you gave verbal approval to clean the well out to the top of the old casing stub and re-enter same, perforate any apparent porosity and permeability down to the top of the cement on the 5 1/2-inch casing at 7795 feet, and attempt to establish sufficient injectivity rates anywhere between 4280 feet and 7795 feet.

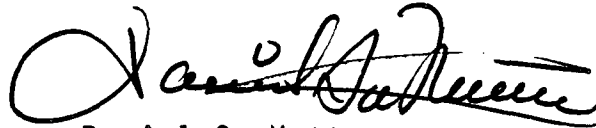
Pursuant to this verbal authority, the top of the 5 1/2-inch casing stub was dressed off, and a 7 5/8-inch cut lip guide shoe was run on ten joints (414.78 feet) of 5 1/2-inch casing and tied onto the old casing stub at 4638 feet. The top of this new 5 1/2-inch casing is at 4219 feet. The 5 1/2-inch casing was then perforated from 4620-30, 4645-50, 4773-83, 4845-55, 4890-4900, 4937-47, 5000-10, and 5030-50 feet. The entire perforated interval from 4620 feet to 5050 feet was treated with a total of 800 gallons of 15% NEFE HCL and 5000 gallons of 20% NEFE HCL acid. Injectivity tests were

Joe D. Ramey
June 13, 1983
Page 2

then run, and the well will now take water at the rate of two barrels per minute on a vacuum.

Warren Petroleum Company now respectfully requests that Administrative Order SWD-255 be amended to permit disposal of water into the perforated interval from 4620 feet to 5050 feet and that the maximum injection pressure allowed be increased to 924 psi.

Very truly yours,



Daniel S. Nutter

DSN:en

xc: Mr. Jerry T. Sexton
District Supervisor
New Mexico Oil Conservation Division
P. O. Box 1980
Hobbs, NM 88240

Warren Petroleum Company
P. O. Box 1589
Tulsa, OK 74102

Attn: Ms. Lynn T. Reed

Warren Petroleum Company
P. O. Box 1689
Lovington, NM 88260

Attn: Mr. Forrest C. Noah

Gulf Oil Corporation
Hobbs, NM 88240

Attn: Mr. Ray Clark

THE APPLICATION OF WARREN PETROLEUM COMPANY,
DIVISION OF GULF OIL CORPORATION, FOR A SALT
WATER DISPOSAL WELL.

ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION

Under the provisions of Rule 701(B), Warren Petroleum Company, a Division of Gulf Oil Corporation, made application to the New Mexico Oil Conservation Division on April 7, 1983, for permission to complete for salt water disposal its Maud Saunders Well No. 4, located in Unit L of Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico.

The Division Director finds:

- (1) That application has been duly filed under the provisions of Rule 701(B) of the Division Rules and Regulations;
- (2) That satisfactory information has been provided that all offset operators and surface owners have been duly notified; and
- (3) That the applicant has presented satisfactory evidence that all requirements prescribed in Rule 701 will be met.
- (4) That no objections have been received within the waiting period prescribed by said rule.

IT IS THEREFORE ORDERED:

That the applicant herein, Warren Petroleum Company is hereby authorized to complete its Maud Saunders Well No. 4, located in Unit L of Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico, in such a manner as to permit the injection of salt water for disposal purposes into the San Andres formation at approximately 4280 feet to approximately 4597 feet through 2 3/8 inch plastic lined tubing set in a packer located at approximately 4180 feet.

IT IS FURTHER ORDERED:

That the operator shall take all steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface.

That the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge at the surface or left open to the atmosphere to facilitate detection of leakage in the casing, tubing, or packer.

That the injection well or system shall be equipped with a pressure limiting device which will limit the wellhead pressure on the injection well to no more than 856 psi.

That the Director of the Division may authorize an increase in injection pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the injected fluid from the San Andres formation. Such showing shall consist of a valid step-rate test run in accordance and acceptable to this office.

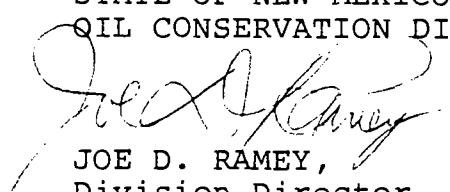
That the operator shall notify the supervisor of the Hobbs district office of the Division of the date and time of the installation of disposal equipment so that the same may be inspected.

That the operator shall immediately notify the supervisor of the Division's Hobbs district office of the failure of the tubing, casing, or packer, in said well or the leakage of water from or around said well and shall take such steps as may be timely and necessary to correct such failure or leakage.

PROVIDED FURTHER, That jurisdiction of this cause is hereby retained by the Division for such further order or orders as may seem necessary or convenient for the prevention of waste and/or protection of correlative rights; upon failure of applicant to comply with any requirement of this order after notice and hearing, the Division may terminate the authority hereby granted in the interest of conservation. That applicant shall submit monthly reports of the disposal operations in accordance with Rule 706 and 1120 of the Division Rules and Regulations.

Approved at Santa Fe, New Mexico, on this 26th day of April, 1983.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


JOE D. RAMEY,
Division Director

S E A L

DANIEL S. NUTTER

REGISTERED PETROLEUM ENGINEER

PETROLEUM CONSULTATION AND STATE AND FEDERAL REGULATORY SERVICES

105 EAST ALICANTE

SANTA FE, NEW MEXICO 87501

PHONE (505) 982-0757

April 7, 1983

**OIL CONSERVATION DIVISION
SANTA FE**

Mr. Joe D. Ramey
Division Director
Oil Conservation Division
New Mexico Energy and Minerals Department
Post Office Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Ramey:

Enclosed herewith, in duplicate, is the application of Warren Petroleum Company, a Division of Gulf Oil Corporation, for authority to convert to water disposal the Gulf Oil Corporation Maud Saunders Well No. 4, a plugged and abandoned well located 1815 feet from the South line and 660 feet from the West line of Section 34, Township 14 South, Range 33 East, NMPM, Saunders Field, Lea County, New Mexico.


Waters to be disposed of will consist of cooling tower blowdown and contained water from the inlet scrubbers of the Warren Saunders Gasoline Plant.

Application is made pursuant to Rule 701 D of the Division Rules and Regulations for administrative approval for disposal into the San Andres, a formation older than Triassic which is nonproductive of oil or gas within a radius of two miles from the proposed injection well.

Publication of Warren's intent to utilize the subject well for water disposal has been made in the Hobbs Daily News Sun, and copies of this application have been furnished to each leasehold operator within one half mile of the well. Warren Petroleum is the owner of the surface of the land upon which the well is located.

Your approval of the subject application at the expiration of the required 15-day waiting period is respectfully requested.

Very truly yours,



Daniel S. Nutter

xc: attached mailing list

Page 2
Joe D. Ramey
April 7, 1983

MAILING LIST

Mr. Jerry T. Sexton
District Supervisor
New Mexico Oil Conservation Division
P. O. Box 1980
Hobbs, NM 88240

Charles B. Gillespie, Jr.
P. O. Box 8
Midland, TX 79702

Petroleum Corp. of Texas and BBL Ltd
P. O. Box 911
Breckenridge, TX 76024

R and C Company
P. O. Box 6434
Odessa, Texas

Getty Oil Co.
P. O. Box 1231
Midland, TX 79702

Attn: District Manager

Warren Petroleum Co.
P. O. Box 1589
Tulsa, OK 74102

Attn: Ms. Lynn T. Reed

Warren Petroleum Co.
P. O. Box 1689
Lovington, NM 88260

Attn: Mr. Forrest C. Noah

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION FOR ADMINISTRATIVE APPROVAL

WARREN PETROLEUM COMPANY

A Division of Gulf Oil Corporation

FOR CONVERSION TO WATER DISPOSAL

the

GULF OIL CORPORATION MAUD SAUNDERS WELL NO. 4

Located 1815' FSL 660' FWL Sec. 34-T14S-R33E

Lea County, New Mexico

T A B L E O F C O N T E N T S

Item	Attachment
Application.....	Form C-108
Injection Well Data Sheet.....	C-108 III
Map of Area Showing Well and Lease Ownership.....	C-108 V
Tabulation of Well Data.....	C-108 VI (a) 1 C-108 VI (a) 2
Schematic Drawings of Plugged and Abandoned Wells...	C-108 VI (b) 1 through 10
Data Sheet.....	C-108 VII (a)
Waste Water Analysis.....	C-108 VII (b)
Disposal Formation Water Analysis.....	C-108 VII (c)
Geological Data Sheet.....	C-108 VIII (a)
Disposal Well Stimulation Program.....	C-108 IX (a)
Logging and Test Data.....	C-108 X (a)
Gamma Ray-Neutron Log of Proposed Disposal Well.....	C-108 X (b)
Fresh Water Discussion.....	C-108 XI (a)
List of Fresh Water Wells in Area.....	C-108 XI (b)
Map of Area Showing Location of Fresh Water Wells...	C-108 XI (c)
Water Analysis, East Water Well.....	C-108 XI (d)
Water Analysis, West Water Well.....	C-108 XI (e)
Affirmative Statement.....	C-108 XII (a)
Proof of Notice (to offset operators).....	C-108 XIV (a)
Proof of Notice (by publication).....	C-108 XIV (b)

APPLICATION FOR AUTHORIZATION TO INJECT

- I. Purpose: ☐ Secondary Recovery ☐ Pressure Maintenance ☒ Disposal
Application qualifies for administrative approval? ☐ yes ☐ no
- II. Operator: Warren Petroleum Company, a Division of Gulf Oil Corporation
Address: P. O. Box 1689, Lovington, New Mexico 88260
Contact party: Dan Nutter, 105 E. Alicante Phone: (505) 982-0757
Santa Fe, New Mexico 87501
- III. Well data: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.
- IV. Is this an expansion of an existing project? ☐ yes ☒ no
If yes, give the Division order number authorizing the project _____.
- V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
- * VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
- VII. Attach data on the proposed operation, including:
1. Proposed average and maximum daily rate and volume of fluids to be injected;
 2. Whether the system is open or closed;
 3. Proposed average and maximum injection pressure;
 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and
 5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).
- *VIII. Attach appropriate geological data on the injection zone including appropriate lithologic detail, geological name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such source known to be immediately underlying the injection interval.
- IX. Describe the proposed stimulation program, if any.
- * X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division they need not be resubmitted.)
- * XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
- XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground source of drinking water.
- XIII. Applicants must complete the "Proof of Notice" section on the reverse side of this form.
- XIV. Certification
- I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
- Name: Dan Nutter Title Consulting Petroleum Engineer
- Signature: *Dan Nutter* Date: APR 7 1983
- * If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be duplicated and resubmitted. Please show the date and circumstance of the earlier submittal.

III. WELL DATA

A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:

- (1) Lease name; Well No.; location by Section, Township, and Range; and footage location within the section.
- (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
- (3) A description of the tubing to be used including its size, lining material, and setting depth.
- (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.

- (1) The name of the injection formation and, if applicable, the field or pool name.
- (2) The injection interval and whether it is perforated or open-hole.
- (3) State if the well was drilled for injection or, if not, the original purpose of the well.
- (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
- (5) Give the depth to and name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

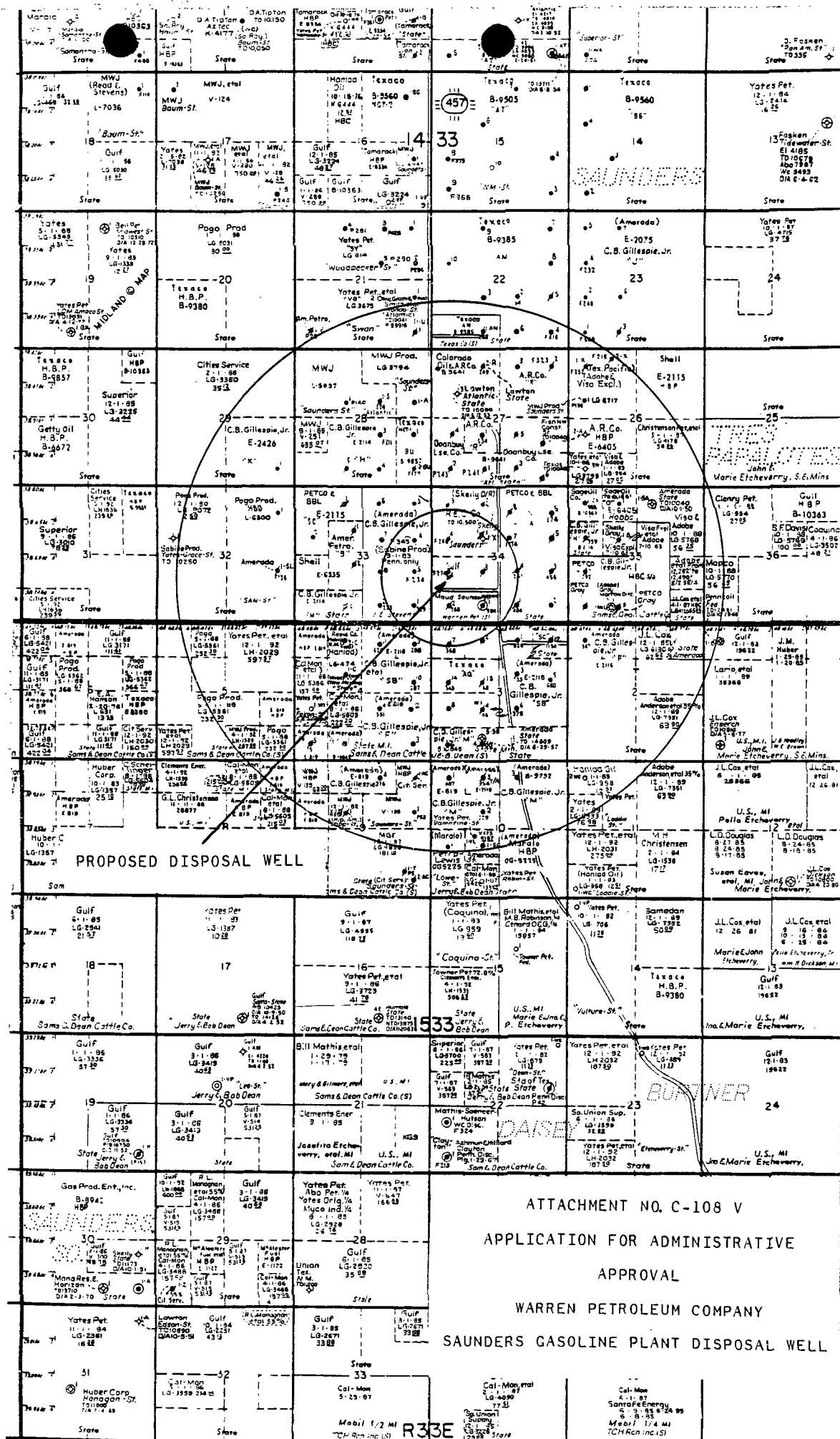
All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) the intended purpose of the injection well; with the exact location of single wells or the section, township, and range location of multiple wells;
- (3) the formation name and depth with expected maximum injection rates and pressures; and
- (4) a notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, P. O. Box 2088, Santa Fe, New Mexico 87501 within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.



OPERATOR, LEASE NAME AND WELL NUMBER	LOCATION	CASING AND CEMENT			PERFORATIONS	POTENTIAL	CURRENT STATUS
		SURFACE	INTERMEDIATE	PRODUCTION			
Petroleum Corp. of Texas State A Well No. 4 (formerly Shell Oil State A No. 4)	1980' FSL 1980' FEL 34-14S-33E Unit J	13 3/8" @ 331' 325 sx. cmt. Cmt. circ.	8 5/8" @ 4205' 3000 sx. cmt. Cmt. circ.	5 1/2" liner 3984'-9921' 900 sx. @ shoe T. cmt. 4615'	9770'-83' 9805'-10' 9842'-56'	251 BO 3 BW	Now P & A; See Attach- ment b 3
Gulf Oil Corporation Maud Saunders Well No. 3	1980' FSL 1980' FWL 34-14S-33E Unit K	13 3/8" @ 297' 395 sx. cmt. Cmt. circ.	9 5/8" @ 4249' 1600 sx. cmt. T. cmt. 1995'	7" @ 9924' 181 sx. cmt. T. cmt. 8715'	9853'-55' 9855'-9905'	392 BO 108 BW 9-23-52	Now P & A; See Attach- ment b 4
Gulf Oil Corporation Maud Saunders Well No. 4-x	1830' FSL 660' FWL 34-14S-33E Unit L	13 3/8" @ 401' 396 sx. cmt.					Surface csg. parted while cementing. Now P & A; See Attachment b 5
Gulf Oil Corporation Maud Saunders Well No. 4	1815' FSL 660' FWL 34-14S-33E Unit L	13 3/8" @ 416' 500 sx. cmt. Cmt. circ.	8 5/8" @ 4280' 3300 sx. cmt. Cmt. circ.	5 1/2" @ 10010' 450 sx. cmt. Calc. top 7916' 7795' 7.5'	9790'-9810' 9818'-23' 9844'-9940' 9952'-60'	274 BO 0 BW 7-10-58	Proposed Disposal Well Now P & A; See Attach- ments b 6 and b 7
Gulf Oil Corporation Maud Saunders Well No. 2	660' FSL 660' FWL 34-14S-33E Unit M	13 3/8" @ 312' 350 sx. cmt. Cmt. circ.	9 5/8" @ 4229' 1800 sx. cmt. Top not rptd.	7" @ 9999' 300 sx. cmt. T. cmt. 7645'	9832'-62' 9870'-86'	268 BO 108 BW 6-16-52	Now P & A; See Attach- ment b 8
Gulf Oil Corporation Maud Saunders Well No. 1	660' FSL 1980' FWL 34-14S-33E Unit N	13 3/8" @ 327' 350 sx. cmt. Cmt. circ.	9 5/8" @ 4197' 1800 sx. cmt. Top not rptd.	7" @ 10759' 800 sx. cmt. T. cmt. 7550'	9800'-12' 9822'-36' 9864'-70' 9865'-82'	996 BO 468 BW 1-11-50	Now P & A; See Attach- ment b 9
Chas. B. Gillespie Jr. State G Well No. 2 (formerly Amerada State S "B" No. 2)	660' FNL 1980' FWL 3-15S-33E Unit C	11 3/4" @ 297' 225 sx. cmt. Cmt. circ.	7 5/8" @ 3100' 1000 sx. cmt. T. cmt. 809'	5" @ 8208' 600 sx. cmt. T. cmt. 3753' 4" liner 8191'- 9915' 275 sx cmt	9783'-9803' 9830'-58' 9885'-9913' Open hole: 9915'-10000'	824 BO 1 BW 5-22-51	TD 10000' Now TA
Chas. B. Gillespie Jr. State G Well No. 7 (formerly Amerada State S "B" No. 7)	800' FNL 660' FWL 3-15S-33E Unit D	13 3/8" @ 296' 250 sx. cmt. Cmt. circ.	8 5/8" @ 4200' 1450 sx. cmt. T. cmt. 1440'	5 1/2" @ 10010' 600 sx. cmt. T. Cmt. 6740'	9801'-07' 9900'-22' 9944'-51' 9957'-65'	368 BO 9-28-51	PBTD 10005' Currently producing approx. 1.5 BOPD

Attachment C-108 VI (a) 1

OPERATOR, LEASE NAME AND WELL NUMBER	LOCATION	CASING AND CEMENT			PERFORATIONS	POTENTIAL	CURRENT STATUS
		SURFACE	INTERMEDIATE	PRODUCTION			
Chas. B. Gillespie Jr. Stevens Well No. 4 (formerly Amerada J. I. Stevens No. 4)	1980' FNL 660' FEL 33-14S-33E Unit H	13 3/8" @ 296' 250 sx. cmt. Cmt. circ.	8 5/8" @ 4159' 1500 sx. cmt. T. cmt. 1848'	5 1/2" liner 4034'-9998' 200 sx. @ top 600 sx. @ shoe	9862'-93' 9932'-53'	344 BO 42 BW 5-13-58	PBTD 9990' Currently SI
Chas. B. Gillespie Jr. Stevens Well No. 5 (formerly Amerada J. I. Stevens No. 5)	1980' FSL 660' FEL 33-14S-33E Unit I	13 3/8" @ 295' 250 sx. cmt. Cmt. circ.	8 5/8" @ 4159' 1500 sx. cmt. Top not rptd.	5 1/2" liner 4035'-10021' 200 sx. @ top 600 sx. @ shoe	9814'-23' 9854'-68' 9882'-96' 9936'-54'	234 BO 12 BW 9-29-58	PBTD 10012' Currently producing approx. 2 BOPD
Chas. B. Gillespie Jr. Stevens Well No. 8 (formerly Amerada J. I. Stevens No. 8)	1980' FSL 1980' FEL 33-14S-33E Unit J	13 3/8" @ 298' 250 sx. cmt. Cmt. circ.	8 5/8" @ 4168' 1500 sx. cmt. T. cmt. 2098'	5 1/2" liner 4063'-10008' 200 sx. @ top 600 sx. @ shoe	9934'-56'	265 BO 9 BW 8-28-59	PBTD 10000' Currently producing approx. 9 BOPD
Chas. B. Gillespie Jr. Stevens Well No. 1 (formerly Amerada J. I. Stevens No. 1)	660' FSL 660' FEL 33-14S-33E Unit P	13 3/8" @ 296' 250 sx. cmt. Cmt. circ.	8 5/8" @ 4164' 1500 sx. cmt. T. cmt. 660'	5 1/2" @ 10025' 600 sx. cmt. T. cmt. 7712'	9858'-92' 9910'-24' 9934'-52' 9974'-92'	220 BO 31 BW 1-25-53	PBTD 10020' Currently producing less than 1 BOPD
Guest and Wolfson M. H. Saunders Well No. 4 (formerly Fish North- west Constructors Maud Saunders A No. 4)	1980' FNL 660' FWL 34-14S-33E Unit E	13 3/8" @ 366' 365 sx. cmt. Cmt. circ.	8 5/8" @ 4300" 2100 sx. cmt. Cmt. circ.	5 1/2" @ 10014' 600 sx. cmt. Top not rptd.	9866'-9900' 9910'-20' 9935'-60'	275 BO 35 BW 1-26-58	Now P & A; See Attach- ment b 1
Skelly Oil Co. M. H. Saunders Well No. 5 (formerly Fish North- west Constructors Maud Saunders A No. 1)	1980' FNL 1980' FWL 34-14S-33E Unit F	13 3/8" @ 397' 375 sx. cmt. Cmt. circ.	8 5/8" @ 4287'				Intermediate casing parted while cementing. Subsequently plugged back and used as gas volume tank. Now P & A; See Attachment b 2
Skelly Oil Co. M. H. Saunders Well No. 1 (formerly Fish North- west Constructors Maud Saunders A No. 1-x)	1955' FNL 1985' FWL 34-14S-33E Unit F	13 3/8" @ 366' 350 sx. cmt. Cmt. circ.	8 5/8" @ 4310' 2500 sx. cmt. Cmt. circ.	5 1/2" @ 10030' 600 sx. cmt. Top not rptd.	9818'-26' 9836'-90' 9914'-44' 9962'-92'	201 BO 3 BW	Now P & A ; See Attach- ment b 10

DATA SHEET

(Section VII, Form C-108)

1. Proposed Rates Of Injection

A. Average daily rate of injection: 450 barrels

B. Maximum daily rate of injection: 600 barrels

2. Type Of System

System will be open.

3. Anticipated Injection Pressures

It is anticipated that injection will be on a vacuum, and that no additional pressure will be needed. However, should surface pressure be necessary to accomplish injection, such pressures would not exceed 0.2 psi per foot of depth to the top of the injection zone at 4280 feet, or 856 psi.

4. Source Of Injection Water

Source of the disposal water is cooling tower blowdown and contained water from inlet scrubbers at the Warren Petroleum Company Saunders Gasoline Plant. See Attachment VII (b) for analysis of disposal water.

5. Disposal Zone Water Analysis

Disposal is to be into a zone not productive of oil or gas at or within one mile of the proposed well, and an analysis of the disposal zone water is therefore attached hereto as Attachment VII (c).



P. O. BOX 1499

707 NORTH LEECH

HOBBS, NEW MEXICO 88240

PHO. (505) 393-7751

WATER ANALYSIS REPORT

(Expressed in ppm Unless Indicated Otherwise)

ATTN: Mr. Forrest Noah

FOR: Warren Petroleum Company

DATE SAMPLED:

PLANT: Saunders

DATE SUBMITTED:

LOCATION: Tatum, NM

DATE ANALYZED: 2-23-83

SAMPLE SOURCE:

		Waste			
		Water			
pH		9.02			
Pheno. Alkalinity	(CaCO ₃)	268			
Total Alkalinity	(CaCO ₃)	348			
Bicarbonate	(HCO ₃)	0			
Carbanate	(CO ₃)	155			
Hydroxide	(OH)	64			
Total Hardness	(CaCO ₃)	2500			
Calcium	(CaCO ₃)	1300			
Magnesium	(CaCO ₃)	1200			
Chloride	(CL)	4700			
Sulfate	(SO ₄)	1867			
Total Phosphate	(PO ₄)				
Orthophosphate	(PO ₄)				
Polyphosphate	(PO ₄)				
Silica	(SiO ₂)				
Iron	(Fe)	NIL			
Chromate	(CrO ₄)				
Specific Conductance (MMHOS)		13990			
Chloride Concentrations					
Hardness Concentrations					
Sulfide (S)		NIL			
Barium (Ba +2)		0.2			
Sodium (Na+) (Calc)		2995			
Total Dissolved Solids		10589			

REMARKS: Here is the analysis for the sample you requested. If we may be of further service, please call.

Thank-you,

Richard L. Maddux

Richard L. Maddux

cc: Scott Wilson

Eddie Slavens

Attachment C-108 VII (b)

TYPICAL WATER ANALYSIS
SAN ANDRES FORMATION
LEA COUNTY, NEW MEXICO

ANALYSIS		P P M or Mg/L	E P M or Meq./L	Ionic P P M	
1. PH	7.25				
2. H ₂ S	Pos.				
3. CO ₂	Pos.				
4. Specific Gravity	1.12				
5. Phenol Alkalinity (CaCO ₃)		0.0			
6. M P. Alkalinity (CaCO ₃)		520.0			
7. Bicarbonate (CaCO ₃)		520.0	10.4	HCO ₃	634
8. Chlorides (Cl)		187,000.0	5,267.6	Cl	187,000
9. Sulphates (SO ₄)		2,800.0	58.33	SO ₄	2,800
10. Total Hardness (CaCO ₃)		10,000.0			
11. Calcium (CaCO ₃)		5,750.0	115.0	Ca	2,300
12. Magnesium (CaCO ₃)		4,250.0	85.0	Mg	1,037
13. Sodium (Na)			5,135.73	Na	118,122
14. XXXXXXXXXX Barium (Ba)				NO ₃	0
15. Iron (Fe)					
16. Total Disolved Solids					311,893

GEOLOGICAL DATA
(Section VIII, Form C-108)

Disposal is proposed by injection into the San Andres Formation in the open hole interval from 4280 feet to approximately 4297 feet in the Gulf Oil Corporation Maud Saunders Well No. 4, located 1815 feet from the South line and 660 feet from the West line of Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico.

The San Andres formation in this well, as well as throughout the general area, is a limestone-dolomite section of Middle Permian Age underlying the Grayburg formation and overlying the Glorieta formation. The top of the San Andres formation in the proposed disposal well occurs at 4278 feet, while the base of the formation is found at 5574 feet, for an overall thickness of some 1296 feet. The San Andres formation is productive of oil and gas throughout many areas of Southeast New Mexico, and although porosity and permeability in the subject well are good, the formation is not productive of oil or gas within a two-mile radius of the proposed injection well.

Fresh water may be found in the Ogallala formation in the vicinity of the proposed injection well. This ground water is usually found at depths of less than 300 feet and all oil wells drilled in the area have surface casing set and cemented to a depth of at least 295 feet, and in most cases deeper. In addition the Santa Rosa formation in the vicinity of the proposed injection well contains a highly mineralized brackish water which is unfit for domestic, stock, or irrigation use. This water usually occurs at depths of from 900 feet to 1500 feet in the subject area.

There are no other known fresh water sands overlying the proposed disposal zone, and there are no known fresh water sands underlying the disposal zone anywhere in the vicinity.

STIMULATION PROGRAM

(Section IX, Form C-108)

The proposed injection well was originally drilled in 1958 as an oil well in the Saunders Permo-Upper Penn Pool. 13 3/8" surface casing was set at 416' and cement circulated to the surface. 8 5/8" intermediate casing was set at 4280' and cement circulated to the surface. 5 1/2" production casing was set at 10,010' and cemented with 450 sacks of cement. The top of the cement was not reported but it is estimated that the cement came back to at least 7916'. When the well was plugged in 1977, the 5 1/2" casing was cut and pulled from 4597'. It is proposed to re-enter the well and clean it out to the top of the 5 1/2" casing stub and use the open hole interval from 4280' to 4597' as the disposal zone.

Treatment of the aforesaid open hole interval will consist of 10,000 gallons of 20% NEFE HCL acid.

LOGGING AND TEST DATA
(Section X, Form C-108)

The proposed injection well was originally drilled as an oil well in the Saunders Permo-Penn Pool in 1958.

Inasmuch as the San Andres formation was not a zone of interest during the drilling of the well, no tests were made in the San Andres. All testing was reserved for the Lower Wolfcamp and Upper Pennsylvanian sections, and a successful completion was made there.

No testing of the San Andres formation as to its suitability as a disposal zone has as yet been conducted on the subject well pending approval of this application.

The Schlumberger Gamma Ray-Neutron Log run on the subject well on July 10, 1958, is included here as Attachment b to this Data Sheet, with the proposed disposal interval marked in red thereon.

FRESH WATER ANALYSIS

(Section XI, Form C-108)

As indicated by Attachments (b) and (c) to this Data Sheet, there have been many fresh water wells drilled over the years within one mile of the proposed disposal well. Attachment (b) is a tabulation of all wells showing their State Engineer File Number, their location, and the purpose for which they were licensed. Attachment (c) is a map showing the wells' approximate location by quarter-quarter-quarter section.

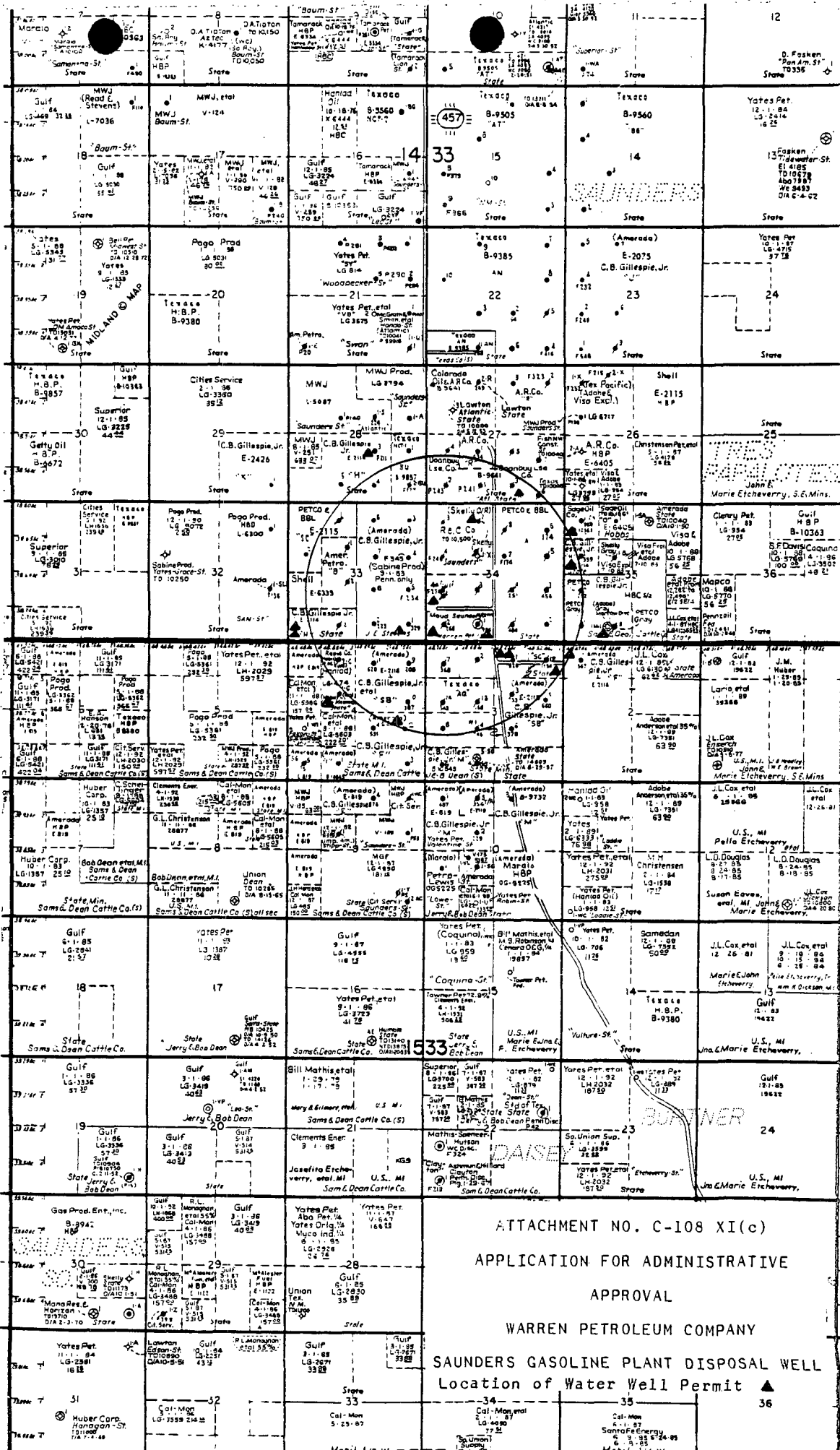
Most of the wells were drilled as water supply wells for oil field drilling operations during the development of the Saunders Pool, and were then abandoned. A ground search of the area failed to turn up any evidence of current use of any of the subject wells except L-1911 and L-1912. These two wells are water supply wells for the Warren Saunders Gasoline Plant. Attachments (d) and (e) are water analyses of the product of these two wells, taken only recently.

WATER WELLS WITHIN ONE MILE RADIUS
OF PROPOSED DISPOSAL WELL

<u>FILE NO.</u>	<u>DESCRIPTION</u>	<u>SERVICE</u>	<u>REMARKS</u>
L-4281	SE SW SE of S27-T14S-R33E	OWD	Unable to locate
L-2419	SW NW SE of S28-T14S-R33E	OWD	Unable to locate
L-1660	SW SE SE of S33-T14S-R33E	OWD	Unable to locate
L-7321-S-6	SW SW SW of S33-T14S-R33E	COM, IND, MUN, WF, DOM	Unable to locate
L-7567	SW SW SW of S33-T14S-R33E	COM, IND, MUN, WF, DOM	Unable to locate
L-3788	NE NW of S34-T14S-R33E	DOM, OWD	Unable to locate
L-3857	SW NW SW of S34-T14S-R33E	OWD	Unable to locate
L-1911	SW SW SW of S34-T14S-R33E	IND	West water well at plant. Analysis is attached
L-1912	SE SE SW of S34-T14S-R33E	IND	East water well at plant. Analysis is attached
L-2229	SW NW NW of S35-T14S-R33E	OWD	Unable to locate
L-1684	SW SW NW of S35-T14S-R33E	OWD, STOCK	Unable to locate
L-8205	SW SE SW of S35-T14S-R33E	OWD, STOCK	Unable to locate
L-4861	NW NW NW of S2-T15S-R33E	SRO	Unable to locate
L-2094	SE NE NE of S3-T15S-R33E	OWD, STOCK	Out of service
L-3841	NW NW NE of S3-T15S-R33E	DOM, OWD	Unable to locate
L-3870	NW NW NE of S3-T15S-R33E	DOM, OWD	Unable to locate
L-5275	SW SE NW of S4-T15S-R33E	STOCK	Unable to locate
L-8237	NW NE SE of S4-T15S-R33E	OWD	Unable to locate

KEY TO TYPE OF SERVICE:

OWD - Oil Well Drilling
 COM - Commercial
 IND - Industry
 MUN - Municipal
 DOM - Domestic
 SRO - Secondary Recovery
 WF - Water Flood



ATTACHMENT NO. C-108 XI(c)

APPLICATION FOR ADMINISTRATIVE

APPROVAL

WARREN PETROLEUM COMPANY

SAUNDERS GASOLINE PLANT DISPOSAL WELL
Location of Water Well Permit



P. O. BOX 1499

HOBBS, NEW MEXICO 88240

707 NORTH LEECH

PHO. (505) 393-7751

WATER ANALYSIS REPORT

(Expressed in ppm Unless Indicated Otherwise)

ATTN: Mr. Forrest Noah

FOR: Warren Petroleum Company

DATE SAMPLED: 3-3-83

PLANT: Saunders

DATE SUBMITTED: 3-4-83

LOCATION: Tatum, NM

DATE ANALYZED: 3-4-83

SAMPLE SOURCE:

East

Water

Well

pH

7.28

Pheno. Alkalinity (CaCO₃)

NIL

Total Alkalinity (CaCO₃)

148

Bicarbonate (HCO₃)

181

Carbonate (CO₃)

0

Hydroxide (OH)

0

Total Hardness (CaCO₃)

228

Calcium (CaCO₃)

170

Magnesium (CaCO₃)

58

Chloride (CL)

58

Sulfate (SO₄)

54.1

Total Phosphate (PO₄)Orthophosphate (PO₄)Polyphosphate (PO₄)Silica (SiO₂)

Iron (Fe)

0.08

Chromate (CrO₄)

Specific Conductance (MMHOS)

518

Chloride Concentrations

Hardness Concentrations

Sulfide (S)

NIL

Barium (Ba +2)

0.08

Sodium (Na⁺) (Calc)

26.7

Total Dissolved Solids

401

REMARKS: Here is the analysis for the sample you requested. If we may be of further service, please call.

Thank-you,

Richard L. Maddux

cc: Scott Wilson

Eddie Slavens

Attachment C-108 XI (d)



P. O. BOX 1499

HOBBS, NEW MEXICO 88240

707 NORTH LEECH

PHO. (505) 393-7751

WATER ANALYSIS REPORT

(Expressed in ppm Unless Indicated Otherwise)

ATTN: Mr. Forrest Noah

FOR: Warren Petroleum Company

PLANT: Saunders

LOCATION: Tatum, NM

DATE SAMPLED: 2-22-83

DATE SUBMITTED: 2-22-83

DATE ANALYZED: 2-23-83

SAMPLE SOURCE:

West
Water
Well

pH		6.81
Pheno. Alkalinity	(CaCO ₃)	NIL
Total Alkalinity	(CaCO ₃)	156
Bicarbonate	(HCO ₃)	190
Carbonate	(CO ₃)	0
Hydroxide	(OH)	0
Total Hardness	(CaCO ₃)	400
Calcium	(CaCO ₃)	312
Magnesium	(CaCO ₃)	88
Chloride	(CL)	96
Sulfate	(SO ₄)	337
Total Phosphate	(PO ₄)	
Orthophosphate	(PO ₄)	
Polyphosphate	(PO ₄)	
Silica	(SiO ₂)	
Iron	(Fe)	0.03
Chromate	(CrO ₄)	
Specific Conductance	(MMHOS)	926
Chloride Concentrations		
Hardness Concentrations		
Sulfide (S)		NIL
Barium (Ba +2)		0.2
Sodium (Na+) (Calc)		111
Total Dissolved Solids		881

REMARKS: Here is the analysis for the sample you requested. If we may be of further service, please call.

Thank-you,

Richard L. Maddux

cc: Scott Wilson

Eddie Slavens

Attachment C-108 XI (e)

AFFIRMATIVE STATEMENT

(Section XII, Form C-108)

Applicant hereby affirms that he has examined the available geologic and engineering data and finds no evidence of open faults or other hydrologic connection between the disposal zone and any underground source of drinking water.

PROOF OF
NOTICE TO OFFSET OPERATORS

P 331 614 905
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Getty Oil Co.		STREET AND NO. P.O. Box 1231		P.O., STATE AND ZIP CODE Midland TX 79702	
POSTAGE		CERTIFIED FEE		TOTAL POSTAGE AND FEES	
CONSULT POSTMASTER FOR FEES		SPECIAL DELIVERY		POSTMARK OR DATE	
OPTIONAL SERVICES		RESTRICTED DELIVERY			
RETURN RECEIPT SERVICE		SHOW TO WHOM AND DATE DELIVERED			
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY			
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY			
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			

PS Form 3800, Apr. 1976

P 331 614 903
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO R&C Company		STREET AND NO. P.O. Box 6434		P.O., STATE AND ZIP CODE Odessa, TX	
POSTAGE		CERTIFIED FEE		TOTAL POSTAGE AND FEES	
CONSULT POSTMASTER FOR FEES		SPECIAL DELIVERY		POSTMARK OR DATE	
OPTIONAL SERVICES		RESTRICTED DELIVERY			
RETURN RECEIPT SERVICE		SHOW TO WHOM AND DATE DELIVERED			
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY			
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY			
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			

PS Form 3800, Apr. 1976

P 331 614 906
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Petr. Corp of Tex & BBL Ltd		STREET AND NO. P.O. Box 911		P.O., STATE AND ZIP CODE Breckenridge TX 76024	
POSTAGE		CERTIFIED FEE		TOTAL POSTAGE AND FEES	
CONSULT POSTMASTER FOR FEES		SPECIAL DELIVERY		POSTMARK OR DATE	
OPTIONAL SERVICES		RESTRICTED DELIVERY			
RETURN RECEIPT SERVICE		SHOW TO WHOM AND DATE DELIVERED			
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY			
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY			
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			

PS Form 3800, Apr. 1976

P 331 614 904
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO Chas. B. Gillespie, Jr.		STREET AND NO. P.O. Box 12		P.O., STATE AND ZIP CODE Midland, TX 79702	
POSTAGE		CERTIFIED FEE		TOTAL POSTAGE AND FEES	
CONSULT POSTMASTER FOR FEES		SPECIAL DELIVERY		POSTMARK OR DATE	
OPTIONAL SERVICES		RESTRICTED DELIVERY			
RETURN RECEIPT SERVICE		SHOW TO WHOM AND DATE DELIVERED			
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY			
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY			
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY			

PS Form 3800, Apr. 1976

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

1, _____

ROBERT L. SUMMERS

of the Hobbs Daily News-Sun, a daily 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 in a supplement thereof for a period

of _____

ONE _____ weeks.

Beginning with the issue dated

MARCH 23, 19 83

and ending with the issue dated

MARCH 23, 19 83

Robert L. Summers
Publisher.

Sworn and subscribed to before

me this 23RD day of

MARCH, 19 83

Lynette Haegle
Notary Public.

My Commission expires _____

March 23, 19 86
(Seal)

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 NOTICE
MARCH 23, 1983
NOTICE**

Notice is hereby given pursuant to Rule 701 B 3 of the New Mexico Oil Conservation Division Rules and Regulations that it is the intent of Gulf Oil Corporation, acting by and through Warren Petroleum Company, a Division thereof, to utilize the Gulf Oil Corporation Maud Saunders Well No. 4 located 1815 feet from the South line and 660 feet from the West line of Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico, for the underground disposal of cooling tower blowdown and contained water from inlet scrubbers

at the Warren Saunders Gasoline Plant. Disposal will average 450 barrels per day but could go as high as 600 barrels per day. Maximum injection pressure will not exceed 856 pounds per square inch. Questions regarding this proposal may be directed to Dan Nutter, Registered Petroleum Engineer, 105 East Alicante, Santa Fe, New Mexico 87501, Telephone (505) 982-0757. Objections to this proposal or requests for hearing on the matter, together with the reasons therefor, must be filed in writing with the Oil Conservation Division, P. O. Box 2088, Santa Fe, New Mexico 87501, within 15 days after date of publication of this notice.

2000

Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

June 6, 1983

Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Re: Saunders Salt Water Disposal
Saunders Field, Lea County, NM

Dear Sir:

The following is the Warren Petroleum Company, Saunders Plant #146 waste water report for the month of May, 1983.

May - 1,960 BBLS.

If further information is needed, please advise.

Yours truly,

WARREN PETROLEUM COMPANY

F. C. Noah

F. C. Noah
Plant Manager

FCN:STW:ef

cc: New Mexico Oil Conservation Commission
Hobbs, New Mexico



A DIVISION OF GULF OIL CORPORATION

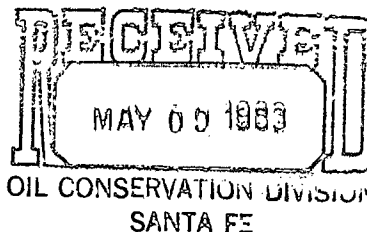
To: Oscar Simpson

Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

May 2, 1983



Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Re: Saunders Salt Water Disposal
Saunders Field, Lea County, NM

Dear Sir:


The following is the Warren Petroleum Company, Saunders Plant #146 waste water report for the month of April, 1983.

April - 2,569 BBLS.

If further information is needed, please advise.

Yours truly,

WARREN PETROLEUM COMPANY


S. T. Wilson
Plant Supervisor

STW:eh

cc: New Mexico Oil Conservation Commission
Hobbs, NM

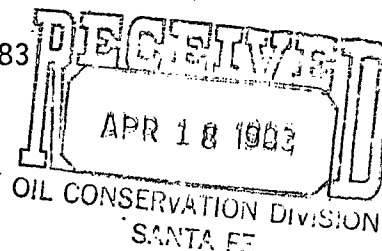


To: Oscar Simpson
Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

April 14, 1983



Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Re: Saunders Salt Water Disposal
Saunders Field, Lea County, NM

Dear Sir:

The following is the Warren Petroleum Company, Saunders Plant #146 waste water report for the month of March, 1983.

March - 1,586 BBLs.

If further information is needed, please advise.

Yours truly,

WARREN PETROLEUM COMPANY

A handwritten signature in dark ink, appearing to read "S. T. Wilson".

S. T. Wilson
Plant Supervisor

STW:eh

cc: New Mexico Oil Conservation Commission
Hobbs, NM

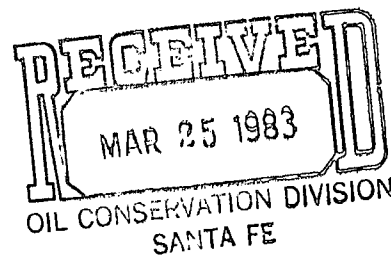


Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

March 16, 1983



Mr. Charles Gillespie
P.O. Box 8
Midland, Texas 79701

Dear Sir:

The follwing is the Warren Petroleum Company, Saunders Plant #146
waste water report for the months of January and February 1983:

January - 1,881 bbls.

February- 1,697 bbls.

If further information is needed, please advise.

Yours truly,

Warren Petroleum Company

A handwritten signature in dark ink, appearing to read "S. T. Wilson".

S. T. Wilson
Plant Supervisor

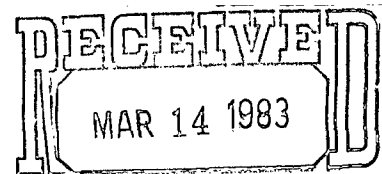
STW/jky

cc: New Mexico Oil Conservation Commission



A DIVISION OF GULF OIL CORPORATION

SAUNDERS PLANT



Warren Petroleum Company

MANUFACTURING DEPARTMENT

March 11, 1983

P. O. Box 1589
Tulsa, Oklahoma 74102

Mr. Joe D. Ramey
Division Director
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Attention: Mr. Oscar A. Simpson III
Hydrogeologist

Re: Modification to Saunders
Plant Discharge Plan

Dear Mr. Simpson:

Warren Petroleum Company, a division of Gulf Oil Corporation, would like to modify the formal waste water Discharge Plan submitted November 23, 1981, for the Saunders Gas Processing Plant. This plant is located in the SW/4 of Section 34, T14S, R33E, Lea County, New Mexico.

The disposal well used by the plant is located in the SW/4 of Section 4, T15S, R33E. This location is approximately 1.5 miles southwest of the Saunders Plant. The operator of the well is Mr. Charles B. Gillespie. Warren will continue using this well, however, the amount of water of which we can dispose has been curtailed. The remainder of the waste water is now being hauled from the plant and injected into a certified well.

what well u do

Currently, Warren is finalizing permit and work-over plans for use of a Warren-owned oil well to dispose of the waste water that is currently being hauled from the plant. This well is located at the plant site. Please refer to the enclosed section plat. This well is scheduled for completion in June, 1983. This is based upon receipt of applicable permits and no problems developing in working over the well for injection. Once the well is completed, no effluent will be injected into fresh waters bearing strata or formations containing oil and/or gas in commercial quantities. Further details will be provided with our permit application.

If you have any questions or need further information, please call Linda Johnson or me at (918)560-4119.

Very truly yours,

L. T. Reed, Director
Environmental Affairs

LTR:de
Attachment



A Division of Gulf Oil Corporation

6					1
31			PLANT**		3C

6					1
31					3C

T-15-S

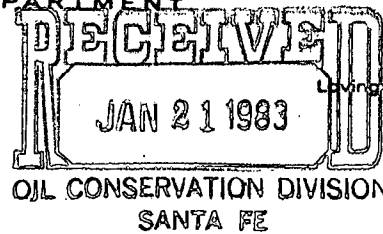
****LOCATION OF THE PLANT SITE. THE PROPOSED DISPOSAL WELL WILL BE LOCATED AT THE PLANT SITE.**

NO.	REVISIONS	BY	DATE	CHK.	APPR.	ISSUED CONST.	NO. OF UNITS REQUIRED THUS	WO-AFE NO.
1	WARREN WELL	LLJ	3-83				WARREN PETROLEUM COMPANY TULSA, OKLAHOMA	GULF 82341
							SAUNDER PLANT AND INJECTION WELL LOCATION PLT.146 LEA COUNTY, LOVINGTON, NM	
							DRAWN P.K.	DATE 11-2-81
							CHECKED	DATE
							APPROVED	DATE
								SCALE NONE DRAWING NO. 146-1002-0

Warren Petroleum Company

MANUFACTURING DEPARTMENT

January 13, 1983



P. O. Box
Livingston, New Mexico

File
Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Dear Sir:

The following is the Warren Petroleum Company, Saunders Plant #146 waste water report for the month of December 1982:

1,164 Bbls

If further information is needed, please advise.

Yours truly,

WARREN PETROLEUM COMPANY

S. T. Wilson
S. T. Wilson
Plant Supervisor

STW/SKS

cc: New Mexico Oil Conservation Commission

*TO: Carol Harrison
1-19-83
Attached are copies of
report filed by Warren on
their Saunders Plant.
I have talked with
El Paso
Warren-Monument &
Northern Nat. -
they will be in submitting
their info to you monthly.*

Evelyn Downs



A DIVISION OF GULF OIL CORPORATION

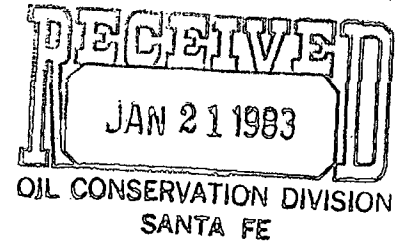
Warren Petroleum Company

MANUFACTURING DEPARTMENT

*File:
Gillespie
C-120*

November 22, 1982

P. O. Box 1689
Lovington, New Mexico 88260



Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Dear Sir:

The following is the Warren Petroleum Company, Saunders Plant #146 waste water report for the month of October, 1982:

1,578 BBLs - October, 1982

If further information is needed, please advise.

Yours truly,

WARREN PETROLEUM COMPANY

F. C. Noah

F. C. Noah
Plant Manager

FCN:SKS:eh

cc: New Mexico Oil Conservation Commission



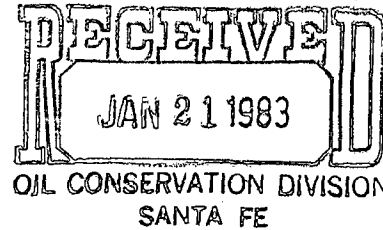
A DIVISION OF GULF OIL CORPORATION

Warren Petroleum Company

MANUFACTURING DEPARTMENT

October 6, 1982

P. O. Box 1689
Lovington, New Mexico 88260



Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Dear Sir:

The following is the Warren Petroleum Company Saunders Plant #146
waste water report for the month of September, 1982:

1977 bbls

If any further information is needed, please advise.

Yours truly,

A handwritten signature in cursive script that reads "F. C. Noah".

F. C. Noah
Plant Manager

FCN/sks

cc: New Mexico Oil Conservation Commission



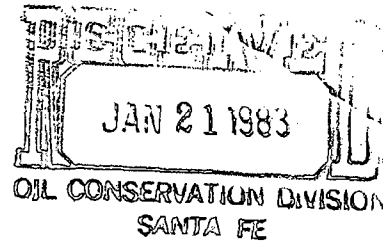
A DIVISION OF GULF OIL CORPORATION

Warren Petroleum Company

MANUFACTURING DEPARTMENT

September 10, 1982

P. O. Box 1689
Lovington, New Mexico 88260



Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Dear Sir:

The following is the Warren Petroleum Company Saunders Plant #146 waste water report from January thru August, 1982:

January	18,651 bbls
February	11,465 bbls
March	7,457 bbls
April	7,343 bbls
May	7,137 bbls
June	13,445 bbls
July	13,624 bbls
August	1,936 bbls

If any further information is needed, please advise.

Yours truly,

F. C. Noah
Plant Manager

FCN/sks

cc: New Mexico Oil Conservation Commission



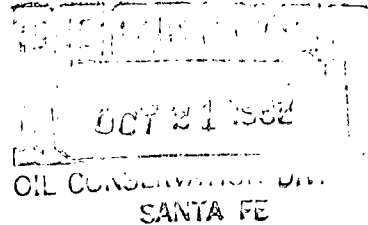
Attn Oscar Simpson

Warren Petroleum Company

MANUFACTURING DEPARTMENT

October 6, 1982

P. O. Box 1689
Lovington, New Mexico 88260



Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Dear Sir:

The following is the Warren Petroleum Company Saunders Plant #146
waste water report for the month of September, 1982:

1977 bbls

If any further information is needed, please advise.

Yours truly,

F. C. Noah

F. C. Noah
Plant Manager

FCN/sks

cc: New Mexico Oil Conservation Commission



Lo. O'Brien Simpson

Warren Petroleum Company

MANUFACTURING DEPARTMENT

John E.R.

September 10, 1982

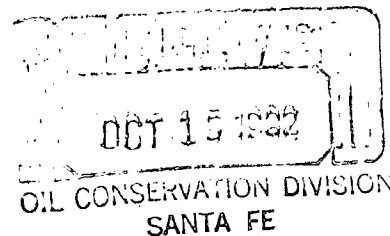
P. O. Box 1689
Lovington, New Mexico 88260

Mr. Charles Gillespie
P. O. Box 8
Midland, TX 79701

Dear Sir:

The following is the Warren Petroleum Company Saunders Plant #146 waste water report from January thru August, 1982:

January	18,651 bbls
February	11,465 bbls
March	7,457 bbls
April	7,343 bbls
May	7,137 bbls
June	13,445 bbls
July	13,624 bbls
August	1,936 bbls



If any further information is needed, please advise.

Yours truly,

F. C. Noah

F. C. Noah
Plant Manager

FCN/sks

cc: New Mexico Oil Conservation Commission

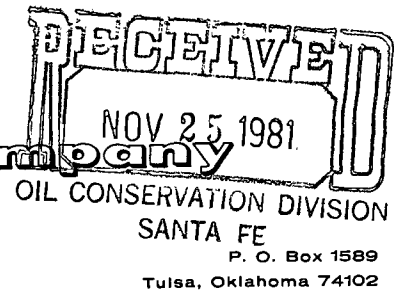


A DIVISION OF GULF OIL CORPORATION

Warren Petroleum Company

MANUFACTURING DEPARTMENT

November 23, 1981



State of New Mexico
Energy and Mineral Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey
Division Director

Re: Saunders Plant Discharge Plans

Gentlemen:

Warren Petroleum Company would like to modify the formal waste water discharge plan submitted May 4, 1981 for its Saunders Plant.

At the time that the plan was submitted, we were having difficulty securing a contract with a disposal located on Section 4, T15S, R32E and operated by Mr. Charles B. Gillespie. The disposal well is approximately 1/2 mile south of the Saunders Plant, which is located in the SW/4 of Section 34, T14S, R33E, Lea County, New Mexico. We have now been granted permission to use the well to dispose of our waste water.


A plot plan has been attached which shows the effluent surge tanks, the pipeline to the injection well, and the injection well location. The pipeline is the responsibility of Warren Petroleum Company until it reaches the main line to the injection well. The pipeline is constructed of polyethylene and the effluent will be pumped to the disposal well. A meter will be installed to measure effluent flow.

The plant will make the following provisions for a contingency plan:

- (1) Install a check valve on the pipeline to prevent back flow.
- (2) Install a centrifugal pump with limited head capacity.
- (3) Have a standby pump for pumping the plant waste water.

If you have any questions or need additional information, please do not hesitate to call me at (918)560-4117.

Very truly yours,


for J. E. Moody, Manager
Environmental and Services

JEM:DFJ:de
Attachment



A DIVISION OF GULF OIL CORPORATION



6

Abstract

31

✓ PLANT

36

6

1

INJECTION WELL

31

36

NO.	REVISIONS	BY	DATE	CHK.	APPR.	ISSUED CONST.		NO. OF UNITS REQUIRED THUS		WO-AFE NO.	
						DATE	BY	WARREN PETROLEUM COMPANY TULSA, OKLAHOMA GULF 82341			
								<u>SAUNDER PLANT AND</u> <u>INJECTION WELL LOCATION</u> <u>PLT.146 LEA COUNTY Y, LOVINGTON, NM</u>			
								DRAWN P.K. CHECKED APPROVED	DATE 11-2-81 DATE DATE	SCALE NONE DRAWING NO. 146-1002-0	



(4) SURGE TANKS



NEW DISPOSAL
LINE BY WPC

PLANT FENCE

PLANT
OFFICE



EXISTING LEASE ROAD

TO DISPOSAL
WELL

EXISTING MAINLINE

NO.	REVISIONS	BY	DATE	CHK.	APPR.	ISSUED CONST.		NO. OF UNITS REQUIRED THUS		WO-AFE NO.	
						DATE	BY	WARREN PETROLEUM COMPANY TULSA, OKLAHOMA GULF 82341			
								SAUNDERS PLANT DISPOSAL LINE TO INJECTION WELL PLT. 146 LEA CO., LOVINGTON, NM			
								DRAWN P.K	DATE 11-2-81	SCALE NONE	
								CHECKED	DATE	DRAWING NO.	
								APPROVED	DATE	146-1003-0	



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

October 16, 1981

Warren Petroleum Company
P.O. Box 1589
Tulsa, Oklahoma 74102

ATTENTION: J. F. Moody

RE: Saunders Plant
Discharge Plan

Dear Mr. Moody:

I received and have reviewed your discharge plan for the Saunders Plant. I apologize for the delay in reviewing and commenting on your discharge plan. The delay was primarily due to the complexity of your plan, the literary search needed to confirm your findings and review of your plan by the Environmental Improvement Division personnel.

In reviewing your discharge plan, additional information and explanation will be required. Please refer to attached outline.

Sincerely,

Oscar Simpson
Water Resource Specialist

OS/dp

Enclosure

SAUNDERS PLANT
DISCHARGE PLAN

- I. On page one, bottom paragraph, and page two, top paragraph, key phrases such as "it is our opinion that all the process water generated at the plant can be safely used for irrigation provided the system is properly managed" and "proper management coupled with a systematic assessment of contamination variables will insure safe irrigation of the land surface".

In the entire report there is no discussion on how "proper management" or "systematic assessment of contamination" will be accomplished, as pointed out in the report—"management and "assessment" are the key to the success of the discharge plan. In order for the discharge plan to be seriously considered an in depth and detailed program of operation, it should include: management, guidelines and practices, field monitoring, personnel to operate and manage the system, and the specific equipment used to implement the spray irrigation and monitor it.

- II. On page 2 under Waste Characterization, it was stated that five waste water samples were collected and analyzed, with summary results in Table I of page 3. Examination of Table I indicates several ambiguities, and is not conclusive to base any assumptions on. The reasons are as follows:

- A. There are only 2 samples, those of 1-21-81, which are almost complete for the items requested. Zinc was not tested. Of the two samples on 1-21-81, only the holding tank water would be considered, as stated on page 2, bottom paragraph, and used to base the discharge plan on.

The Oil Conservation Division (OCD) cannot accept the results of only one sample and three partially analyzed samples, to be representative of the plant's efficiency and valid enough to base a discharge plan on.

Additional samples must be collected, filtered, preserved, and analyzed as per Section 3-107 (B) of the "Water Quality Control Commission Regulations" (WQCC). A detailed written description of the procedure will be required of the sampling process and shall include when the samples were collected, by whom, how and when the samples were transported to the lab for analysis and when the lab received and analyzed samples. A sufficient number of samples shall be taken and analyzed to determine what is a representative analysis of the effluent, or define parameters thereof.

- B. In addition to the elements listed in Section 3-103 (A, D, & C) of the (WQCC) regulations; those elements listed under Definition "X" Toxic Pollutant must be considered. That is, Warren Petroleum shall analyze its Saunders Plant waste water effluent for those toxic pollutants listed on pages 4, 5, and 6 of the WQCC regulations, that they believe are associated with their plant.

1. Explain the reason for the high nitrate -N in the cooling tower and holding tank sample of 1-21-81 and not being detectable in the other three partial samples.
2. For what reasons were the 3 partial holding tank samples not completely analyzed.
3. Explain the fluctuations of CL, SO₄, PH, and TDS, in the different samples.
4. Your statement that "the first holding tank sample of 1-21-81 is the worst case sample" is not valid from the results of Table 1. You have only shown that 4 of the 25 elements of the 3 partial samples are lower in value than the holding tank sample of 1-21-81.

- III. There is a ambiguity between statements made on page 2 in the 3rd paragraph, "Analysis of the first holding tank sample indicated that the PH was too high for safe application to vegetation" and the last and first paragraph of pages 2 and 3 respectively, "The field area requirements and constituent loading rates are based on constituent concentrations in the first holding tank sample". Although probably not representative of the average water quality, use of this "Worst Cause" sample will give an added factor of safety to the irrigation system.

How can there be an added factor of safety if you use the PH of holding tank sample 1-21-81, which will kill the vegetation and reduce significantly the transpiration rates.

Also, the statement which states that holding tank sample 1-21-81 is probably not representative of the average waste water is further cause to completely resample and analyze the plant effluent.

- A. On page 2, third paragraph, "the higher levels in the first sample were probably the result of a temporary modification or fluctuation in the plant process or operation".

Your supposition of the above as to cause and effect of chemical analysis results on Table 1 is very inept. Prior to sampling, efforts should have been made to investigate plant operations that were occurring or had occurred that would effect or alter analysis results.

- IV. The use of the term "spray irrigation" is only used three times in the whole report. On page 1, second paragraph, page 10, under Irrigation System, third paragraph, and page 11 under "Conclusions". In the rest of the report, only the term "irrigation" was used some 18 times.

The OCD would like a firm statement as to whether spray irrigation will only be used or some form of irrigation is extended, or confirmation thereof.

Conversations with the Saunders Plant manager indicated that only irrigation by flooding the ground was going to be used.

- A. On page 10 under the heading, "Irrigation System", of the report, there is no description of the specific design to be used for spray irrigation. The OCD requests detailed description of the spray irrigation system to be used, which should include:

1. detailed drawings, how the system will function, and be controlled.

- V. From Page 1, state who is the commercial hauler, how is waste water is being transported, and where is the plant waste water being deposited. A brief past history should be included of the plant effluent disposal methods which include diagrams showing positions of old pits if applicable.

- VI. On Page 4 under Topsoil Characterization, three types of soil were indicated to be representative of the soil which would be subjected to spray irrigation. There is no sieve analysis of the three types of soil, no map showing where the soil samples were taken, and at what frequency, what aerial extent each soil has, and no percolation tests run on these three soil types

- VII. On Page 4 and 5 under Vegetation Characteristics it is stated that "the predominant grass species of the site were determined by an on site inspection".

This statement is probably very accurate, but an on site examination of the area by myself revealed there was abundant vegetation of various kinds and predominantly not blue and black gramma grass.

The OCD requests another survey of the area to be irrigated which will identify other species of vegetation, their density, maturity, the combined evapo-transpiration rates, growing season, and nutrient requirements.

- VIII. On Page 5 under Surface Water Concerns, the OCD requests a topographic map to be submitted of area surrounding the plant for a distance of one mile. Also a map showing the area to be irrigated and the plant properly showing topographic contours in one foot increments.

- IX. On Page 5 under Water Balance, first paragraph, the statement that "Water loss due to percolation is assumed to be zero in the study, because water will be applied to rates considerably less than the rate at which water is lost from the soil to evapo-transpiration".

How will zero percolation be monitored, managed, and monitored specifically as related to the type of spray irrigation system to be used?

How will precipitation be monitored and integrated into the spray irrigation system to prevent any percolation of waste water and prevent leaching of the soil.

- A. On page 5, second paragraph, under Water Balance it is stated the yearly evapo-transpiration rate for grasses in the area is 117.3 inches.

The OCD would like detailed information and reference on how 117.3 inches is derived and under what conditions.

Also the OCD thinks that evapo-transpiration such as in Table 3 of page 6, should be considered on all the vegetation in the irrigation area and not just gramma grass.

- B. On page 5 under footnote 2 of Table 3, what gauging station was used for the precipitation and evaporation rates. Where are the evaporation rates?

- X. From page 9 - 10 the discussion of phenol breakdown and average requirements.

The OCD will insist on 39.1 acres be used for spray irrigation until such detailed and quantitative data can be presented proving the concentration of phenols will be lowered and to what extent.

- XI. (1) On page 10 - 11 under System Management, the OCD requires a detailed and quantitative explanation of this section as related to the spray irrigation system.

8-25-81

Oscar A. Simpson III
Hydrogeologist
State of New Mexico
Energy and Minerals Department
P. O. Box 2088
Santa Fe, New Mexico 87501

PURPOSE OF VISIT:

Inspection of Saunders Plant made in relation to irrigation waste water discharge which will consist of looking at area to be irrigated, the proposed injection well, and plant facilities for collecting the waste water.

Oscar A. Simpson III

Warren Petroleum Company

MANUFACTURING DEPARTMENT

May 4, 1981

P. O. Box 1589
Tulsa, Oklahoma 74102

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey, Division Director

Re: Saunders Plant Discharge Plans

Gentlemen:

Warren Petroleum Company is submitting the following formal waste water discharge plan for its Saunders Plant. The plan consists of two alternatives.

Alternative I

Fox and Associates, Inc. was retained by Warren Petroleum Company to investigate the feasibility of land application of the effluent by means of spray irrigation. Five waste water samples were collected between January 21 and April 1, 1981. The study is based on two samples which were considered "worst case" and will give an added factor of safety to the irrigation system.

All effluent generated at the Saunders Plant could be safely disposed of by spray irrigation on 12.2 acres of land, as supported by the consultants in the attached study. The system will be carefully inspected periodically. Verification of the waste water quality will be done by monitoring the PH and conductivity weekly. Storage or alternate disposal of the effluent during period of excessive rainfall and freezing weather will be provided.

Alternative 2

The effluent water has been tested and found to be non-hazardous which re-opened our plans to utilize an injection



A DIVISION OF GULF OIL CORPORATION

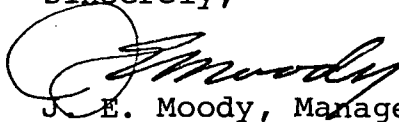
Page 2

May 1, 1981
State of New Mexico
Energy and Minerals Department

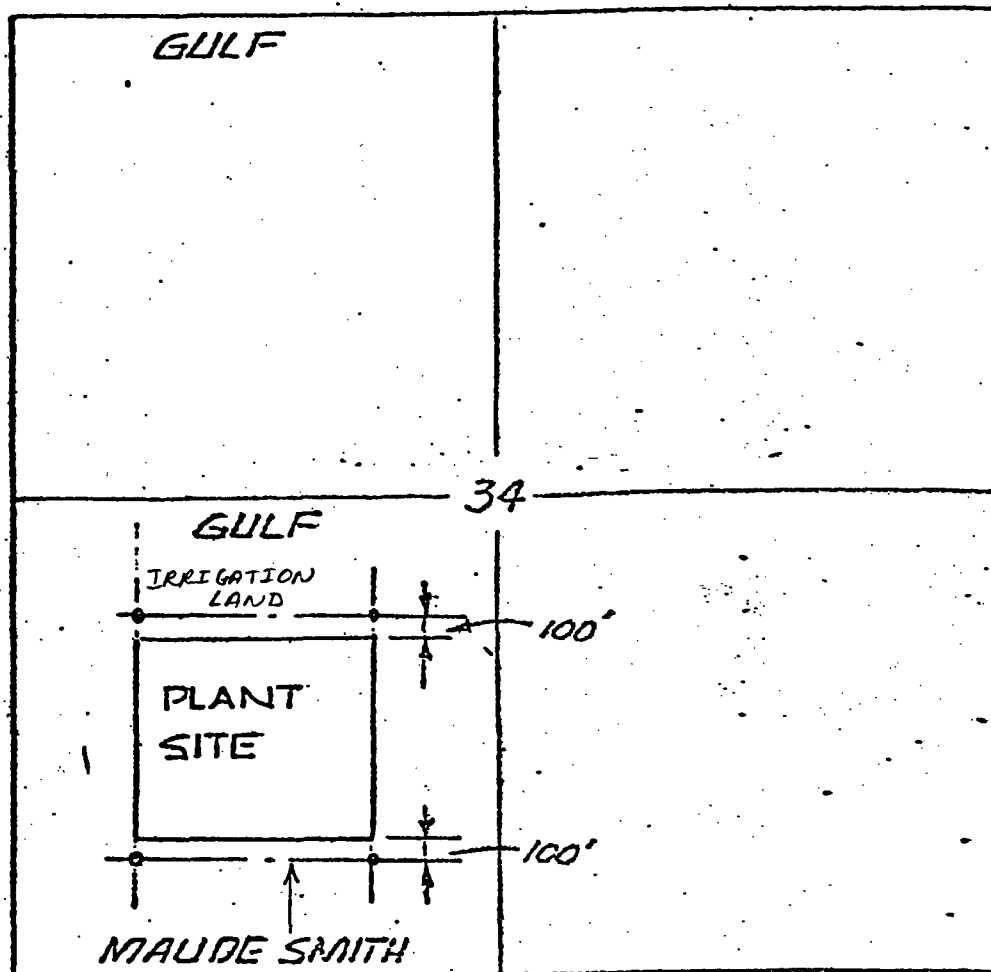
well for disposal. The injection well would be used when conditions for irrigation are not favorable.

Attached is a map showing the plant site, injection well, and a proposed irrigation site. If you have any questions, please do not hesitate to call me at (918) 560-4117.

Sincerely,


J. E. Moody, Manager
Environmental and Services

JEM:DFJ:nh
Encl.



R-33-E

APPROXIMATELY
1/2 MILE

INJECTION WELL

LEA COUNTY, N.M.

NO.	REVISIONS	BY	DATE	CHK.	APPR.	ISSUED CONST.		NO. OF UNITS REQUIRED THUS	WO-AFE NO.
						DATE	BY		
								WARREN PETHOLEUM COMPANY	
								TULSA, OKLAHOMA	
								<u>PLOT PLAN</u>	
								PLT. 146 SAUNDERS LOVINGTON	
								DRAWN P.K. DATE 10-16-80 SCALE 1/4"	
								CHECKED DATE	DRAWING NO. 146-1000

FOX

Consulting Engineers and Geologists

F. M. FOX & ASSOCIATES, INC.
4765 INDEPENDENCE STREET
WHEAT RIDGE, COLORADO 80033
(303) 424-5578

IRRIGATION PLAN

for

SAUNDERS GAS PLANT

LEE COUNTY, NEW MEXICO

Prepared for:

Warren Petroleum Company

Job No. 1-2534-3222
April 29, 1981

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INTRODUCTION

Warren Petroleum Company is presently contracting with a commercial hauler to remove waste process water generated at the Saunders Gas Plant, Lee County, New Mexico. The excessive cost of this removal has necessitated the investigation of alternative disposal methods.

Fox & Associates, Inc. was retained by Warren Petroleum Company to investigate the feasibility of land application of the effluent by means of spray irrigation. In the following plan, we have outlined the results of our investigation and recommended irrigation management practices for rangeland adjacent to the Saunders Gas Plant. The plan is based on analysis of the effluent, topsoils to be irrigated, regional climatology, vegetation and water quality standards established by the New Mexico Water Quality Control Commission.

The results of the chemical analyses of the effluent, particularly the first two samples, indicate that several of the constituents exceed the maximum concentrations allowed for irrigation, as established by the New Mexico Water Quality Control Commission. These maximum concentrations were established to protect surface and ground water and are identical to drinking water standards. Although exceeding some of the maximum allowable constituent concentrations, irrigation with the effluent can be conducted without degrading surface water or ground water.

Based on the factors investigated, specifically, evapo-transpiration rate, soil conditions, topography, and the quality and quantity of the waste water generated at the plant, it is our opinion that all the process water generated at the plant can be safely used for irrigation provided the system is properly managed. A properly managed system is necessary to

assure the even distribution of liquid effluent to a designated land surface area. Proper management, coupled with a systematic assess- *ment of* contamination variables will insure safe irrigation of the land surface.

WASTE CHARACTERIZATION

A total of five waste water samples were collected and analyzed (See Table 1 for results). The first two samples were collected on January 21, 1981 from the cooling tower and the holding tank for the purpose of determining if one or both of the wastes could be used as irrigation water. Three additional samples were collected from the holding tank between February 20, 1981 and April 1, 1981. It should be noted that the holding tank is a mixture of all the process water generated at the site including the cooling tower water.

Analysis of the first holding tank sample indicated that the pH was too high for safe application to vegetation. The three additional samples were collected to determine the effect, on salt concentration, of lowering the pH below pH 9; however, the pH and salt concentration of these additional samples was already at a safe level for irrigation. The higher levels in the first sample were probably the result of a temporary modification or fluctuation in the plant process or operation.

The last three analyses indicate that the mixture of all water generated at the site (holding tank water) is more suited for irrigation than the cooling tower water alone. Therefore, recommendations discussed in the following sections are based on irrigation with the holding tank water. The field area requirement and constituent loading

rates are based on constituent concentrations in the first holding tank sample. Although probably not representative of the average water quality, use of this "worst case" sample will give an added factor of safety to the irrigation system.

Table 1 Results of Analyses of Saunders Gas Plant Process Waste Water
(Results represent dissolved concentrations reported in mg/l unless otherwise noted)

Parameter	Cooling Tower	Holding Tank	Holding Tank	Holding Tank	Holding Tank
Date	1/21/81	1/21/81	2/24/81	3/30/81	4/1/81
Arsenic	0.019	0.005			
Selenium	0.016	0.016			
Antimony	0.033	0.032			
Mercury	0.003	<0.0005			
Manganese	0.032	0.026			
Cadmium	0.011	0.006			
Chromium	0.110	0.230			
Copper	0.050	0.017			
Lead	0.050	0.050			
Nickel	0.032	0.032			
Silver	0.013	0.006			
Barium	0.320	0.160			
Aluminum	<0.25	<0.25			
Cobalt	0.025	0.038			
Iron	0.200	0.190			
Molybdenum	<0.007	<0.007			
Boron	0.93	0.98	<i>Effluent meets growth</i>		
Cyanide	—	0.032			
Phenols	<0.005	0.074			
Nitrate-N	13.6	9.44	ND	ND	ND
Fluoride	2.52	2.01			
Chloride	272	324	104	170	275
Sulfate	1024	718	240	380	287
pH(units)	8.5	10.2	8.6	7.5	7.4
TDS	2400	1450	550	870	1005

ND = non-detectable

"Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79/020, March, 1979

TOPSOIL CHARACTERIZATION

Three samples of the topsoil to be effected by irrigation at the site were collected and analyzed for the parameters in Table 2.

Table 2 Results of Analysis of Topsoil to be Irrigated
at the Saunders Plant Site

<u>Texture</u>	<u>% Organic Matter</u>	<u>Cation Exchange Capacity (CEC)</u>
Loam	2.4	23.3
Sandy Loam	2.6	17.0
Loam	2.4	21.3

who ran tests
st

The percent organic matter and the cation exchange capacity (CEC) play important roles in a soils ability to adsorb and exchange metals and ions and to promote microbial assimilation and breakdown of ions and compounds. Chromium, for example, will be reduced from hexavalent chromium (Cr^{6+}) to trivalent chromium (Cr^{3+}) and bound in the soil by the soil organic matter. Trivalent chromium is nontoxic to animals and is not taken up by plants, even in large concentrations (The Impact of Metals Present in Municipal Sludges Upon the Human Food Chain, J. B. Lucas, EPA). The organic matter in these soils will also promote sufficient microbial activity for the breakdown of many phenols and other organic compounds, thus lowering the net accumulation of undesirable organics in the soil.

VEGETATION CHARACTERISTICS

The predominant grass species at the site were determined by an on-site inspection and consultation with the Soil Conservation Service

in Lovington, New Mexico. The grasses are predominantly blue grama and black grama. Additional information on these grasses, including transpiration rates and nutrient requirements, was obtained from grass specialists at the Agricultural Research Center at Colorado State University in Fort Collins, Colorado.

SURFACE WATER CONCERNS

There are no significant surface water drainages or natural impoundments in the immediate vicinity of the site. Since the area is very flat, surface runoff is minimal. These factors will prevent surface water contamination and runoff of irrigation water from the site.

WATER BALANCE

A water balance study was performed to determine the amount of water which could be added to the soil without allowing contact with ground water (the water balance study is summarized in Table 3). The primary modes of water loss from surface soils are precolation (downward movement of water due to gravity), and evapo-transpiration (losses due to evaporation and transpiration of water, by plants, into the atmosphere). Water loss due to percolation is assumed to be zero in this study, because water will be applied at rates considerably less than the rate at which water is lost from the soil due to evapo-transpiration.

The water balance study allows the determination of the volume of water which can be added to the soil without allowing percolation. As seen in Table 3, the average yearly rainfall is 14.4 inches, and the average yearly evapo-transpiration rate for grasses in the area is 117.3

inches. The difference in the water added and water lost is 102.9 inches. Therefore, 102.9 inches of additional water could theoretically be added to the soil on a yearly basis without any potential for leaching.

Table 3 Water Balance Data for Irrigation of Rangeland Adjacent to the Saunders Gas Plant

Month	¹ Evapo-transpiration(in)	² Precipitation (in.)	Net Water Loss	³ Effluent Applied(in)	Total Water(in)
January	3.6	0.4	3.2	3.2	3.6
February	5.2	0.3	4.9	4.9	5.2
March	9.0	0.6	8.4	8.4	9.0
April	12.7	0.7	12.0	12.0	12.7
May	14.9	2.2	12.7	12.7	14.9
June	16.4	1.3	15.1	15.1	16.4
July	15.7	2.0	13.7	13.7	15.7
August	13.4	2.0	11.4	11.4	13.4
September	10.8	2.4	8.4	8.4	10.8
October	7.6	1.6	6.0	6.0	7.6
November	4.6	0.4	4.2	4.2	4.6
December	<u>3.4</u>	<u>0.5</u>	<u>2.9</u>	<u>2.9</u>	<u>3.4</u>
	117.3	14.4	102.9	102.9	117.3

1 Transpiration rates were obtained from Alma Wilson, Agricultural Research Center, Colorado State University.

2 Evaporation and precipitation rates were obtained from the National Oceanic and Atmospheric Administration, Albuquerque, New Mexico.

3 To prevent percolation of irrigation water into ground water, effluent to be applied was calculated assuming that all water applied would be transpired or evaporated.

As can be seen in Table 3, the net water loss is not the same for all months of the year. Likewise, the effluent to be applied is not the

same every month. Therefore, management of the amount of field area and effluent application rates will be necessary to prevent over-saturation of the soil and subsequent percolation of the waste water into the subsoils.

FIELD AREA REQUIREMENT

In order to calculate the field area required for safe irrigation of the waste water, maximum loading rates for each water constituent which was above drinking water standards was calculated. The soil loading rates which would exist for irrigation water complying to drinking water standards were calculated and used as the maximum loading rates for the waste water (See Table 4 for maximum loading rates). For example: the total amount of total dissolved solids (TDS) which would be added to the soil if the concentration of TDS was at the drinking water standard (1000 mg/l) would be 26,460 lb/acre. This loading rate assumes irrigation of 102.9 inches of water per year and is used as the maximum loading rate.

Table 4 - Maximum Loading Rate for Constituents Above the Drinking Water Standard $N = (2.7)(C)(L)$.

Where: C = total constituent concentration, mg/l
 L = annual liquid loading rate, ft/yr.
 N = annual constituent loading rate, lbs/acre/yr.

<u>Constituent</u>	<u>*Constant</u>	<u>C</u>	<u>**L</u>	<u>N</u>	
Phenols	2.7	.005	9.8	0.132	1.958
Chromium	2.7	.05	9.8	1.323	6.086
Boron	2.7	.75	9.8	19.85	25.93
Fluoride	2.7	1.6	9.8	42.34	53.18
Chloride	2.7	250	9.8	6,615	8,573.04
Sulfate	2.7	600	9.8	15,876	18,998.28
TDS	2.7	1000	9.8	26,460	38,367.00
					248.72

* The purpose of the constant (2.7) is for conversion of units.

** 9.8 ft/yr = 102.9 in/yr which is the amount of effluent which can be applied as determined in the water balance study.

The minimum field area required is that surface area necessary to prevent overloading of the soil by the waste water or any one constituent in the water. The field area requirements are indicated in Table 5.

Table 5 Field Area Requirement for Application of Saunders Plant Process Waste Water

Effluent $A = 1.118 \text{ Q/L}$
 Constituent $A = 3040 (C)(Q)L_c$

Where: A = field area requirement, acres
 Q = wastewater generated by the plant, million gallons/day
 C = concentration of constituent, mg/l
 L = annual liquid loading rate, ft/yr
 L_c = loading rate of constituent, lb/acre/yr

Constituent	*Constant	<u>Q</u>	<u>C</u>	<u>L(L_c)</u>	<u>A</u>
Effluent	1,118	.023	**NA	9.8	2.6
Phenols	3,040	.023	0.074	.132	39.1
Chromium	3,040	.023	0.230	1.323	12.2
Boron	3,040	.023	0.98	19.85	3.5
Fluoride	3,040	.023	2.01	42.34	3.3
Chloride	3,040	.023	324	6,615	3.4
Sulfate	3,040	.023	718	15,876	3.2
TDS	3,040	.023	1450	26,460	3.8

* The purpose of the constant is for conversion of units

** NA - not applicable

The average field area required for application of the liquid without allowing percolation into the subsoils is 2.6 acres. This 2.6 acres does not take into account seasonal variations in the weather. Therefore, additional field area requirement calculations were established to assure that the soil is not over-saturated during periods of low evapotranspiration (refer to Table 6 for minimum monthly field area requirements). The lowest evapo-transpiration rate occurs in December when net water loss is 2.9 inches (See Table 3); therefore, irrigation, assuming

no percolation into the subsoil, will require the greatest number of acres during December. If the effluent which can be applied is assumed to be 2.9 inches/month for the whole year, then the total water which could be added would be 2.9 feet/year (35 inches/year). Using the equation from Table 5, the field area requirement would be 8.9 acres [$A = 1,118 (.023)(2.9) = 8.9$ acres]. Irrigation during any given month will require even application of the liquid over the minimum field area for that month.

Table 6 Minimum Monthly Field Area Required for Application of Waste Water Based on Monthly Evapo-transpiration and Precipitation Rates from Table 3

<u>Month</u>	<u>Waste Flow Rate (mgd)</u>	<u>Minimum Field Area (Acres)</u>
January	.023	8.0
February	.023	4.9
March	.023	3.1
April	.023	2.1
May	.023	2.1
June	.023	2.0
July	.023	1.7
August	.023	1.9
September	.023	2.3
October	.023	3.1
November	.023	4.3
December	.023	8.9

The highest field area requirement for any of the constituents in question is 39.1 acres for phenols (refer to Table 5). Unlike salts and metals, phenols are broken down by microbes; therefore, accumulation in the soil will be considerably less than .132 lbs/acre. In addition, phenols do not exhibit any significant phytotoxicity. Following a review of world literature, McKee and Wolf concluded that 50 mg/l would not interfere with irrigation (McKee, J.E., Wolf, H.W., 1963, Water

Quality Control Board, Sacramento, California, Pub. 3-A). Because of their definite half-life in the soil and low phytotoxicity, we recommend that phenols not be used in establishing limiting field area requirements.

The next highest field area requirement in Table 5, is 12.2 acres for chromium. As discussed earlier, chromium is reduced to a non-toxic form in the soil; however, significant accumulation of the non-toxic form will occur if the rates of application are not controlled. To minimize this accumulation, we recommend that the 12.2 acres be used as the minimum yearly acreage to be irrigated. In addition to minimizing the accumulation of chromium, this 12.2 acres will provide an added safety factor to the irrigation of the waste water.

*Penetration
by roots*

IRRIGATION SYSTEM

Spray irrigation should be used for application of the waste water. Spray irrigation will enhance evaporation, thus adding an additional safety factor to the method of application. The specific system design will be determined by Warren Petroleum Company based on economic and management factors.

SYSTEM MANAGEMENT

Land application of waste water from the Saunders Gas Plant is an environmentally sound disposal alternative provided that good management of the system is practiced. Adequate management of the system will require:

1. Periodic verification of the waste water quality;
2. Field inspection by Saunders Plant personnel to prevent irrigation of saturated soils;

3. Application of the waste water in accordance with the minimum monthly and yearly field area requirements; and
4. Storage or alternative disposal of the waste water during periods of excessive rainfall and freezing weather. (The holding tanks presently being used at the site are capable of storing about five production days' waste water).

CONCLUSIONS

We feel that spray irrigation is a sound disposal alternative for effluent generated at the Saunders Gas Plant. The safety of the system is reinforced by three major factors:

1. The data used for all calculations was from the first holding tank sample. This sample exhibited poorer than average water quality for the holding tank and represents the "worst case" sample.
2. The 12.2 acre requirement is based on the addition of chromium which will not be a threat to vegetation or the human food chain.
3. This 12.2 acres is more than four times the acreage required to prevent percolation of the effluent into groundwater.

By following the recommendations provided in this report, irrigation using the Saunders Plant waste water can be carried out without damage to the soils, vegetation, and ground water in the area to be irrigated.

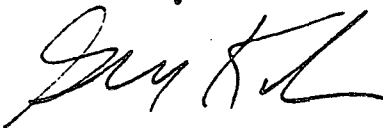
F. M. FOX & ASSOCIATES, INC.


Kip R. White
Staff Environmental Scientist

KRW/rd

Copies: 8

Reviewed by:


Gerald W. Knudsen, P.E.
Project Environmental
Engineer



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

February 23, 1981

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

Warren Petroleum Company
Box 1589
Tulsa, Oklahoma 74102

Attention: Mr. J. E. Moody

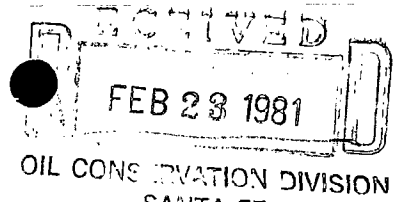
Gentlemen:

An extension to June 1, 1981, for filing a
discharge plan for your Saunders plant is
approved.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd



Warren Petroleum Company

MANUFACTURING DEPARTMENT

February 17, 1981

P. O. Box 1589
Tulsa, Oklahoma 74102

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey
Division Director

Re: Saunders Plant
Discharge Plan

Dear Mr. Ramey:

Warren Petroleum Company requests an additional 90 days in which to prepare a final Discharge Plan for the Saunders Plant.

As stated in our February 10 letter, hauling the water for disposal is far too expensive to become our final plan.

As discussed in our February 12 meeting, we are actively pursuing two alternative disposal options, irrigation and injection. We feel that 90 days is adequate time to develop a final plan acceptable to all involved.

Very truly yours,

J. E. Moody
for J. E. Moody, Manager
Environmental and Services

JEM:LTR:ds



A DIVISION OF GULF OIL CORPORATION

Warren Petroleum Company

MANUFACTURING DEPARTMENT

February 10, 1981

RECEIVED
FEB 12 1981

P. O. Box 1589
Tulsa, Oklahoma 74102

OIL CONSERVATION DIVISION
SANTA FE

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey, Division Director

Re: Saunders Plant
Discharge Plan

Dear Mr. Ramey:

During the last 90 days, Warren Petroleum Company has taken the opportunity to modify the waste water discharge plan defined in our October 23, 1980 letter.

The retention ponds mentioned in the original plan are no longer in service. Their contents have been removed for recycling and disposal. Instead, the plant waste water is piped to a set of treatment tanks where the oil and water are separated. The oil is recycled; the water is removed by a local disposal company.

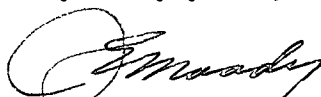
As discussed by phone on Friday, hauling the water for disposal is far too expensive for a permanent solution. We are therefore, considering two other options.

The water from the treatment tanks proved to be non-hazardous which reopens the injection well disposal option. The operator of the well requires an additional 30 to 40 days before he can approve our use of the well.

The initial water analysis was so favorable that subsequent testing was performed to thoroughly investigate the option of using the water for irrigation.

We are pursuing both the injection and irrigation options simultaneously. We hope to discuss these with you during our meeting on Thursday. If you have any questions, please call Lynn Reed or me at (918) 560-4117.

Very truly yours,



J. E. Moody, Manager
Environmental and Services



JEM:ds



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

November 12, 1980

Mr. J. E. Moody
Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

Re: Saunders Plant

Dear Mr. Moody:

We have received your letter of October 27, 1980, concerning your request for an extension of 90 days.

The information Warren Petroleum Company submitted shows good cause why the Oil Conservation Division should grant a time extension. The due date is hereby extended to February 10, 1981.

We are very concerned about your preliminary proposal which leaves the waste water pits without an impermeable liner and a lack of plans for a means to detect leaks from the ponds. Warren Petroleum Company's Saunders Plant discharge plan should deal with these two (2) problems.

Please let us know if you have any problems with this arrangement.

Yours very truly,

JOE D. RAMEY
Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

November 12, 1980

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Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

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Please let us know if you have any problems with this arrangement.

Yours very truly,

JOE D. RAMEY
Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs

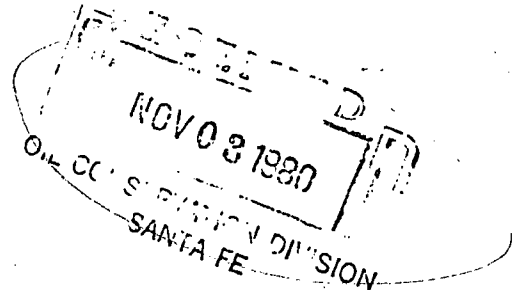
Warren Petroleum Company

MANUFACTURING DEPARTMENT

October 27, 1980

P. O. Box 1589
Tulsa, Oklahoma 74102

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501



Attention: Mr. Joe D. Ramey, Division Director

Gentlemen:

Please find attached the completed discharge plans for the Warren Petroleum Eunice Plant (3-T22S-37E) and Saunders Plant (34-T145-33E) in Lea County, New Mexico.

These plans include the utilization of injection wells for the disposal of waste water from the plants. It has come to our attention very recently that the operators of the injection well at Saunders have not applied for a hazardous waste permit and are exempt from applying. Further study of the plan is therefore needed to evaluate other alternatives.

We would like to request an additional three months to review and develop new plans for the Saunders Plant.

Should you have questions, please feel free to contact Lynn Reed or me.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. E. Moody".

J. E. Moody, Manager
Environmental and Services

JEM:DFJ:ds

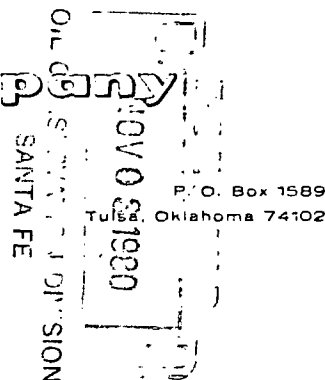
Attachments



Warren Petroleum Company

MANUFACTURING DEPARTMENT

October 23, 1980



State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attention: Mr. Joe D. Ramey, Division Director

Gentlemen:

In regards to your letter dated June 27, 1980, regarding the Warren Petroleum Saunders Plant (34-T14S-33E), Warren Petroleum is submitting the following wastewater discharge plans.

Presently, all waste water from the plant operations is being piped to two retention pond systems (see attached map). The ponds appear to be naturally lined with the bentonite from oil well formation water. Commercial liquid waste disposal companies remove the water from the ponds on a routine basis. The waste water from the plant includes cooling tower blowdown, plant runoff, brine from the Zeolite softener, boiler blowdown water, inlet scrubber water, compressor (interstate scrubber) condensate, and water from the dehydrator.

*FUTURE PLAN TO BE SUBMITTED
G.W.K.*

Should you have questions, please feel free to contact Lynn Reed of this office or myself.

Reviewed by:

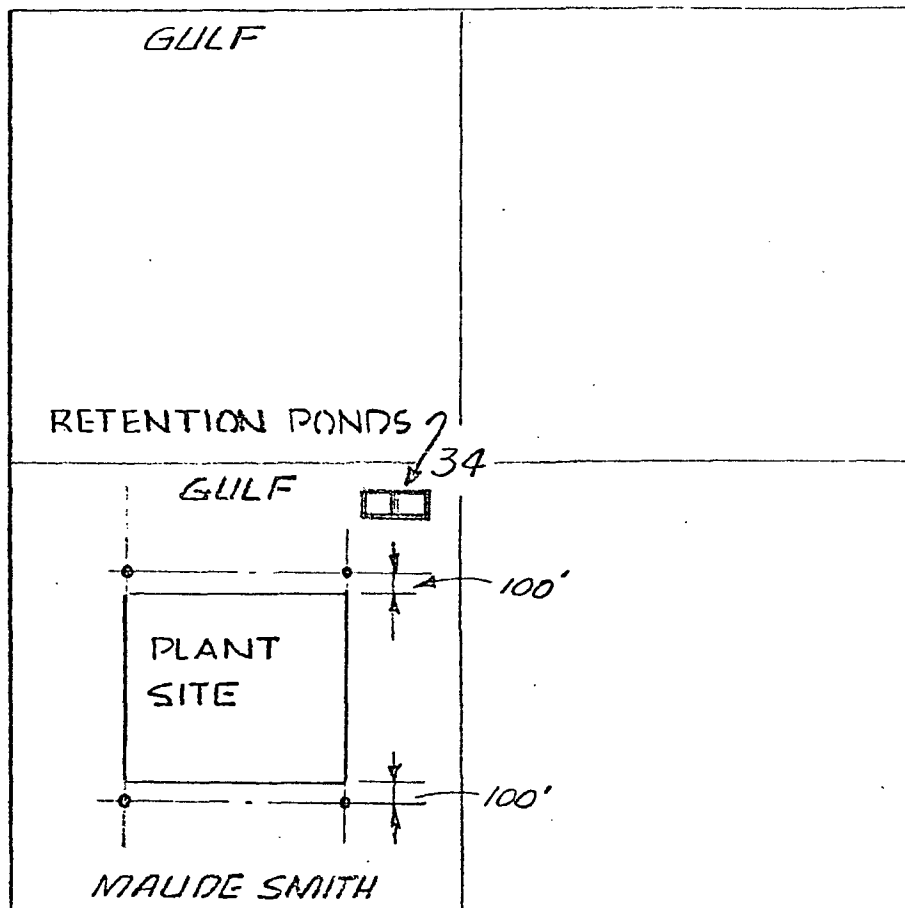
Gerald W. Knudsen, P. E.
F. M. FOX & ASSOCIATES, INC.

Very truly yours,

J. E. Moody, Manager
Environmental and Services

JEM:ds





T
14
5

R-33-E

LEA COUNTY, N.M.

NO.	REVISIONS	BY	DATE	CHK.	APPR.	ISSUED CONST.		NO. OF UNITS REQUIRED THUS	WO-AFE NO.	
						DATE	BY			
								WARREN PETROLEUM COMPANY TULSA, OKLAHOMA GUS 82341	PLOT PLAN PLT. 146 SAUNDERS LOVINGTON, N.M.	
								DRAWN P.K.	DATE 10-16-80	SCALE 1/4"
								CHECKED	DATE	DRAWING NO.
								APPROVED	DATE	146-1001-0



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

June 27, 1980

Mr. J. E. Moody
Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

Re: Request for Discharge Plans

Dear Mr. Moody:

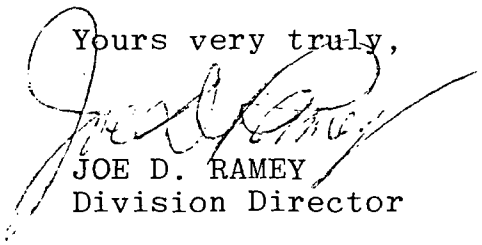
Under provisions of the regulations of the Water Quality Control Commission you are hereby notified that the filing of discharge plans for Warren's Saunders Plant (34-T14S-33E) and Eunice Plant (3-T22S-37E) is required. Discharge plans are defined in Section 1-101.1 of the regulations and a copy of the regulations is enclosed for your convenience.

These plans should cover all discharge of effluent at the plant sites or adjacent to the plant sites. Section 3-106A. of the regulations requires submittal of the discharge plans within 120 days of receipt of this notice unless an extension of this time period is sought and approved.

The discharge plans should be prepared in accordance with Part 3 of the Regulations. Due to a recent court decision references to "toxic pollutants" may be ignored.

If there are any questions on this matter, please do not hesitate to call me or Thomas Parkhill at 827-3260. Mr. Parkhill has been assigned responsibility for review of all discharge.

Yours very truly,


JOE D. RAMEY
Division Director

JDR/TP/og

cc: Oil Conservation Division - Hobbs

Warren Petroleum Co, P. O. Box 966, Lovington

Warren Petroleum Co., P. O. Box 1197, Eunice, N. Mex.



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

June 27, 1980

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Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

Re: Request for Discharge Plans

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Yours very truly,

JOE D. RAMEY
Division Director

JDR/TP/og

cc: Oil Conservation Division - Hobbs

Warren Petroleum Co, P. O. Box 966, Lovington

Warren Petroleum Co., P. O. Box 1197, Eunice, N. Mex.



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

June 27, 1980

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Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

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Yours very truly,

JOE D. RAMEY
Division Director

JDR/TP/og

cc: Oil Conservation Division - Hobbs

Warren Petroleum Co, P. O. Box 966, Lovington

Warren Petroleum Co., P. O. Box 1197, Eunice, N. Mex.



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
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POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

June 27, 1980

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Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

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Yours very truly,

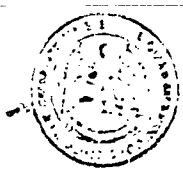
JOE D. RAMEY
Division Director

JDR/TP/og

cc: Oil Conservation Division - Hobbs

Warren Petroleum Co, P. O. Box 966, Lovington

Warren Petroleum Co., P. O. Box 1197, Eunice, N. Mex.



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
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POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

June 27, 1980

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Tulsa, Oklahoma 74102

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Yours very truly,

JOE D. RAMEY
Division Director

JDR/TP/og

cc: Oil Conservation Division - Hobbs

Warren Petroleum Co, P. O. Box 966, Lovington

Warren Petroleum Co., P. O. Box 1197, Eunice, N. Mex.



HERCULES INCORPORATED

WATER MANAGEMENT CHEMICALS • INDUSTRIAL SYSTEMS DEPARTMENT
P. O. BOX 40160 • HOUSTON, TEXAS 77040 • TELEPHONE: (713) 462-4501

March 6, 1978

Mr. James Gray
Warren Petroleum Company
Saunders Plant
P. O. Box 1689
Lovington, NM 88260

Dear Mr. Gray:

On February 8, 1978, your Hercules representative, Mr. John Hubbard, obtained four water samples from your Saunders Plant, which he submitted to our Houston laboratory, requesting a complete analysis. The resulting data is attached for your review and files.

We appreciate this opportunity to be of service to you and your plant. If you should have any questions concerning this information, please do not hesitate to contact Mr. Hubbard or this office.

Very truly yours,

Donald B. Willis

Donald B. Willis
Technical Service Chemist

DBW/br
Attachment

cc: Mr. Wayne Ballinger ✓
Mr. John Hubbard - WMC

Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

SAUNDERS #146
PLANT

PIT
#1

PIT
#2

Pit
#3

ALL IN SW/4
34-14S-33E

TABULATION

	Length	width	Depth	Description	Annual Volume
PIT #1	60'	60'	8'	unlined	88,275 bbls./year water equalizes from Pit #1 to Pit #2
PIT #2	100'	60'	8'	unlined	88,275 bbls./yr.
PIT #3	35'	18'	4'	unlined	4,288 bbls./yr.



Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1689
Lovington, New Mexico 88260

November 24, 1978

State Of New Mexico
Oil Conservation Division
P. O. Box 1980
Hobbs, New Mexico 88240

Mr. Eddie Seay

Per your request please find data relative to the use of pits, ponds and lagoons for the Saunders Gasoline Plant #146 located in Lea County, T 14 S R 33 E, Sec. 34.

If further information is needed please let us know.

L. W. Ballenger
L. W. Ballenger
Plant Supervisor

LWB/rb

Attachments

Posted
11/25/79
#6



A DIVISION OF GULF OIL CORPORATION

LABORATORY WATER ANALYSIS*

From: Warren Petroleum Co.
Location: Lovington, New Mexico

Date Sampled: February 8, 1978
Date Received: February 14, 1978

Sample Description:	Boiler	Final Pit	Cooling Tower	Raw Water
"P" Alkalinity (CaCO_3)	328	40	NIL	NIL
"M" Alkalinity (CaCO_3)	428	208	NIL	148
Bicarbonate (HCO_3)	NIL	156		181
Carbonate (CO_3)	110	48		NIL
Hydroxide (OH)	80	NIL		NIL
Chloride (Cl)	252	230	160	64
Sulfate (SO_4)	550	450	1112	165
Ortho Phosphate (PO_4)			6.2	
Total Phosphate (PO_4)	1.1	1.4	12.5	NIL
Silica (SiO_2)	61	85	61	39
Total Hardness (CaCO_3)	NIL	450	1010	360
Calcium (Ca)	NIL	112	296	104
Magnesium (Mg)	NIL	41	66	24
Sodium (Na)	621	254	155	23
Iron (Fe)				<0.1
TDS	1675	1377	1862	600
Conductivity @ 77° (μmhos)	2500	1800	2400	820
pH	11.4	8.7	3.1	7.2
Free Mineral Acidity			56	
Arsenic (As)	<0.1	<0.05	<0.1	<0.1
Barium (Ba)	<1.0	<0.5	<1.0	<1.0
Cadmium (Cd)	<0.05	<0.05	<0.05	<0.05
Chromium (Cr)	<0.05	<0.05	<0.05	<0.05
Cyanide (Cn)	<0.05	<0.05	<0.05	<0.05
Fluoride (F)	<1.6	1.55	<1.6	<1.6
Lead (Pb)	<0.05	<0.05	<0.05	<0.05
Total Mercury (Hg)	<0.005	<0.005	<0.005	<0.005
Molybdenum (Mo)	<1.0	<0.5	<1.0	<1.0
Nickel (Ni)	<0.2	<0.05	<0.2	<0.2
Nitrate (NO_3)	<10	<0.05	<10	<10
Selenium (Se)	<0.05	<0.02	<0.05	<0.05
Silver (Ag)	<0.05	<0.05	<0.05	<0.05
Manganese (Mn)	<0.2	<0.05	<0.2	<0.2

Chloride (Cl)	252	250	100	64
Sulfate (SO ₄)	550	450	1112	165
Ortho Phosphate (PO ₄)			6.2	
Total Phosphate (PO ₄)	1.1	1.4	12.5	NIL
Silica (SiO ₂)	61	85	61	39
Total Hardness (CaCO ₃)	NIL	450	1010	360
Calcium (Ca)	NIL	112	296	104
Magnesium (Mg)	NIL	41	66	24
Sodium (Na)	621	254	155	23
Iron (Fe)				<0.1
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Conductivity @ 77° (umhos)	2500	1800	2400	820
pH	11.4	8.7	3.1	7.2
Free Mineral Acidity			56	
Arsenic (As)	<0.1	<0.05	<0.1	<0.1
Barium (Ba)	<1.0	<0.5	<1.0	<1.0
Cadmium (Cd)	<0.05	<0.05	<0.05	<0.05
Chromium (Cr)	<0.05	<0.05	<0.05	<0.05
Cyanide (Cn)	<0.05	<0.05	<0.05	<0.05
Fluoride (F)	<1.6	1.55	<1.6	<1.6
Lead (Pb)	<0.05	<0.05	<0.05	<0.05
Total Mercury (Hg)	<0.005	<0.005	<0.005	<0.005
Molybdenum (Mo)	<1.0	<0.5	<1.0	<1.0
Nickel (Ni)	<0.2	<0.05	<0.2	<0.2
Nitrate (NO ₃)	<10	<0.05	<10	<10
Selenium (Se)	<0.05	<0.02	<0.05	<0.05
Silver (Ag)	<0.05	<0.05	<0.05	<0.05
Manganese (Mn)	<0.2	<0.05	<0.2	<0.2
Aluminum (Al)	<5.0	<0.05	<5.0	<5.0
Boron (B)	<0.75	<0.5	<0.75	<0.75
Cobalt (Co)	<0.05	<0.05	<0.05	<0.05
Uranium (U)	_____	_____	Unable to detect	_____
Radioactivity	_____	_____	Unable to detect	_____
Phenols	_____	_____	Unable to detect	_____
Sample Number:	8661	8662	8663	8664

*All results are reported in parts per million unless otherwise stated.