

GW - 152

**GENERAL
CORRESPONDENCE**

YEAR(S):

1999 - 1993



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

September 22, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 274 520 505

Mr. Ed Sloman
LG&E Energy Marketing Inc.
921 West Sanger
Hobbs, New Mexico 88240

Re: Whites City Compressor Station (GW-152)
NE/4 SE/4 Sec 10-Ts24S-R24S

Dear Mr. Sloman:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of LG&E Energy Marketing Inc.'s letter dated February 26, 1999 requesting termination of the discharge plan for the above captioned site. On June 16, 1999 the NMOCD performed an inspection of the site. (Site inspection report enclosed). **The NMOCD hereby approves of your request to terminate the discharge plan.**

Please be advised that NMOCD approval does not relieve LG&E Energy Marketing Inc. of liability if their operations have caused contamination that poses a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve LG&E Energy Marketing Inc. of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7152).

Sincerely Yours,

for Roger C. Anderson
Environmental Bureau

cc: OCD Artesia District

attachments-1

OCD ENVIRONMENTAL BUREAU
SITE INSPECTION SHEET

DATE: 6/16/99 Time: 11:30 PM

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☒ Brine St. ☐ OilField Service Co. ☐
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐ _____

Discharge Plan: No ☐ Yes ☒ DP# GW-152

FACILITY NAME: (LLANO) NOW LG+E WHITE CITY COMPRESSOR ST.

PHYSICAL LOCATION: _____

Legal: QRT NE QRT SE Sec 10 TS 24 R 26 E County FOOY

OWNER/OPERATOR (NAME) LG+E

Contact Person: ED SLOMAN Tele:# 505-373-2153

MAILING ADDRESS: 921 W. SANGER State NM ZIP 88290

Owner/Operator Rep's: ED SLOMAN

OCD INSPECTORS: W PRICE, J FORD, M STUBBLEFIELD

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

OK - NONE

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

COMPRESSORS HAVE BEEN REMOVED!

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

ONE TANK FOR PRELIME SLAGGING OPERATIONS - BERMED / UNLINED

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

OK-

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

OK-

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

NONE - OK

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

PIPELINES ONLY

8. **Onsite/Offsite Waste Disposal and Storage Practices:** Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? Yes No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ☒ NO ☐ IF NO DETAIL BELOW.

9. **Class V Wells:** Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☒ YES ☐ IF YES DESCRIBE BELOW !

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

GOOD

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

NO SPILLS OBSERVED !

12. **Does the facility have any other potential environmental concerns/issues?**

NONE OBSERVED !

13. **Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?**

14. **ANY WATER WELLS ON SITE ?** NO ☒ YES ☐ IF YES, HOW IS IT BEING USED ?

Miscellaneous Comments:

Number of Photos taken at this site: 3 01 ENVR... \PIC_CAM\PIC00010
attachments-

Photo #1



LG&E White City Compressor ST. GW-152 6/17/99 by: Wayne Price
Looking North -Pipeline NGL Tank

Photo #2



GW-152 6/17/99 by: Wayne Price
Looking Northeast- Pipeline system

Photo #3



GW-152 6/17/99 by: Wayne Price
Looking West - Area where compressor set. Back ground shows water tank.

LG&E ENERGY
MARKETINGSM

LG&E Energy Marketing Inc.
921 West Sanger
Hobbs, New Mexico 88240
505-393-2153
505-393-0381 FAX

February 26, 1999

MAR - 3 1999

OIL CONSERVATION DIVISION

Mr. Roger C. Anderson
Environmental Bureau Chief
New Mexico Energy, Minerals & Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Anderson,

This letter is concerning the Discharge Plan for our White City Compressor, Plan number GW-152. That location is no longer a compressor station. The compressor was removed during the early part of 1994.

This compressor was installed as a booster compressor to move "sweet" natural gas from one part of our system to another for the purpose of enhanced gas supply to one of our processing plants. At the time this operating scenario no longer applied to the benefit of our gas processing scheme this compressor was discontinued in use.

The actual operations of this compressor and station was short lived. As previously stated the compressor was removed in the early part of 1994. As stated in the discharge plan, the compressor had an environmental spill containment system on it, and was properly equipped to avoid spills and contamination of the area around the unit.

This particular compressor had a concrete filled base. Thus, there was no need to pour a concrete foundation to set the unit on. As a result of this design when the unit was no longer needed, we were able to have the compressor company, Dresser Rand, simply come to the location, the White City Compressor Station, and load the unit on a truck. From the ease created in setting, and removing this type of compressor unit there was no concrete foundation to contend with from the removal of this compressor, and this enhanced the decommissioning of this compressor station. As the unit was loaded on the truck it was apparent that the ground both around and under the compressor had not been contaminated with oil or other fluids from this compressor. The location is made of caliche and is white in appearance. If there is contamination it is easy to visually detect.

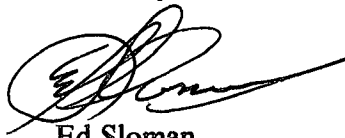
A SUBSIDIARY OF

LG&E ENERGY

At this time, this compressor station has been removed, and no longer exists.
Therefore, there is no need to renew Discharge Plan number GW-152.

If you have any questions concerning this closure report on this compressor station
please feel free to contact me your convenience.

Sincerely

A handwritten signature in black ink, appearing to read 'Ed Sloman', with a long horizontal flourish extending to the right.

Ed Sloman
Supervisor
Operations Support

cc. file



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

June 16, 1998

CERTIFIED MAIL

RETURN RECEIPT NO. P-288-259-080

Mr. Ed Sloman
LG&E Natural Gathering and Processing Co.
921 West Sanger
Hobbs, New Mexico 88240

**RE: Discharge Plan Renewal
Whites City Compressor Station (GW-152)
Eddy County, New Mexico**

Dear Mr. Sloman:

On December 13, 1993, the groundwater discharge plan, GW-152, for the LG&E Natural Gathering and Processing Co. (LG&E) Whites City Compressor Station located in the NE/4 SE/4 of Section 10, Township 24 South, Range 26 East, NMPM, Eddy County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulation 3106 and was approved pursuant to section 3109 for a period of five years. The approval will expire on December 13, 1998.

If the facility continues to have potential or actual effluent or leachate discharges and LG&E wishes to continue operations, the discharge plan must be renewed. Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether LG&E has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the LG&E Natural Gathering and Processing Co. Whites City Compressor Station is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee for compressor stations. There is no flat rate fee for compressor station with less than 1000 total horsepower. The \$50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

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

*2/4/99 - THEY
called - THE
CLOSED ALL 5600
TO CLOSURE PLEASE!
JP*

Mr. Ed Sloman
June 16, 1998
Page 2

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Artesia District Office. **Note that the completed and signed application form must be submitted with the discharge plan renewal request.** Copies of the WQCC regulations and discharge plan application form and guidelines have been provided in the past. If LG&E requires additional copies of these items notify the OCD at (505) 827-7152. A complete copy of the regulations is also available on the OCD's website at www.emnrd.state.nm.us/ocd/.

If LG&E no longer have any actual or potential discharges and a discharge plan is not needed, please notify this office. If LG&E has any questions, please do not hesitate to contact Mark Ashley at (505) 827-7155.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/mwa

xc: OCD Artesia Office

P 288 259 080

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	
Street & Number	
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Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

RECEIVED

OCT 04 1993

OIL CONSERVATION DIV.
SANTA FE

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,
OIL REFINERIES AND GAS COMPRESSOR STATIONS**

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

- I. TYPE: GAS COMPRESSOR STATION
- II. OPERATOR: LLANO, INC.
ADDRESS: 921 WEST SANGER HOBBS, NEW MEXICO 88240
CONTACT PERSON: J.R. DELANEY PHONE: 393 2153
- III. LOCATION: NE/4 SE/4 Section 10 Township 24 S Range 26 E
Submit large scale topographic map showing exact location.
- IV. Attach the name and address of the landowner(s) of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. Attach a description of current liquid and solid waste disposal procedures.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a contingency plan for reporting and clean-up of spills or releases.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
- XIII. CERTIFICATION

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

Name: J. R. DELANEY Title: MANAGER OF OPERATIONS

Signature:  Date: 9/28/93

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

I.

The major purpose of this facility is to compress natural gas.

This compressor station will be a "Mainline Booster" station. We will take gas from one section of our transmission system, boost the pressure, and move the gas to another part of our system. To accomplish this goal we will be using a 738 H.P. gas compressor.

At this facility we will have a scrubber in front of the compressor. This will remove the free liquids from the stream of natural gas before it is compressed. All liquids which are recovered from this facility will be contained by a 100 Bbl. tank which will be emptied into trucks as often as necessary, and transported to either market, or to a licensed disposal, whichever is applicable.

II.

The Owner/Operator of the facility will be:
LLano Inc. (505) 393-2153
921 W. Sanger
Hobbs, New Mexico 88240

Mr. J. R. Delaney (505) 393-2153
Manager; Operations
921 W. Sanger
Hobbs, New Mexico 88240

The Compressor unit, will belong to the below listed company. They will provide the compressors, and full maintenance on the unit.

Dresser Rand Company
7800 West County Road 116
Midland, Texas 79701
1-800-327-6935

Mr. Earl Selman
same address, and phone number

III.

Location: NE/4, of SE/4, Section 10, Township 24 S,
Range 26 E, NMPM, Eddy County,
New Mexico:

Attached please find a copy of the topographic map
showing the location of the compressor station, along with a
copy of the original survey plat of the described location.

3569000m N.

T23S
T24S

3285

3252

HAMON STATE L-4325
MEASURING STA.
NMG-11114

3270

M X 3421

3466 A

3372

BM
3281

BLK. VLV.
(F-31)

Sims Ranch

WHITE CITY
(COMPR.)

O'NEIL FED. B#1
2" NMG-11112

BLK. VLV.
(C-71)

12" NMG-10200

3296

3300

Three mile

13

14

15

16

12

11

10

9

1

1

2



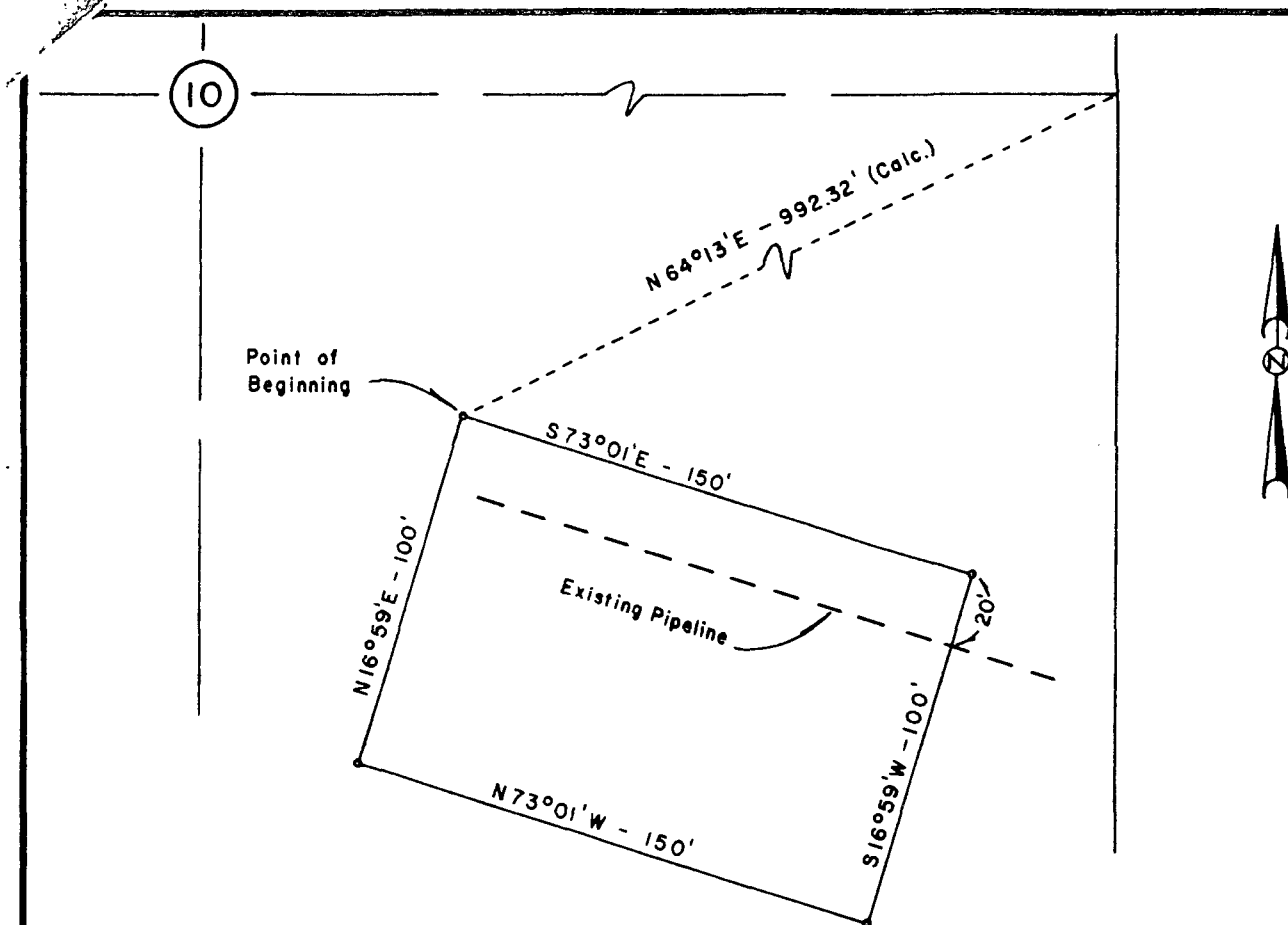
8" NMG-11100

3275

3275

32

32



DESCRIPTION

A tract of land in the NE $\frac{1}{4}$ SE $\frac{1}{4}$ Section 10, T24S, R26E, of the N.M.P.M., Eddy County, New Mexico and being more particularly described as follows:

Beginning at a point in said Section 10 from which the east quarter corner of said Section 10 bears N64°13'E a distance of 992.32 feet; Thence S73°01'E a distance of 150 feet; Thence S16°59'W a distance of 100 feet; Thence N73°01'W a distance of 150 feet; Thence N16°59'E a distance of 100 feet to the point of beginning.

Said tract contains 0.34 acres more or less.

STATE OF NEW MEXICO } ss.
County of Eddy

FILED APR 26 1976 FOR RECORD

at 9:45 A.M. and was duly
recorded in Book 135 of Records of
Misc. Pages 767
Mildred Branch, County Clerk
Constance L. Lawrence

Llano Inc.		
Proposed Tract of Land in the NE 1/4 SE 1/4 Sec. 10, T24S, R26E, Eddy Co., New Mex.		
Scale: 1" = 50'	Date: 4-13-76	Dwn. By: JB

IV.

According to original Rights - of - Way
documents the land owner for this property is:

Walker Hood
Carlsbad, N.M.

Mr. Hood has had the following take care of the
porperty for him:

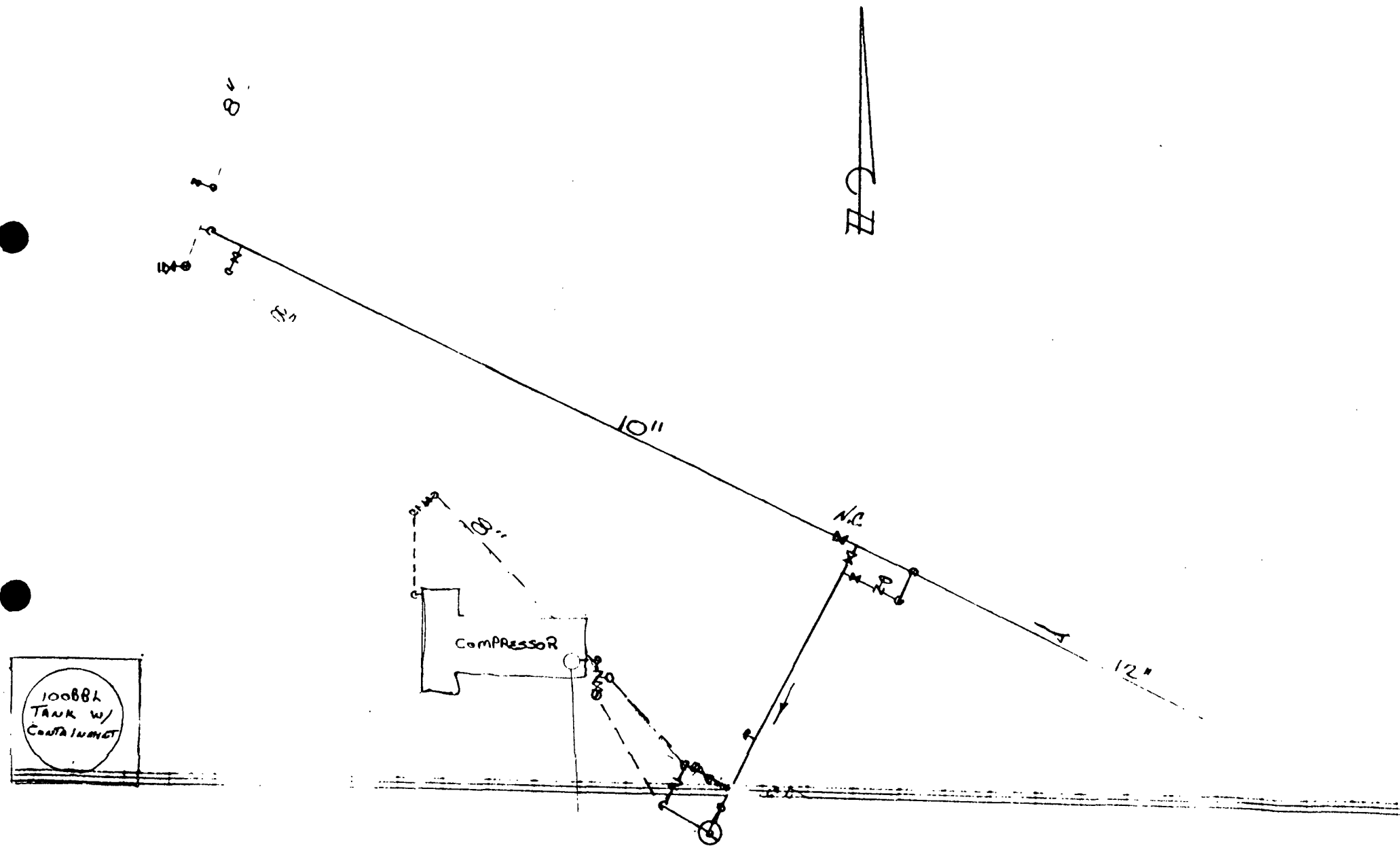
Mr. Eugene Hood
Black River Village Road
Carlsbad, New Mexico. (505) 785-2338

V. Facility Description

The proposed compressor station will consist of a skid - mounted, engine-driven gas compressor, an inlet separator, and a 100 barrel tank. (See attached diagram of the facility.)

Natural gas will enter the compressor station from the east through a pipeline. The gas will be a commingled stream from various wells in the area. The gas will go through an inlet separator, before going into the compressors. After compression the gas will flow to the north through an existing LLano pipeline.

PROJECT 764
WHITE CITY COMPRESSOR STATION



VI. Sources, Quantities, & Quality of Effluent & Waste Solids

- 1) ENGINE COOLING WATER - The engine driving the compressor contains approximately 340 gallons of a 50% antifreeze, 50% water mixture for cooling purposes. This is a closed loop system and normally requires no make-up.
- 2) SEPARATORS - The inlet separator, and scrubber (located on the compressor skid) remove an estimated 0 to 13 BBL/day of water and an estimated 0 to 40 BBL/day of hydrocarbon liquids depending upon ambient conditions, and other factors involved in the transmission of natural gas.
- 3) WASTE LUBRICATION OILS - The compressors contains approximately 60 gallons of lubricating oil and the engine contains approximately 120 gallons of lubrication oil. The lubrication oil is a standard 30 or 40 weight oil and replaced approximately every 5000 hours of run time, or as required by oil analysis.

The waste water and hydrocarbon liquids will be commingled within the facility. Individual rates, volumes and concentrations should not vary beyond the ranges identified above. All process units will be self-contained to prevent intentional or inadvertent discharges and spills.

VII. TRANSFER & STORAGE OF PROCESS FLUIDS & EFFLUENTS

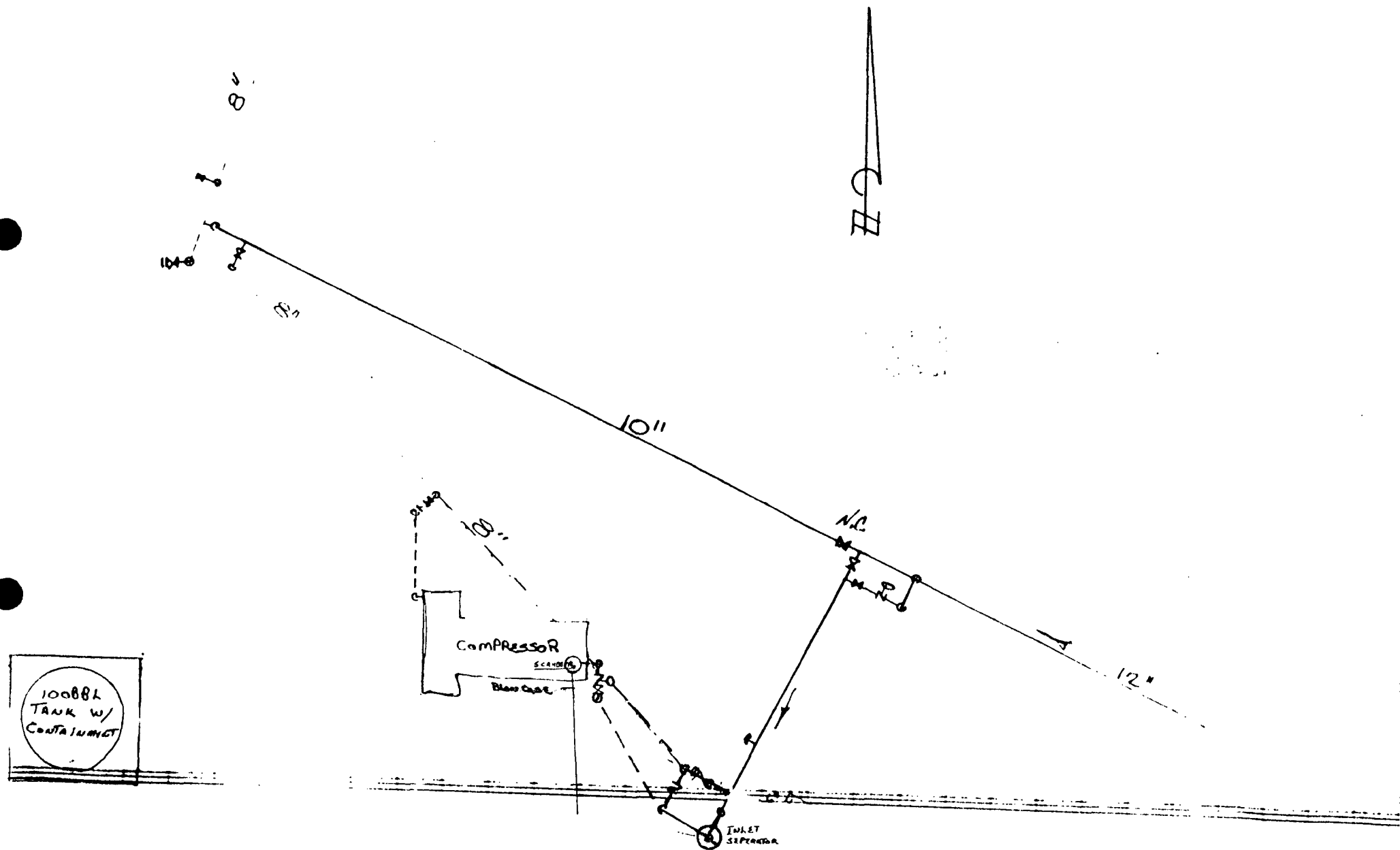
Waste water and hydrocarbon liquids are collected in the inlet separator, the compressor scrubber, and the blowcase. The waste water and hydrocarbon liquids are commingled and piped to a closed storage tank. (See attached facility schematic).

The inlet separator, and compressor scrubber, are each pressurized. The closed storage tank will be maintained at 1.5 oz. pressure.

The closed storage tank is a standard API 100 Barrel tank. The tank will be constructed above ground level with an earthen dike enclosure to provide secondary containment equal to one-third greater than the tank capacity.

Waste lubrication oil and foundation drains are piped to above ground pipe blowcases. The blowcases will be pressured as required to send the waste lubrication oil to the closed storage tank.

PROJECT 764
WHITE CITY COMPRESSOR STATION



VIII.

This is not a disposal site for EFFLUENT Liquid.

As previously stated, the purpose of this site is to compress natural gas. There will be some produced water, and condensate which will be recovered from the natural gas. These liquids will be stored in a 100 Bbl. tank, and will be hauled from location. The produced water will be disposed of by a trucking company, either Rowland Trucking, or AA Oilfield Service. Both of these companies have approved disposal wells which they use, and charge us for the disposal of the produced water.

The condensate will be sold to a refinery. The refinery of choice will be elected by price, and they will pick up the condensate from the storage tank and transport it to their facility.

The used engine lubricants, and engine coolants will be handled by Dresser Rand Corp. The Compressor will be a rental unit, and the owner will preform all maintenance required on this unit. This is inclusive of disposing of any and all used filters etc., which are generated from this compressor.

The storage tank will be monitored by our operators on a daily bases. Our operators will be reporting to their supervisor by mobile communications if this tank should need any further attention. Our supervisors have the means to order a truck to haul liquid at the time our operator's report to him. With this type of check, and safety check, there should be no ground water contamination to contend with.

Simply stated, if the liquid is contained in the tank, then it cannot contaminate the ground, or ground water.

IX.

This facility will have an operator which will check the operations of the facility on daily bases. The operator will report the functioning of the compressor, and a log will be kept of the units. If the operator should locate any problem in any of the equipment, what-so-ever, he will report the problem to his supervisor. Each operator is equipped with mobile communications, which is monitored 24 hours a day.

In the event of a "reportable spill", the operator would notify his supervisor immediately of the occurrence. The supervisor would in turn notify his immediate supervisor, and our emergency report and operating plan would be implemented.

Fluids will be collected inside pressure vessels. These vessels will be ASME stamped, approved, pressure vessels. Therefore, no precipitation can be collected in them, or commingled with produced fluids.

The compressor units will have an "environmental" skid, which will not allow precipitation which has contacted this unit to runoff onto the ground. The unit skid will be piped into a "blow casing" which will transfer all fluids to a 100 Bbl. above ground storage tank. As previously stated the contents of this tank will be hauled by truck as often as necessary to assure proper levels are maintained.

X.

Our contingency plan for cleaning up spills, and reporting same is not complicated. We have a supervisor on call who is available on 24 hours a day. There are administrative support supervisors available when ever needed.

If a spill should occur, the supervisor on duty would start the field operations of the clean-up, by first stopping the source of the spill, and containing all fluids that he possibly can. The on duty supervisor would notify the support people of the situation. The OCD would be notified pursuant to rule 116, and a contractor would be dispatched at that time to start clean up. The land owner would be notified, and all measures would be taken to protect his live-stock, as well as any wild animals.

All clean up would be carried out in an approved manner, and all necessary waste would be dealt with accordingly.

XI. SITE CHARACTERISTICS

A. There have been no water wells located within one mile of the location of this compressor station. Therefore no laboratory analysis of water from wells has been submitted.

This is not a disposal site. So we would not adversely effect any water, ground, or other environmental state with the disposal of waste.

(ALSO SEE SECTION 5)



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

December 13, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-292

Mr. J.R. Delaney
Llano Inc.
921 W. Sanger
Hobbs, New Mexico

**Re: Discharge Plan (GW-152)
Whites City Compressor Station
Eddy County, New Mexico**

Dear Mr. Delaney:

The groundwater discharge plan GW-152 for the Llano Inc. Whites City Compressor Station located in the NE/4 SE/4 Section 10, Township 24 South, Range 26 East, NMPM, Eddy County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated October 28, 1993.

The discharge plan was submitted pursuant to section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A.. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that 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 (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, 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.

Mr. J.R. Delaney
December 13, 1993
Page 2

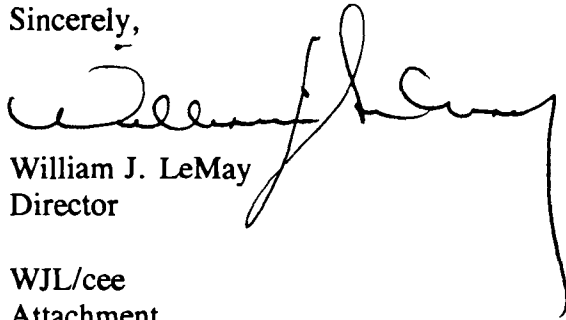
Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire December 13, 1998 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the Llano Inc. Whites City Compressor Station is subject to the 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 a flat rate fee. There is no flat rate fee for compressor stations with less than 1000 horsepower.

The OCD has received your \$50 filing fee.

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 black ink, appearing to read 'William J. LeMay', with a long, sweeping horizontal line extending to the right.

William J. LeMay
Director

WJL/cee
Attachment

xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN GW-152 APPROVAL
LLANO INC.

WHITES CITY COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(December 13, 1993)

1. Drum Storage: All drums will be stored on pad and curb type containment.
2. Sump Inspection: Any new sumps or below-grade tanks will incorporate leak detection in their designs.
3. 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.
4. 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.
5. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.
6. OCD Inspection: Additional requirements may be placed on the facility based upon results from OCD inspections.

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS & 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-152) - Llano Inc., J.R. Delaney, Operations Manager, 921 W. Sanger, Hobbs, New Mexico 88240, has submitted a discharge plan application for their Whites City Compressor Station located in the NE/4 SE/4 Section 10, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. Approximately 5 gallons per day of waste water with a total dissolved solids concentration of 2400 mg/l will be collected and stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 125 feet with a total dissolved solids concentration of approximately 3500 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 the publication of this notice during which comments may be submitted to him a 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 3rd day of November, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
William J. LeMay
Director

Journal: November 12, 1993

STATE OF NEW MEXICO

County of Bernalillo

ss

OIL CONSERVATION DIVISION
RECEIVED

'93 NOV 19 AM 8 33

Paul D. Campbell being duly sworn declares and says that he is National 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 or assessed as court costs; 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 on the 12 day of Nov, 1993, and the subsequent consecutive publications on _____, 1993.

Paul D Campbell

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 12 day of Nov, 1993.

PRICE

\$ 30.47

Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

Bernadette Ortiz
NOTARY PUBLIC
STATE OF NEW MEXICO
SECRETARY OF STATE
12-18-93

Affidavit of Publication

No. 14519

STATE OF NEW MEXICO,

County of Eddy:

Gary D. Scott being duly

sworn, says: That he is the Publisher of The

Artesia Daily Press, a daily newspaper of general circulation,

published in English at Artesia, said county and :

the hereto attached Legal Notice

was published in a regular and entire issue of th

Daily Press, a daily newspaper duly qualified for

within the meaning of Chapter 167 of the 1937 S

the state of New Mexico for 1 consec

the same day as follows:

First Publication November 10, 1993

Second Publication _____

Third Publication _____

Fourth Publication _____

LEGAL NOTICE

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 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-152)- Llano Inc., J.R. Delaney, Operations Manager, 921 W. Sanger, Hobbs, New Mexico, 88240, has submitted a discharge plan application for the Whites City Compressor Station located in the NE/4 SE/4 Section 10, Township 24

Copy of Publication

South, Range 26 East, NMPM, Eddy County, New Mexico. Approximately 5 gallons per day of waste water with a total dissolved solids concentration of 2400 mg/l will be collected and stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth approximately 125 feet with a total dissolved solids concentration of approximately 3500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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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 3rd day of November, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION

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

SEAL
Published in the Artesia Daily Press, Artesia, N.M. November 10, 1993.

Legal 14519

Subscribed and sworn to before me this 10th day

of November, 1993

Barbara Anne Benson

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Mary has copy

NOTICE OF PUBLICATION

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

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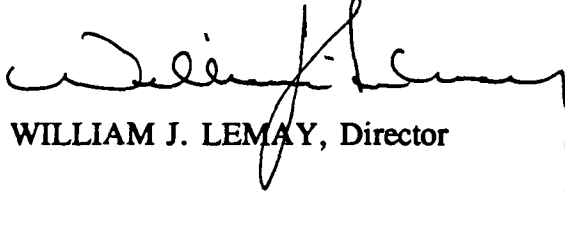
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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 3rd day of November, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/28/93,
or cash received on 10/7/93 in the amount of \$ 50.00
from Llano, Inc.

for White City CS (compressor station) GW-152
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 10/7/93

Received in ASD by: A. Albre Date: 10-7-93

Filing Fee X New Facility _____ Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

LLANO, INC.

BOX 1320
HOBBS, NEW MEXICO 88240

SUNWEST BANK OF HOBBS, N.A.
HOBBS, NEW MEXICO 88240

CHECK DATE	CH
09/28/93	02

CHECK AMOUNT
\$ 50.00

PAY TO THE ORDER OF

THE SUN & OIL CO. LTD.
LLANO INC.
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPT.
OIL CONSERVATION DIVISION
P O BOX 2088
SANTA FE, NEW MEXICO 87501

LLANO, INC. - GENERAL ACCOUNT

[Signature]
VOID AFTER 90 DAYS