GW-

PERMITS, RENEWALS, & MODS Application

Mr. Roy M. Brehm 04/19/00 Page 3

ATTACHMENT TO THE DISCHARGE PLAN GW-313 APPROVAL Shoreham Pipeline Company - North White Ranch Compressor St. DISCHARGE PLAN APPROVAL CONDITIONS April 19, 2000

- 1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by OCD.
- 2. <u>Commitments:</u> Shoreham Pipeline Company will abide by all commitments submitted in the discharge plan application dated October 26, 1999 and these conditions for approval.
- 3. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
- 4. <u>Process Areas:</u> 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.
- 5. <u>Above Ground Tanks:</u> 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 facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
- 6. <u>Above Ground Saddle Tanks:</u> 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.
- 7. <u>Labeling:</u> All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.
- 8. <u>Below Grade Tanks/Sumps:</u> 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 be tested to demonstrate their mechanical integrity no later than June 30, 2000 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating

Mr. Roy M. Brehm 04/19/00 Page 4

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. The test results will be submitted to OCD by July 30, 2000.

- 9. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June 30, 2000 and every 5 years, from tested date, thereafter. Permittees 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. The test results will be submitted to OCD by July 30, 2000.
- 10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 11. <u>Housekeeping:</u> All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent overtopping or system failure.
- 12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Artesia District Office.
- 13. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
- 14. <u>Transfer of Discharge Plan:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Closure:</u> 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.

Mr. Roy M. Brehm 04/19/00 Page 5

- 16. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
- 17. <u>Storm Water Plan:</u> Shoreham Pipeline Company will submit a storm water run-off plan for OCD approval by June 30, 2000.
- 18. <u>Site Remediation</u>: Shoreham Pipeline Company commits to investigating and remediating contaminated soil from past operations.
- 19. <u>Conditions accepted by:</u> Shoreham Pipeline Company by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Shoreham Pipeline Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Shoreham Pipeline Company

Print Name: Thomas W. Sieh
Signature: Moron W Sieh
Title: President
Date: May 1, 2000

RECEIVED

SEP 2 7 1999

Environmental Bureau Oil Conservation Division

SHOREHAM PIPELINE COMPANY

DISCHARGE PLAN FOR

SHOREHAM'S NORTH WHITE RANCH COMPRESSOR STATION SECTION 7, TOWNSHIP 8 SOUTH, RANGE 29 EAST CHAVES COUNTY, NEW MEXICO

FILED WITH

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT
WATER QUALITY CONTROL COMMISSION

P. O. Box 1980 Hobbs, NM 88241-1980 District II - (505) 748-1283 811 S. First Artesia, NM 88210 District III - (505) 334-6178 1000 Rio Brazos Road Aztec, NM 87410

District IV - (505) 827-7131

Energ Minerals and Natural Resource Department Oil Conservation Division 2040 South Pacheco Street

2040 South Pacheco Street Santa Fe, New Mexico 87505 (505) 827-7131 Submit Orig Plus 1 Co to Sant 1 Copy to approp: District O

Revised 12"

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)

	X New Renewal Modification
1.	See Following/Attached Discharge Plan for Response to Parts 1 through 13. Type:
2.	Operator:
	Address:
	Contact Person: Phone:
3.	Location:/4/4 Section Township Range Submit large scale topographic map showing exact location.
4.	Attach the name, telephone number and address of the landowner of the facility site.
5.	Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility
6.	Attach a description of all materials stored or used at the facility.
7.	Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9.	Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10.	Attach a routine inspection and maintenance plan to ensure permit compliance.
10. 11.	Attach a routine inspection and maintenance plan to ensure permit compliance. Attach a contingency plan for reporting and clean-up of spills or releases.
11.	Attach a contingency plan for reporting and clean-up of spills or releases.
11. 12.	Attach a contingency plan for reporting and clean-up of spills or releases. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD
11. 12. 13.	Attach a contingency plan for reporting and clean-up of spills or releases. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
11. 12. 13.	Attach a contingency plan for reporting and clean-up of spills or releases. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. CERTIFICATION I herby certify that the information submitted with this application is true and correct to the best of my knowledge

SEP 2 7 1999

Environmental Bureau
Oil Conservation Division

1. Type of Operation

Indicate the major operational purposes(s) of the facility. (i.e. Gas Plant, Crude Oil Pump Station, or Compressor station.) If the facility is a compressor station include the total combined site rated horsepower.

<u>Response</u> - This site is a small gas gathering compressor station with (gas condensate and water) dehydration and sweeting processes. The compressor at this location is a Waukesha Model F-1197 which is rated at 150 hp at sea level.

2. Name of Operator or Legally Responsible Party and Local Representative

Include address and telephone number.

Response

Name of Operator or Legally Responsible Party

Shoreham Pipeline Company 333 Clay Street, Suite 4010 Houston, Texas 77002 Contact Person: Roy M. Brehm, Jr. Office No. (713) 654-7033 FAX No. (713) 659-3555

Name of Local Representative

Nathan Holloway Shoreham Pipeline Company HC 12 - Box 1205 Roswell, New Mexico 88201 Office/FAX No. (505) 626-4730

3. Location of the Discharge Plan Facility

Give a legal description of the location (i.e. 1/4, 1/4, Section, Township, Range) and county. Use state coordinates or latitude/longitude on unsurveyed land. Submit a large scale topographic map, facility site plan, or detailed aerial photograph for use in conjunction with the written material. If within an incorporated city, town or village also provide a street location and map.

Response

North by north west quarter of Section 7, Township 8 South, Range 29 East of Chaves County, New Mexico.

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SHOREHAM PIPELINE COMPANY North White Ranch Compressor Station Section 7, Township 8 South, Range 29 East Chaves County, New Mexico



Buried Gas Flow Line
Emergency Sweetening Plant
1,000 Gallon Steel Amine Storage Tank
100 bbl Fiberglass Demineralized/Deionize Water Storage Tank
Remediated and Filled Pit
500 Gallon Steel Antifreeze Storage Tank
300 Gallon Steel Engine Oil Storage Tank
Inlet Scrubber

9. Buried Flow Line From Inlet Scrubber to Storage Tank
10. Natural Gas Compressor
11. In Line Gas Filter

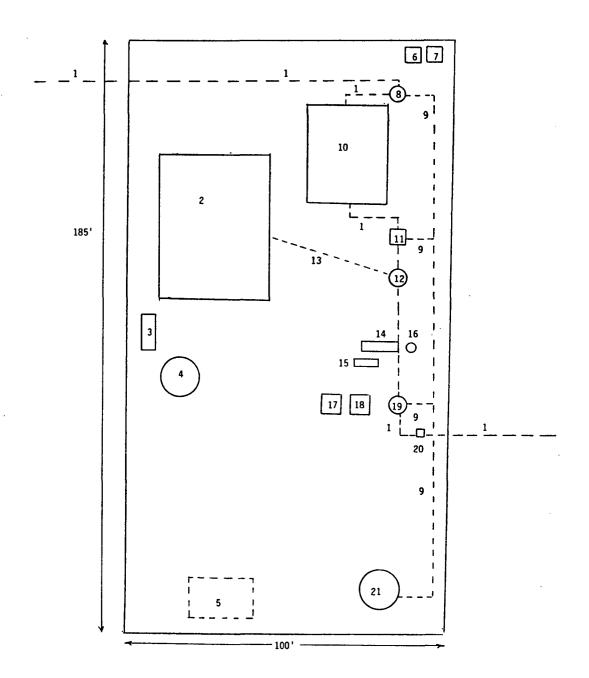
- 12. Emergency Sweetening Plant Contactor 13. Buried Emergency Sweetening Plant

Flow Lines Dehydrator

- 300 Gallon Steel Glycol Storage Tank 3 Fifty Gallon Drums to Catch Water Condensate 16.
- Storeroom
- 18. Delmar Control Room
- 19. Discharge Scrubber
- 20. Methanol Injection Pump and Methanol

Storage Barrels

210 bbl Steel Drip and Water Catch Tank



4. <u>Landowners</u>

Attach the name, telephone number, and address of the landowner(s) of record of the facility site.

Response

White Lake Ranch Frates and Martha Seeligson HCR 61 - Box 1343 Roswell, New Mexico 88201 (505) 623-2657

5. Facility Description

Attach description of the facility with a diagram indicating location of fences, pits, berms, and tanks on the facility. The diagrams of the facility should depict the locations of descharges, storage facilities, disposal facilities, processing facilities and other relevant areas including drum storage. Show the facility/property boundaries on the diagram.

Response

Diagram Enclosed.

SHOREHAM PIPELINE COMPANY North White Ranch Compressor Station Section 7, Township 8 South, Range 29 East Chaves County, New Mexico

Buried Gas Flow Line
Emergency Sweetening Plant
1,000 Gallon Steel Amine Storage Tank
100 bbl Fiberglass Demineralized/Deionize Water Storage Tank
Remediated and Filled Pit

500 Gallon Steel Antifreeze Storage Tank 300 Gallon Steel Engine Oil Storage Tank

9. Buried Flow Line From Inlet Scrubber to Storage Tank
10. Natural Gas Compressor
11. In Line Gas Filter

Emergency Sweetening Plant Contactor Buried Emergency Sweetening Plant

Flow Lines

Dehydrator
 300 Gallon Steel Glycol Storage Tank
 3 Fifty Gallon Drums to Catch Water

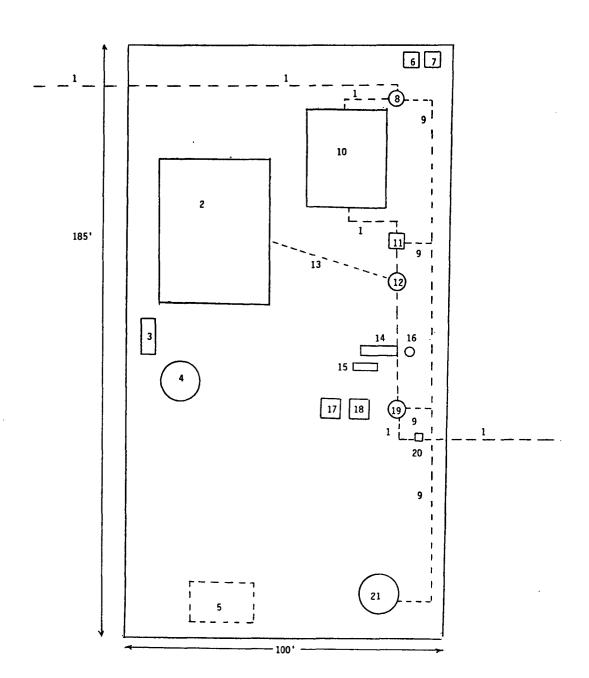
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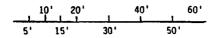
17. Storeroom

18. Delmar Control Room 19.

20.

Discharge Scrupber
Methanol Injection Pump and Methanol
Storage Barrels
210 bbl Steel Drip and Water Catch Tank





6. Materials Stored or Used at the Facility

For each category of material listed below provide information on the general composition of the material or specific information (including brand names if requested), whether a solid or liquid, type of container (tank, drum, etc.), estimated volume stored, and location (yard, shop, drum storage, etc.). MSD sheets need only be provided as requested; sheets for all chemicals should be maintained at the facility.

A. Process specific chemicals - ie, TEG, Amine, Lean Oil, etc.

Response

- 1. Approximately 300 gallons of antifreeze for the compressor engine. Stored in a steel 500 gallon tank in the northeast corner of the yard adjacent to the compressor.
- 2. Approximately 200 gallons of lubiracating oil for the compressor engine. Stored in a steel 300 gallon tank in the northeast corner of the yard adjacent to the compressor.
- 3. Approximately 700 gallons of Amine for the emergency sweeting equimpment. Stored in a steel 1,000 gallon tank on the western boundry of the yard adjacent to the emergency sweeting equipment.
- 4. Approximately 50 barrels of Demineralized/Deionize Water for the emergency sweeting equipment. Stored in a fiberglass 100 barrel tank on the western boundry of the yard adjacent to the emergency sweeting equipment.
- 5. Approximately 200 gallons of Glycol for the dehydrator. Stored in a steel 300 gallon storage tank on the eastern boundry of the yard adjacent to the dehydration facilities.
- 6. Four fifty gallon drums of Methanol stored on the southeast corner of the yard for injection into the gas stream during the winter months only.

B.	Acids/Caustics;
	Response
	None
C.	Detergents/soaps;
	Response
	None
D.	Solvents, inhibitors and degreasers;
	Response
	None
E.	Paraffin Treatment/Emulsion breakers;
	Response
	None
F.	Biocides;
	Response
	None
G.	Others;
	Response
	None

:

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7. Sources and Quantities of Effluent and Wast Solids Generated at the Facility

- A. For each source include types of major effluent (e.g. produced water, spent gas treating fluids, heat media, hydrocarbons, sewage, etc.) estimated quantities in barrels or gallons per month, and types and volumes of major additives (e.g. acids, biocides, detergents from steam cleaner, degreasers, corrosion inhibitors etc.)
 - 1. Separator(s), Scurbber(s), and Slug Catcher(s);

Response

Approximately sixteen (16) barrels per month of water from inlet scrubbers, discharge scrubbers, and in-line filters.

2. Boilers, Waste Heat Recovery Units, cogeneration facilities, and cooling towers/fans;

Response

None - n/a

3. Wash down/Steam out effluent from process and storage equipment internals and externals;

Response

None - n/a

4. Solvent/degreaser use; (Describe)

Response

None - n/a

5. Spent acids or caustics; (Describe)

Response

None - n/a

6. Used engine coolants; (i.e. antifreeze) Response Approximately 300 gallons per year. 7. Used lubrication and motor oils; Response Approximately 400 gallons per year. 8. Used lube oil and process filters; Response Oil described in No. 7 above. Approximately four (4) compressor filters per year. 9. Solids and sludges from tanks (provide description of materials) Response None - n/a 10. Painting wastes; Response None - n/a Sewage (Indicate if other wastes are mixed with sewage; if no commingling 11. occurs domestic sewage under jurisdiction of the NMED); Response None - n/a 12. Laboratory wastes; Response None - n/a

13. Other waste liquids; (Describe in detail)

Response

Approximately forty five (45) barrels per month of water condensate from the dehydration equipment.

14. Other waste solids; (e.g. used drums, molecular sieve materials, charcoal filter media, etc.)

Response

None - n/a

B. Quality Characteristics

Provide the following information for each above listed source where applicable.

1. Provide concentration analysis for Total Dissolved Solids (TDS) and Major Cations/Anions (eg. F,Br,Ca,K,Mg,Na,HCO3,CO3,Cl,SO4 in mg/l), Ph, and Conductivity in umhos/cm.

Response

n/a

2. Provide hydrocarbon analysis for benzene, ethyl benzene, toluene, and meta-, ortho-, and Para-xylene (i.e. BTEX).

Response

n/a

3. Provide analyses for WQCC section 3103 standards not included within above analyses. Exceptions can be approved upon request for certain constituents if not used in processing or not expected to be present in the waste water effluent.

Response

n/a - However, analysis on OCD collected soil sample collected at the compressor site at the northeast corner of the facility included as well as soil sample collected at the reclemated "pit" on the south side of the facility.

4. Discuss the presence or absence of toxic pllutants (WQCC 1101.TT) in each process where a discharge/possible discharge effluent may be generated. If present, provide volumes and concentrations. Estimates may be used pending Director evaluation of discharge plan submittal and proposed discharge methods.

Response

None Present.

5. Discuss sampling locations, methods, and procedures used to obtain values for #1, 2, and 3 above. Include information as to whether the sample was "grab" or "time-composite", and sample collection and preservation techniques, laboratory used for the analysis, etc. Sources for sampling and analytical techniques to be used are listed in WQCC 3107.B.

Response

See Item No. 3 above and the attached sample testing results and description.

6. Discuss any variations that could produce higher or lower values than those shown by the sampling procedures outlined above in #5 - i.e. flowrate variations, process upsets, etc. If major variations are expected or inherent with a particular process, provide ranges and the expected average.

Response

No variations anticipated or inherent.

C. Commingled Waste Streams.

Note: It is recommended that waste streams be segregated as much as possible-especially those wastes that are exempt from RCRA Subtitle C regulations and those that are non-exempt. If hazardous wastes are on site they should never be commingled with exempt wastes or non-exempt wastes. For guidance in dealing with hazardous wastes contact the NMED Hazardous and Radioactive Materials Bureau at 505-827-1558.

1. If produced and process fluids are commingled within the facility, and if individual rates, volumes and concentrations do not vary beyond a set range, and if proces units are entirely self-contained to prevent intentional discharges and spills or inadvertent discharges (see B. 3,4 previous page), then chemical characterization of commingled effluent or process streams may be sufficient to satisy discharge plan requirements.

2. If the discharger wishes to submit information on commingled streams in lieu of submittal of individual stream characteristics, adequate information should be provided to justify the request.

Response

The only discharge wastes or materials to be disposed of at this site are as follows:

- a. Water from inlet, inline, and discharge filters.
- b. Condensate from dehydration facilities.
- c. Spent oil and coolant from the compressor.
- d. Spent filters from the compressor.

All of these materials are discharged/contained in their own units or discharge lines and containment facilities. There is no commingled waste streams.



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury

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

Wagner

Field Inspection Report

Time:

10am-12 noon

Date:

March 3, 1999

Re:

Site/Location:

North White Ranch Compressor St.

Sec 7-Ts 8s-R29e

Chaves County, New Mexico

Subject:

Site Inspection

Originating Party: Wayne Price- V. Barton, E. Gonzales, D. Williams- NMOCD

Other Parties:

Roy Brehm-Shoreham PL, and Contract Pumper (Bud Halloway)

Findings:

A small gas gathering compressor station with (gas condensate and water) de-hydration and sweeting processes.

Previous inspections by OCD inspectors revealed unlined pits, active discharges, and numerous leaks and spills. Current inspection revealed fresh sand has been spread over these previous leaks and spills, and all pits had been covered.

OCD collected a soil sample just NE of the main compressor where previous leak & spills had been covered with fresh sand. A field test was conducted using a PID to check for volatile organics. The results were 1077 ppm of BTEX which is 10 times the OCD guideline allowable.

The inspection revealed Shoreham had removed RCRA type non-exempt waste (compressor oil filters, empty drums, non-exempt contaminated soil, etc) from an on-site unlined pit and sent this waste to Gandy-Marley landfarm. There was no sampling or testing to determine if this waste was RCRA hazardous.

There were tanks and drums of various chemical treating and lubricating fluids, condensate, etc with no containment. The compressor was leaking used oils onto the ground. There was evidence of a point source discharge from the condensate/water tank in which fluids were being drained off into a graded ditch which leads off-site to a small playa lake located approximately 1/4-1/2 mile north of the facility.

Conclusion/Agreements: OCD instructed Shoreham to call Gandy-Marly Landfarm and have waste isolated for testing. OCD will evaluate site to determine if a Discharge Plan is required and will notify Shoreham of clean-up requirements.

Photos Taken: Yes-Filed O/Envr....Pic Cam album (Shoreham) 3/3/99

CC:

OCD Artesia

Martyne Kieling-OCD



"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO. ATTN: MR. ROY BREHM 333 N. CLAY STREET HOUSTON, TEXAS 77002

Receiving Date: 03/05/99

Sample Type: Soil

Project Name: North Compressor Station

Project Location: None Given Field Code: Composite Soil

Analysis Date: 03/10/99 Sampling Date: 03/03/99 Sample Condition: Intact

TCLP	REPORTING	ELTS				
SEMIVOLATILE ORGANICS (mg/L)	LIMIT	17170	RPD	%EA	%IA	
Disability					· · · · · · · · · · · · · · · · · · ·	
Pyridine	0.05	ND	1	43	95	
1.4-Dichlorobenzene	0.05	ND	4	42	90	
o-Cresol	0.05	ND	2	62	109	
Nitrobenzene	0.05	ND	1.	60	92	
m.p -Cresol	0.05	ND	2	54	105	
Hexachloroethane	0.05	ND	3	39	96	
Hexachlorobutadiene	0.05	ND	3	41	95	
2.4.6-Trichlorophenol	0.05	ND	3	75	98	
2.4.5-Trichlorophenol	0.05	ND	3	78	100	
2.4-Dinitrotoluene	0.05	ND	3	76	110	
Hexachlorobenzene	0.05	ND	3	64	94	
Pentachlorophenol	0.05	ND	4	72	108	
2,4-D	0.05	ND	2	18	105	
2,4,5-TP	0.05	ND	9	48	112	

ND= NOT DETECTED, < REPORTING LIMIT	
SYSTEM MONITORING COMPOUNDS	% Recovery
2-Fluorophenol	37
Phenoi-d6	25
Nitrobenzene-d5	66
2-Fluorobiphenyl	60
2.4.6-Tribromaphenol	77
Terphenyl-d14	68

Method: SW 846-8270C,1311

Ralanck Justs

3-22-99

Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO. ATTN: MR. ROY BREHM 333 N. CLAY STREET HOUSTON, TEXAS 77002

RECEIVING DATE: 03/05/99

SAMPLE TYPE: Soil

PROJECT: North Compressor Station

FIELD CODE: Composite Soil PROJECT LOCATION: None Given

ANALYSIS DATE: 03/12/99 SAMPLING DATE: 03/03/99 SAMPLE CONDITION: Intact

TCLP VOLATILES (mg/L)	SAMPLE 17170	PQL	BLANK	%EA	%DEV	
VOCATICES (IIIg/E)	17170	FUL	DIMINI	/8CA	78UEV	
1,1-Dichloroethene	ND	0.001	ND	99	-2.0	
2-Butanone	ND	0.010	ND		-10.4	
Chloroform	ND	0.001	ND		1.9	
Senzene	ND	0.001	ND	95	1.6	
1,2-Dichloroethane	ND	0.001	ND		-3.8	
Vinyl Chloride	ND	0.001	ND		4.6	
Carbon Tetrachloride	ND	0.001	ND		7.7	
Trichloroethene	ND	0.001	ND	95	0.8	
Tetrachloroethene	ND	0,001	ND		-1.2	
Chlorobenzene ·	ND	0.001	ND	89	3.8	
1,4-Dichlorobenzene	ND	0.001	ND		7.7	
SYSTEM MONITORING CO	MPOUNDS		% RECOVERY 95			

96

97

ND = < PQL

toluene-d8

4-bromofluorobenzene

PQL = PRACTICAL QUANTITATION LIMIT

Methods: EPA SW 846-8240, 1311

Rale dk Julie

3-22-99 Date

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO. ATTN: MR. ROY BREHM 333 N. CLAY STREET HOUSTON, TEXAS 77002

Receiving Date: 03/05/99 Sample Type: Soil

Project: North Compressor Station Project Location: None Given Analysis Date: see below Sampling Date: 03/03/99 Sample Condition: Intact

TCLP METALS (mg/L)

ELT#	Field Code	Ag	As	Ba_	Cd	Cr	Hg	Pb	Se
	EPA LIMIT	5,00	5.00	100.0	1.00	5.00	0.20	5.00	1.00
17170	Composite Soil	0.01	<0,10	<0.50	0.014	<0.03	<0.010	0.14	<0.100
						:			
	REPORTING LIMIT	0.01	0.10	0.50	0.005	0.03	0.010	0.10	0.100
	% IA	100	103	108	102	104	98	105	97
	% EA	105	102	98	95	85	100	93	89

METHODS: EPA SW 846-1311,7760, 7080,7130, 7190, 7420, SW-846 Revision 3, 6010B, 7470A

Raland K Jusul

3-22-99

ENVIRONMENTAL LAB OF , INC.

"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO. ATTN: MR. ROY BREHM 333 N. CLAY STREET HOUSTON, TEXAS 77002

RECEIVING DATE: 03/05/99

SAMPLE TYPE: Soil PROJECT #: None Given

PROJECT NAME: North Compressor Station

PROJECT LOCATION: None Given

ANALYSIS DATE: 03/05/99 SAMPLING DATE: 03/03/99 SAMPLE CONDITION; Intact

ELT'S	FIELD CODE	TPH (mg/kg)	·
17170	Composite Sail	7475	
	BLANK	<10	
	% INSTRUMENT ACCURACY % EXTRACTION ACCURACY	100 110	

Methods: EPA 418.1

Raland K Tuttle

3-22-99



"Don't Treat Your Soil Like Dirt!"

SHOREHAM PIPELINE CO. ATTN: MR. ROY BREHM 333 N. CLAY STREET HOUSTON, TEXAS 77002

Receiving Date: 03/06/99 Sample Type: Soil

Project Name: North Compressor Station

Project Location: None Given

Analysis Date: see below Sampling Date: 03/03/99 Sample Condition: Intact

		REACTI		CORROSIVITY	IGNITABILITY
ELT#	Field Code	H2\$	CN-	(s.u.)	
		NON-REA	CTIVE	NON-CORROSIVE	
		(ppm)	(ppm)		
17170	Composite Soll	<10.0	<2.5	Non Corrosive 9.66	>140 deg, F
	RPD % PRECISION	0	0	o	0
	% INSTRUMENT ACCURACY			100	
	ANALYSIS DATE	3/12/99	3/12/99	3/08/99	3/18/99

METHODS: EPA SW-846-2.1.3.2.1.2,2.1.1

Raland K July

3-22-90

Envi	Environmental Lab of Texas, Inc. 12600 West-20 East Odessa, Texas 79763 (915) 563-1800 FAX (915) 563-1713	as, Inc. 12600 West (915) 54	West 1-20 East Odesta, Texas 79763 (915) 563-1800 FAX (915) 563-1713	63 CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST
Project Manager	Brehm	beze ft:	713-654-7035	ANALYSIS REQUEST
Company Name & A	મું છે	522	n Cfoy St	
Project #:		TX. Project Name	14 C 2200	
Project Locations		Some	or Signature	Bacd Cr
		MA	PRESERVATIVE SAMPLING METHOD	99 84 64 84 64 1 12030
(28 use)	FIELD CODE	CONTAINE Solume/Annou SOIL IIR LUDGE		TIME TOLP Metata TOLP Metata TOLP Volatilit TOLP Semi / TOLP Semi / TOLP Semi / TOLP Semi /
02171	Composite Soil	402	A-6-6 /	S S S S S S S S S S
0				
Retingation of	Date:	Tlmes:	Received by:	REMARKS E.W. 4 COLL 5072
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8. <u>Description of Current Liquid and Solid Waste Collection/Storage/Disposal Procedures</u>

A. Summary Information

For each source listed in Part 7, provide summary information about onsite collection, storage and disposal systems. Indicate whether collection/storage/disposal location is tank or drums, floor drain or sump, lined or unlined pit, onsite injection well, leach field, or offsite disposal.

B. Collection and Storage Systems

- 1. For collection and storage systems named in Part A, provide sufficient information to determine what water contaminants may be discharged to the surface and subsurface within the facility. Water and wastewater flow schematics may be used provided they have sufficient detail to show individual treatment units. Information desired includes whether tanks, pipeing, and pipelines are pressurized, above ground or buried. If fluids are drained to surface impoundments, oil skimmer pits, emergency pits, shop floor drains, sumps, etc. for further transfer and processing, provide size and indicate if these collection units are lined or unlined. If lined describe lining material (e.g. concrete, steel tank, synthetic liner, etc.).
- 2. Tankage and Chemical Storage Areas Storage tanks for fluids other than fresh water must be bermed to contain a volume one-third more than the largest tank. If tanks are interconnected, the berm must be designed to contain a volume one-third more than the total volume of the interconnected tanks. All new tank installations must be placed on an impermeable type pad. Chemical and drum storage areas must be paved, curbed and drained such that spills or leaks from drums are contained on the pads or in lined sumps.
- 3. All facilities must demonstrate the integrity of buried piping. If the facility contains underground process or wastewater pipelines the age and the specifications (i.e., wall thickness, fabrication material, etc.) of said pipelines should be submitted. A proposed hydrostatic test method and schedule for testing of pipeing must be included as part of the submittal. All lines must be tested to a pressure of 3 pounds per square inch above the normal operating pressure in the line, and a duration time for the test will also be proposed for OCD approval. If hydrostatic tests have already been conducted, details of the program and the results should be submitted.

Response

For the sources listed in Part 7, the methods of collection and containment for each is as follows:

a. Approximately sixteen (16) barrels per month of water from inlet scrubbers, discharge scrubbers, and in-line filters.

The inlet scrubber (no. 8 on the following schematic), the in-line filter (no. 11 on the following schematic), and the discharge scrubber (no. 19 on the following schematic) are all located above ground. These scrubbers/filters are designed to trap liquid impurities. These impurities consist of approximately sixteen (16) barrels per month of water. These impurities are pushed into a buried two and one-half inch OD steel line (2.0" ID) for subsequent storage in a 210 bbl steel tank (no. 21 on the following schematic). This flow line which operates at approximately forty (40) pounds of pressure was hydrostaticaly pressure tested when installed in September 1996. The line will be tested annually in the future. This is a closed system.

Although the 210 bbl steel tank has historically only held water, certain "oil" impurities could be separated and delivered for storage in this tank. As such, this tank will be bermed with the area within the berm lined with a synthetic liner.

b. Approximately 300 gallons per year of used engine coolants (antifreeze).

The antifreeze for the compressor unit is stored in a 500 gallon steel tank (no. 6 on the following schematic) and is connected in a closed system to the compressor radiator. When the coolant is changed, the supplier of the compressor removes the used coolant for disposal.

The 500 gallon steel tank used for storage of antifreeze is not currently bermed. This tank will be bermed with the area within the berm lined with a synthetic liner.

c. Approximately 400 gallons per year of used engine oil.

The engine oil for the compressor unit is stored in a 300 gallon steel tank (no. 7 on the following schematic) and is connected in a closed system to the compressor. When the oil is changed, the supplier of the compressor removes the used oil for disposal.

The 300 gallon steel tank used for storage of oil is not currently bermed. This tank will be bermed with the area within the berm lined with a synthetic liner.

d. Four (4) compressor filters per year.

When the oil is changed, the supplier of the compressor removes the used filters for disposal.

e. Approximately forty-five (45) barrels per month of water condensate from the dehydration equipment.

An above ground line extends from the dehydrator (no. 14 in the following schematic) to three (3) fifty (50) gallon drums to catch the water vapor from the dehydrator. When the water is trucked from the 210 barrel tank, any of this condensate which has not evaporated is also trucked away. These three barrels will be replaced with a fiberglass tank which is not subject to rusting. In that only water condensation is stored at this point, such is not bermed or lined.

C. Existing Effluent and Solids Disposal.

1. On-Site Facilities

- a. Describe existing on-site facilities used for effluent or solids disposal of water, sludges, waste oils, solvents, etc., including surface impoundments, disposal pits, leach fields, floor drains, injection wells, and land farms etc. (If effluents and solids are shipped off-site for recycling or disposal, see C.2 on pg. 11.) Locate the various disposal areas on the facility site plan or topographic map. Provide technical data on the design elements of each disposal method:
 - (1) Surface impoundments date built, use, type and volume of effluent stored, area, volume, depth, slope of pond sides, subgrade description, liner type and thickness, compatibility of liner and effluent, installation methods, leak detection methods and frequency checked, freeboard, runoff/run on protection.
 - (2) Leach fields Type and volume of effluent, leach field area and design layout. If non-sewage or mixed flow from any process units or internal drains is, or has been sent to the leach fields, include dates of use and disposition of septic tank sludges.

- (3) Injection wells - Describe effluent injected, volume, depth, formation, OCD order number and approval date. The effluent must not be classified as a hazardous waste at the time of injection. (Note - Any sump, floor drain or hole deeper than wide used for subsurface emplacement of fluids may be considered an injection well unless its integrity to contain fluids can be demonstrated). Class II inujection wells are required to have an OCD permit and can only inject produced water or other waste fluids brought to the surface that are Exempt from RCRA Subtitle C Hazardous Waste regulations. A Part 5 WQCC Class I Non-Hazardous discharge plan approval will be required if the injection well is used to dispose of Non-Exempt, Non-Hazardous effluent. The effluent cannot be classified as a Hazardous Waste by characteristics or listing as spelled out in RCRA Subtitle C.
- (4) Drying beds or other pits Types and volumes of waste, area, capacity, liner, clean-out interval and method, and ultimate disposal location.
- (5) Solids disposal Describe types volumes frequency and location of on-site solids dried disposal. Types solids include sands, sludges, filters, containers, cans and drums.
- (6) Landfarms Describe the surface dimensions of the landfarm area and the operational and monitoring procedures. NOTE: The OCD has developed specific guidelines for the construction and operation and monitoring of landfarms.
- b. For leach fields, pits, and surface impoundments having single liners of any composition, clay liners or that are unlined and not proposed to be modified or closed as part of this discharge plan:
 - (1) Describe the existing and proposed measures to prevent or retard seepage such that ground water at any place of present or future use will meet the WQCC Standards of Section 3103, and not contain any toxic pollutant as defined in Section 1101.TT.
 - (2) Provide the location and design of site(s) and method(s) to be available for effluent sampling and for measurement or calculation of flow rates.

(3) Describe the monitoring system existing or proposed in the plan to deterct leakage or failure of the discharge system. If ground water monitoring exists or is proposed, provide information on the number, location, design, and installation of monitoring wells.

Response

n/a - There are no existing effluent and solid disposal facilities on site at this location. There are no surface impoundments, leach fields, injection wells, drying beds or pits, solids disposal facilities, and/or landfarms at this site.

2. Off-Site Disposal.

If wastewater, sludges, solids etc. are pumped or shipped off-site, indicate general composition (e.g. waste oils), method of shipment (e.g. pipeline, trucked), and final disposition (e.g. recycling plant, OCD permitted Class II disposal well, or domestic landfill, etc.). Include name, address, and location of receiving facility. If receiving facility is a sanitary or modified landfill show operator approval for disposal of the shipped wastes.

Response

For the sources listed in Part 7, the methods of disposa for each is as follows:

a. Approximately sixteen (16) barrels per month of water from inlet scrubbers, discharge scubbers, and in-line filters.

These volumes are picked up by the commercial water hauling/disposal company depicted below from the 210 barrel steel tank on the site (no. 21 on the following schematic) for disposal at an approved disposal well/site.

Gandy Corporation P. O. Box 827 Tatum, New Mexico 88267

b. Approximately 300 gallons per year of used engine coolants (antifreeze).

These volumes are removed by the entity named below supplying the compressor (no. 10 on the following schematic) when this service is being performed and is disposed of at the appropriate disposal facility.

Hy-Bon Engineering P. O. Box 4185 Midland, Texas 79704

c. Approximately 400 gallons per year of used engine oil.

These volumes are removed by the entity named below supplying the compressor (no. 10 on the following schematic) when this service is being performed and is disposed of at the appropriate recycling facility.

Hy-Bon Engineering P. O. Box 4185 Midland, Texas 79704

d. Four (4) compressor filters per year.

These filters are removed by the entity named below supplying the compressor (no. 10 on the following schematic) when this service is being performed and is disposed of at the appropriate disposal facility.

Hy-Bon Engineering P. O. Box 4185 Midland, Texas 79704

e. Approximately forty-five (45) barrels per month of water condensate from the dehydration equipment.

These volumes are picked up by the commercial water hauling/disposal company depicted below from the storage barrels on the site (no. 16 on the following schematic) for disposal at an approved disposal well/site.

Gandy Corporation P. O. Box 827 Tatum, New Mexico 88267

f. For any solid materials to be removed by operator, the appropriate disposal facility will be utilized, such as the Gandy Landfarm, Controlled Recovery, Inc.'s facilities, or the Sundance Services, Inc. facilities depending on the type of materials to be disposed of.

SHOREHAM PIPELINE COMPANY North White Ranch Compressor Station Section 7, Township 8 South, Range 29 East Chaves County, New Mexico



Buried Gas Flow Line
Emergency Sweetening Plant
1,000 Gallon Steel Amine Storage Tank
100 bbl Fiberglass Demineralized/Deionize Water Storage Tank
Remediated and Filled Pit
500 Gallon Steel Antifreeze Storage Tank
300 Gallon Steel Engine Oil Storage Tank
Lalet Scrubber

Inlet Scrubber Buried Flow Line From Inlet Scrubber to Storage Tank

10. Natural Gas Compressor 11. In Line Gas Filter

Emergency Sweetening Plant Contactor Buried Emergency Sweetening Plant

13.

Flow Lines

Dehydrator

15.

300 Gallon Steel Glycol Storage Tank 3 Fifty Gallon Drums to Catch Water 16.

Condensate Storeroom

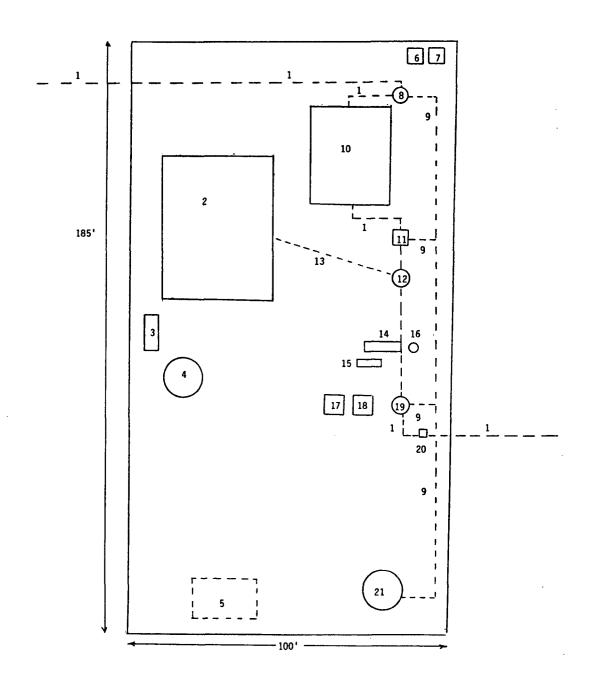
17. 18. Delmar Control Room

19.

Discharge Scrubber Methanol Injection Pump and Methanol 20.

Storage Barrels 210 bbl Steel Drip and Water Catch

Tank



9. Proposed Modifications

- A. If collection and storage systems do not meet the criteria of Section 8 B. above, or if protection of ground water cannot be demonstrated pursuant to Section 8C.1.b.(1) above, describe what modification of that particular method (including closure), or what new facility, is proposed to meet the requirements of the Regulations. Describe in detail the proposed changes. Provide the information requested in 8 B, and C.1.a. and b. Above for the proposed facility modifications and proposed time schedule for construction and completion. (Note: OCD has developed specific guidelines for lined surface impoundments, land farms, below grade tanks, and closure guidelines that are available on request.)
- B. For ponds, pits, leach fields, etc. where protection of ground water cannot be demonstrated, describe the proposed closure of such units so that existing fluids are removed and emplacement of additional fluids and runoff/run on of precipitation are prevented. Provide a proposed time schedule for closure. (Note: The OCD has closure guidelines and are available upon request.)

Response

- 1. The "soiled" soil on the northeast side of the compressor and around the compressor (no. 10 on the following schematic) to be remediated and dispossed of at the appropriate facility.
- 2. A berm is to be installed around the compressor (no. 10 on the following schematic) and around the antifreeze and lubricating storage tanks (no. 6 and no. 7 on the following schematic) and the area within the berm is to be lined with a synthetic material.
- 3. A berm is to be installed around the amine storage tank (no. 3 on the following schematic) with this berm area to be lined with a synthetic material.
- 4. A berm is to be installed around the glycol storage tank (no. 15 on the following schematic) with this berm area to be lined with a synthetic material.
- 5. The storage area for the glycol injection (no. 20 on the following schematic) to be bermed and lined with a synthetic material.

- 6. The three (3) fifty (50) gallon drums used to catch the water condensation at the dehydration unit will be replaced with a fiberglass tank that is not subject to rusting.
- 7. The 210 barrel steel storage tank (no. 21 on the following schematic) will be bermed with the berm area to be lined with a synthetic material.
- 8. The fence enclosing the facility is to be repaired.
- 9. The facility will be graded or bermed to preven run on and/or run off.
- 10. These changes to be initiated upon approval/confirmation of this plan.

SHOREHAM PIPELINE COMPANY North White Ranch Compressor Station Section 7, Township 8 South, Range 29 East Chaves County, New Mexico



Buried Gas Flow Line

Buried Gas Flow Line
Emergency Sweetening Plant
1,000 Gallon Steel Amine Storage Tank
100 bbl Fiberglass Demineralized/Deionize Water Storage Tank
Remediated and Filled Pit
500 Gallon Steel Antifreeze Storage Tank
300 Gallon Steel Engine Oil Storage Tank
Lalet Scrubbor 2. 3. 4. 5. 6. 7.

Inlet Scrubber

Buried Flow Line From Inlet Scrubber to Storage Tank
 Natural Gas Compressor
 In Line Gas Filter

- **Emergency Sweetening Plant Contactor**
- Buried Emergency Sweetening Plant Flow Lines

- Dehydrator
 300 Gallon Steel Glycol Storage Tank
 3 Fifty Gallon Drums to Catch Water
 Condensate 16.

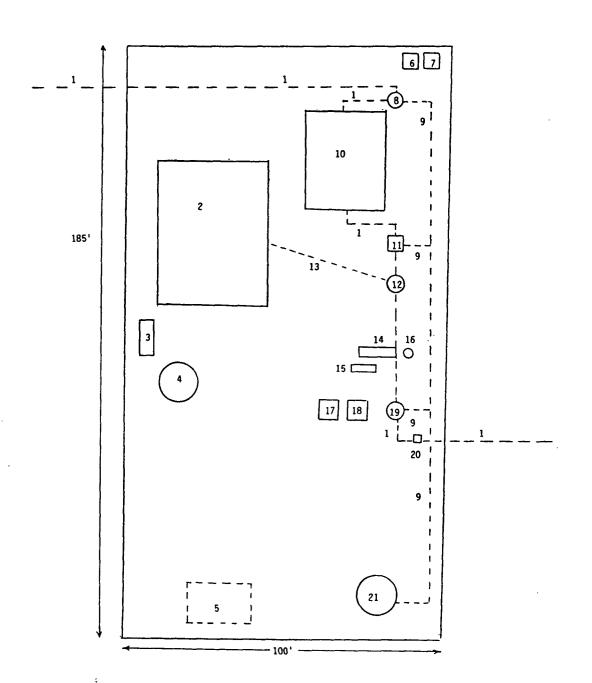
Storeroom

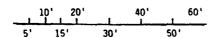
18. Delmar Control Room

19. Discharge Scrubber

20.

Methanol Injection Pump and Methanol Storage Barrels 210 bbl Steel Drip and Water Catch Tank





10. <u>Inspection, Maintenance and Reporting</u>

A. Describe proposed routine inspection procedures for surface impoundments and other disposal units having leak detection systems. Include frequentcy of inspection, how records are to be maintained and OCD notification in the event of leak detection.

Response

n/a as to this question - However, Operator's field representative is at this site daily during the business week and on most weekend days. On each visit, the containment, storage, and removal facilities in this plan will be inspected and repaired as necessary. Should there be a discharge, leak, spill, etc., Operator's field representative will notify Operator who will likewise notify the nearest OCD Field Representative to coordinate any clean-up and or repairs.

- B. If ground water monitoring is used to detect leakage on failure of the surface impoundments, leach fields, or other approved disposal systems provide:
 - 1. The frequency of sampling, and constituents to be analyzed.
 - 2. The proposed periodic reporting of the results of the monitoring and sampling.
 - 3. The proposed actions and procedures (including OCD notification) to be undertaken by the discharger in the event of detecting leaks or failure of the discharge system.

Response

n/a

C. Discuss general procedures for containment of precipitation and runoff such that water in contact with process areas does not leave the facility, or is released only after testing for hazardous constituents. Include information on curbing, drainage, disposition, notification, etc.

Response

As discussed hereinabove, all facilities will be bermed and lined. This will prevent the run-off of any discharged materials. It will also prevent the contact with any production area from run-on. As a further precaution, the high side of the facility site (south side) will be walled or bermed to divert any run-on around the facility. As a further precaustion, although all facilities will be bermed, the low side of the facility site (north side) will also be bermed or walled to prevent any run-off from the site.

11. Spill/Leak Prevention and Reporting Procedures (Contingency Plans)

It is necessary to include in the discharge plan submittal a contingency plan that anticipates where any leaks or spills might occur. It must describe how the discharger proposes to guard against such accidents and detect them when they have occurred. The contingency plan must also describe the steps proposed to contain and remove the spilled substance or mitigate the damage caused by the discharge such that ground water is protected, or movement into surface waters is prevented. The discharger will be required to notify the OCD Director of significant leaks and spills, and this commitment and proposed notification threshold levels must be included in the contingency plan. In any case the local OCD District field office should be notified by telephone within 24 hours of a significant spill or release as defined in OCD Rule 116 and WQCC Section 1203. Note: Use NMOCD Rule 116 and WQCC Section 1203 for spill reporting.

- A. Describe proposed procedures addressing containment, cleanup and reporting in case of major and minor spills at the facility. Include information as to whether areas are curbed, paved and drained to sumps; final disposition of spill material; proposed schedule for OCD notification of spills; etc.
- B. Describe methods used to detect leaks and ensure integrity of above and below ground tanks, and piping. Discuss frequency of inspection and procedures to be undertaken if significant leaks are detected.
- C. If an injection well is used for on-site effluent disposal, describe the procedures to be followed to prevent unauthorized discharges to the surface or subsurface in the event the disposal well or disposal line is shut-in for work over or repairs (e.g. extra storage tanks, emergency pond, shipment offsite, etc.). Address actions to be taken in the event of disposal pipeline failure, extended disposal well downtime, etc.

Response

In Parts 7, 8, 9, and 10 above, the potential spill points have been identified, the measures to be taken to prevent and retain any potential spill have been identified, the method of clean-up and disposal has been identified, the method to prevent and retain run-on and run-off has been identified, the timing of inspections has also been identified, the measures to be taken to protect ground water (none within two miles of this location) and surface precipitation has been identified, as well as the commitment to notify the OCD District Field Office has been made.

12. Site Characteristics

- A. The following hydrologic/geologic information is required to be submitted with all discharge plan applications. Some information already may be on file with OCD and can be provided to the applicant on request.
 - 1. Provide the name, description, and location of any bodies of water, streams (indicate perennial or intermittent), or other watercourses (arroyos, canals, drains, etc.); and ground water discharges sites (seeps, springs, marshes, swamps) within one mile of the outside perimeter of the facility. For water wells, locate wells within one-quarter mile of the outside perimeter of the facility and specify use of water (e.g. public supply, domestic, stock, etc.).

Response

None

2. Provide the depth to and total dissolved solids (TDS) concentration (in mg/l) of the ground water most likely to be affected by any discharge (planned or unplanned). Include the source of the information and how it was determined. Provide a recent water quality analysis of the ground water, if available, including name of analyzing laboratory and sample date.

Response

None. The nearest groundwater (well) is in Section 35, Township 8 South, Range 28 East of Chaves County, New Mexico which is five and one-fourth miles from the facility.

- 3. Provide the following information and attach or reference source of information as available (e.g. driller's logs):
 - a. Soil type(s) (sand, clay, loam, caleche);

Response

Approximately six inches of topsoil (primarily sandstone) on rock at the facility site. Source - dug with shovel.

b. Name of aquifer(s);

Response

None at site.

- c. Composition of aquifer material (e.g. alluvium, sandstone, basalt, etc.); and
- d. Depth to rock at base of alluvium (if available).

Response

No aquifer at site.

4. Provide information on:

a. The flooding potential at the discharge site with respect to major precipitation and/or fun-off events; and

Response

No flooding potential at discharge site.

b. Flood protection measures (berms, channels, etc.), if applicable.

Response

Not applicable. However, discharge site will be bermd on each end to prevent run-on and run-off.

B. Additional Information

Provide any additional information necessary to demonstrate that approval of the discharge plan will not result in concentrations in excess of the standards of WQCC Section 3103 or the presence of any toxic pollutant (Section 1101.TT.) at any place of withdrawal of water for present or reasonably foreseeable future use. Depending on the method and location of discharge, detailed technical information on site hydrologic and geologic conditions may be required to be submitted for discharge plan evaluation. This material is most likely to be required for unlined surface impoundments and pits, and leach fields. Check with OCD before providing this information. However, if required it could include but not be limited to:

1. Stratigraphic information including formation and member names, thickness, lithologies, lateral extent, etc.

- 2. Generalized maps and cross-sections;
- 3. Potentiometric maps for aquifers potentially affected;
- 4. Porosity, hydraulic conductivity, storativity and other hydrologic parameters of the aquifer;
- 5. Specific information on the water quality of the receiving aquifer; and
- 6. Information on expected alteration of contaminants due to sorption, precipitation or chemical reaction in the unsaturated zone, and expected reactions and/or dilution in the aquifer.

Response

Not applicable. No such materials on site, no ground water, no aquifers at the discharge site.

13. Other Compliance Information

Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. Examples include previous Division orders or letters authorizing operation of the facility or any surface impoundments at the location.

- 1. Also include a brief statement committing to NMOCD Rile 116 WQCC Section 1203 spill/leak reporting.
- 2. A closure plan as described in WQCC Section 3107.A.11 "Monitoring, Reporting, and other Requirements." The "Closure Plan" shall include all of the information described in WQCC Section 3107.A.11 and can use OCD guidelines for accepted remmediation techniques and unlined surface impoundment closure guidelines.

Response

Respondent has complied with the required submittals for the site in question. Respondent further commits to executed all of those actions contained hereinabove and commits to comply with all rules, regulations, and requirements applicable to the site in question and asserts Respondent's further commitment to promptly and correctly report and spills and/or leaks and to seed the OCD guidance for all clean-up and remmediation of any such spills and/or leaks.