GW - 345

GENERAL CORRESPONDENCE

YEAR(S):

2000 - 2006

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/07/06

or cash received on _____ in the amount of $ 1700.00

from Versado Gas Processors, LP

for GW-345 Eunice - North Compressor station

Submitted by: Lawrence Romero Date: 6/14/06

Submitted to ASD by: Lawrence Romero Date: 6/14/06

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

WARNING – THIS CHECK IS PROTECTED BY SPECIAL SECURITY GUARD PROGRAM™ FEATURES

VOID VOID VOID

Versado Gas Processors, L.P.
1000 Louisiana
Suite 4700
Houston, TX 77002

Chase Bank USA, N.A.
Wilmington, Delaware

CHECK NO. [redacted]
CHECK DATE 06/07/2006

62-28/311
0934623

CHECK AMOUNT
$1,700.00

PAY * * * One Thousand Seven Hundred Dollars Only*****
To The Order Of

WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

SECURE FEATURES INCLUDE INVISIBLE FIBERS • MICROPRINTING • VOID FEATURE PANTOGRAPH • ENDORSEMENT BACKER • BROWNSTAIN CHEMICAL REACTANT

[redacted]

PAY TO:
WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

Versado Gas Processors, L.P.

VENDOR NO.	CHECK DATE	CHECK NO	CHECK TOTAL
26062	**6/7/2006**	**539417**	**$1,700.00**

VOUCHER NUMBER	INVOICE NUMBER	INVOICE DATE	AMOUNT PAID
00099392	053006	20060530 RTN X41398 - JO	$ 1,700.00

	Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1	CY Reimbursement Project _____ Tax ___	064	01						
5	Gross Receipt Tax	064	01		2329	900000	2329134		
3	Air Quality Title V	092	13	1300	1696	900000	4169134		
4	PRP Prepayments	248	14	1400	9696	900000	4969014		
2	Cliffmax Chemical Co.	248	14	1400	9696	900000	4969015		
6	Circle K Reimbursements	248	14	1400	9696	900000	4969248		
7	Hazardous Waste Permits	339	27	2700	1696	900000	4169027		
8	Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		
10	Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	3400 00	10
11	Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4169029		11
12	Air Quality Permits	631	31	2500	1696	900000	4169031		12
13	Payments under Protest	651	33		2919	900000	2919033		13
14	Xerox Copies	652	34		2349	900000	2349001		*14
15	Ground Water Penalties	652	34		2349	900000	2349002		15
16	Witness Fees	652	34		2349	900000	2439003		16
17	Air Quality Penalties	652	34		2349	900000	2349004		17
18	OSHA Penalties	652	34		2349	900000	2349005		18
19	Prior Year Reimbursement	652	34		2349	900000	2349006		19
20	Surface Water Quality Certification	652	34		2349	900000	2349009		20
21	Jury Duty	652	34		2349	900000	2349012		21
22	CY Reimbursements (i.e. telephone)	652	34		2349	900000	2349014		22
23	UST Owner's List	783	24	2500	9696	900000	4969201		*23
24	Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
25	UST Maps	783	24	2500	9696	900000	4969203		*25
26	UST Owner's Update	783	24	2500	9696	900000	4969205		*26
28	Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
29	Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
30	Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
31	Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
32	Smoking School	783	24	2500	9696	900000	4969214		32
33	SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
34	Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
35	Sale of Equipment	783	24	2500	9696	900000	4969301		*35
36	Sale of Automobile	783	24	2500	9696	900000	4969302		*36
37	Lust Recoveries	783	24	2500	9696	900000	4969614		**37
38	Lust Repayments	783	24	2500	9696	900000	4969615		**38
39	Surface Water Publication	783	24	2500	9696	900000	4969801		39
40	Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
41	Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
42	Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
44	Ust Permit Fees	989	20	3100	1696	900000	4169020		44
45	UST Tank Installers Fees	989	20	3100	1696	900000	4169021		45
46	Food Permit Fees	991	26	2600	1696	900000	4169026		46
43	Other								43

Gross Receipt Tax Required ** Site Name & Project Code Required TOTAL 3400 00

Contact Person: Wayne Price Phone: 476-3490 Date: 6/4/00

Received in ASD By: _____ Date: _____ RT #: _____ ST #: _____

FS6025
Revised 07/07/00

TARGA

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

2006 MAY 19 PM 1 38

May 15,2006

Mr. Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

RE: OCD Draft Notice of Publication for Discharge Plan Renewals
Eunice (GW-005), Eunice South (GW- 344), Eunice North (GW-345) Facilities

Dear Mr. Chavez

Enclosed please find the Public Notice in the Eunice News, affidavit of Publication from the Eunice News, and the affidavit of Posting from the Eunice Post Office.

Sincerely,

Don Embrey
Targa Midstream Services Limited Partnership

Affidavit of Publication

ATE OF NEW MEXICO)
) ss.
UNTY OF LEA)

being first duly sworn on oath oses and says that he is editor/publisher ie Eunice News , a daily newspaper general paid circulation published in the English guage at Eunice Lea County, New Mexico; that newspaper has been so published in such county tinuously and uninterruptedly for a period in excess Twenty-six (26) consecutive weeks next prior to the publication of the notice hereto attached as hereter shown; and that said newspaper is in all things qualified to publish legal notices within the meanof Chapter 167 of the 1937 Session Laws of the e of New Mexico.

That the notice which is hereto attached, entitled OCD Draft Notice

....

numbered .... in the

.... Court of Lea nty, New Mexico, was published in a regular and re issue of The Eunice News and in any supplement thereof, once each week on the e day of the week, for One (1) ecutive weeks, beginning with the issue of April 6, 2006

ending with the issue of April 6, 2006

And that the cost of publishing said notice is the of $ 91.22

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

[signature]

Subscribed and sworn to before me this 14 of April 2006

Tanya White

Notary Public, Lea County, New Mexico

Commission Expires 9-28-08

NOTICE OF PUBLICATION

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

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

(GW-005) - TARGA, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the Eunice-Middle Gas Plant located in the NE/4 of Section 3, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has a combined horsepower rating of 28,250 HP. The discharge plan consists of a waste management plan which addresses how oilfield products and wastes will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Ground water most likely to be affected by an accidental discharge is at a depth ranging from 90 feet with a total dissolved solids concentration of 2,000 mg/l. In addition, a work plan for the abatement of ground water and vadose zone contamination is included.

(GW-344) - TARGA, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-South Gas Plant (GW-003) located in the SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 5,300 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan which addresses how oilfield products and wastes will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Ground water most likely to be affected by an accidental discharge is at a depth ranging from 50 feet with a total dissolved solids concentration of 1,000 mg/l.

(GW-345) - TARGA, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-North Gas Plant (GW-004) located in the SE/4 of Section 28, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 17, 925 HP. The discharge plan consists of a gas plant decommissioning plan, a waste management plan which addresses how oilfield products and wastes will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water. Ground water most likely to be affected by an accidental discharge is at a depth ranging from 55 feet with a total dissolved solids concentration of 1,100 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's website http://www.emnrd.state.nm.us/ocd/. Prior to ruling on any proposed discharge permit or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 3rd day of March 2006.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

MARK FESMIRE, Director

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Friday, March 03, 2006 3:45 PM
To: 'cwrangham@targaresources.com'
Cc: Stone, Ben, EMNRD
Subject: Discharge Plan Public Notice & Administrative Completeness for GW-005, GW-344 and GW-345

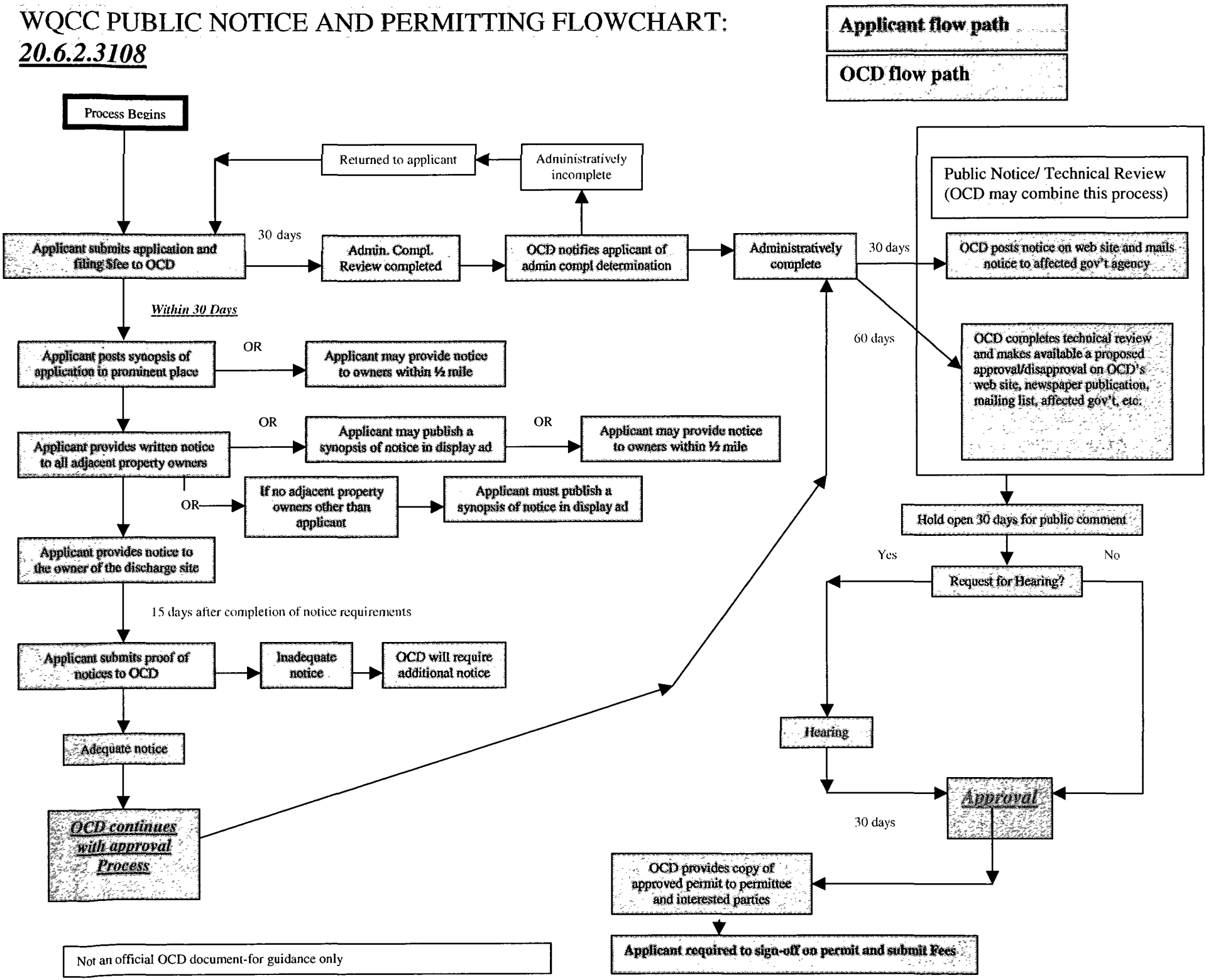
Dear Mr. Wrangham:

Please note GW-005, GW-344 and GW-345 discharge applications are hereby administratively complete. OCD will issue public notice as attached and draft discharge permits upon completion of OCD's review of the permits. TARGA is required to issue on-site public notice and provide proof thereof. Please find attached a copy of the public regulations and flow chart to assist you in this matter.

Please contact me if you have questions.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJ.Chavez@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/
(Pollution Prevention Guidance is under "Publications")

WQCC PUBLIC NOTICE AND PERMITTING FLOWCHART: *20.6.2.3108*



TITLE 20 ENVIRONMENTAL PROTECTION
CHAPTER 6 WATER QUALITY
PART 2 GROUND AND SURFACE WATER PROTECTION

20.6.2.3108 PUBLIC NOTICE AND PARTICIPATION:

A. Within 30 days of submission of an application for discharge permit, modification or renewal:

(1) The applicant shall provide notice, in accordance with the requirements of Section E of this Section, to the general public in the locale of the proposed discharge in a form provided by the department by each of the three methods listed below:

(a) prominently posting a synopsis of the public notice, in English and in Spanish, at a conspicuous public location, approved by the department, at or near the existing or proposed facility for 30 days; and

(b) providing written notice of the discharge by certified mail, return receipt requested, to owners of record of all adjacent properties; and

(c) providing notice by certified mail, return receipt requested, to the owner of the discharge site if the applicant is not the owner;

(2) In lieu of the public notice requirements of Subparagraph (b) of Paragraph (1) of Subsection A above, the applicant may publish a synopsis of the notice in a display ad at least two inches by three inches in a newspaper of general circulation in the location of the proposed discharge.

(3) In lieu of the public notice requirements of Subparagraph (a) and (b) of Paragraph (1) of Subsection A above, the applicant may provide notice of the discharge by certified mail, return receipt requested, to property owners of record within 1/2 mile of the discharge site on a form provided by the department.

(4) If there are no adjacent properties other than properties owned by the discharger, the applicant shall, in lieu of the requirements in Subparagraph (b) of Paragraph (1) of Subsection A above, publish a synopsis of the notice in a display ad at least two inches by three inches in a newspaper of general circulation in the location of the facility.

B. Within fifteen days of completion of the public notice requirements in Subsection A of this Section, the applicant shall submit to the department proof of notice, including certified mail receipts and an affidavit of posting, as appropriate. If the department determines that the notice provided pursuant to Subsection A of this Section is inadequate, the department may require additional notice in accordance with Subsection A of this Section.

C. Within 30 days of receipt of an application for a discharge permit, modification or renewal, the department shall review the application for administrative completeness. To be deemed administratively complete, an application must provide all of the information required by Paragraphs (1) through (5) of Subsection E of this Section. The department shall notify the applicant in writing when the application is deemed administratively complete. If the department determines that the application is not administratively complete, the department shall notify the applicant of the deficiencies in writing within 30 days of receipt of the application and state what additional information is necessary.

D. Within 30 days of determining an application for a discharge permit, modification or renewal is administratively complete, the department shall post a notice on its web site and shall mail notice to any affected local, state, federal, tribal or pueblo governmental agency, political subdivisions, ditch associations and Land Grants, as identified by the department. The department shall also mail or e-mail notice to those persons on a list maintained by the department who have requested notice of discharge permit applications. The notice shall include the information listed in Subsection E of this Section.

E. The notice provided under Subsection A and D of this Section shall include:

(1) The name and address of the proposed discharger;

(2) The location of the discharge, including a street address, if available, and sufficient information to locate the facility with respect to surrounding landmarks;

(3) A brief description of the activities that produce the discharge described in the application;

(4) A brief description of the expected quality and volume of the discharge;

(5) The depth to and total dissolved solids concentration of the ground water beneath the discharge site;

(6) The address and phone number within the department by which interested persons may obtain information, submit comments, and request to be placed on a facility-specific mailing list for future notices; and

(7) A statement that the department will accept comments and statements of interest regarding the application and will create a facility-specific mailing list for persons who wish to receive future notices.

F. All persons who submit comments or statements of interest to the department and who provide a mail or e-mail address shall be placed on a facility-specific mailing list and the department shall send those persons the public notice issued pursuant to Subsection G of this Section, and notice of any public meeting or hearing scheduled on the application.

G. Within 60 days after the department makes its administrative completeness determination and all required technical information is available, the department shall make available a proposed approval or disapproval of the application for a discharge permit, modification or renewal, including conditions for approval proposed by the department or the reasons for disapproval. The department shall mail or deliver a copy of the proposed approval or disapproval to the applicant, and shall provide notice of the proposed approval or disapproval of the application for a discharge permit, modification or renewal by:

(1) Posting on the department's website;

(2) Publishing notice in a newspaper of general circulation in this state and a newspaper of general circulation in the location of the facility;

(3) Mailing or e-mailing to those persons on a facility-specific mailing list;

(4) Mailing to any affected local, state, or federal governmental agency, as identified by the department; and

(5) Mailing to the Governor, Chairperson, or President of each Indian Tribe, Pueblo or Nation within the state of New Mexico, as identified by the department.

H. The public notice issued under Subsection G shall include the information in Subsection E of this Section and the following information:

(1) A brief description of the procedures to be followed by the secretary in making a final determination;

(2) A statement of the comment period and description of the procedures for a person to request a hearing on the application; and

(3) The address and telephone number at which interested persons may obtain a copy of the proposed approval or disapproval of an application for a discharge permit, modification or renewal.

I. In the event that the proposed approval or disapproval of an application for a discharge permit, modification or renewal is available for review within 30 days of deeming the application administratively complete, the department may combine the public notice procedures of Subsections D and G of this Section.

J. Following the public notice of the application and proposed approval or disapproval of an application for a discharge permit, modification or renewal, and prior to a final decision by the secretary, there shall be a period of at least 30 days during which written comments may be submitted to the department and/or a public hearing may be requested in writing. All comments will be considered by the department. Requests for a hearing shall be in writing and shall set forth the reasons why a hearing should be held. A public hearing shall be held if the secretary determines there is significant public interest. The department shall notify the applicant and any person requesting a hearing of the decision whether to hold a hearing and the reasons therefore in writing.

K. If a hearing is held, pursuant to Subsection J of this Section, notice of the hearing shall be given by the department at least 30 days prior to the hearing in accordance with Subsection G of this section. The notice shall include the information identified in Subsection H of this section in addition to the time and place of the hearing and a brief description of the hearing procedures. The hearing shall be held pursuant to Section 20.6.2.3110 NMAC.

[2-18-77, 12-24-87, 12-1-95, 11-15-96; 20.6.2.3108 NMAC – Rn, 20 NMAC 6.2.III.3108, 1-15-01; A, 12-1-01; A, 9-15-02]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 12/14/05

or cash received on _____ in the amount of $ 300.00

from VERSADO GAS

for EUNICE GAS PLANT / N EUNICE COMPST / S EUNICE GW-005 / GW-345 / GW-344
(Facility Name) (OP No.)

Submitted by: WAYNE PRICE Date: 1/27/06

Submitted to ASD by: [signature] Date: "

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ___ Renewal X

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2006

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

WARNING – THIS CHECK IS PROTECTED BY SPECIAL SECURITY GUARD PROGRAM™ FEATURES

Versado Gas Processors, L.P.
1000 Louisiana
Suite 4700
Houston, TX 77002

Chase Bank USA, N.A.
Wilmington, Delaware

CHECK NO. [redacted]
CHECK DATE 12/14/2005
62-28/311
0934623

CHECK AMOUNT
$300.00

PAY * * * Three Hundred Dollars Only**********
To The Order Of

WATER QUALITY MANAGEMENT FUND
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

GW-005/GW-345/GW-344

[signature]

SECURE FEATURES INCLUDE INVISIBLE FIBERS • MICROPRINTING • VOID FEATURE PANTOGRAPH • ENDORSEMENT BACKER • BROWNSTAIN CHEMICAL REACTANT

[redacted]

Larson & Associates, Inc.
Environmental Consultants

RECEIVED
FEB 18 2002
Environmental Bureau
Oil Conservation Division

February 14, 2002

Mr. Roger C Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Addendum to Groundwater Discharge Plan GW-345 - Storm Water Management Plan, Dynegy Midstream Services, L.P., Eunice North Plant Compressor Station, Unit Letter H, Section 28, Township 21 South, Range 37 East, Lea County, New Mexico

Dear Mr. Anderson:
Dynegy Midstream Services, L.P. (Dynegy) has retained Larson and Associates, Inc. (LA) to prepare a Storm Water Management Plan (SMP) for the Eunice North Plant Compressor Station (Site) located in Unit Letter H, Section 28, Township 21 South, Range 37 East, Lea County, New Mexico. The SMP is submitted as an addendum to groundwater discharge plan GW-345, and was requested by the New Mexico Oil Conservation Division (NMOCD) in correspondence to Dynegy dated July 12, 2001. The SMP was originally due to the NMOCD on December 31, 2001, however, an extension was granted until February 15, 2002.

Please call me at (915) 687-0901 if you have questions.
Sincerely,
Larson and Associates, Inc.

Mark J. Larson, CPG, CGWP
President

Encl.

cc: Mr. Cal Wrangham - Dynegy

507 North Marienfeld, Suite 202 ◆ Midland, Texas 79701 ◆ Ph. (915) 687-0901 ◆ Fax (915) 687-0456

ADDENDUM TO GROUNDWATER DISCHARGE PLAN GW-345
STORM WATER MANAGEMENT PLAN
DYNEGY MIDSTREAM SERVICES, L.P.
EUNICE NORTH PLANT COMPRESSOR STATION

This Storm Water Management Plan (SMP) has been developed at the request of the New Mexico Oil Conservation Division (NMOCD) as a condition for renewal of the Groundwater Discharge Plan (GW-345) for the Dynegy Midstream Services, L.P. (Dynegy) Eunice North Plant Compressor Station (Site). The Site is located in Unit Letter H, Section 28, Township 21 South, Range 37 East, Lea County, New Mexico. Figure 1 presents a location and topographic map.

Operation Summary

In April 2000 the Eunice North Plant ceased operating as a natural gas processing plant, and is currently operated as a compressor station. The groundwater discharge plan was modified in 2001 to include equipment associated the compressor station, including compressor engines housed in two (2) buildings, a suction scrubber, material and chemical storage areas, and drain system tank battery. Equipment associated with former gas processing activity is out-of-service, and Texaco Exploration and Production Inc. submitted a groundwater discharge plan to the New Mexico Oil Conservation Division (NMOCD) in 2001 for environmental remediation associated with the former gas plant. Figure 2 presents a Site location and topographic map. Appendix A presents Site photographs.

Secondary containment has been constructed at areas where materials and chemicals are stored, and areas where spills have the potential to contact the ground. The areas include:

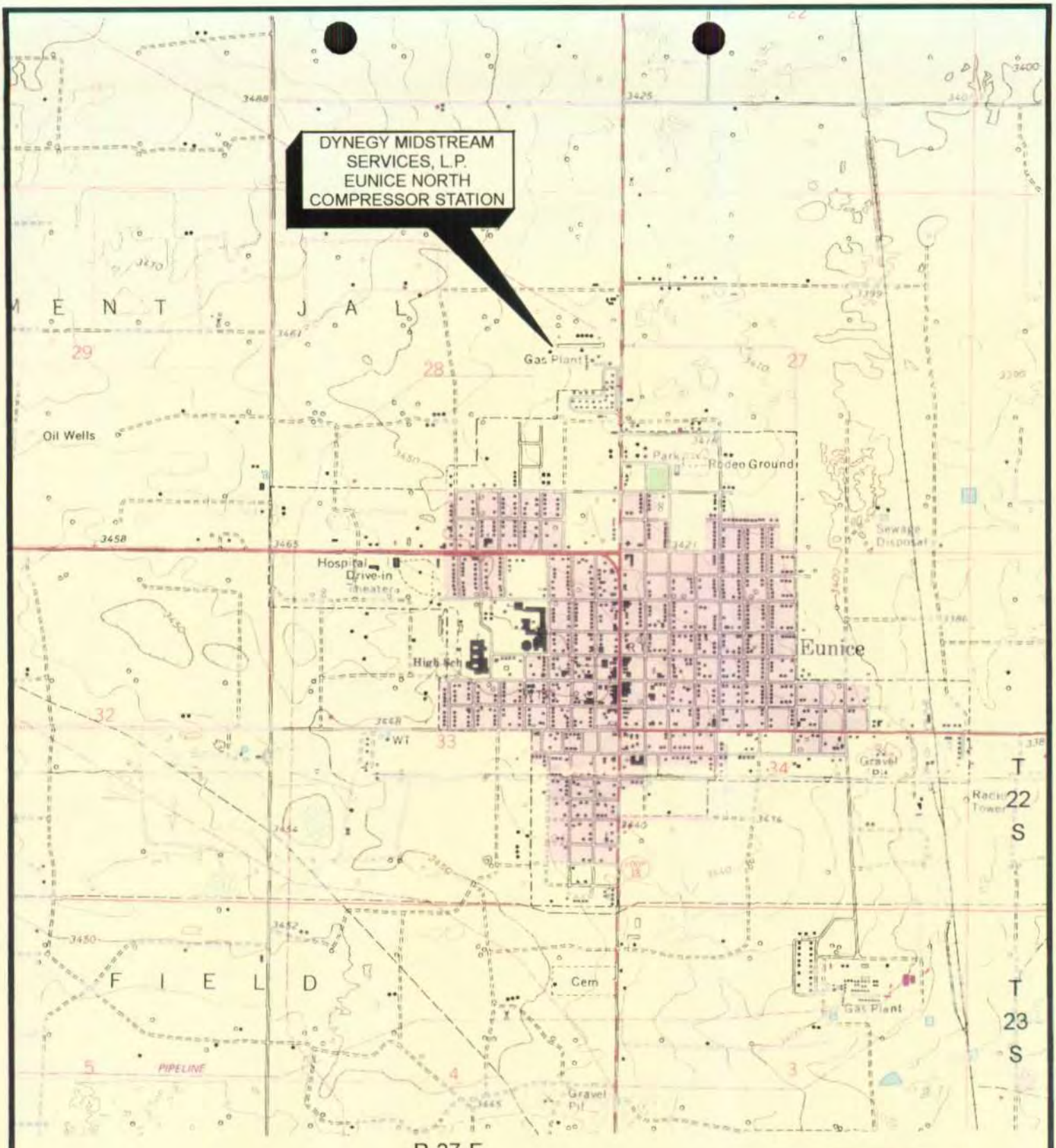
- Above-ground storage tanks for diesel, varsol, and lube oil storage;
- Drain system tank battery; and
- Drum storage area.

Above-ground tanks are used to store diesel fuel (504 gallons), varsol (1,050 gallons), hot oil (8,400 gallons), and hydril oil (128 gallons). Above-ground tanks are located inside concrete secondary containment structures. The secondary containment structures are designed to contain the contents of the tanks in case of accidental spills, and storm water. The compressor engines are housed in two (2) buildings equipped with floor drains to collect drips. The floor drains flow to a sump located near the southwest corner of the main engine building. Electronic controls meter the sump fluid level, and a pump transfers fluid to a tank battery located near the southwest corner of the Site. The tank battery is equipped with secondary containment that consists of a lined steel dike designed to hold the contents of the tanks and storm water. Chemical drums are stored in a concrete containment structure located near the southeast corner of the Site. The concrete structures is curbed, and designed to hold the contents of drums and storm water.

Strom Water Management Plan

Dynegy included a comprehensive Spill Prevention Control and Countermeasure (SPCC) Plan as an appendix to GW-345. The SPCC plan includes mechanisms to prevent potential non-point-source discharges of materials used or wastes generated at the facility, and control storm water. Secondary containment structures that have been installed at locations where equipment is operated or materials are stored to prevent accidental discharge of materials used or wastes generated at the facility. Earthen containment has also been constructed around aboveground storage tanks, in accordance with the groundwater discharge plan. Since the Site is no longer processes natural gas point-source contact by storm water is low. A suction scrubber removes a small volume of liquid from the gas stream, and is located on the south side of the main engine building. Strom water in the area of the scrubber would collect on the south side of the engine building since it is topographically lower than the scrubber. The potential for storm water contact with the compressor engines is also very low since the engines are enclosed in buildings. There is a potential for storm water contact at the areas where materials and chemicals are stored. However, secondary containment structures designed to contain the contents of the vessels, as well as storm water are in place. Oil or product collected in the secondary containment structures is absorbed with booms or other similar equipment, and disposed in a regulatory-accepted manner. Storm water that collects in the low area south of the main engine building, and in containment structures is allowed to evaporate or drained, unless hydrocarbons are present. Storm water containing hydrocarbons, based on visual identification of a sheen or floating layer, is picked up with a vacuum truck, and disposed in a regulatory-permitted manner.

FIGURES



TAKEN FROM U.S.G.S.
EUNICE, NEW MEXICO 1979
7.5' QUADRANGLES

SCALE: 1"=2000'

FIGURE #1

LEA COUNTY, NEW MEXICO

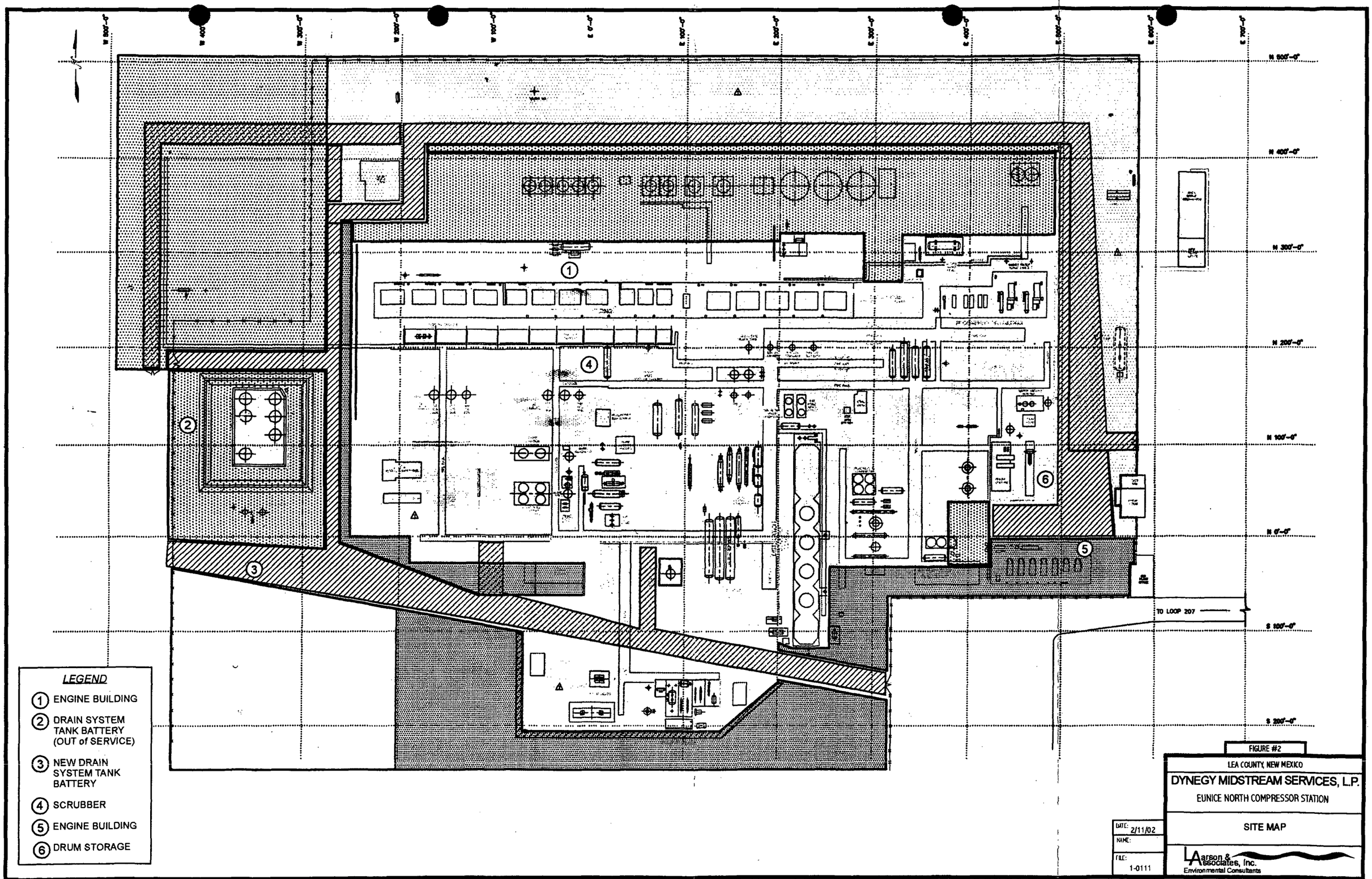
DYNEGY MIDSTREAM SERVICES, L.P.

EUNICE NORTH COMPRESSOR STATION

LOCATION MAP

DATE:	2/11/02
NAME:	
FILE:	1-0111

LAarson & Associates, Inc.
Environmental Consultants



LEGEND

1. ENGINE BUILDING
2. DRAIN SYSTEM TANK BATTERY (OUT of SERVICE)
3. NEW DRAIN SYSTEM TANK BATTERY
4. SCRUBBER
5. ENGINE BUILDING
6. DRUM STORAGE

FIGURE #2

LEA COUNTY, NEW MEXICO

DYNEGY MIDSTREAM SERVICES, L.P.

EUNICE NORTH COMPRESSOR STATION

SITE MAP

DATE: 2/11/02
NAME:
FILE: 1-0111

Larson & Associates, Inc.
Environmental Consultants

APPENDIX A

Photographs

1. Diesel Fuel Storage Tank Northeast of Engine Building

2. Lube Oil Storage Tanks North of Engine Building

3. Chemical Storage North of Engine Building

4. Drain System Sump (Southwest of Engine Building)

5. Drain System Tank Battery (Southwest Corner of Site)

6. Chemical and Drum Storage Area (Southeast Corner of Site)

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

OIL CONSERVATION DIV.

01 AUG -7 PM 12:57

DYNEGY

August 1, 2001

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

RE: GW-345
North Eunice Compressor Station
Discharge Plan Renewal

Dear Sir:
Please find attached a check ($100.00) for the discharge plan renewal fee and the signed approval conditions. I would like to thank you and your staff for the professional and courteous manner in which you have guided us through this process.

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

Sincerely,

Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/31/01

or cash received on ______________ in the amount of $ 100.00

from VERSADO GAS PROCESSORS, L.L.C.

for DYNEGY NORTH EUNICE COMP. ST. GW-395

Submitted by: (Family Name) WAYNE PRICE Date: (DP No.) 8/20/01

Submitted to ASD by: [signature] Date: 8/20/01

Received in ASD by: ______________ Date: ______________

Filing Fee ✓ New Facility ____ Renewal ____

Modification ____ Other ______________ (specify)

Organization Code 521.07 Applicable FY 2002

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877) 672-1449

BANK ONE, NA
CHICAGO, IL 60670

62-28
311
0934623

PAY One Hundred and NO/100 Dollars

CHECK NO.	CHECK DATE	PAY EXACTLY
[redacted]	07 / 31 / 01	$********100.00

Void After 90 Days

TO THE ORDER OF
Water Quality Management Fund
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

[signature]

VICE PRESIDENT - TREASURER
AUTHORIZED SIGNATURE

[redacted]

THE SANTA FE
NEW MEXICAN
Founded 1849

OIL CONSERVATION DIVISION
ATTN: WAYNE PRICE
1220 S. ST. FRANCIS DRIVE
SANTA FE, NM 87505

AD NUMBER: 210545 ACCOUNT: 56689
LEGAL NO: 69398 P.O.#: 01199000033
459 LINES 1 time(s) at $ 202.33
AFFIDAVITS: 5.25
TAX: 12.97
TOTAL: 220.55

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, M M Weidemann being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #69398 a copy of which is hereto attached was published in said newspaper 1 day(s) between 06/11/2001 and 06/11/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 11 day of June, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

Approved
7/06/01

/S/ M M Weidemann
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
11 day of June A.D., 2001

Notary Janet L. Montoya
Commission Expires 12/30/03

OFFICIAL SEAL
Janet L. Montoya
NOTARY PUBLIC - STATE OF NEW MEXICO
MY COMMISSION EXPIRES 12/30/03

NOTICE OF PUBLICATION

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

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

(GW-344) - Dynegy Midstream Services, LP, Cal Wrangham, ES&H Adviser, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted an application for renewal of their previously approved discharge plan for the former Texaco Eunice-South Gas Plant located in the SW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The gas plant has been converted to a natural gas compressor station with a combined horsepower rating of 18,000 HP. The discharge plan consist of a gas plant decommissioning plan, a waste management plan which addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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(GW-252) - Rotary Wireline, Inc., Mickey Welborn, (505) 397-6302, P.O. Box 2735, Hobbs, New Mexico, 88241 has submitted a discharge plan application for the Rotary Wireline, Inc. facility located in the NW/4 NW/4 of Section 5, Township 19 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 42 gallons per day of waste water is discharged to the City of Hobbs publicly owned treatment works (POTW). Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 1,100 mg/l. The discharge plan consist of a waste management plan which addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-253) - Zia Transportation, Terry Wallace, (505) 393-8352, 816 Northwest County Road, Hobbs, New Mexico, 88240 has submitted a discharge plan application for the Zia Transportation, Inc. facility located in the SE/4 NW/4 NW/4 of Section 32, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of 40 mg/l to 1,000 mg/l. The discharge plan consist a waste management plan which addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-72) - BJ Services Company, Jo Ann Cobb, (281) 351-8131, 11211 FM 2920, Tomball, Texas, 77375 has submitted an application for renewal of its previously approved discharge plan for the Hobbs Facility 2708 West County Road, located in the NE/4 of Section 20, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 55 feet with a total dissolved solids concentration of approximately 300 mg/l. The discharge plan consists of a waste management plan, soil and groundwater remediation, sampling and monitoring program to be conducted until the groundwater meets standards as contained in 20 NMAC 6.2.3103 of the New Mexico Water Quality Control Commission (WQCC) Regulations.

(GW-240) - Basic Energy Services, David Alvarado, (505) 392-6498, 3400 N. Industrial Blvd, Hobbs, New Mexico 88240, has submitted a Discharge Plan Application for the Hobbs Facility located in the NW/4 NW/4 of Section 21, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 750 mg/L. The discharge plan consist a waste management plan which addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico on this 5th day of June, 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

LORI WROTENBERY, Director
Legal #69398
Pub. June 11, 2001

OK Approval
7/6/01

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 1

weeks.

Beginning with the issue dated

June 8 2001

and ending with the issue dated

June 8 2001

Kathi Bearden

Publisher

Sworn and subscribed to before me this 8th day of

June 2001

Jodi Henson

Notary Public.

My Commission expires
October 18, 2004
(Seal)

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

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5 Th. day of June 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Approved
7/6/01

NOTICE OF PUBLICATION

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

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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.

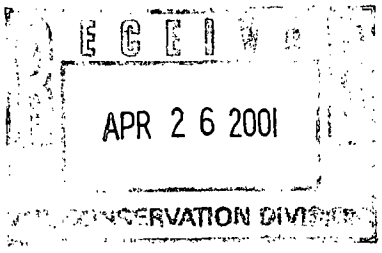
GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5 Th. day of June 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

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



DYNEGY

April 20, 2001

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
1220 St. Francis Dr.
Santa Fe, NM 87505

RE: Eunice North and South Compressor Station Discharge Plans

Dear Sir:
Dynegy Midstream Services, Limited Partnership (DMS) is requesting that our previously submitted Discharge Plan applications dated November 9, 2000 for Eunice South CS (GW-003) and Eunice North CS (GW-004) be assigned new Discharge Plan numbers. DMS operates both sites as compressor stations only. No gas processing is done. The equipment operated is the engine/compressors with their air-cooled fans, gas scrubbers/tanks, related drain system piping and sumps, and the Class II Disposal well located at the South facility. DMS does have plans to remove some of the out-of-service equipment and will notify OCD prior to starting this process pertaining to any regulations or guidelines. Please find attached two checks, one for each facility in the amount of $1700.00 for the plan flat fee.

I would like to thank you and your staff for the professional and courteous manner in which you have assisted us through this process.

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

Sincerely,

Cal Wrangham

Cal Wrangham
ES&H Advisor

OLD GW-003 NOW GW-039
OLD GW-004 " GW-0395

Cc: Chris Williams/ OCD Hobbs

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4/18/01

or cash received on _____ in the amount of $ 1700 00

from VERSADO GAS PROCESSORS L.L.C.

for ~~AQ~~ EUNICE NORTH COMPRESSOR ST. GW-345

(Facility Name) (OGP No.)

Submitted by: WAYNE PRICE Date: 5/14/01

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility X Renewal ___

Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877)672-1449

BANK ONE, NA
CHICAGO, IL 60670

62-28
511
0934623

PAY One Thousand Seven Hundred and NO/100 Dollars

CHECK NO.	CHECK DATE	PAY EXACTLY
[redacted]	04 / 18 / 01	$******1,700.00

Void After 90 Days

TO THE ORDER OF

Water Quality Management Fund
c/o Oil Conservation Division
1220 S St Francis Dr
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

Robert D. Doty Jr.

VICE PRESIDENT - TREASURER
AUTHORIZED SIGNATURE

[redacted]

THE ORIGINAL DOCUMENT HAS A WHITE REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO SEE THE MARK WHEN CHECKING THE ENDORSEMENTS

Price, Wayne

From: Price, Wayne
Sent: Friday, April 06, 2001 3:26 PM
To: 'patterh@texaco.com'; Price, Wayne
Cc: Olson, William; 'cwwr@dynegy.com'
Subject: RE: Discharge Plans for Old Texaco Eunice North & South Plants

Correction: Underlined for Texaco

From: Price, Wayne
Sent: Friday, April 06, 2001 3:07 PM
To: 'patterh@texaco.com'
Cc: Olson, William; 'cwwr@dynegy.com'
Subject: Discharge Plans for Old Texaco Eunice North & South Plants

Gentlemen: If agreeable to both parties please following the instructions listed below and complete no later than April 30, 2001.

Dynegy-Cal Wrangham:

Provide letter requesting your previously submitted DP applications dated Nov. 9, 2000 for Eunice-South Compressor Station (GW-003) and Eunice-North Compressor station (GW-004) be assigned new discharge plan numbers. Commit to a gas plant decommission plan and give general details of agreement with Texaco, including which pieces of property, equipment, wells, etc will be operated by Dynegy. The fee for these facilities will be if (>10001 hp) will be $1700 each for a period of 5 years to be paid upon discharge plan approval.

Texaco-Robert Patterson:

Please submit a discharge plan renewal application for the Texaco formal Eunice-South Gas Plant (GW-003) and Eunice-North Gas Plant (GW-004). Please commit to the investigation and remediation of all existing contamination. Please submit a $100 discharge plan application fee with the discharge plan application. Give general details of agreement with Dynegy, including which pieces of property, equipment, wells, remediation areas,etc will be operated by Texaco. The fee for each of these facilities will be an abatement plan fee of $2600 each for a period of 5 years to be paid upon discharge plan approval.

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

DYNEGY

November 9, 2000

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

RECEIVED
NOV 2 ? 2000
Environmental Bureau
Oil Conservation Division

Discharge Plan GW-004 Renewal
North Eunice Compressor Station

Gentlemen:

Dynegy Midstream Services, L. P. would like to renew the North Eunice Compressor Station Discharge Plan as required by WQCC Sec. 3106. This site is the former Texaco North Eunice Plant. Dynegy now operates only the site compression. The combined horsepower is 17,925.

Please find the attached:
1) The renewal form and a check in the amount of $50.00, which constitutes our filing fee for the Discharge Plan renewal.
2) A complete copy of the Discharge Plan.

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

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: Chris Williams, OCD Hobbs District Office with attachments

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

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: North Eunice Compressor Station
2. Operator: Dynegy Midstream Services, L. P.

   Address: PO Box 1909 Eunice, NM 88231

   Contact Person: Cal Wrangham Phone: (915) 688-0542

3. Location: SE /4 SE /4 Section 28 Township 21 South Range 37 East
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site. **See in attached Discharge Plan**
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. **See in file OCD**
6. Attach a description of all materials stored or used at the facility. **See in attached Discharge Plan**
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. **See in attached Discharge Plan**
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **See in attached Discharge Plan**
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **See in attached Discharge Plan**
10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See in attached Discharge Plan**
11. Attach a contingency plan for reporting and clean-up of spills or releases. **See in attached Discharge Plan**
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. **See in attached Discharge Plan**
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See in attached Discharge Plan**

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

Name: Cal Wrangham Title: Permian Basin Region ES&H Advisor

Signature: Cal Wrangham Date: 11/10/2000

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/12/00

or cash received on _____ in the amount of $ 50.00

from DYNEGY MIDSTREAM SERVICE

for NORTH EUNICE COMP ST GW-004 .
(Facility Name) (OCD No.)

Submitted by: WAYNE PRICE Date: 11/22/00

Submitted to ASD by: [signature] Date: 11/22/00

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ___

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM. ARTIFICIAL WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW.

DYNEGY MIDSTREAM SERVICES, LIMITED PARTNERSHIP
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(713) 507-3988

BANK ONE, NA
CHICAGO, IL 60670

62-28
311
0973777

PAY Fifty and NO/100 Dollars

CHECK NO. [redacted]

CHECK DATE 10 / 12 / 00

PAY EXACTLY $**********50.00

Void After 90 Days

TO THE ORDER OF

Water Quality Management Fund
c/o Oil Conservation Division
2040 South Pacheco
Santa Fe NM 87508

DYNEGY MIDSTREAM SERVICES,

[signature]

VICE PRESIDENT - TREASURER
AUTHORIZED SIGNATURE

COPYRIGHT - ANTI-FRAUD PROTECTION - PATENTS 4,210,346; 4,227,720; 4,310,180; 4,197,788; 4,345,150

[redacted]

GW-345

DYNEGY MIDSTREAM SERVICES, L. P.

DISCHARGE PLAN GW-004

NORTH EUNICE
COMPRESSOR STATION

RECEIVED
NOV 22 2000
Environmental Bureau
Oil Conservation Division

SECTION 1 - TYPE OF OPERATION

The Following is the North Eunice Compressor Station Discharge Plan and is in accordance with part 3100 of the State of New Mexico Water Quality Control Commission Regulations. The facility is a compressor station operating approximetly 18,000 horsepower.

This Plan provides information regarding any potential discharges onto or below the surface of the ground.

SECTION 2 - NAME OF OPERATOR

Dynegy Midstream Services, L. P. (DMS) operates the facility. The main office is located at 1000 Louisiana St. Ste. 5800 Houston, TX 77002-5050.
The local Eunice Plant address and phone number is :
Dynegy Midstream Services, L. P.
P.O. Box 1909
Eunice, NM 88231
505)394-2534

The local contacts are the Area Manager or Team Advisor, both officed at the Eunice Plant (505)394-2534 and the Region ES&H Advisor at (915)688-0542.

SECTION 3 - LOCATION OF DISCHARGE PLAN FACILITY

The facility is located on the north side of the city of Eunice, New Mexico. The legal discription is SE ¼, SE ¼ of Section 28, Township 21 South, Range 37 East, Lea County, New Mexico.

SECTION 4 - LANDOWNERS

Versado Gas Processors, L. L. C. owns the North Eunice Compressor Station and is the landowner of record.

SECTION 5 - FACILITY DISCRIPTION

The North Eunice Compressor Station simply compresses raw field inlet gas (green gas) utilizing natural gas fueled engines driving compressors. The compressed gas is transported via pipeline to the Eunice Gas Processing Plant.

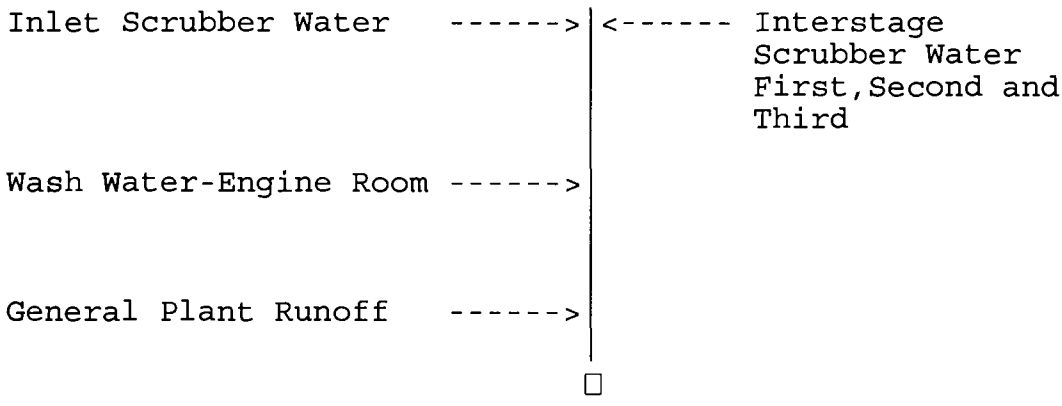
SECTION 6 - SOURCES OF EFFLUENT AND WASTE SOLIDS GENERATED AT THE FACILITY

The stages of compression use scrubbers to capture liquids that fall from the gas stream. A portion of these liquids is produced water which goes to the Rice Engineering SWD. The remainder of the liquids are hydrocarbons. These hydrocarbons are pipelined from the facility.

All Compressor Station wastewaters are piped via a 7300' PVC line to Aqua Incorporated/Rice Engineering Corporations Blinbry-Drinkard SWD Well C-2 collection system for disposal. The disposal well is located in Section 2, Township 22 South, Range 37 East, Lea County, NM. The well operates under OCD case #4916, Order #R-4495.

The Waste Management Section of this Plan (Section 8)further describes waste materials and the disposal methods for each stream generated at the North Eunice Compressor Station.

WASTE WATER DISCHARGE NORTH EUNICE COMPRESSOR STATION



RICE ENGINEERING INJECTION WELL

Note: In the event of any emergency shutdown of the Injection Well, waste water would be hauled from the plant by truck and delivered to an alternate, state approved SWD well.

Accidental Spill: Procedures in the Spill Control and Countermeasure Plan Section of this plan would take effect.

Underground Wastewater Lines:
The wastewater drain system will be tested to demonstrate mechanical integrity. The lines will be isolated into sections that can be tested individually, the testing will be done over an extended period during 2001. For lines that can be blocked in and pressurized we will apply 3 pounds per square inch above normal operating pressure and monitor for 10 minutes. For those lines

that cannot be sealed sufficiently to hold pressure we propose to block the down grade end and apply static head pressure and monitor for 10 minutes. All testing will have written documentation identifying piping, method, date and personnel.

SECTION 7 - HYDROLOGIC & GEOLOGIC DATA

Wastewater is removed from the North Eunice C S as described in Section 6.

The North Eunice C S uses water from the city of Eunice.

Further hydrologic and/or geologic data will be researched at the request of the Oil Conservation Division.

SECTION 8 - WASTE MANAGEMENT PLAN

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

TABLE OF CONTENTS

North Eunice Compressor Station Dynegy Midstream Services, L.P.

New Mexico Waste Management Plan

Title	Part
Management Approval	1
Basic Training Guide	2
Waste Classification	3
Natural Gas Wastes	4
Typical Gas Plant Wastes with Disposal Information	5
Surface Waste Management Facilities	6
Waste Sampling	7
North Eunice Waste Streams	8

WASTE MANAGEMENT PLAN - New Mexico

FACILITY MANAGEMENT APPROVAL

James Lingnau
Area Manager

11-7-00
DATE

Cal Wrangham
ES&H Advisor

11-7-00
DATE

PURPOSE AND SCOPE

The management of wastes generated at gas processing facilities has become increasingly complex; new regulations are promulgated so quickly it is practically impossible to keep up with them. Waste handling and disposal techniques that were acceptable yesterday are no longer allowed today. Facility personnel must comply with a myriad of agency notifications, testing requirements and recordkeeping requirements. This waste management plan is designed to provide guidance in the management of wastes generated at the facility by ensuring their proper storage, transportation, and disposal. Specifically, this plan will provide the following information:

- Waste identification, classification, handling, and disposition.
- Waste minimization and elimination alternatives.
- Information on applicable shipping requirements under the Department of Transportation
- Examples of forms and letters necessary for disposal and reporting requirements.
- Data on how each facility is managing waste and the associated costs.

This information will make it possible to meet the following goals:

- Facilitate proper waste identification and management by plant personnel.
- Involve plant personnel in identifying ways to reduce waste generation.
- Comply with regulatory requirements for developing and implementing a plan to minimize waste generation.
- Increase awareness and provide training to plant personnel.
- Provide a means for inter-facility communication and transfer of technology.

The scope of this plan covers all wastes generated at the facility which meet the Resource Conservation and Recovery Act (RCRA) definition of a "solid waste" and does not include the following:

- Wastes which are discharged into and remain as part of the atmosphere (i.e., fired equipment exhaust, relief valve discharges, flare emissions, incinerator emissions, etc...).

- Wastes which are discharged through an effluent system which is covered under an NPDES or State permit (i.e., boiler and/or cooling tower blowdown, sewage treatment facility effluent, stormwater runoff, etc...).

WASTE MINIMIZATION

The primary emphasis of this Plan is on waste minimization; the reasons for this emphasis are:

1. A congressional mandate,
2. Savings to the company, and
3. Reduction in environmental liability.

Minimization is defined by the U. S. Environmental Protection Agency (EPA) as "the reduction, to the extent feasible, of waste generated prior to treatment." Congress established a national policy declaring the importance of reducing or eliminating the volume of hazardous waste generated as soon as possible. **As a result, industry is required by law to develop waste management plans and reduce the volume of waste generated each year (54 FR 25056-25057).** A second reason for emphasizing waste

reduction is the savings to the company. By eliminating a waste stream, it is no longer necessary to devote resources to the handling, storage, analysis, and disposal of that waste stream. Finally, the environmental liability that a company sustains is reduced each time a waste stream is eliminated.

Corporate policy on waste management options is, by order of preference,

1. reduction,
2. recycle/reuse,
3. treatment (including disposal).

Therefore, plant personnel should continually try to identify and evaluate possible waste management alternatives. Information can be obtained from a variety of sources including trade associations (such as the Gas Processors Association), published literature (from the American Petroleum Institute or industry publications), state and federal environmental agencies, and company personnel. Waste minimization may be something as simple as proper maintenance and operation of equipment to prevent generation of excessive volumes of waste, or using corrosion inhibitors in cooling tower water that do not contain chromium.

RECYCLING & REUSE

In situations where waste elimination or reduction may not be possible, recycling or reusing a material is the next alternative. If a material can be used more than once, the overall volume of material purchased and waste generated is reduced as well as disposal costs. Additionally, some states such as Louisiana require certain wastes be recycled instead of disposed. Finally, the following recyclable materials are excluded from hazardous waste regulation:

- Used oil that is recycled in some other way than burning for energy recovery.
- Scrap metal.
- Used batteries returned for regeneration.
- Materials used or reused as ingredients to make a product.
- Wastes used or reused as effective substitutes for chemical products.
- Wastes returned to the original process from which they were generated.

The latter three are excluded only if the wastes are not reclaimed or treated before reusing (such as distillation, ion exchange, dewatering). A complete guide on recycling can be found in Section 14, How to Recognize a Hazardous Waste.

WHAT IS A SOLID WASTE?

The Solid Waste Disposal Act (SWDA) was enacted in 1965 to regulate the disposal of solid waste primarily at municipal landfills. The SWDA was amended in 1976 by the Resource Conservation and Recovery Act (RCRA) to include more stringent regulations of solid waste and a "cradle to grave" regulation of hazardous waste. Hazardous waste is monitored from the point of generation, through storage, transportation, and final disposal. However, the fundamental principle behind RCRA, as indicated in its title, is to minimize the volume of hazardous waste generated through elimination, reduction, or recycling and reuse of solid and hazardous waste and to avoid land disposal of wastes whenever possible. In an effort to promote waste reduction, land disposal restrictions were authorized

when RCRA was amended in 1984. In order to understand the solid and hazardous waste programs some critical definitions must be understood.

A solid waste includes *garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, air pollution control facility, and other* ***discarded*** *material including solid, liquid, semi-solid, or contained gaseous materials, resulting from industrial, commercial, mining and agriculture activities, and from community activities with the exception of domestic sewage, irrigation return flows, or industrial discharges permitted under the Clean Water Act (Title 40 of the Code of Federal Regulations Part 261.2 (40 CFR 261.2)).* A material must first be discarded to become a waste. **Discarded** is defined as "*any material which is disposed, abandoned, recycled or considered inherently waste-like (40 CFR 261.2(a)(2))*." Several categories of materials are exempt from regulation as solid waste. Two of these exemptions important to the gas processing industry include:

- Industrial wastewater discharges permitted under the Clean Water Act.
- Secondary materials that are reclaimed and returned to the original process from which they were generated.

WHAT IS A HAZARDOUS WASTE?

Hazardous waste is actually a subset of solid waste; discarded material cannot be a hazardous waste unless it first fits the definition of a solid waste. There are two types of hazardous waste as defined in RCRA (40 CFR 261.3), 1) characteristically hazardous, and 2) listed hazardous wastes. Wastes that are characteristically hazardous exhibit one of the following four characteristics: ignitability, corrosivity, reactivity, or toxicity. An ignitible waste is any solid, liquid or compressed gas with a flashpoint less than 140□ F such as Varsol (40 CFR 261.21). A corrosive waste is any liquid that has a pH less than or equal to 2, or greater than or equal to 12.5 such as spent acid or spent caustic (40 CFR 261.22). Reactive wastes are those that are normally unstable, react violently with water (sometimes releasing hydrogen sulfide (H_2S) or cyanide (CN), if present in the waste, as gases), form potentially explosive mixtures with water, are capable of detonation or explosion reaction if subjected to a strong initiating source or heated under confinement, capable of detonation or explosive decomposition or reaction at standard temperature and pressure, or meets the DOT definition of forbidden explosive (40 CFR 261.23). Cooling tower sludge might be a reactive waste due to its potential to contain hydrogen sulfide. Toxic wastes contain concentrations of regulated metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), organic compounds (26 compounds including benzene and trichloroethylene), and insecticides/herbicides above allowable limits (40 CFR 261.24). For example, soil in meter sheds are sometimes toxic due to elevated concentrations of mercury.

Listed wastes are those which have been identified as "typically or frequently" hazardous because they exhibit a characteristic or they threaten human health or the environment. Listed wastes include material used in non-specific sources such as spent solvents (40 CFR 261.31), from specific processes such as API separator sludge from refining (40 CFR 261.32), commercial chemical products that are off-specification species, or are container or spill residues such as methanol (40 CFR 261.33).

As with the definition of a solid waste there are several exemptions to the definition of hazardous waste. Among the several categories of exempt waste are two that are particularly important, the exclusion of household waste, and the exclusion of drilling fluids, produced waters, and other wastes associated with the exploration, development, and production of crude oil, natural gas, or geothermal energy (known as the petroleum exclusion). The exemption is important because it explicitly states that certain wastes unique to the exploration and production of natural gas and oil are exempt from consideration as a

hazardous waste. Therefore, the wastes do not have to be tested to determine if they are hazardous and they can be handled as a solid waste. Many states including Louisiana and Oklahoma have put some limits on the full interpretation of this exemption. In these states, the environmental agencies require these wastes to be tested before they can be disposed in a landfill permitted by that agency. The benefit of this exemption is evident in the disposal of aqueous wastes such as spent amine or cooling tower blowdown in a Class II disposal well. Because of the complexities, it is important to review the exemption and state requirements (review the memorandum of understanding between the agencies). A copy of the book How to Recognize A Hazardous Waste (Even If Its Wearing Dark Sunglasses) has been included in Section 14 as an additional resource. The book provides an complete analysis of the hazardous waste regulations.

WHO IS A GENERATOR OF HAZARDOUS WASTE?

A generator is "any person, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation." There are three types of generators of hazardous waste; each category is defined by the quantity of waste generated and has specific requirements that must be met (40 CFR 262).

A large quantity generator (LQG) produces more than 1,000 kilograms per month (kg/mo), or 2200 pounds per month (lbs/mo), of hazardous waste. Large quantity generators must comply with the following requirements:

- Obtain an EPA Identification number.
- Store waste onsite for no more than 90 days.
- Manifest the transport and disposal of each waste shipment and comply with all Department of Transportation (DOT) shipping requirements.
- Wastes must be disposed at RCRA-permitted facilities.
- Comply with specific storage requirements.
- Provide complete training for personnel handling wastes.
- Maintain a complete contingency plan.
- Comply with reporting and recordkeeping requirements.

A generator that produces more than 100 kg/mo, or 220 lbs/mo but less than 1,000 kg/mo of hazardous waste is defined as a small quantity generator (SQG). Generators in this category must comply with the following requirements:

- Obtain an EPA Identification number.
- Store no more than 6,000 kg (132,000 lbs) onsite at any time for up to 180 days or up to 270 days if the disposal site is more than 200 miles away.
- Manifest the transport and disposal of each waste shipment and comply with DOT shipping requirements.
- Wastes must be disposed at RCRA-permitted facilities.
- Comply with specific storage requirements.
- Provide basic training for personnel.
- Maintain a basic contingency plan.

A conditionally exempt small quantity generator (CESQG) produces no more than 100 kg/mo (220 lbs/mo) of hazardous waste or no more than 1 kg/mo (2.2 lbs/mo) of acutely hazardous waste and accumulates no more than 1,000 kg of hazardous waste on site at one time. Conditionally exempt

generator's hazardous wastes are not subject to many of the requirements that larger generators must meet. They do not have to obtain an EPA Identification number (although most transporters and disposers will not accept waste without a number), manifest waste shipments, provide training to personnel, maintain contingency plans, or comply with storage requirements. However, they must send their hazardous wastes to disposal facilities authorized to accept that waste (40 CFR 261.5). Generators producing less than 100 kg/mo in Louisiana are termed Small Quantity Generators and are required to use shipping manifests, comply with recordkeeping and reporting requirements. Texas, Oklahoma, and New Mexico follow the federal program for CESQGs.

STORAGE PRACTICES

Facilities which store waste prior to disposal should follow a few simple best management practices to ensure wastes are stored in an appropriate manner. Following these practices can also reduce environmental liability caused by spills or leaks from storage containers. These practices include the following:

- Store wastes in containers or tanks that are in good condition.
- Containers should be compatible with the material being stored in them.
- Containers should be stored in covered areas and on impermeable surfaces whenever possible.
- Containers should be always be closed unless the contents are being transferred.
- Always label containers, identifying the contents and the start date of accumulation.
- Never allow accumulation of waste onsite longer than is absolutely necessary.
- Inspect storage areas and containers periodically (at least weekly for LQG and SQG) to ensure they are not leaking.
- Replace or repair immediately any container that is leaking.

RECORDKEEPING

Facilities that generate both hazardous and nonhazardous waste should always maintain records that document waste management practices at their facility. Maintaining copies of records serves four purposes. First, large and small quantity generators are required by regulation, for example, to keep copies of manifests for three years. Second, a generator, whether a CESQG or LQG, must maintain copies of records to document compliance with regulations such as waste analysis, classification, storage, transportation, and disposal practices. These records can be requested by a regulatory agency for review when conducting an inspection of the facility. Third, generators may be subject to monthly, quarterly, or annual reporting requirements including information such as type and volume of waste generated, the transporter, and treatment, storage, or disposal site must be provided to state or federal regulatory agencies. Fourth, maintenance of records can help to determine how effectively the goals of the waste management plan are met. The type of records that should be retained include the type and quantity of waste generated; waste manifests, bills of lading, or run tickets; names, addresses, and contact person for transporters and disposers; any results of waste analysis including how and where samples were collected. It is the responsibility of the generator to be sure that transporters and treatment storage and disposal facilities utilized are registered or certified with the appropriate state and/or federal agencies for those activities. This can minimize the possibility of illegal disposition of wastes generated from the facility.

WASTE SAMPLING AND ANALYTICAL PROCEDURES

The majority of states require that facilities sample and analyze some or all wastes generated at a facility. Different states have different requirements on the number and type of samples that must be collected as well as which specific analytical procedures should be used.

Before collecting samples it is important to ask a few basic questions. What parameters am I trying to analyze? What type and quantity of sample do I need? How and where do I collect the sample? What type of analytical procedure will I use? The answers to these questions will determine how the samples are collected, preserved, and how quickly they must be analyzed. **It is important to coordinate sampling activities with a laboratory prior to sample collection.** Laboratory personnel can provide assistance with these questions and others. They can also provide the proper sample and shipping containers.

When collecting samples, the facility should always follow proper sampling procedures. Always clean and rinse the sampling equipment between sampling locations to prevent cross-contamination of one sample by another. Always place samples in a clean sample containers. Take great care when packing samples for shipment to the laboratory so that containers are not broken or punctured. Always document the sample locations in a field notebook, and be sure to label the sample containers with the sample identification, the time and date collected, and specify the analytical method to be used. Proper chain-of-custody procedures should be followed to be sure samples have not been tampered with while in transit from the plant to the laboratory. If samples are not handled properly, inaccurate analytical data can be the result.

The Environmental Protection Agency has outlined specific analytical procedures that should be performed when testing for specific compounds in SW-846 Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods. Each analytical test method has been assigned a test number which identifies the specific procedure to be used. In many cases, more than one test method can be used to analyze the same compound. For example, total petroleum hydrocarbons can be analyzed using Method 418.1 or Method 8015 Modified. Therefore, it is important to specify the correct analytical method. The specific test methods necessary for testing wastes are included on the Waste Identification Sheets (Section 5).

WASTE MANAGEMENT AND CLASSIFICATION

Waste Classification

The Hazardous Waste Management System was promulgated by the EPA in response to requirements levied by the Resource Conservation and Recovery Act (RCRA). This act, as codified in 40 CFR, lists those substances considered as hazardous. It provides lists of chemicals, pollutants, wastes and the like that are to be monitored, reported, controlled, or eliminated, if present in the workplace or the general environment. There is not an all encompassing list that can be used. The Environmental Department does monitor the lists published by the EPA and the hazardous materials as identified in Material Safety Data Sheets (MSDS) received from chemical manufacturers and distributors used by NGC Warren.

Before disposing of used chemicals, solvents, filters, drums, or other solid or liquid wastes, check to be certain that it is not a listed substance or that the MSDS received on the substance does not identify it as hazardous due to its characteristics. Contact the Environmental Department if you are unsure of the category of the waste or if you do not know what the substance is. If you do not recognize the term SQG, you are not alone in that regard. Many firms that generate hazardous waste are not familiar with this term. The law that gave rise to the term, or the multitude of requirements that the government imposes on generators of small quantities of hazardous waste.

Small Quantity Generators

SQG's generate between 100 and 1,000 kilograms (kg) of hazardous waste in any calendar month, which translates to between 220 and 2,200 pounds. That's roughly equivalent to between one-half and five 55-gallon drums, or between 25 and 300 gallons. That amount of hazardous waste monthly is the federal government's definition of a small quantity generator (SQG). Many states' definitions of the SQG are even more restrictive, which is why we have included as much state-specific regulatory information as is practically possible.

Defining a Hazardous Waste

It's likely that your facility uses hazardous chemicals of some kind often easily identified Hazardous as such because the vendors selling them also supply the chemicals' material safety data sheets (MSDSs).

Operations involving such chemicals often result in wastes such as spent chemicals, stained rags, or contaminated filters. When those wastes pose a potential danger to the environment or human health and life, they are considered hazardous wastes.

The regulations focus on four specific dangers. These are:

1. Ignitability - the property of being easily set aflame by nearby heat sources;

2. Corrosiveness - the capability to bum eyes or skin on contact;

3. Reactivity - the tendency for a substance to explode or otherwise react violently if exposed to air, water, or other common substances; and

4. Toxicity - meaning poisonous if taken into the body.

Wastes are considered hazardous if they exhibit any of these characteristics or if they appear on certain government lists.

Because they are hazardous, these wastes must be accounted for, constantly tracked and reported on, and handled with "kid gloves," from "cradle to grave" from the point of generation to the moment they are incinerated, treated, recycled, or landfilled.

The law that governs this "cradle-to-grave" tracking system and that imposes requirements on businesses, large and small alike, is called the Resource Conservation and Recovery Act (RCRA). This is also the law under which the category of "small-quantity generator" was created.

To find out if you are subject to the provisions of RCRA, you need to:

Start With The Right Question

Under RCRA, firms whose operations create hazardous waste are classified as one of three types of "generators"— based on the quantity of waste they generate.

The federal government's categories are:

1. Conditionally exempt generator,
2. Small-quantity generator, and
3. Large-quantity generator.

Again, some states have their own categories.

To determine which category of hazardous waste generator your facility falls into and what requirements you must meet you must answer two questions:

1. Is the waste you generate hazardous, under the law? and
2. Knowing the amount of hazardous waste you generate, which of the three compliance categories describes your business?

In determining the amount of hazardous waste generated, it is easy to become confused because the law defines quantity limits expressed in pounds or kilograms, while companies measure their waste in terms of gallons or gallon-rated containers, e.g., drums.The following chart helps you visualize how much waste we are talking about.

Conversion Chart

KILOGRAMS	POUNDS	GALLONS	55 GAL.
100 kilograms	220 pounds	30 gallons	one-half
1,000 kilograms	2,200 pounds	300 gallons	five
6,000 kilograms	13,200 pounds	1,800 gallons	thirty

If You're Unsure if Your Waste is Hazardous

The critical decision of whether your waste is hazardous is based on your special knowledge of the waste. Some wastes such as certain spent solvents are easily classified as hazardous. Yet, other wastes such as solvents that are not readily flammable, oils that may be contaminated with toxic metals, or chemical by-products may have to be tested to determine if they are hazardous.

Generator Responsibilities

It's important to note that under the law, you are presumed to know what your waste contains and are able to support any conclusions you reach. The generator category into which you fall is based on your adding up the weight of all the hazardous wastes your facility generates during the month. The compliance requirements vary markedly depending on how much waste you generate.

Note at this point, however, that the following *are federal* RCRA requirements. Some state requirements vary.

Conditionally Exempt Compliance Requirements (0- 100 kg/month)

The government recognizes that generators of very low quantities of hazardous waste are often smaller firms with limited resources. They have therefore allowed firms that generate between 0 and 100 kg (0 to 220 pounds) of hazardous waste per month to be "conditionally exempt" from certain federal regulations governing hazardous waste disposal, if they fulfill the following requirements:

- ☐ Fully identify all hazardous waste they generate;
- ☐ Send their waste to a waste facility approved by the state or RCRA-authorized facility; and
- ☐ Never accumulate more than 1,000 kg (2,200 pounds) of hazardous waste at any single time.

SQG Compliance Requirements (100-1,000 kg/month)

Those firms that generate between 100 and 1,000 kg (220 and 2,200 pounds) of hazardous waste, however, come under additional regulation by the EPA. Under the federal law, SQGs must:

- ☐ Fully identify all hazardous waste they generate;
- ☐ Obtain a U. S. EPA Identification Number,
- ☐ Send their waste to a hazardous waste facility, or other facility approved by the EPA or state to receive such waste;
- ☐ Use a hazardous waste manifest form when shipping waste off-site;
- ☐ Offer waste only to a hazardous waste transporter that has a U.S. EPA Transporter Identification Number,

- ☐ Comply with applicable Department of Transportation (DOT) requirements for shipping wastes off-site;

- ☐ Accumulate waste on-site for no more than 180 days, or 270 days if the waste is being shipped more than 200 miles—unless a hazardous waste storage permit is obtained;

- ☐ Never accumulate more than 13,200 lbs (expressed as 6,000 kg in the law) of hazardous waste at any single time; and

- ☐ Comply with emergency preparedness requirements.

Large-Quantity Generator Compliance Requirements

The requirements are most stringent if you are a "large-quantity" generator. For those facilities generating greater than 1,000 kg (2,200 pounds or 300 gallons) of hazardous waste per month, you must also:

- ☐ Certify on the manifest form that you have a program in place to minimize the volume and toxicity of your hazardous wastes;

- ☐ Accumulate waste on-site for no more than 90 days, unless a hazardous waste storage permit is obtained;

- ☐ File a biennial report with the EPA and an annual report with the state environmental agency, if applicable;

- ☐ Comply with annual RCRA training requirements; and

- ☐ Develop and maintain an emergency response "contingency plan."

Under the law any facility that produces or manages a waste must evaluate that waste to determine if It s hazardous.

Are your Wastes Hazardous?

The law's definition of the term "hazardous waste" is quite specific and can be boiled down to one key definition and four words:

A hazardous waste is a discarded substance that is either:

(1) ignitable, (2) corrosive, (3) reactive, or (4) *toxic.*

For example, a hazardous waste can be a solid, liquid, or containerized gas. "Discarded" may mean land-disposed, incinerated, burned, recycled, and even stored. The potential universe of hazardous wastes is limitless. Some substances are mentioned by chemical name. Most are not. Unnamed wastes, such as "spent solvents, "sludges," and "by-products," for example, that exhibit

one of the four hazard characteristics mentioned above, are regulated as hazardous.

First, though, you need to thoroughly understand the issues involved with hazardous waste determination.

Here's the logic you should follow in building that understanding:

- ☐ Are You a Typical SQG?
- ☐ Have You Conducted a Waste Inventory?
- ☐ Have You Assembled Raw Material Data?
- ☐ What Exemptions are Available?
- ☐ Is the Waste Listed?
- ☐ Does the Waste Exhibit a Hazardous Characteristic?
- ☐ Are You Obeying all the Rules?

Question 1: Have You Conducted a Waste Inventory?

For most SQGs, the easiest inventory approach is to ask production and maintenance personnel about wastes, tour your production and nonproduction areas, and inspect storage areas and dumpsters.

It is important to identify: (1) what wastes you generate, (2) the quantity you generate, and, ultimately, (3) how you discard the wastes.

To help you to inventory your wastes, use the form found in Section 8 of this manual and list your wastes by name and quantity:

You can then proceed to determine what wastes on the list are hazardous.

Question 2: Have You Assembled Data on Your Raw Materials?

Since wastes usually begin with the raw materials you use, information on those materials will greatly assist you in understanding whether your wastes are hazardous.

Often, the right phone call or a look at the appropriate information sheet may rule out the need to have your wastes analyzed by a laboratory. If the raw material was considered a hazardous substance, the waste it creates will likely be so as well. Hazardous waste characterization information may be available from your trade association, your chemical vendor, or your waste hauler.

Such information may also be available on the material safety data sheets that came with many of the materials. You should receive (or you must generate if you are a chemical manufacturer) and keep on file an MSDS for every chemical product that you have on your premises for commercial use.

These sheets are invaluable in providing information about the physical, chemical, and toxic properties of the material.

An MSDS can greatly simplify the process of identifying the characteristics of your chemical waste. It can also save you money by eliminating the need for expensive first-time chemical analysis. Be forewarned, however, that you must always scrutinize any MSDS, making sure that the information it contains is accurate and sufficiently detailed. If there is any question, call the supplier listed on the sheet.

At a minimum, an MSDS will give you information on the hazards or risks associated with the hazardous substance. This includes: (a) the potential for, explosion, corrosivity, and reactivity; (b) the acute and chronic health effects resulting from exposure, including any medical conditions that might be aggravated by exposure; (c) the potential routes of exposure via skin, inhalation, ingestion, etc. and (d) the symptoms of overexposure.

The MSDS will also provide a description of the specific potential health risks posed by a hazardous substance. This includes, but is not limited to, carcinogenic (cancer-causing), mutagenic (mutationcausing), teratogenic (fetus-damaging), or neurotoxic (nerve-damaging) effects.

If your waste stream is relatively simple, an MSDS may provide you with all the information you need to determine whether your chemical waste is hazardous.

Some waste cannot be evaluated using MSDSs. Short of expensive laboratory analysis, there are additional ways to determine if your waste is hazardous.

Question 3: What Are the Eligible Exemptions?

First, you need to see if your waste stream may be among a group of substances that are totally excluded from the regulations. Although we have not listed all the exclusions here, those that may be pertinent to SQGs include:

- ☐ Household refuse;
- ☐ Unusable paper, cardboard, and plastic scrap;
- ☐ Air emissions;
- ☐ Certain wastes containing chromium;

- ☐ Demolition debris
- ☐ Wastes left in the bottom of product storage tanks, as long as that residue is not removed from the tank;
- ☐ Wastes discharged to surface waters under a National Pollutant Discharge Elimination System (NPDES) permit;
- ☐ Fly ash and related waste from burning fossil fuels;
- ☐ Scrap metal, used lead-acid batteries, and waste oil ***that will be sent offsite for reclamation;***
- ☐ Waste remaining in the bottom of containers emptied through conventional means (e.g., pumping or pouring). This residue must measure no more than one inch, or constitute no more, in the case of a 55-gallon drum, than 3 percent by weight of the total capacity (1.65 gallons in a 55 gallon drum).
- ☐ Wastes managed in an elementary neutralization unit, a totally enclosed treatment unit, or a wastewater treatment unit.
- ☐ Arsenic-treated wood or wood products used as intended.
- ☐ Waste materials that are reclaimed and returned for use to the original process in which they were generated, provided that certain "closed-loop" recycling criteria are met (essentially, the wastes never leave the production loop).

If you think, but are not sure, that your wastes fit this group, call the state environmental agency.

Question 4: Is The Waste Listed?

A waste is *automatically* considered hazardous if it appears on any one of four lists of hazardous wastes contained in the RCRA regulations. Comprised of more than 400 substances, the lists—found in Subpart D of the regulations—include chemicals that exhibit one of the four hazard characteristics.

A chemical waste does not make one of these lists by accident. EPA follows strict criteria in making the determination of whether a particular substance should be listed. EPA is authorized to list classes of hazardous wastes (e.g., electroplating sludges), as well as named substances (e.g., acetone).

The listed wastes are known by letter identification, as follows:

F wastes. This category refers to generic waste streams found in a variety of industrial processes. Many SQGs generate F wastes; the short list includes cleaners and strippers, dry-cleaning solvents, spent paint wastes, still residues, cleaning and stripping tank solutions, plating bath

solutions and sludges from electroplating operations, and sludges from pretreatment of wastewaters.

Examples
F002—Waste perchloroethylene
F005—Methyl ethyl ketone
F003—Acetone

K wastes. This category refers to specific industrial processes whose wastes are deemed hazardous, such as wastes from the manufacturing of certain chemicals, pigments, inks, explosives, and petroleum refining and steel finishing.

Examples
KOO 1—Bottom sediment sludge from the treatment of wastewaters from wood preserving, processes that use creosote and/or pentachlorophenol
K083—Distillation bottoms from aniline production

P wastes. This category refers to discarded chemical products or off-specification products containing certain acute toxic chemicals. This category includes many pesticides, toxic metals, and organic chemicals shown to be carcinogenic. Except for small chemical firms and pesticide formulators, few SQGs generate P wastes.

Examples
P05-Fluorine
P099—Potassium silver cyanide

U **wastes.** This category refers to discarded chemical products or off-specification products containing certain toxic chemicals. This list also contains many pesticides, toxic metals, and organic chemicals. As described above, few SQGs generate these wastes.

Examples
U037-chlorobenzene
U06 1—DDT

Special Note about Solvent Wastes

Many *solvents* are mixtures that contain one or more of the "listed" F-waste constituents. It is important to remember that only wastes derived from products containing 10 percent or more of listed solvents are hazardous wastes.

The 10 percent rule does not, however, apply to ignitable wastes (F003) because F003 solvent mixtures may be ignitable at concentrations below 10 percent.

F003 Mixtures should therefore be tested; if the wastes are no longer considered ignitable, they do not need to be classified as a RCRA hazardous waste.

Question 5: Does your Waste Exhibit a Hazardous Characteristic?

The "lists" are not exhaustive. Listing is only one of the ways in which regulated wastes are identified. In addition to all of the substances that are specifically listed in the regulations, any other wastes found to be ignitable, corrosive, reactive, or toxic are also hazardous wastes.

Let's look more closely at how the characteristics are defined (wastes identified as hazardous by characteristic carry the code "D"):

Ignitable. A waste is considered hazardous if it is easily combustible or flammable. Specifically, the wastes must have *a flash point of less than 140 F: A* solid waste is ignitable if it can burn spontaneously and burn persistently. Oxidizers are generally considered ignitable under this definition.

Examples
D00 1 -Spent mineral spirits
D001—Spent lacquers
D00 1—Spent Stoddard solvent

Corrosive. A waste is considered hazardous if it dissolves metals or other materials, or burns the skin. Specifically, the wastes must have a pH of 2 or less (acids) or a pH of 12.5 or more (bases or caustics).

Examples

D002—Spent sulfuric acid
D002—Spent naval jelly
D002—Spent strippers

Reactive. A waste is considered hazardous if it is unstable or undergoes rapid or violent chemical reaction, often explosion, with water or other materials. Reactive wastes also, under certain conditions, can release toxic vapors. Most SQGs will not encounter reactive wastes as often as those with other characteristics.

Examples
D003 - Waste hydrogen cyanide
D003 - Waste hydrogen sulfide

Toxic. A waste is considered toxically hazardous if it is poisonous or can cause cancer, mutations, illness, or death. This could include an enormous universe of chemicals, but it does not. The regulations currently contain a list of just 14 substances that, if present in an extract of the waste stream at threshold concentrations, render the entire waste stream subject to regulation as a hazardous waste.

Testing involves extracting the liquid portion of the waste in such a way that the procedure itself simulates landfill leaching. For this reason, the analytical method is often referred to as the

Toxicity Characteristic Leaching Procedure (TCLP or "T-Clip") extraction test. Currently, EPA has set thresholds for 25 toxic constituents, but the Agency should soon finalize standards for many additional toxic metals, and organic and inorganic chemicals.

Examples
D004 Spent arsenicals
DOO 7/DOO Most paints with toxic metals (chromium, lead)
D008—Lead dross/scrap from batteries
DO 11—Spent silverplating waste

Question 6: Are You Complying With Two Special Rules?

At this point, you may be starting to realize that all of the above determination methods are based on the idea that you have, and can isolate, a single specific waste from one process. What if, as is often the case, several kind of wastes are thrown together, as in a single barrel in the comer, waiting for pickup? This turns what may have started out as waste oil (not a regulated substance in most states) into a hazardous waste which can greatly increase the quantity of hazardous waste you generate.

There are two additional rules that SQGs must understand. The first is called the "mixture rule," and the second, the "derived-from rule." Both are relatively easy to understand.

"Mixture rule." Unless permitted to do so by the EPA or the state hazardous-waste management agency, intentionally mixing a hazardous waste with a nonhazardous waste brings ***the entire mixture*** under regulation as a hazardous waste. For example, when contaminated solvent is mixed with waste oil in the same drum.

A notable exception to this "treatment rule" is altering pH. Check with your hazardous-waste management agency or local treatment plant concerning pH adjustments.

"Derived-from rule." This rule is even more basic:

Any waste derived from a *listed* hazardous waste is a hazardous waste.

An obvious example of this is the incineration of contaminated solvent, a hazardous waste, which leaves a sludge. The sludge was derived from the original waste so it too is hazardous.

In the case of *characteristic* waste mixtures, if the residue continues to exhibit one or more of the characteristics of the original substance, the waste is **classified as hazardous. Thus, the sludge, ash, dust, or leachate from** hazardous **waste reclamation** (e.g., **distillation stills), incineration, or** treatment may be fully regulated as a hazardous waste.

To determine whether your wastes are regulated, ask yourself:

1. Are they in the exempted list above?

2. Are they named on the EPA's lists?

3. If unnamed, do the MSDSs or other information (labels, brochures, spec sheets, correspondence, shipping papers) concerning the raw materials that created the wastes indicate one of RCRA's four hazardous characteristics?

4. Is the waste listed in the Warren Waste Management Plans waste data sheets?

Other Waste' Issues to Address

First, you should be aware that there is a subcategory of listed wastes referred to as "acutely hazardous. " These wastes are so dangerous, even in small amounts, that if you generate more than 1 kg (approximately 2.2 pounds) of these wastes in a calendar month, you are subject to all of the "large-quantity" generator requirements.

These wastes are primarily pesticides and are neither typically generated nor stored by SQGs.

Second, other wastes, must also be addressed—but not under RCRA. For example, wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than 50 ppm are wastes whose disposal is regulated by the Toxic Substance Control Act (TSCA), and appropriate state regulations.

Brake pads and linings containing asbestos must also be disposed of properly. EPA regulations require that asbestos be disposed of in a doublewalled plastic bag marked "Asbestos." While some local landfills will accept these bags, it is increasingly common to have to pay for these wastes to be taken to a special commercial landfill.

Third, check the Warren Waste Management Plans data sheets to review additional wastes.

Summary Checklist

Learning to Identify Wastes as Hazardous

1. Assume that all wastes excluding household garbage and paper wastes are potential hazardous wastes.

2. Make a list of all discarded substances, including wastes that are burned, placed in the trash, or poured down the drain.

3. Ask for assistance. For general compliance and notification assistance, contact the Environmental Department

4. Determine which of your wastes are "listed" wastes by comparing your wastes to the lists found in Part 261.31-.33 of 40 CFR (RCRA).

5. Use MSDS information on the product label, lists in this document, and consultation with the Environmental Department, chemical vendors, or waste haulers to determine which wastes are probable "characteristic" wastes.

Other Hints

Once you have determined which wastes are "listed" and which wastes are probable "characteristic" wastes, your waste hauler or an independent EPA-licensed laboratory canperform a waste characterization on your wastes to answer any uncertainties.

Try to avoid unnecessary and expensive private laboratory analysis. Industry-specificwaste streams are generally similar and can easily be identified by a RCRA compliance expert.

Be sure to test any chemicals that could be contaminated with heavy metals.

Remember, ignorance of a waste's hazard characteristics is not a legal defense. Be sure to identify all hazardous waste streams.

Finally, no matter what the legal status of a waste, and even if it is "exempted" (e.g., lead-acid batteries destined for reclamation), remember that these remain substances dangerous to human health and the environment. Treat them as such.

Specific Help

In Section 5 of this manual, you will find charts of hazardous (and non-hazardous) wastes commonly generated by NGC natural gas and NGL facilities. The following paragraphs discuss wastes typically generated in the natural gas industry.

WASTES GENERATED IN EXPLORATION AND PRODUCTION OPERATIONS

GAS PLANTS

This section discusses the four primary operations associated with E&P activities: gas plants, production facilities, drilling and workovers It discusses operational and design aspects as well as wastes generated Companies may vary in their engineering design and operational practices, but they generally all utilize the technology and generate the wastes discussed in this section.

Natural gas plants provide centralized dehydration, compression and sweetening facilities necessary to place natural gas in marketable condition and to extract natural gas liquids such as ethane, propane and butane.

Natural gas streams entering gas processing plants vary in composition but methane usually is the predominant component, with smaller amounts of ethane, propane, butanes, pentanes, and heavier hydrocarbons. The raw gas may also contain compounds such as carbon dioxide, hydrogen sulfide, mercaptans, other sulfur compounds, water, and certain solid impurities. These compounds are removed in treating facilities. The treated raw gas then enters an extraction facility which produces residue gas and heavier natural gas liquids (NGLs) such as ethane, propane and butane.

Listed below are the five extraction and treating processes frequently performed in gas plants and the waste materials that may be generated from these processes.

INLET SEPARATION AND COMPRESSION

Gas is gathered from the field at the inlet of the gas plant. Here fluids such as produced water and liquid hydrocarbons are separated, and the gas, if necessary, is compressed to a sufficient pressure to allow the plant to operate. Wastes typically associated with inlet separation include produced water as well as pigging materials, inlet filter media, fluids from corrosion treatments, and small amounts of solid material (pipe scale, rust, and minor amounts of reservoir formation materials). Wastes generated from the operation of plant inlet compressors are the same as wastes generated from compressors used in field operations. These wastes include engine cooling water and used lubrication oil and filters.

Inlet separators should be designed to send the produced water and hydrocarbons into process vessels where hydrocarbons can be recovered for sale and produced water separated for disposal. Small amounts of pigging materials may be recovered at pig receiving traps andshould be disposed of properly.

For safety reasons, inlet separators are equipped with relief valves that vent to emergency containment. This occurs if a fluid slug reaches the plant that exceeds separation capacity or if gas pressure exceeds design capacity of plant facilities. Emergency pits are not disposal facilities and fluids vented should be recovered as soon as practical (generally within 48-72 hours) and disposed of properly.

The pits should be constructed in accordance with regulations. In the event natural gas is flared, these flare incidents may require reporting to air quality and oil and gas regulatory agencies depending on the composition and volume of the flare gas.

DEHYDRATION

All natural gas contains a certain amount of water vapor. Typically this water content must be reduced to meet sales pipeline specifications. Dehydration is the process of extracting water vapor to make the gas marketable. The processes used are identical to those used in field facilities where centralized dehydration at a gas plant does not occur.

Natural gas is dehydrated by contact with liquid or solid desiccants. Liquid desiccants such as ethylene, diethylene, or triethylene glycol absorb the water. Heat regeneration evaporates the water, and the glycol is recovered for reuse. With solid desiccant dehydration, natural gas flows through tower vessels filled with alumina, silica-gel, silica-alumina beads, or molecular sieve which absorb water vapor

Wastes generated during the dehydration process consists of glycol based fluids, glycol filters, condensed water, and solid desiccants. These fluids and solids may contain trace levels of hydrocarbons and treating chemicals.

SWEETENING & SULFUR RECOVERY

Some natural gas contains hydrogen sulfide, carbon dioxide, or other impurities that must be removed to meet specifications for sales pipeline and field fuel use. The process of sweetening may be conducted using units identical in operation to units used in field facilities where centralized sweetening facilities are unavailable or in dedicated sulfur recovery facilities where high hydrogen sulfide concentrations are present.

Sweetening primarily consists of lowering the hydrogen sulfide and carbon dioxide content in natural gas. Hydrogen sulfide is removed from natural gas by contact with amine, sulfinol, iron sponge, caustic solutions, and other sulfur converting chemicals. Heat regenerates amine or sulfinol for reuse. Iron sponge, caustic solutions, and other sulfur converting chemicals are spent in the process as hydrogen sulfide is converted to iron sulfide and other sulfur compounds.

Amine treating of natural gas for the removal of hydrogen sulfide and carbon dioxide is the process that is probably most widely used in industry.

This process is based on the reaction that aliphatic alkanolamines will react with acid gases at moderate temperatures, and that the acid gases are released at slightly higher temperatures.

The reactions for this process using aqueous monoethanolamine (MEA) and hydrogen sulfide are as follows:

$$2\,(HO\,CH_2 - CH_2 - NH_2) + H_2S \leftrightarrows (HO\,CH_2 - CH_2 - NH_3)\,2\,S + Heat$$

$$(HO - CH_2 - CH_2 - NH_3)\,2\,S + H_2S \leftrightarrows 2\,(HO - CH_2 - CH_2 - NH_2)\,HS + Heat$$

Wastes generated in amine sweetening include spent amine, used filter media, and acid gas which must be flared, incinerated or sent to a sulfur recovery facility.

In the iron sponge treating process, iron oxide reacts with hydrogen sulfide to form iron sulfide. Iron sponge is composed of finely divided iron oxide, coated on a carrier such as wood shavings.

The chemical reaction for the removal of hydrogen sulfide with the iron sponge treating process is as follows:

$3H_2S + Fe_2O_3 \nearrow Fe_2S_3 + 3H_2O$

The iron sponge process is generally used for treating gas at pressures less than 50 psig with total hydrogen sulfide content under 100 grains per 100 standard cubic feet. There is no limit to treating pressure; however, due to inherent gas velocity limitations through the treating bed, most high pressure applications are limited due to the economics of bed size and bed life. Wastes generated in the iron sponge process are iron sulfide and wood shavings.

Small volumes of hydrogen sulfide may also be removed from natural gas and NGLs by contact with a caustic solution which is reused until spent. Most caustic treaters utilize a 15 to 20 percent by weight sodium hydroxide solution wherein the caustic consumption is approximately 2.4 pounds per pound of hydrogen sulfide removed and 1.9 pounds per pound of carbon dioxide removed. Most caustic treaters consist of a simple vessel holding the caustic solution through which gas is allowed to bubble.

The chemical reaction for removal of hydrogen sulfide with caustic is as follows:

$H_2S + NaOH \nearrow Na_2S + 2H_2O$

The primary waste from caustic treating is spent caustic solution. Use of other sulfur converting compounds such as sulfa-check are employed in one-step processes for the removal of low levels of hydrogen sulfide. Here, a direct conversion occurs at ambient temperature that uses a single contact vessel. Natural gas bubbles through the vessel until the sulfur converting compound is spent. The spent material is a nonhazardous slurry of sulfur and salts.

Dedicated sulfur recovery facilities for high hydrogen sulfur content gas or high throughput facilities may use catalytic processes. Here, hydrogen sulfide is removed from sour natural gas using amine or sulfinol solutions.

As part of the regeneration process, hydrogen sulfide is driven out of solution. The hydrogen sulfide is then burned in the presence of oxygen to produce sulfur dioxide. A mixture of hydrogen sulfide and sulfur dioxide, when passed over a heated catalyst, forms elemental sulfur.

This process is known as the Claus process. It uses inert aluminum oxide, in pellet form, as a catalyst. The catalyst does not react in the sulfur making process. The aluminum oxide catalyst simply provides a greater surface area to speed and assist the process.

Molecular sieve absorbents are used to remove hydrogen sulfide, mercaptans, and heavier sulfur compounds from gases and NGLs. Simultaneous sweetening and dehydration may be accomplished in the same unit. Molecular sieve sweetening is a regenerable batch type operation which requires at least two beds for continuous processing. One bed is sweetening gas while the other is being regenerated.

Waste materials generated may include water vapor, which is vented, condensed or contained within the molecular sieve; regeneration gas which is used as a fuel source or recombined and sent to sales; and spent molecular sieve.

NGL RECOVERY

Gas plants provide centralized gas gathering services (such as compression, dehydration, and sweetening) and also recover NGLs which are hydrocarbons heavier than methane which exist as liquids at moderate pressures. NGL recovery is the process by which hydrocarbons such as butane or propane are extracted. NGL extraction may use either compression and/or cooling processes, absorption processes, or cryogenic processes. These processes either absorb heavier molecular compounds from the process stream with an absorption oil that is recycled or use temperature and pressure to separate fractions with different boiling points.

Wastes generated include lubrication oils, spent or degraded absorption oil, waste waters, cooling tower water, and boiler blowdown water.

Plant compression and utility systems (fuel, electrical generators, steam equipment, pump, and sump systems) are necessary to operate gas plants and to raise the pressure of plant residue gas to match sales gas pipeline pressure. Compressors are driven by electric motors, internal combustion or turbine engines. These engines, compressors and utility systems generate used lubrication oils, cooling waters, drips of lubrication and hydraulic oils, wastewaters, varsol used for cleaning equipment, and oily debris such as rags, sorbents and filters.

Liquid wastes should be disposed of via the plant sump system where wash waters, lubrication oils, cooling waters, etc., are typically collected via a series of sumps. Fluids are usually collected from the sumps into a central clarifier/classifier pit where waters are

separated for disposal via Class II injection wells, NPDES discharge, or evaporation pits.

Hydrocarbons are recycled by returning them to sales streams or, if sales streams are not available, to waste oil collection and reclamation facilities.

Other solid wastes include filters which should be disposed of in accordance with applicable regulations

SEPARATORS

Two phase separators isolate produced liquids from gases as they flow from the wells. Three phase separators, with additional float mechanisms, also separate produced water from liquid hydrocarbons and deliver gas, oil or condensate, and water to respective facilities for further processing or sale. The primary waste generated is bottoms, including sand and scale recovered during cleanout operations. A free-water knockout (F WKO) is a vessel which separates free water (water that is not linked to oil in an emulsion) from other produced fluids. Separated produced water then flows into a

disposal or injection system. FWKOs are occasionally drained to remove solids and bottom sludges.

HEATER TREATERS

Heater treaters and/or electrostatic treaters separate emulsified oil and water. Occasionally, emulsions which cannot be successfully treated in a single pass ("bad oil") must be placed in a standby oil tank for recycling and further treatment. Produced water which is separated in the treaters goes to a disposal or injection system. As with the FWKO, these vessels are occasionally drained to remove solids and bottom sludges. Vessels which use hay or excelsior sections to absorb minute amounts of oil must be periodically cleaned out and the absorption material replaced.

FILTERS

To improve fluid and water quality, filters are frequently used. Filter media must be replaced or, if permanent, backwashed. Replaceable filters include sock, cartridge, or canister units. Permanent filters may use diatomaceous earth or granular media such as sand or coal.

Permanent filters are periodically backwashed with fresh or produced water sometimes containing a small amount of surfactant. Backwash is circulated to a solids treatment and disposal system where the backwash liquid is then usually returned to the production facilities for reprocessing.

GAS FLOTATION VESSELS

Another type of treatment system utilizes gas flotation. These units are sometimes used to remove small concentrations of insoluble oil and grease from produced water. The units agitate the water by injecting a gas, usually natural gas or air, through the liquid stream. This action flocculates the suspended oil, grease, and dirt. The flocculated materials rise to the surface where they are skimmed off. Depending on the quality of this material, it may be discarded as waste or recovered as oil.

COMPRESSORS

Compressors are used to boost lower pressure gas to sales line pressure, for vapor recovery, or to allow flow into central facilities. Compressors may be electric motor driven or driven by internal combustion or turbine engines.

Wastes generated include engine cooling water and used lubrication oils and filters.

DEHYDRATION AND SWEETENING UNITS

Field dehydration and sweetening units perform the same function as described for gas plants. Wastes include iron sponge, spent glycol, spent amine, spent caustic and filter media.

Scrubbers are used where necessary to separate fluids from gas. After scrubbing, recovered fluids may include condensate, oil and/or produced waters which should be recycled by returning to process facilities.

METHANOL INJECTION AND LINE HEATERS

As gas is produced from a reservoir, its pressure and temperature drop. If sufficient water or water vapor exists in the gas stream hydrates (ice) may form and block flow lines. To prevent hydrate formation, methanol is sometimes injected in low concentrations (ppm) or line heaters are used.

The only waste generated from methanol injection is empty methanol containers. Wastes generated from line heaters include spent thermal fluids (such as glycol, oil or salt mixtures) used to transfer heat from heat sources to the gas stream.

EPA's List of Exempt Exploration and Production Wastes

The following wastes are listed as exempt in EPA's Regulatory Determination submitted to Congress in June 1988:

- ☐ Produced water
- ☐ Drilling Fluids
- ☐ Drill Cuttings
- ☐ Rigwash
- ☐ Drilling fluids and cuttings from offshore operations disposed of onshore
- ☐ Well completion, treatment, and stimulation fluids
- ☐ Basic sediment and water and other tank bottoms from storage facilities that hold product and exempt waste
- ☐ Accumulated materials such as hydrocarbons, solids, sand, and emulsion from production separators, fluid treating vessels, and production impoundments
- ☐ Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
- ☐ Gas plant dehydration wastes, including glycol-based compounds, glycol filters, filter media, backwash, and molecular sieves
- ☐ Gas plant sweetening wastes for sulfur removal, including amine, amine filters, amine filter media, backwash, precipitated amine sludge, iron sponge, and hydrogen sulfide scrubber liquid and sludge.
- ☐ Cooling tower blowdown.
- ☐ Spent filters, filter media, and backwash (assuming the filter itself is not hazardous and the residue in it is from an exempt waste stream
- ☐ Packing fluids
- ☐ Pipe scale, hydrocarbon solids, hydrates, and other deposits removed from piping and equipment prior to transportation
- ☐ Hydrocarbon-bearing soil

- ☐ Pigging wastes from gathering lines
- ☐ Wastes from subsurface gas storage and retrieval, except for the listed nonexempt wastes
- ☐ Constituents removed from produced water before it is injected or otherwise disposed of
- ☐ Liquid hydrocarbons removed from the production stream but not from oil refining
- ☐ Gases removed from the production stream, such as hydrogen sulfide and carbon dioxide, and volatilized hydrocarbons
- ☐ Materials ejected from a producing well during the process known as blowdown
- ☐ Waste crude oil from primary field operations and production
- ☐ Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment.

EPA's List of Nonexempt Exploration and Production Wastes

EPA's Regulatory Determination for exploration and production wastes lists the following wastes as nonexempt. It appears that the EPA concluded waste materials from maintenance of production equipment as well as transportation (pipeline and trucking) related wastes were nonexempt. While the following wastes are nonexempt, they are not necessarily hazardous.

- ☐ Unused fracturing fluids or acids
- ☐ Gas plant cooling tower cleaning wastes
- ☐ Painting wastes
- ☐ Oil and gas service company wastes, such as empty drums, drum rinsate, vacuum truck rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals, and waste acids
- ☐ Vacuum truck and drum rinsate from trucks and drums transporting or containing nonexempt waste
- ☐ Refinery wastes
- ☐ Liquid and solid wastes generated by crude oil and tank bottom reclaimers

- ☐ Used equipment lubrication oils
- ☐ Waste compressor oil, filters, and blowdown
- ☐ Used hydraulic fluids
- ☐ Waste solvents
- ☐ Waste in transportation pipeline-related pits
- ☐ Caustic or acid cleaners
- ☐ Boiler cleaning wastes
- ☐ Boiler refractor bricks
- ☐ Incinerator ash
- ☐ Laboratory wastes
- ☐ Sanitary wastes
- ☐ Pesticide wastes
- ☐ Radioactive tracer wastes
- ☐ Drums, insulation, and miscellaneous solids.

EPA did not specifically address in the Regulatory Determination the status of hydrocarbon-bearing material that is recycled or reclaimed by reinjection into a crude stream (used oils, hydraulic fluids, and solvents).

However, under existing EPA regulations, recycled oil, even if it were otherwise hazardous, could be reintroduced into the crude stream, if it is from normal operations and is to be refined along with normal process streams at a petroleum refinery facility [see 40 CFR§261.6 (a)(3)(vi)].

ADDITIONAL EXEMPT WASTES

It should be noted that EPA's lists of exempt and nonexempt wastes are not all-inclusive and that determinations will need to be made on a number of other incidental wastes. In deciding which wastes were exempt, it appears that EPA focused on wastes necessary to conduct so-called "primary field operations" (including centralized facilities and gas plants).

Using this approach, the following wastes, although not specifically listed as exempt, appear clearly exempt.

- ☐ Excess cement slumes and cement cuttings

- ☐ Sulfur contaminated soil or sulfur waste from sulfur recovery units
- ☐ Gas plant sweetening unit catalyst
- ☐ Produced water contaminated soil
- ☐ Wastes from the reclamation of tank bottoms and emulsions when generated at a production location
- ☐ Production facility sweetening and dehydration wastes
- ☐ Pigging wastes from producer operated gathering lines
- ☐ Production line hydrotest presenring fluids utilizing produced water
- ☐ Iron sulfide

This section does not address wastes exempt from Subtitle C under other provisions of RCRA (e.g., 40 CFR 261.4).

Requirements for Nonexempt Wastes

Operators should consider testing nonexempt wastes whenever there is reason to believe they may exhibit one of the hazardous waste characteristics.

Although there is no requirement that a nonexempt waste be tested to determine if it is hazardous, civil and criminal penalties may be imposed if the waste is not managed in a safe manner, and according to regulations.

It is also important to emphasize the prudence of segregating non-exempt waste from exempt waste. One possible implication is that knowingly commingling of a nonexempt waste with an exempt waste could result in the entire waste stream losing its exempt status and perhaps having to be handled as a hazardous waste.

If the nonexempt waste were a listed hazardous waste, EPA's mixture rule makes the entire commingled waste stream subject to stringent RCRA Subtitle C requirements, including the requirement that it be disposed at a hazardous waste facility. Therefore, it is usually in the best interest of an operator to routinely segregate nonexempt waste from exempt waste. When segregation is not practical, the nonexempt waste should be examined closely to ensure that it is not a hazardous waste.

Finally, there are a few states with hazardous waste regulations which differ from those the EPA has promulgated. These state rules are at least as stringent as the federal regulations (by law they must be at least equivalent to those set forth by the EPA).

LIST OF TYPICAL GAS PROCESSING WASTE STREAMS

ACID SPENT 2
ACTIVATED ALUMINA 3
AMINE 4
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ACID (SPENT)

WASTE CATEGORY:

Spent acid from gas processing plants may be a characterisitcally hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.20 - 261-24). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Test for hazardous characteristics (corrosivity) and TCLP metals.

DISPOSAL AT AN OCD-APPROVED FACILITY If **NOT HAZARDOUS**: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store acid in a properly labeled rigid-wall container prior to disposal. Handle in a manner that minimizes employee exposure.

FOR SHIPPING: if **nonhazardous** no shipping requirements. If **hazardous**, will need to review the shipping requirements and possibly test. Call ES&H in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD-APPROVED FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site. MAINTAIN copies of records in active files for 3 years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If test indicates non-hazardous waste, it should be disposed of in a permitted injection/disposal well. If test indicates hazardous waste, it should be disposed of at a RCRA permitted TSD facility. Contact safety department.

ACTIVATED ALUMINA

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT AN OCD-APPROVED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect fluids. Allow alumina to dry for 48 hours. Collect and incorporate fluids into wastewater disposal system. Store alumina in a properly labeled container prior to disposal.

FOR OFFSITE SHIPPING, not a hazardous waste, therefore no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD-APPROVED FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site. MAINTAIN copies of records in active files for 3 years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-approved disposal facility. See Section 12 for a complete and current list of facilities.

AMINE - includes spent monoethanolamine, diethanolamine.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) **when used in gas sweetening processes. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.**

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or storage tank prior to disposal in onsite or commercial disposal well.

FOR SHIPPING OFFSITE: For **Monoethanolamine only** the shipping description is **Ethanolamine Solutions, 8, UN2491, III.** Shipping papers are **required,** the placard is **Corrosive.** For **Diethanolamine only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains Diethanolamine), 9, UN3082, III.** Shipping papers are **required,** the placard is **Class 9.**

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD to **dispose of gas plant wastewaters; OR,** if specified in the permit, NPDES discharge.

AMINE RECLAIMER BOTTOMS

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL FACILITIES: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of bottoms from vessels should be done in such a manner as to minimize spillage. Use drip pans or catchment vessels.

Mix solids with wastewaters for disposal via Class II disposal well.

For storage onsite prior to disposal, place in drums, tanks, or other closed/covered containers, or remove from site immediately upon removal of bottoms from vessels.

FOR SHIPPING OFFSITE: For **Monoethanolamine only** the shipping description is **Ethanolamine Solutions, 8, UN2491, III.** Shipping papers are **required**, the placard is **Corrosive.** For **Diethanolamine only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains Diethanolamine), 9, UN3082, III.** Shipping papers are **required**, the placard is **Class 9.**

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (on-site or off-site) permitted by the OCD to accept gas plant wastewaters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

ANTIFREEZE (USED)

WASTE CATEGORY:

Used antifreeze consists of a mixture of ethylene glycol and water that is used as a heat transfer medium in internal combustion gas compressor engines. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Used antifreeze should be recycled or reclaimed if possible.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL FACILITIES: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Remove antifreeze from radiator/engine in a manner which prevents spillage. Drip pans or catchment vessels are recommended. If antifreeze is stored, leak-proof, rigid-walled containers are preferred.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

FOR RECLAIM OR RECYCLE: No recordkeeping requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If reclaim or recycle not possible, state may allow disposal in a permitted injection well. Contact environmental staff.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

BARRELS/DRUMS/CONTAINERS (NOT EMPTY)

WASTE CATEGORY:

Containers which held chemicals, paints, thinners, solvents, or other products but now are only partially full of the material. The exact contents of the material in the barrel/drum may be unknown. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

If the contents are known, return the barrel/drum/container to the vendor or use the contents. If the contents are unknown, see **MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS** section below.

TESTING:

Contact environmental staff.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

If the contents of the barrel/drum/container are known, handle the material as indicated by the IVISDS. If the contents are unknown, contact your environmental staff. Store the barrel/drum/container so that leakage is prevented. Place bungs or covers securely on containers during storage.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR RECLAIM OR RECYCLE: No recordkeeping requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If reclaim or recycle not possible, Contact environmental staff.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

BOILER WATER BLOWDOWN

WASTE CATEGORY:

Non-exempt solid waste (53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL WELL: this waste must be tested for ignitability, corrosivity, reactivity, and Toxicity Characteristic Leaching Procedure (TCLP) metals and organic compounds to characterize the waste. If the generator can prove by knowledge of process, that this waste is not hazardous, then no testing is required. The generator must provide information concerning the process and the chemicals used in that process.

FOR NPDES DISCHARGE: comply with testing specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or storage tank prior to disposal.

FOR SHIPPING: if nonhazardous no shipping requirements. If hazardous, will need to review the shipping requirements and possibly test. Call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL, maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters; OR**, if specified in the permit, discharge per NPDES permit .

IF THE WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well or if specified in the permit, NPDES discharge.

BRINE CONTAMINATED SOILS

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT AN OCD-APPROVED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

FOR ON-SITE TREATMENT/DISPOSAL: Contact environmental department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

If necessary, brine contaminated soils should be stored in an area lined with impermeable material and bermed to prevent runoff or leaching.

When remediation is deemed necessary (usually per landowner's request) contaminated soils should be sampled and analyzed for chloride content and sodium absorption ratio. Soil restoration should begin promptly. In-place treatment is recommended. Depending on site hydrologic characteristics, land treatment may be acceptable. Gypsum or other soil treatments may be applied. (Such as LCA 11.) Soil rinsing may be appropriate with approved disposal of residue (see Brine Water).

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE TREATMENT/DISPOSAL: Contact environmental department.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal sites.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Removal of the contaminated soil and disposal in a permitted off-site pit or landfill is acceptable. Contact safetydepartment.

BRINE WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with the testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Separate oil, condensate, water. Store water in holding vessels such as sumps, storage tanks or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted or covered in some manner to protect wildlife. Avoid contact with soil as much as possible. Collect hydrocarbons in storage vessel for sale.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal sites.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters; OR,** if specified in the permit, NPDES discharge.

Off-site evaporation at a permitted facility.

CAUSTIC - spent.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump, storage tank, or evaporation pit prior to disposal. Tanks and pits that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING: The shipping description is **Sodium Hydroxide, Solution, 8, UN1824, II.** Shipping papers are **required,** the placard is **Corrosive.** If the shipment contains 1,000 lbs or more, the letters **"RQ"** must precede the shipping description.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters; OR,** if specified in the permit, NPDES discharge.

CHARCOAL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect fluids. Allow charcoal to dry for 48 hours. Collect and incorporate fluids into wastewater disposal system. Store charcoal in a properly labeled and sealed container prior to disposal. Dust can be explosive.

FOR SHIPPING OFFSITE: The shipping description is **Charcoal, 4.2, NA1361, III.** Shipping papers are **required.** The placard is **Spontaneously Combustible.**

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT OCD FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

COOLING TOWER BLOWDOWN

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use corrosion inhibitors that do not contain chromium.

Operate cooling towers efficiently to minimize the generation of blowdown.

TESTING:

FOR DISPOSAL WELL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in wastewater storage vessel such as sump, storage tank or evaporation pit prior to disposal. Tanks and pits that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted to dispose of gas plant wastewaters; **OR**, if specified in the permit, NPDES discharge.

COOLING TOWER SLUDGE

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use corrosion inhibitors that do not contain chromium.

TESTING:

DISPOSAL AT A OCD-APPROVED FACILITY: The waste must be characterized. Test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, ignitability, and reactivity. Use the Paint Filter Liquids test to determine if sludge contains free liquid. If free liquids are present test for corrosivity. If the generator can prove by knowledge of process that a waste is not hazardous, then no testing is required. The generator must provide information regarding the process from which the waste is generated and the chemicals used in that process.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

(1) Remove all free liquids and incorporate into wastewater disposal system. (2) Store in drums, tanks, or other closeable containers.

FOR SHIPPING OFFSITE: if nonhazardous there are no shipping requirements. If hazardous, will need to review the shipping requirements and possibly test. Call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT OCD FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

DEBRIS, UNCONTAMINATED - includes wood, glass, concrete.

WASTE CATEGORY:

Inert nonhazardous solid waste. Inert wastes can be disposed at facilities approved by the New Mexico Oil Conservation Division or at a municipal landfill. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in labeled bins. Do not mix with material that is contaminated or may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements if uncontaminated.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary for the disposal of inert and uncontaminated solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of debris disposed.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

On-site burial if permitted in the facility discharge plan. Consult lease requirements and landowner for any additional requirements.

DEHYDRATOR - CONDENSED WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be stored in leak-proof, rigid-walled containers.

FOR SHIPPING OFFSITE, no shipping requirements if uncontaminated.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary for the disposal of inert and uncontaminated solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of debris disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters; OR,** if specified in the permit, NPDES discharge

DRUMS - Empty plastic or metal.

WASTE CATEGORY:

Non-exempt solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste. Check the Material Safety Data Sheet (MSDS) and Hazardous Waste Booklet (Section 14) to confirm whether drum contained a pure product that is listed as acutely hazardous. If the product is acutely hazardous consult with HE&LP in Houston for specific cleaning instructions.

WASTE MINIMIZATION:

Return drums to vendor.

Use tanks to store chemicals in bulk and reduce or eliminate the use of drummed chemicals.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Do not allow empty drums to accumulate onsite. All drums must be empty; i.e., All materials or wastes have been removed using practices employed to handle drums such as pouring, pumping, or aspirating. No more than 2.5 centimeters (one inch) of residue remains on the bottom of the drum or inner liner. No more than 3% by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 110 gallons in size; no more than 0.3% by weight of the total capacity of the container or inner liner if the container is greater than 110 gallons in size. Mark the drums as "Empty" and use one of the following options prior to disposal. 1) Replace the lid or bungs tightly on empty drums to prevent the accumulation of rainwater or other materials. Rainwater or other materials that accumulate in empty drums may have to be handled and disposed as hazardous waste. 2) Cut the ends out of the drum so it cannot be used as a container.

FOR SHIPPING: Remove or paint over all DOT markings and labels on drums prior to shipping.

RECORDKEEPING/REPORTING REQUIREMENTS:

Track the empty drums using the Warren Petroleum Company Waste Drum/Container Log (Section 11). Keep Bill of Lading, run ticket, or other information that documents the generator, transporter, disposal site and volume when drums are disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle drums: Make arrangements with vendor to return on a deposit basis.

Replace drums with bulk storage units.

FILTERS, AIR

WASTE CATEGORY:

Inert nonhazardous solid waste. This waste can be disposed at a facility permitted by the New Mexico Oil Conservation Division or at a municipal landfill.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store separately from oil, sock, glycol or other filters to avoid contamination, testing and permitting requirements.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary if disposed with other inert solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of filters disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, GLYCOL

WASTE CATEGORY:

Inert nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste

WASTE MINIMIZATION:

None at this time.

TESTING:

TCLP (not required if recycled).

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Waste filters should be handled in a way to prevent spillage. Drip pans or catchment vessels should be used. All liquids should be drained from filters before disposal. Liquids should be returned to production facilities for reprocessing. Filters should be segregated from other filter types, placed in plastic garbage bags and into metal containers.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep following records: Disposal date, number of filters disposed of, haulers name, location and name of disposal facility. Results of analyses (TCLP) required for disposal into landfill. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle filters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, SOCK includes sock filters used as glycol, and amine filters.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-APPROVED FACILITY: OCD does not require testing of this waste; however, each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect liquids. Allow filters to dry for 48 hours. Store in bin for process filters. Incorporate liquids into wastewater disposal system.

FOR SHIPPING OFFSITE, not a hazardous waste, therefore no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, USED OIL - non-terne plated; terne is an alloy of tin and lead which is used to plate oil filters. These filters are from an internal combustion engine used to filter crankcase oil.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain more than 24 hours to remove all used oil by one of the following hot-draining methods: 1) Puncturing the filter anti-drain back valve or the filter dome end and hot-drain; OR 2) Hot-drain and crush; OR 3) Dismantle and hot-drain; OR 4) Flush the filter; OR 5) Any other equivalent method which will remove the free flowing oil.

After draining, allow filters to dry. Collect oil and reclaim or sell for refining. Store filters in covered enclosure or covered rainproof containers on an impermeable surface. Containers must be labeled "Used Oil Filters". Do not keep storage units containing filters onsite more than 30 days. Transport containers must be labeled with the date, the final destination, and the name and address of both the generator and the transporter.

FOR SHIPPING OFFSITE, if nonhazardous no shipping requirements. If hazardous contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY: There are no reporting requirements for the OCD. Retain copies of the Bill of Lading, run ticket, or other billing information that documents the volume and type of waste, generator, transporter, and disposal facility.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

OCD-permitted processor, disposer, or end user (someone who uses the oil filters or its components as

feedstock for their processes).

GLYCOL - spent ethylene glycol, triethylene glycol, and diethylene glycol.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) **when used in dehydration processes** (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or tank, prior to disposal. Tanks that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, For **Ethylene Glycol only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains ethylene glycol), 9, UN3082, III.** Shipping papers are **required**, the placard is **Class 9.**

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters; OR, if specified in** the permit, NPDES discharge.

HYDROSTATIC TEST WATER

WASTE CATEGORY:

Hydrostatic test water is **exempt** from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b)) **when derived from the testing of gathering pipelines or pipelines used to transport raw or unrefined products.** Hydrostatic test water is **non-exempt** solid waste under RCRA **when derived from the testing of transmission pipelines or pipelines used to transport refined products.** The New Mexico Oil Conservation Division has jurisdiction over the management of this waste. See Section 12 (Guidelines for Hydrostatic Test Dewatering) for specific information regarding the requirements for disposal of this waste in New Mexico.

WASTE MINIMIZATION:

Conduct tests only when necessary.

TESTING:

FOR CLASS II DISPOSAL WELL: if exempt no testing is required. If non-exempt, test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, ignitability, corrosivity and reactivity. If the generator can prove by knowledge of process that this waste is not hazardous, then no testing required. The generator must provide information on the chemical composition of the waste and the process from which it was derived.

FOR DISCHARGE PER NPDES PERMIT: meet testing requirements of the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store water in holding vessels such as sumps, storage tanks or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted, or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, if nonhazardous, no shipping requirements. If hazardous, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ON-SITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: maintain records of type and volume of waste, generator, transporter, and disposal facility by retaining run tickets or other billing information. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF EXEMPT OR NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted **for disposal of gas plant wastewaters; OR,** If specified in the permit, NPDES discharge.

IF THE WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well; **OR,** if specified in the permit, NPDES discharge.

INHIBITORS (USED) / BIOCIDES

WASTE CATEGORY:

(Chemical inhibitors can be used for selected chemical treating programs to prevent scale. In most cases these chemicals will remain in the gas stream and do not become a waste management issue. This description addresses the case where inhibitors are recovered). Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: TCLP, RIC if recovered inhibitors cannot be reused.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

All spent inhibitors should be contained to prevent spills or leaching to the soil. Drums or containerized storage is preferred.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Reuse/reclaim if possible.

If reuse/reclaim not possible, contact the safety and environmental department for case bycase evaluation.

IRON SPONGE

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wash thoroughly with a soda ash and water solution by circulating it through the bed for several hours to prevent auto-ignition. Can also be regenerated using this method. Incorporate soda ash solution into water disposal system.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

LEAD ACID BATTERIES

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Recycle or return to vendor if possible.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wear protective equipment and handle in manner to prevent spillage of acid. Store in vented area. Do not store on ground or cement slab.

RECORDKEEPING/REPORTING REQUIREMENTS:

1) DOT manifest for transport by vessel. 2) Retain copy at assigned locations. 3) Copy of MSDS.

Keep records of off-site recycling in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Return to vendor for exchange.

Local recycler.

LITHIUM BATTERIES

(Batteries used in Haliburton flow meters)

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Recycle or return to vendor if possible.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wrap in shipping container provided by Haliburton. Store in a cool dry area.

RECORDKEEPING/REPORTING REQUIREMENTS:

1) Mailing receipts. 2) Copy of MSDS.
Keep records of off-site recycling in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Return to vendor.

MERCURY

WASTE CATEGORY:

Mercury is a listed hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.20 - 261-24). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None if reclaimed or recycled, otherwise TCLP/Mercury and Total/Mercury.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contact Safety & Environmental Manager prior to any mercury handling. Should be stored in air-tight, properly labeled containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

Manifests or records of recycling. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details. No hazardous waste disposal is allowed in OCD-permitted facilities.

Contact safety department for recycling.

Dispose at an EPA permitted hazardous waste facility. Contact safety department.

MOLECULAR SIEVE

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Regenerate for reuse.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain all liquids and incorporate them into the water disposal system. Allow molecular sieve to cool in a nonhydrocarbon inert atmosphere. Hydrate in ambient air for 24 hours.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Regenerate for reuse.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

NORM (Naturally Occurring Radioactive Material)

WASTE CATEGORY:

Special E&P Waste (Contact the Safety/Environmental Department). See Section 12 of the Manual for specific procedures for NORM handling and disposal in New Mexico.

WASTE MINIMIZATION:

None at this time.

TESTING:

Will be required for ground contamination and prior to disposal company acceptance. Check state rules.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Review company safety guidelines for handling NORM. Protect ground area with non-permeable material. NORM should be properly labeled and contained in an isolated area where there is restricted access to the public and employees. Area should be clearly marked.

RECORDKEEPING/REPORTING REQUIREMENTS:

Records generated for the disposal or storage of NORM should be maintained as active files.

DISPOSAL OPTIONS:

Do not dispose of NORM without approval of Safety/Environmental Department.

OILY RAGS - contaminated with lubricating oil.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use a contractor to supply clean rags and pick up used rags.

TESTING:

RECYCLING: The contractor may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in containers marked for oily rags only. Keep cover of container secure when not transferring material. Do not mix with material that may be hazardous.

FOR SHIPPING OFFSITE, if nonhazardous, no shipping requirements. If hazardous, will need to review the shipping requirements. Contact EH&S, in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

RECYCLING: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Contract with a company to recycle used rags.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PAINTING WASTES

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Contact the Safety & Environmental Department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Paints should remain in their original metal containers with tight fitting lids.

RECORDKEEPING/REPORTING REQUIREMENTS:

If waste is hazardous, manifests, test data, and disposal records must be retained for three years and archived for fifteen years. No recordkeeping is necessary for non hazardous disposal.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Unused paint should be applied to equipment and buildings to prevent corrosion and water damage. Empty containers may be disposed of in permitted landfills.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PAINTING SOLVENT - used

WASTE CATEGORY:

Special - contact ES&H Deaprtment in Houston. Used painting solvent which is returned directly to condensate stream (hydrocarbon) without processing is not defined as a solid waste by the Resource Conservation and Recovery Act (RCRA).

WASTE MINIMIZATION:

None at this time.

TESTING:

Contact the Safety & Environmental Department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Painting solvent should not be filtered, accumulated, stored or otherwise processed prior to returning to condensate stream.

RECORDKEEPING/REPORTING REQUIREMENTS:

No recordkeeping is necessary if painting solvent returned to condensate stream.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Do not process used painting solvent prior to returning to condensate stream. Processing creates a "solid waste" which may be subject to hazardous waste regulations.

PIGGING WASTE

WASTE CATEGORY:

Exempt waste under the Resource Conservation and Recovery Act (RCRA) if derived from gathering line; non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) if from distribution line. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

If non-exempt, TCLP; RIC analysis may be required. Contact Safety & Environmental Department

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled to prevent spills or leakage. Should be stored in rigid-walled, leak-proof containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

Maintain manifest or run ticket for a minimum of three years if off-site disposal is utilized and records archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If exempt, liquids can be disposed of at a Class II injection well. Solids need to go to an oil and gas permitted facility. If hazardous or non-exempt, contact the safety & environmental department.

PLANT TRASH - includes paper, cardboard, plastic containers, glass. Does not include items such as aerosol cans, paint cans, pesticides, batteries or flammables.

WASTE CATEGORY:

Inert nonhazardous solid waste. Inert wastes can be disposed at a facility permitted by the New Mexico Oil Conservation Division or a permitted landfill.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in labeled bins. Do not mix with material that is contaminated or may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep Bill of Lading, run ticket, other billing information that documents the generator, transporter, disposal site, and volume of material disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle paper, cardboard, glass, aluminum and plastics.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PROCESS WASTEWATER

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL WELL: this waste must be tested for ignitability, corrosivity, reactivity, Toxicity Characteristic Leaching Procedure (TCLP) metals and organic compounds. If the generator can prove by knowledge of process that this waste is not hazardous then no testing is required. The generator must provide information concerning the process and the chemicals used in the process.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements of the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store water in holding vessels such as sumps, storage tanks, or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted, or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, if nonhazardous, no shipping requirements. If hazardous, need to review the shipping requirements and possibly test. Contact EH&S for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ON-SITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS, Class II disposal well (on-site or off-site) permitted **for disposal of gas plant wastewaters; OR,** If specified in the permit, NPDES discharge.

IF THIS WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well; **OR, if specified** in the permit, NPDES discharge.

PRODUCED WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Regenerate for reuse.

TESTING:

None required

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled in a manner which prevents spillage onto ground or other surface and stored in rigid-walled containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

State injection well regulations require that records be kept of volumes injected, annular pressures, origin of produced water. These records are required to be kept for a period of threeyears, and then should be archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Produced water can be injected into a state permitted Class II injection well.

SANDBLAST MEDIA

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Disposal of sandblast media used by a contractor remains the responsibility of that contractor.

TESTING:

Test for TCLP metals.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Enclose area to be blasted to collect media. Use proper personal protective equipment. Store in rigid-walled containers, or in 5000# polyurethane sacks.

RECORDKEEPING/REPORTING REQUIREMENTS:

All off-site disposal records should be maintained as active files for three years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Disposal of sandblast media used by a contractor remains the responsibility of that contractor. If non-hazardous, recycle for reuse. Company generated sandblast media should be analyzed for TCLP metal content prior to disposal. Refer laboratory results to the Safety & Environmental Department.

SEWAGE

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). Local authorities typically have jurisdiction over sewage disposal (either in a sewer system or via septic tank). OCD has authority over sewage disposal when it is mixed with an oilfield waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled in a manner that minimizes exposure to workers. Adequate sanitary procedures should be implemented. For- long term operations, a septic system may be desirable. Septic systems must be permitted by state or local authorities.

RECORDKEEPING/REPORTING REQUIREMENTS:

Local authorities may have specific recordkeeping or reporting requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Disposal in local sewer system (requires sewer connection).

Can be disposed of in an on-site septic system or by a commercially owned sanitation service.

SCRAP METAL - uncontaminated.

WASTE CATEGORY:

Nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Testing is not required unless contamination or scale is present. Review the Warren Petroleum Company policy on testing for Naturally Occurring Radioactive Material (NORM).

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in areas designated for scrap metal. Do not mix with contaminated or hazardous material.

FOR SHIPPING: if not radioactive then no shipping requirements. If radioactive, call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, recycle site, and volume of scrap recycled. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SILICA GEL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain all liquids and allow silica gel to dry for 48 hours. Incorporate fluids into water disposal system.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOIL CONTAMINATED WITH CRUDE OIL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Check equipment on a regular basis for leaks, spills. Repair or replace leaking equipment immediately. Use sorbent pads to prevent spills from contaminating the soil.

TESTING:

LANDFARM ONSITE: Total Petroleum Hydrocarbons (TPH) by Method 418.1 and leachable chlorides.

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contaminated soils must be cleaned up. For small, localized spills remediate by tilling soil and adding fertilizer. For remediation (such as landfarming) of large quantities of soil onsite the OCD may have site specific handling requirements. Contact the OCD District Office (Sectioon 13) for specific guidelines.

FOR SHIPPING OFFSITE, contact EH&S for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

LANDFARM ONSITE: For large spills, send a letter to the District Office detailing the landfarm procedures, the quantity of soil involved, and receive written approval from the District.

DISPOSAL OR LANDFARMING AT AN OCD FACILITY: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of soil to be treated or disposed.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Landfarm onsite if permitted by disposal plan.

Landfarm or disposal at OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOIL CONTAMINATED WITH LUBE OIL

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Check equipment on a regular basis for leaks, spills. Repair or replace leaking equipment immediately. Use sorbent pads to prevent spills from contaminating the soil.

TESTING:

LANDFARM ONSITE: Total Petroleum Hydrocarbons (TPH) by Method 418.1 and leachable chlorides.

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contaminated soils must be cleaned up. For small, localized spills remediate by tilling soil and adding fertilizer. For remediation (such as landfarming) of large quantities of soil onsite the OCD may have site specific handling requirements. Contact the OCD District Office (Section 13) for specific guidelines.

FOR SHIPPING OFFSITE, contact Compliance for specific requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

LANDFARM ONSITE: For large spills, send a letter to the District Office detailing the landfarm procedures, the quantity of soil involved, and receive written approval from the District.

DISPOSAL OR LANDFARMING AT A OCD FACILITY: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of soil to be treated or disposed.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Landfarm onsite if permitted by the disposal plan

Landfarm or disposal at OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOLVENT, HAZARDOUS - this material is either a listed hazardous waste according to 40 CFR 261.31 or is characteristically hazardous according to 40 CFR 261.21-24. The characteristics of the solvent are on the Material Safety Data Sheet (MSDS).

WASTE CATEGORY:

Non-exempt hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use water-based solvents or detergents when possible.

TESTING:

If the waste is a listed hazardous waste per 40 CFR 261.31, then no testing is necessary. If the waste could be characteristically hazardous waste test for Ignitability, Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, Reactivity and Corrosivity. The MSDS may have specific information regarding the solvents hazardous status. If the generator can prove by knowledge of process that the solvent is not hazardous then no testing is required. The generator must provide information about the chemical composition of the solvent and about the processes in which it was used.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Do not mix waste solvents with materials that are not hazardous. Nonhazardous waste mixed with a listed hazardous waste is automatically hazardous and increases the volume of hazardous waste that must be treated and disposed.

Store in containers for "Used Solvent" Only. Keep cover secure when not transferring material. Containers should be stored on an impervious surface and/or in a covered area. For conditionally exempt small quantity generators (CESQG) (generators producing less than 220 lbs per calendar month) do not accumulate more than 2200 lbs (1,000 kilograms) onsite at any one time. If the generator accumulates more than 2200 lbs onsite at any one time, then the generator must meet the requirements of a small quantity generator or large quantity generator depending on the volume of waste onsite.

FOR SHIPPING: the hazardous nature of this solvent will determine which shipping requirements to follow. Contact EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR CESQGs: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled or disposed. The generator may have to obtain an EPA identification number; many disposal facilities will not accept waste, regardless of generator status, without an EPA identification number. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for

details.

Contract with a company to recycle waste solvents.
Dispose at a disposal facility permitted to accept waste solvent.

SOLVENT, NONHAZARDOUS - this material does not contain listed hazardous wastes (40 CFR 261.31) and is not characteristically hazardous (40 CFR 261.21-24). The characteristics of the solvent are on the Material Safety Data Sheet (MSDS).

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

If the generator can prove by knowledge of process, including information on the MSDS, that the waste is not characteristically hazardous and has not been combined with a listed hazardous waste, no testing is required. If the waste could be characteristically hazardous, then test for ignitability, Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, corrosivity, and reactivity.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store spent solvent in a sealable container or combine with slop oil or condensate. Do not mix with material that may be hazardous. Containers should be stored on an impervious surface and/or in a covered area.

FOR SHIPPING: the specific nature of the solvent will determine the applicable shipping requirements. Contact EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

IF COMBINED WITH SLOP OIL, CONDENSATE OR SENT TO A RECYCLER: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle by combining with slop oil or condensate for sale.

Contract with a company to recycle waste solvents.

SORBENT PADS - CONTAMINATED WITH CRUDE OIL.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

RECYCLE: each recycler may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Remove all free oil by washing to reduce the TPH concentration and return to oil storage tanks. Store pads in containers marked for sorbent pads only. Keep cover of container secure when not transferring material. Do not mix with material that may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY OR RECYCLER: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.
Recycle.

STORMWATER

WASTE CATEGORY:

Special E&P Waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Test for chlorides. Check for oil sheen.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Uncontaminated stormwater should be allowed to run-off the location as needed. Stormwater collected behind firewalls should not be discharged if it contains a "sheen". Stormwater should not be stored when it prohibits adequate storage volume within diked areas for spill prevention.

RECORDKEEPING/REPORTING REQUIREMENTS:

Diked areas refer to SPCC. If stormwater is taken to an injection well for disposal, a run ticket should be retained for a period of three years.

DISPOSAL OPTIONS:

Uncontaminated stormwater should be allowed to escape from location into natural drainage pathways.

Stormwaters containing a "sheen" should have the sheen removed and then be allowed to escape into natural drainage pathways.

SUMP SLUDGE - from all sumps onsite.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) and must be characterized to determine if hazardous. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL PITS: waste must be classified to determine if the waste is hazardous. Test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, reactivity and ignitability. Use the Paint Filter Liquids test to determine if sludge contains free liquid. If free liquids are present test for corrosivity. If the generator can prove that the waste is not hazardous, then no testing is required. The generator must provide information on the chemical composition of the waste and the process from which it was produced.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of sludge from sumps should be done in such a manner ad to minimized spillage. Use drip pans or catchment basins. Remove all free liquids. If nonhazardous, mix solids with wastewaters for disposal via Class II disposal well. For storage onsite prior to disposal place in drums, tanks, or other closed/covered containers or dispose immediately upon removal of bottoms from tanks.

FOR SHIPPING: if nonhazardous, no shipping requirements. If hazardous contact EH&S in Houston for specific shipping instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, disposal site, and analytical results.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted to accept gas plant wastewaters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

TANK BOTTOMS - from crude oil tanks.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

RECLAIMING: None required.

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR TRC-PERMITTED DISPOSAL PITS: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of bottoms from tanks should be done in such a manner ad to minimized spillage. Use drip pans or catchment basins. Remove and reclaim all free oil. Mix solids with wastewaters for disposal via Class II disposal well. For storage onsite prior to disposal place in drums, tanks, or other closed/covered containers or dispose immediately upon removal of bottoms from tanks.

FOR SHIPPING OFFSITE, contact EH&S for specific shipping instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site. FOR ONSITE DISPOSAL WELLS, maintain records per Class II disposal well permit.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted to accept gas plant wastewaters.
OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

USED OIL - includes any oil refined from crude oil, or any synthetic oil, that has been used and as a result of such use if contaminated by physical or chemical impurities (40 CFR 279.1; 57 FR 41613).

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Inspect tanks or containers on a regular basis for leaks or spills and to confirm that storage units are in good condition.

TESTING:

RECYCLING: each recycler may have specific testing requirements (such as total halogen) prior to accepting used oil. No testing required when combined with scrubber oil or condensate for sale.

DISPOSAL: used oil must be recycled in the State of Texas.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in tanks or containers marked "Used Oil". Tanks and containers must be in good condition (Generators storing used oil onsite must comply with applicable requirements of 40 CFR 112 Spill Control and Countermeasures plan for used oil storage units). Keep cover secure when not transferring material. Leaks or spills must be contained and repaired immediately; releases to the environment must be cleaned up.

Shipments of used oil of 55 gallons or less may be transported by the generator in their own vehicles and without obtaining an EPA identification number. An EPA registered transporter must be used for shipments of more than 55 gallons of used oil. Generators transporting more than 55 gallons must obtain an EPA identification number and comply with all requirements of 40 CFR 279 Subpart E.

Do not mix used oil with material that may be hazardous.

FOR SHIPPING OFFSITE, if nonhazardous, no shipping requirements. If hazardous, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A PERMITTED RECYCLER: keep copies of Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of oil shipped as well as any analytical results and certification forms required by recycler.

WHEN COMBINED WITH SCRUBBER OIL OR CONDENSATE: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of oil sold.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

Combine with scrubber oil or condensate for sale.

WASH WATER

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA)(40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

For DISPOSAL WELL: this waste must be tested for corrosivity, reactivity, ignitability and Toxicity Characteristic Leaching Procedure (TCLP) metals and organic to characterize the waste. If the generator can prove by knowledge of process that this waste is not hazardous, then no testing required. The generator must provide information on the chemical composition of the waste and the process from which it was derived.

For NPDES DISCHARGE: comply with testing specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump, storage tank or evaporation pit prior to disposal.

FOR SHIPPING OFFSITE, if nonhazardous, no shipping requirements. If hazardous, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted to dispose of gas plant wastewaters; **OR**, If specified in the permit, discharge per NPDES permit.

IF THE WASTE IS HAZARDOUS, it can be disposed in a Class I Hazardous disposal well; **OR**, if specified in the permit, NPDES discharge

WOODEN PALLETS

WASTE CATEGORY:

Inert nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Return to vendor or sell.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

No special handling requirements..

RECORDKEEPING/REPORTING REQUIREMENTS:

No recordkeeping required.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

On-site burial if allowed by the discharge plan. Consult lease requirements and landowner for any additional requirements.

Part 6 Waste Management Plan Surface Waste Management Facilities

A commercial surface waste management facility is a facility that receives compensation for collection, disposal, evaporation, remediation, reclamation, treatment, and/or storage of oil field related wastes. A centralized surface waste management facility is a facility that does not receive compensation for waste management, and is used exclusively by one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended; or is used by more than one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended under an operation agreement and which receives waste that are generated from two or more production units or areas or from a set of jointly owned or operated leases.

Attachment I is a current list of the commercial surface waste management facilities in the state ofNew Mexico. To construct and operate a commercial waste management facility an application, form C-137 (Attachment II), must be filed with the OCD Santa Fe Office as specified under OCD Rule 711.

Financial assurance is required prior to construction of all surface waste management facilities. Centralized surface waste management facilities shall submit acceptable financial assurance in the amount of $25,000 per facility. Commercial surface waste management facilities shall submit acceptable financial assurance in the amount of the closure cost estimate to be based upon the useof equipment normally available to a third party contractor sufficient to close the facility to protectpublic health and the environment according to the four year or percentage filled, whichever comes first, schedule. The financial assurance shall be in a form approved by the Director (Attachment III). The Division will issue public notice for all surface waste management facilities and allow 30 daysfor comments.

Tab 4a contains the Guidelines for Permit Application, Engineering Design, and Construction of Surface Waste Management Facilities and the accompanying application.

Oil and gas wastes which are exempt from RCRA Subtitle C do not need OCD approval to be disposed of at an OCD authorized surface waste management facility. Oil and gas wastes which are not exempt from RCRA Subtitle C, but which do not exhibit hazardous waste characteristics must receive OCD approval prior to disposal at any surface waste management facility. Either the disposal facility or the waste generator may request OCD approval with a form C-138 (AttachmentIV) to dispose of the wastes at the facility. A blanket approval to dispose of non-exempt, non-hazardous OCD regulated oil and gas waste may be obtained if incorporated into an OCD discharge plan.

Non-oilfield wastes which are not regulated by the OCD may be accepted in an emergency if ordered by the Department of Public Safety. Prior to acceptance, a OCD form C-138 accompanied by the Department of Public Safety order will be submitted to the OCD Santa Fe office and the appropriate District office.

Part 6 Waste Management Plan Surface Waste Management Facilities

OCD regulated commercial surface waste management facilities may accept wastes from out-of-state on a case-by-case basis. Approval must be requested by the disposal facility, be received prior to disposal and be accompanied by acceptable documentation to determine that the waste is non-hazardous.

Under no circumstance will an OCD regulated surface waste management facility accepthazardous wastes.

ATTACHMENT I
COMMERCIAL SURFACE WASTE MANAGEMENT FACILITIES

SOUTHEAST

COMPANY	ORDER/PERMIT NO	LOCATION	WASTE	DATE
AA Oilfield Services Inc	R-7333	S3 T19S R37E	PW TP	1983
C & C	R-9769-A / 711-01-0012	S03 T20S R37E	LF	1993
Chaparral	----	S17 T23S R37E	PW TP	1995
Controlled Recovery Inc.	R-9166 /711-01-0006	S27 T20S R32E	PW TP S M	1990
EPI	711-01-0013	S15 T22s R37E	LF	1993
ESSR	----	S01 T26S R31E	LF	1993
Gandy Corp.	R-4594	S11 T10S R35E	PW TP	1973
Gandy Marley Inc	711-01-0019	S04 T11S R31E	LF	1995
GooYea	711-01-0015	S14 T11S R38E	LF	1995
Jenex Operating Co.	----	S14 T20S R38E	PW TP	1993
Kelly Maclaskey	----	S16 T20S R37E	PW TP	1992
Kenneth Tank Services	R-8167	S35 T09S R35E	TP	1986
Loco Hills	R-6811-A	S16 T17S R30E	PW TP	1982
Sundance	R-6940 / 711-01-0003	S29 T21S R38E	PW TP S M	1982
Watson	R-6095	S34 T08S R35E	TP	1979

NORTHWEST

COMPANY	ORDER/PERMIT NO	LOCATION	WASTE	DATE
Basin Disposal	711-01-0005	S03 T29N R11W	PW TP	1985
Envirotech No. 2	711-01-0011	S06 T26N R10W	LF	1992
Sunco	R-9485-A	S02 T29N R12W	PW TP	1991
TNT Construction	711-01-0008	S08 T25N R03W	PW TP LF	1990
Tierra Environmental Inc	R-9772 / 711-01-0010	S02 T29N R12W	LF	1992

PW - Produced Water
TP - Waste Oil Treating Plant
S -- Solids
LF - Landfarm (Solids)

M - Drilling Muds

COMERCIAL SURFACE WASTE MANAGEMENT FACILITIES
IN NEW MEXICO

AA OILFIELD SERVICES, INC.
P.O. Box 5208
Hobbs, NM 88241

BASIN DISPOSAL, INC.
P.O Box 100
Aztec, New Mexico 87410
(505) 325- 6336

C&C LANDFARM
Box 55
Monument, N. Mex.
(505) 397-2045

CHAPARRAL TREATING PLANT
P.O. Box 1769
Eunice, NM 88231
(505) 394-2545

CONTROLED RECOVERY, INC.
P.O Box 369
Hobbs, N.M. 88241
(505) 393-1079

ENVIRONMENTAL PLUS, INC.
601 W Illinois
Hobbs N.M. 88240

ENVIROTECH, INC.
5796 U.S. Highway 64-3014
Farmington, NM 87401

ESSR INC.
208 W. Stevens
P.O. Box 1387
Carlsbad, N.M. 88220
(505) 885-2353

GANDY CORP.

1109 East Broadway
P.O. Box 827
Tatum, NM 88267
(505) 398-4960

GANDY MARLEY, INC.
Box 1658
Roswell, N.M. 88202
(505) 625-9026

GOO YEA
4007 Lovington Highway
Hobbs, N.M.
(505) 392-4498

JENEX OPERATING
P.O. Box 308
Hobbs, NM 88241
(505) 397-3360

KELLY MACLASKEY OILFIELD SERVICES, INC.
P.O. Box 580
Hobbs, NM 88241
(505) 393-1016

KENNETH TANK SERVICES, INC.
P.O. Box 100
Crossroads, NM 88114

LOCO HILLS WATER DISPOSAL
8426 N. Dal Paso
Hobbs, N.M. 88240
(505) 667-2118

SUNDANCE SERVICES, INC.
P.O. Box 1737
Eunice, N.M. 88231
(505) 394-2511

SUNCO WATER DISPOSAL
P.O. Box 443
Farmington, N.M. 87499
(505) 327-0416

TNT CONSTRUCTION
HCR 74 Box 115
Lindrith N.M. 87029
(505) 774-6663

TIERRA ENVRONMENTAL COMPANY, INC.
420 CR 3100
Aztec, N.M. 87410
(505) 334-8894

WATSON TREATING PLANT, INC
P.O. Box 75
Tatum, NM 88267
(505)398-3490

Subpart 1

General Procedures For Sample Collection and Analysis

Contact and use an EPA certified laboratory for all sampling. State and Federal regulations set strict sampling requirements for various substances. Using a properly certified lab will save time and money in the long run. A good lab will usually furnish all the sample equipment, labels and forms necessary to do a good sampling job.

Samples should be collected by personnel wearing clean, unused latex gloves. During sample collection, particular care should be taken to prevent contamination of the sample and container. A sample collected for laboratory analysis should be placed directly into the appropriate container(s) that are properly labeled.

Samples should be placed into individual airtight plastic bags, and stored in an ice chest approximately 1/4 filled with bagged ice. The containers, labels, and empty ice chests should will be provided by the laboratory.

Exhibit I shows an example of a completed sample label that includes project name, number, and location, sample point and identification, person and company conducting the sampling, sample date and time, and required analyses. The laboratory forms may differ but should include the above listed information.

The sampler should keep a record of all samples collected and show the location of the samples on a sketch of the facility. These records (and sketch) should be kept in afield notebook which should be kept in the project file.

After all necessary containers have been filled, a chain-of-custody form (provided by the laboratory) should be completed. This document should include all the samples collected, with the parameters and analytical methods specified (discussed below). The chain-of-custody form should be signed and dated (along with time relinquished), and sent with the samples to the laboratory. Exhibit 2 shows an example of a completed chain-of-custody document.

The laboratory should be notified approximately two days prior to the sampling to allow time for delivery of the sampling equipment, and should be contacted during the day of the sampling in order to send a courier to pick up the samples or to ensure they know the samples are being delivered by company personnel.

Because of laboratory schedules and sample holding time limitations, sampling should be planned for the early part of the week.

Ensure the lab analyzes the sample and sends the report with the parameters set forth in the permit or regs. For example, if the permit limits are in ppm then the report should state the results in ppm.

Subpart 2

Types of Samples

Selection of the type of sample to take is usually directed by the specific permit or regulation. There are generally two different types of samples used in water or waste sampling.

Discrete or Grab Samples - These are samples collected at selected intervals, and each sample is retained separately for analysis. Usually, each sample is collected at a single point in the discharge or storage container.

Composite Samples - Simple composite samples are those made up of a series of smaller samples know as aliquots. These samples should be taken at regular time intervals or locations in the sampling stream or storage device. It is important they be similar in size and content.

Sampling Locations

The proper location for taking a sample is usually the actual discharge point and is very important in ensuring a representative and accurate analysis. It is also necessary to have awareness of the general character of water flows and knowledge of the variability of the pollutant concentration. Some of the considerations necessary in selecting a proper location are:

- ☐ Make sure to sample the proper point. For a combined process/stormwater outfall, make sure to sample below the confluence point.
- ☐ Be sure the sampling site provides the information desired. This includes familiarity with the water discharge system including inflow and outflow.
- ☐ Make sure there is no cross contamination of the sampling stream from othersources, such as fresh water in a stream or other pollutant discharge points.
- ☐ Locate the sample point in a straight length of pipe or discharge conveyance(ditch etc.).
- ☐ Make sure the sampling point is easily accessible and safe. Areas with turbulent water flows should be avoided.
- ☐ Finally. make sure the sample point is in compliance with any permit, regulation or guidance document that lists specific requirements.

Subpart 3

Water Sampling

Appropriate Sample

Sample should be collected during a dry period when no rainfall is expected for at least 24 hours

Do not sample within 24 hours prior to a weekend or holiday

General Sampling Guidelines

Use clean latex gloves prior to collection of each sample

Use clean sampling containers between grab sample and each composite sample at each location

Collect samples from the center of the discharge flow channel.

Record all pertinent sampling data on the chain-of-custody.

Use preprinted labels provided in the sampling kit to label each sample container.

Seal, label, bag, and ice down each sample immediately after collection

Make certain the laboratory preserves the samples within 24 hours of collection. Some laboratories ship sample containers already containing the required preservative. Call the lab to discuss any special handling requirements or precautions for preserved samples.

Sample Collection

Collect a grab sample for laboratory analysis of oil and grease and field analysis of temperature and pH.

An additional grab sample will be required for analysis of fecal coliform. After filling the appropriate sample containers for laboratory analysis of fecal coliform and oil and grease, immediately measure the temperature and pH of a portion of the sample, and record all pertinent data in the field notebook.

Collect a composite sample. This process involves collecting a minimum of 8 separate samples at periodic intervals during the operating hours of the facility over a 24 hour period, filling a complete set of sample containers for each sample (samples will be composited by the laboratory), and recording all pertinent sampling information upon completion of sampling.

Quality Assurance/Quality Control

Collect a single field blank from each sampling location at some point during a composite sampling event. This process involves pouring deionized water into a clean sampling device and then pouring this water into the two 40 ml glass vials, label and bag the field blank sample, and place the sample in an ice chest to accompany the samples to the laboratory. When collecting field blanks, the vials must be completely filled with fluids, allowing no headspace or air bubbles.

Trip blanks are provided by the laboratory with the sample containers. After all samples have been collected, label and bag the trip blank and place one trip blank into each ice chest to accompany the samples to the laboratory.

Sample Analysis

Each grab sample will be analyzed by the laboratory for oil and grease and a portion of the sample will be analyzed for temperature and pH in the field.

Each composite sample will be analyzed by the laboratory for the parameters required by the permit or regulation such as: BTEX, ammonia, total suspended solids, biological oxygen demand (5 day), chemical oxygen demand, and total organic carbon.

Table B-1 of the Sampling and Analysis Plan summarizes the analytical parameters and method numbers to be included on the chain-of-custody form.

Chain-of-Custody Form

For each sampling event, complete the chain-of-custody form (in ink) to include project name and numbers, transportation information and name of the laboratory. For each sample, the chain-of-custody will include: identity of sample, date and time collected, name and significant collector, number of containers, sample matrix, and analytical requirements.

Sample transfers will be evidenced on the chain-of-custody form by signature of the receiver and relinquisher until final delivery to the laboratory. Place the chain of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit B-3.

Place the chain-of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit A-3.

Section 6 Surface Waste Management Facilities

A commercial surface waste management facility is a facility that receives compensation for collection, disposal, evaporation, remediation, reclamation, treatment, and/or storage of oil field related wastes. A centralized surface waste management facility is a facility that does not receive compensation for waste management, and is used exclusively by one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended; or is used by more than one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended under an operation agreement and which receives waste that are generated from two or more production units or areas or from a set of jointly owned or operated leases.

Attachment I is a current list of the commercial surface waste management facilities in the state ofNew Mexico. To construct and operate a commercial waste management facility an application, form C-137 (Attachment II), must be filed with the OCD Santa Fe Office as specified under OCD Rule 711.

Financial assurance is required prior to construction of all surface waste management facilities. Centralized surface waste management facilities shall submit acceptable financial assurance in the amount of $25,000 per facility. Commercial surface waste management facilities shall submit acceptable financial assurance in the amount of the closure cost estimate to be based upon the useof equipment normally available to a third party contractor sufficient to close the facility to protectpublic health and the environment according to the four year or percentage filled, whichever comes first, schedule. The financial assurance shall be in a form approved by the Director (Attachment III). The Division will issue public notice for all surface waste management facilities and allow 30 daysfor comments.

Tab 4a contains the Guidelines for Permit Application, Engineering Design, and Construction of Surface Waste Management Facilities and the accompanying application.

Oil and gas wastes which are exempt from RCRA Subtitle C do not need OCD approval to be disposed of at an OCD authorized surface waste management facility. Oil and gas wastes which are not exempt from RCRA Subtitle C, but which do not exhibit hazardous waste characteristics must receive OCD approval prior to disposal at any surface waste management facility. Either the disposal facility or the waste generator may request OCD approval with a form C-138 (AttachmentIV) to dispose of the wastes at the facility. A blanket approval to dispose of non-exempt, non-hazardous OCD regulated oil and gas waste may be obtained if incorporated into an OCD discharge plan.

Non-oilfield wastes which are not regulated by the OCD may be accepted in an emergency if ordered by the Department of Public Safety. Prior to acceptance, a OCD form C-138 accompanied by the Department of Public Safety order will be submitted to the OCD Santa Fe office and the appropriate District office.

OCD regulated commercial surface waste management facilities may accept wastes from

out-of-state on a case-by-case basis. Approval must be requested by the disposal facility, be received prior to disposal and be accompanied by acceptable documentation to determine that the waste is non-hazardous.

Under no circumstance will an OCD regulated surface waste management facility accepthazardous wastes.

ATTACHMENT I
COMMERCIAL SURFACE WASTE MANAGEMENT FACILITIES

SOUTHEAST

COMPANY	ORDER/PERMIT NO	LOCATION	WASTE	DATE
AA Oilfield Services Inc	R-7333	S3 T19S R37E	PW TP	1983
C & C	R-9769-A / 711-01-0012	S03 T20S R37E	LF	1993
Chaparral	----	S17 T23S R37E	PW TP	1995
Controlled Recovery Inc.	R-9166 /711-01-0006	S27 T20S R32E	PW TP S M	1990
EPI	711-01-0013	S15 T22s R37E	LF	1993
ESSR	----	S01 T26S R31E	LF	1993
Gandy Corp.	R-4594	S11 T10S R35E	PW TP	1973
Gandy Marley Inc	711-01-0019	S04 T11S R31E	LF	1995
GooYea	711-01-0015	S14 T11S R38E	LF	1995
Jenex Operating Co.	----	S14 T20S R38E	PW TP	1993
Kelly Maclaskey	----	S16 T20S R37E	PW TP	1992
Kenneth Tank Services	R-8167	S35 T09S R35E	TP	1986
Loco Hills	R-6811-A	S16 T17S R30E	PW TP	1982
Sundance	R-6940 / 711-01-0003	S29 T21S R38E	PW TP S M	1982
Watson	R-6095	S34 T08S R35E	TP	1979

NORTHWEST

COMPANY	ORDER/PERMIT NO	LOCATION	WASTE	DATE
Basin Disposal	711-01-0005	S03 T29N R11W	PW TP	1985
Envirotech No. 2	711-01-0011	S06 T26N R10W	LF	1992
Sunco	R-9485-A	S02 T29N R12W	PW TP	1991
TNT Construction	711-01-0008	S08 T25N R03W	PW TP LF	1990
Tierra Environmental Inc	R-9772 / 711-01-0010	S02 T29N R12W	LF	1992

PW - Produced Water
TP - Waste Oil Treating Plant
S -- Solids
LF - Landfarm (Solids)
M - Drilling Muds

COMERCIAL SURFACE WASTE MANAGEMENT FACILITIES
IN NEW MEXICO

AA OILFIELD SERVICES, INC.
P.O. Box 5208
Hobbs, NM 88241

BASIN DISPOSAL, INC.
P.O Box 100
Aztec, New Mexico 87410
(505) 325- 6336

C&C LANDFARM
Box 55
Monument, N. Mex.
(505) 397-2045

CHAPARRAL TREATING PLANT
P.O. Box 1769
Eunice, NM 88231
(505) 394-2545

CONTROLED RECOVERY, INC.
P.O Box 369
Hobbs, N.M. 88241
(505) 393-1079

ENVIRONMENTAL PLUS, INC.
601 W Illinois
Hobbs N.M. 88240

ENVIROTECH, INC.
5796 U.S. Highway 64-3014
Farmington, NM 87401

ESSR INC.
208 W. Stevens
P.O. Box 1387
Carlsbad, N.M. 88220
(505) 885-2353

GANDY CORP.
1109 East Broadway
P.O. Box 827
Tatum, NM 88267

(505) 398-4960

GANDY MARLEY, INC.
Box 1658
Roswell, N.M. 88202
(505) 625-9026

GOO YEA
4007 Lovington Highway
Hobbs, N.M.
(505) 392-4498

JENEX OPERATING
P.O. Box 308
Hobbs, NM 88241
(505) 397-3360

KELLY MACLASKEY OILFIELD SERVICES, INC.
P.O. Box 580
Hobbs, NM 88241
(505) 393-1016

KENNETH TANK SERVICES, INC.
P.O. Box 100
Crossroads, NM 88114

LOCO HILLS WATER DISPOSAL
8426 N. Dal Paso
Hobbs, N.M. 88240
(505) 667-2118

SUNDANCE SERVICES, INC.
P.O. Box 1737
Eunice, N.M. 88231
(505) 394-2511

SUNCO WATER DISPOSAL
P.O. Box 443
Farmington, N.M. 87499
(505) 327-0416

TNT CONSTRUCTION
HCR 74 Box 115
Lindrith N.M. 87029
(505) 774-6663

TIERRA ENVRONMENTAL COMPANY, INC.
420 CR 3100
Aztec, N.M. 87410
(505) 334-8894

WATSON TREATING PLANT, INC
P.O. Box 75
Tatum, NM 88267
(505)398-3490

Part 1

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Part 2

Types of Samples

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Part 3

Water Sampling

Appropriate Sample

Sample should be collected during a dry period when no rainfall is expected for at least 24 hours

Do not sample within 24 hours prior to a weekend or holiday

General Sampling Guidelines

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Use clean sampling containers between grab sample and each composite sample at each location

Collect samples from the center of the discharge flow channel.

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Place the chain-of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit A-3.

North Eunice Compressor Station Waste Streams
Dynegy Midstream Services, L. P.

ITEM	TYPE	EXPECTED AMOUNT	SOURCE	DISPOSAL METHOD
Filter	Dust	800 Cartridges/yr	Oil, Air, Gas filter	Waste Management
	Oil, Product		cases, Air intake	of SE New Mexico
	Charcoal, Air,		cases	
Plant	Paper, Wood,	5 tons/yr.	Office, Shop etc	Waste Management
Trash	Cardboard,			of SE New Mexico
	Household items,			
	etc.			
Oil/Scrubber	Oil sludge, Sand,	Infrequent, varied	Scrubbers, Oil	Gandy Marley, Inc.
Tank Bottoms	Dirt, Scrubber	amounts	Tanks	
Solvent	Varsol	100 gals/yr	Parts washing	Oil Recovery
	Cleaning Fluid			Tank (Recycled)
Steel Drums	Lube oil, Antifreeze,	Infrequent, varied	Outside vendors	Emptied and
	Chemicals	amounts		returned to
				vendor.
Concrete		Infrequent, varied	Various in-plant	Waste Management
		amounts		of SE New Mexico
Molecular Sieve,	Solid Particles	Infrequent varied	Dehydrators and	Waste Management
Activated Alumina,		amounts	Treaters	of SE New Mexico
Silica Gel, Ion				
exchange, Iron				
Sponge				
Soil contaminated	N/A	Infrequent varied	Pipeline Leaks	NMOCD Permitted
with hydrocarbons		amounts	NGL Liquids	Landfarm
Used Oil	Lub Oils	1500 bbls/yr.	Engines	Added to Scrubber
				Oil Sales
Scrap		Infrequent varied	Maintenance,	Sold to Scrap
Metals		amounts	Construction	Dealer (Recycled)

SECTION 9 - SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

DMS personnel will follow the SPCC guidelines on spill/leak reporting. These guidelines will conform to the Water Quality Control Commission Section 1203 and to NMOCD Rule 116 for spill/leak reporting.

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PART 1
GENERAL INFORMATION

1. Name of facility: **Versado Gas Processors – New Mexico and Texas Facilities**

2. Type of facility: **Onshore facilities –Natural Gas Processing Plants and associated compressor stations**

3. Location of facility: **See attached Data Sheets**

4. Name and address of owner or operator:

Dynegy Midstream Services, Limited Partnership (operator)

1000 Louisiana Street
Suite 5800
Houston, Texas 77002

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

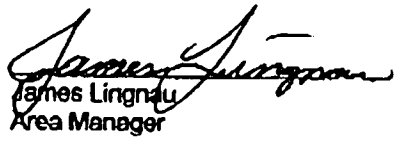
Area Managers **James Lingnau – South Versado (Eunice, Monument Area)**
Tim Jordan- North Versado (Saunders Area)

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

MANAGEMENT APPROVAL AND COMMITMENT OF MANPOWER

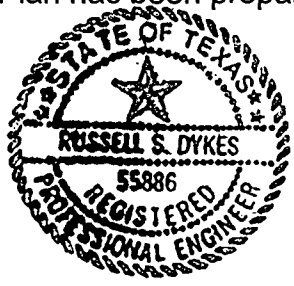
This SPCC Plan will be implemented as herein described. I hereby commit the necessary manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

Area Manager

Signature: 

SPCC CERTIFICATION

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



Russell S. Dykes, P.E.
Printed Name of Registered Professional

Signature of Registered Professional Engineer

Date: Sept. 16, 1999 Registration No.: 55886 State: TX

APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CERTIFICATION

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

_____

Signatures

_____

Data Sheets attached:

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

Environmental Incidents / Spill Reporting

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

For materials spills and releases:

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

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

Name	Telephone
Cal Wrangham	(915)688-0542
David Howard	(915)688-0541
Shankar	(713)507-6753
Bob Cinq-Mars	(713)507-3993
Russell Dykes	(713)767-0072
Paul Lankford	(713)507-3729
J.D. Morris	(713)507-6752

Amendment / Periodic Review of SPCC Plans

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

The actual text of the regulation is as follows:

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

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

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

(1) Such technology will significantly reduce the likelihood of a spill event from the facility, and

(2) if such technology has been field-proven at the time of the review.

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

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

Periodic Review / Administrative Change Record

Facility _____

Date	Review (#)	Admin. Change (#)	Description	Signature

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

PART I
GENERAL INFORMATION
Page 7

7. Potential Spills -- Prediction & Control

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

See attached Data Sheets

***See maps on attached data sheets**

Discussion:

See attached Data Sheets

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

   Yes, for tanks.

9. Inspections and Records

   A. The required inspections follow written procedures. **Yes**

   B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached.

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

   Discussion:

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

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

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

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

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

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

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

10. Personnel, Training, and Spill Prevention Procedures

A. Personnel are properly instructed in the following:

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

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

Describe procedures employed for instruction:

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

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

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

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

Describe briefing program:

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

PART II
DESIGN AND OPERATING INFORMATION

A. Facility Drainage

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

See attached Data Sheets

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

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

See attached Data Sheets

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

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

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

B. Bulk Storage Tanks

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

See attached Data Sheets

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

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

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

See attached Data Sheets

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

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

See General Information, Inspections and Records, Item 9.

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

a. Monitoring the steam return or exhaust lines for oil: **N/A**

Describe the monitoring procedure. **N/A**

b. Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system. **N/A**

c. Installing external heating systems. **N/A**

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

Describe method and frequency of observation: **N/A**

C. Facility Transfer Operations and Pumping

1. Corrosion protection for buried pipelines:

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

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

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

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

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

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

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

Describe pipe support design:

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

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

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

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

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

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

D. Facility Tank Car & Tank Truck Loading/Unloading Rack
Tank car and tank truck unloading occurs at the facility. (If yes, complete 1 through 5 below.)

See attached Data Sheets

1. Unloading procedures meet the minimum requirements and regulations of the Department of Transportation. **See attached Data Sheets**

2. The unloading area has a quick drainage system. **See attached Data Sheets**

3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the plant. **See attached Data Sheets**

Describe containment system design, construction materials, and volume:

See attached Data Sheets

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

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

See attached Data Sheets

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

E. Security

1. Plants handling, processing, or storing oil products are fenced. **Yes**

2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. **Yes**

3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. **Yes**

4. Starter controls on all oil product pumps in non-operating or standby status are:

   a. locked in the off position; **No**

   b. located at site accessible only to authorized personnel. **Yes**

5. Discussion of items 1 through 4 as appropriate:

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

6. Discussion of lighting around the facility:

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

NOT APPLICABLE

SPCC PLAN, ATTACHMENT #1
SPILL HISTORY

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

1. Date_____ Volume _____ Cause: _____

_____

_____

_____

_____

Corrective action taken: _____

_____

_____

_____

Plans for preventing recurrence: _____

_____

_____

_____

_____

_____

2. Date_____ Volume _____ Cause: _____

_____

_____

_____

_____

Corrective action taken: _____

_____

_____

_____

_____

Plans for preventing recurrence: _____

_____

_____

_____

_____

_____

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

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

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

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

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

A strong oil spill contingency plant is attached?
Spill Response Plan is at the Asset Office.
A written commitment of manpower is attached?
Yes, See first page of General SPCC Plan.

EXAMPLE - ONLY

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

Inspection Procedure:

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

Date of Drainage	Date of Bypassing		Date of Inspection	Oil Removal	Supervisor's or Inspector's Signature
	Open	Closed			

North Eunice Compressor Station
DATA SHEET

PART I
GENERAL INFORMATION

1. Name of facility: **North Eunice Compressor Station**

3. Location of facility: **North city limits of Eunice, New Mexico.**

7. Potential Spills -- Prediction & Control: **See Table 1.**

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

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

PART II
DESIGN AND OPERATING INFORMATION

A. Facility Drainage

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

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

B. Bulk Storage Tanks

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

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

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

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

2. The unloading area has a quick drainage system. **N/A**

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

Describe containment system design, construction materials, and volume:

N/A

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

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

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

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

Attachments:
Site Plan – Figure 1
Table 1 – Potential Spills – Prediction and Control

Figures 3-10 (Tank photographs)
Applicability of the Substantial Harm Criteria
Table 2 - Dike Calculations.

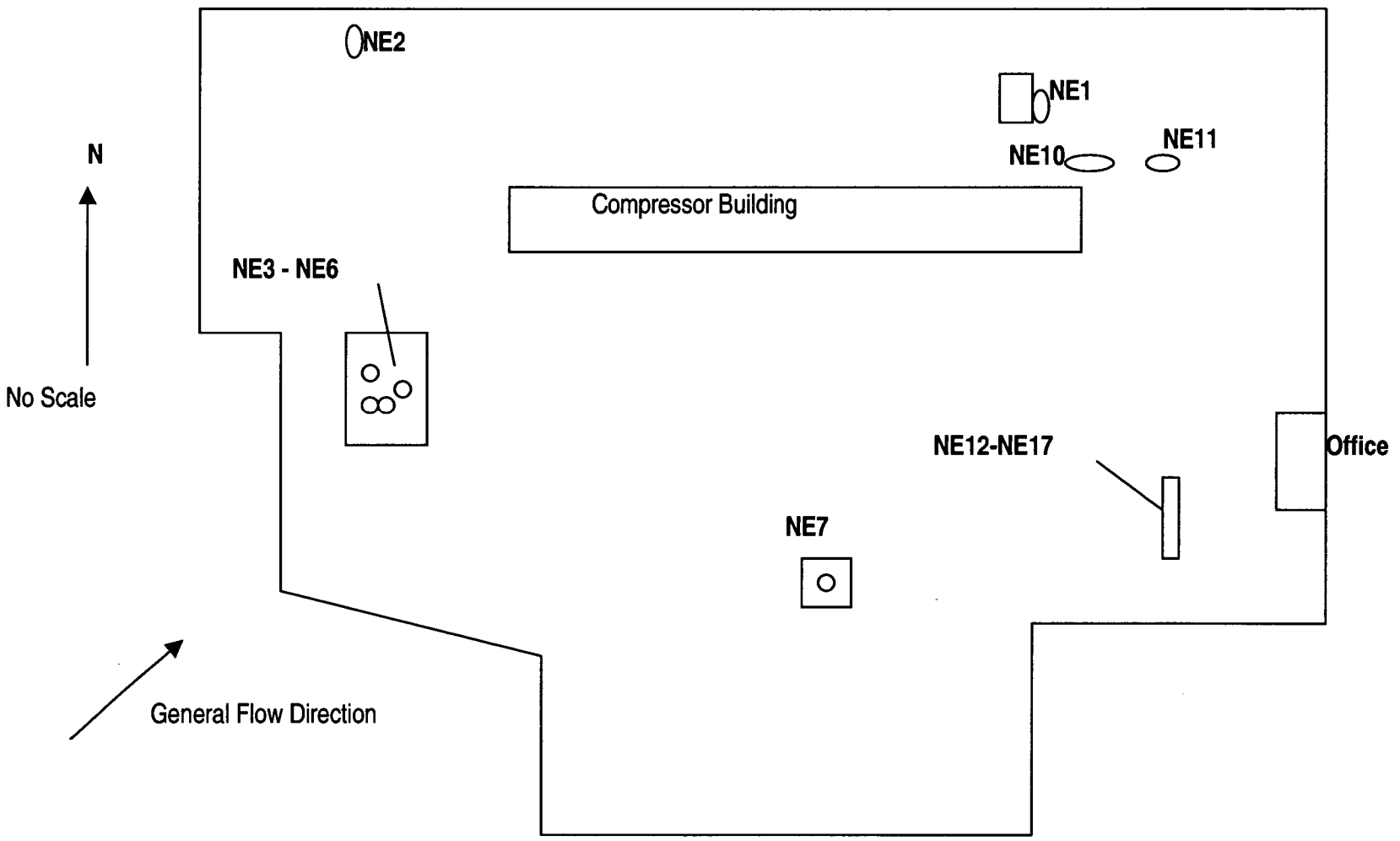


Figure 1
North Eunice Compressor Station
Site Plan

Table 1
Potential Spills – Prediction and Control

Vessel Number	Contents	Major Type of Failure	Total Quantity (gal)	Direction of Flow	Secondary Containment	Figure No.
NE1	Diesel	Overfill / rupture	504	N	Concrete dike 6' x 12' x 2'	2
NE2	Varsol	Overfill / rupture	1,050	N	Concrete dike 6' x 15' x 2'	3
NE3	Slop oil	Overfill / rupture	8,820	E	Steel dike 96 lf x 5' x 2'	4
NE4	Slop oil	Overfill / rupture	8,820	E	Steel dike 96 lf x 5' x 2'	4
NE5	Slop oil	Overfill / rupture	8,820	E	Steel dike 96 lf x 5' x 2'	4
NE6	Oil/water	Overfill / rupture	16,800	E	Steel dike 96 lf x 5' x 2'	4
NE7	Texatherm hot oil	Overfill / rupture	8,400	N	Concrete dike 27' x 24' x 3'	5
NE8	GeoTex lube oil	Overfill / rupture	5,000	N	Concrete dike 18' x 39' x 4'4"	6
NE9	URSA ED40 lube oil	Overfill / rupture	5,000	N	Steel oval tank 34.6 sf x 3'	7
NE10	Varsol	Overfill / rupture	128	E	Concrete dike 12' x 51' x 8"	8
NE11	Hydril oil	Overfill / rupture	128	E	Concrete dike 12' x 51' x 8"	8
NE12	URSA 30 oil	Overfill / rupture	128	E	Concrete dike 12' x 51' x 8"	8
NE13	RU 68 oil	Overfill / rupture	128	E	Concrete dike 12' x 51' x 8"	8
NE14	Regal 32 oil	Overfill / rupture	128	E	Concrete dike 12' x 51' x 8"	8
NE15	Syn-star DE68 oil	Overfill / rupture	128	E	Concrete dike 12' x 51' x 8"	8

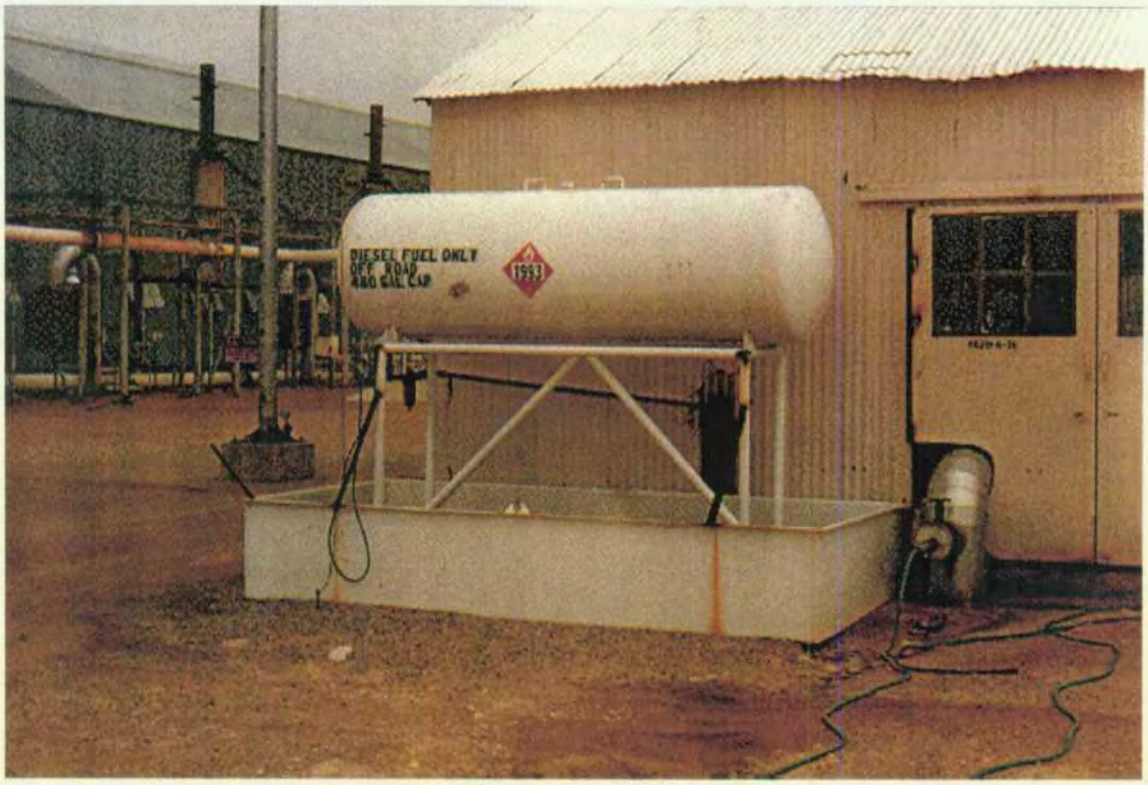


Figure 2 – NE1

Figure 3 – NE2

Figure 4 – (left to right) NE3, NE4, NE5 and NE6

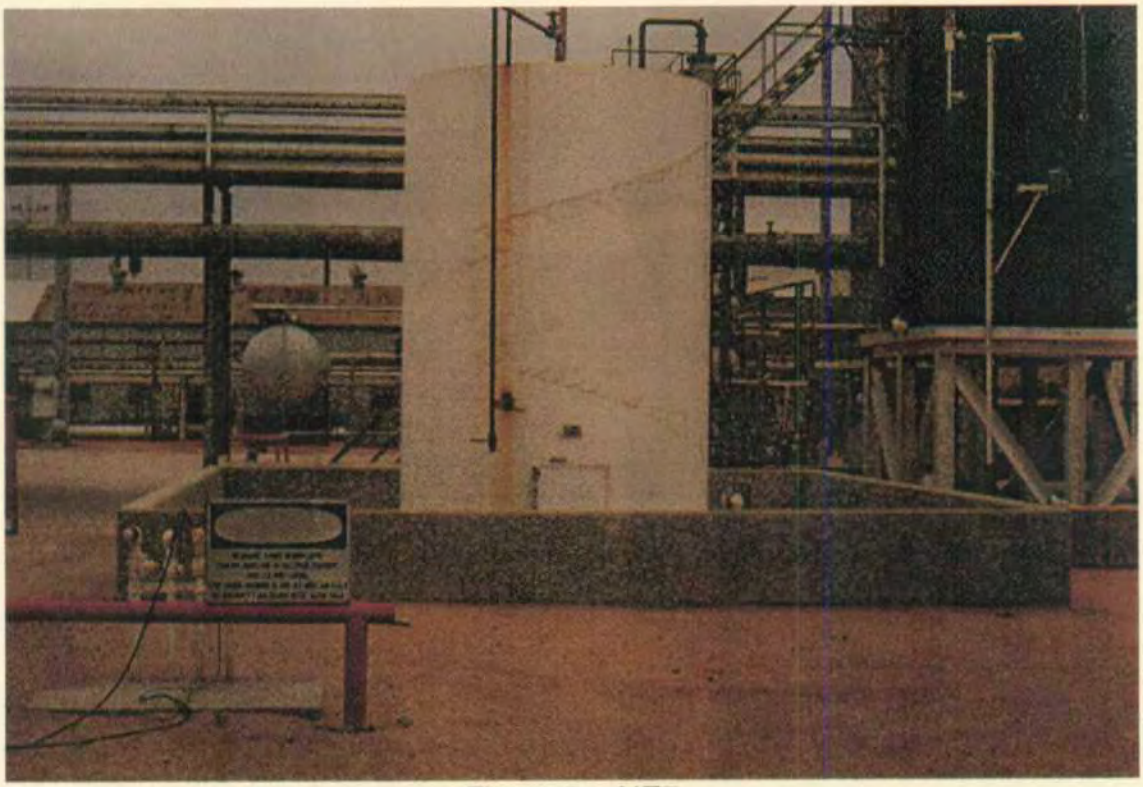


Figure 5 – NE7

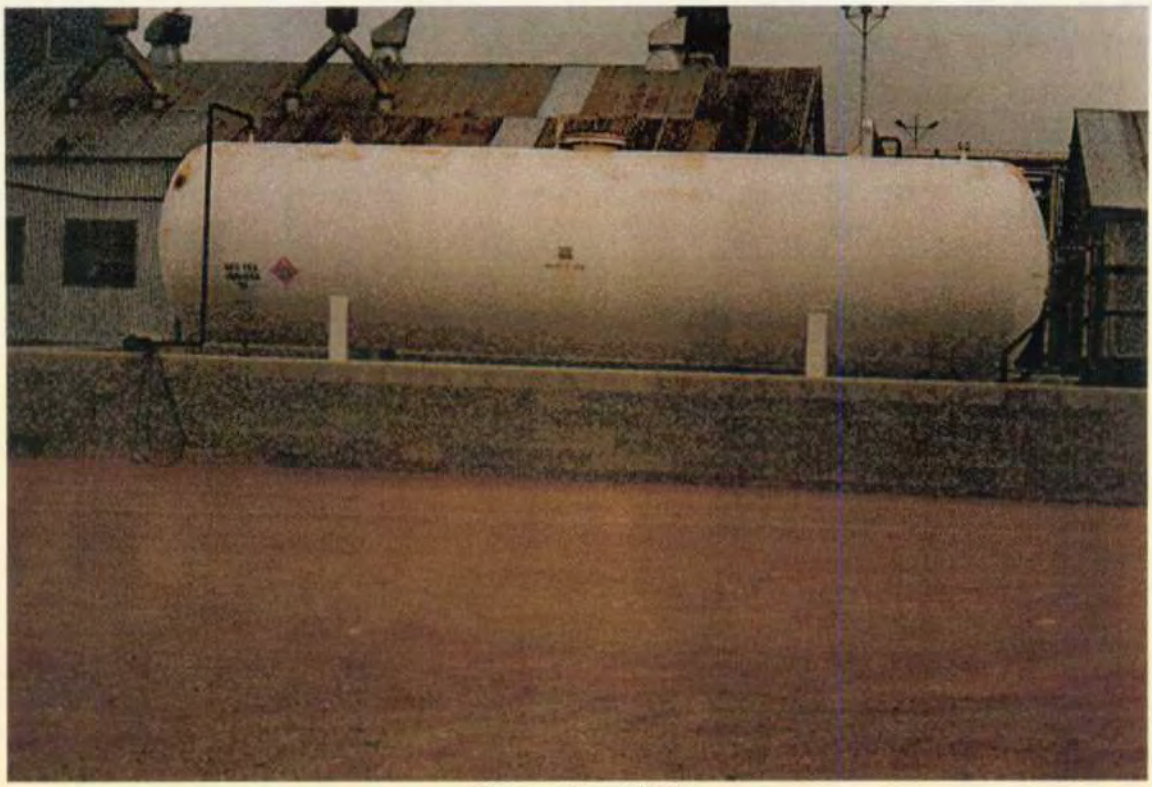


Figure 6 – NE8

Figure 7 – NE9

Figure 8 (left to right) – NE10, NE11, NE12, NE13, NE14, NE15

Applicability of Substantial Harm Criteria

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? **No**

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? **No**

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **No**

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

Table 2
Dike Calculations
North Eunice Plant

Tank / Dike Combination	Dike Full Storage Volume (see Table 1 for dimensions), gal.	Largest Tank capacity (gal)	Available Dike Full Precipitation Storage (in.)
NE1	1,077	504	12.7
NE2	1,346	1,050	5.3
NE3, NE4, NE5, NE6	7,180	16,800	NA
NE7	14,541	8,400	15.2
NE8	22,754	5,000???	41.4
NE9	776	5,000	NA
NE10, NE11, NE12, NE13, NE14, NE 15	3,051	128	7.7

SECTION 10 - CLOSURE PLAN

CLOSURE PLAN-NORTH EUNICE COMPRESSOR STATION
DYNEGY MIDSTREAM SERVICES, L. P.
AS PART OF THE
DISCHARGE PLAN

Pursuant to WQCC 3:107.A.11, Dynegy will take all reasonable and necessary measures to prevent the exceedance of WQCC Section 3103 quality standards should Dynegy choose to permanently close the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on the site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.