



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



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

November 5, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-143

RECEIVED
NOV 8 1993
OIL CON. DIV.
DIST. 3

Mr. David Roderick
Refinery Manager
Bloomfield Refining Company
P.O. Box 159
Bloomfield, New Mexico 87413

RE: **APPROVAL OF DISCHARGE PLAN GW-130**
BLOOMFIELD REFINING CO. CLASS 1 WELL
SAN JUAN COUNTY, NEW MEXICO

Dear Mr. Roderick:

The **discharge plan GW-130** for the Bloomfield Refining Company (BRC) Class I non-hazardous well located in the NE/4 SE/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The approved discharge plan consists of the discharge plan dated September 16, 1992; the materials dated January 6, 1993, and January 21, 1993, submitted as supplements to the application; and the amended administrative order SWD-528 issued by the Director of the Oil Conservation Division (OCD) on October 6, 1993.

The discharge plan was submitted pursuant to Section 5-101.B.3 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Sections 5-101.A and 3-109.C. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan.

Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface water, ground water, or the environment which may be actionable under other laws and/or regulations. In addition, the OCD approval does not relieve you of liability for compliance with any other laws and/or regulations.

Mr. David Roderick
November 5, 1993
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The monitoring and reporting shall be as specified in the above referenced materials. Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

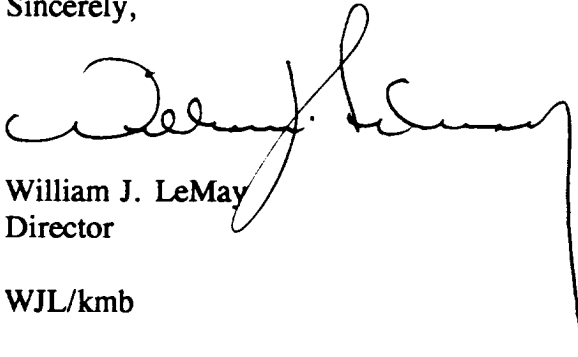
Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire November 4, 1998, and you should submit an application for renewal in ample time before this date. Note that under Section 5-101.G of the regulations, if a discharger submits a discharge plan renewal application at least 180 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the BRC Class I non-hazardous well is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat fee of one-thousand, three-hundred and eighty (1380) dollars for Class I injection wells.

The OCD has not received your \$50 filing fee or \$1380 flat fee (total fee \$1430). The filing fee is due upon receipt of this letter. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. Please make all checks out to: **NMED - Water Quality Management** and addressed to the OCD Santa Fe Office.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'William J. LeMay', with a long vertical line extending downwards from the end of the signature.

William J. LeMay
Director

WJL/kmb

Attachment

xc: Denny Foust, OCD Aztec Office

**ATTACHMENT TO DISCHARGE PLAN GW-130 APPROVAL
BLOOMFIELD REFINING COMPANY CLASS I WELL
DISCHARGE PLAN REQUIREMENTS**

(November 5, 1993)

1. Sump Construction: All sumps and below-grade tanks will be approved by the OCD prior to installation and will incorporate secondary synthetic containment and leak detection in their designs. All leak detection systems will be inspected weekly and the OCD Santa Fe Office will be notified immediately upon discovery of fluids in any leak detection system.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Tank Berming: All tanks that contain materials other than fresh water will be bermed to contain one and one-third times the capacity of the tank.
4. Spill Reporting: All spills and/or leaks will be reported to the OCD Aztec District Office pursuant to WQCC Rule 1-203 and OCD Rule 116.
5. Maximum Injection Pressure: The maximum operating injection pressure at the wellhead will be 659 psi in accordance with OCD Order SWD-528.
6. Mechanical Integrity Testing: A mechanical integrity test will be conducted on the well annually in accordance with OCD testing procedures. The OCD will be notified prior to the test so that they may witness the test.
7. Well Construction: Cement for all strings of casing will be circulated to surface. Injection will be through a plastic lined tubing with a packer set no more than 100 feet from the bottom of the long-string casing.
8. Annulus: The casing-tubing annulus will be filled with an inert fluid and a minimum pressure of 100 psi maintained.
9. Continuous Monitoring: Continuous monitoring devices will be installed and records made of injection pressure, flow rate, flow volume, and annular pressure.
10. Wastes Permitted for Injection: The injection well will only accept non-hazardous waste from BRC operations. No other wastes from commercial or private sources will be accepted.

11. Chemical Analysis of Injection Fluids: The following analyses of injection fluids will be conducted on a quarterly basis:
 - a. Aromatic and halogenated volatile hydrocarbon scan by either EPA method 8010/8020 or EPA method 8240.
 - b. General water chemistry to include calcium, potassium, magnesium, sodium, bicarbonate, carbonate, chloride, sulfate total dissolved solids (TDS), pH, and conductivity.
 - c. Heavy metals using the ICAP scan (EPA method 6010) and Arsenic and Mercury using atomic absorption (EPA methods 7060 and 7470).
12. Oily-Water Pond Sampling: The oily-water ponds will be sampled and analyzed in accordance with the New Mexico Environment Department's (NMED) Hazardous Waste Regulations.
13. Quarterly Reporting: The following reports will be signed and certified in accordance with WQCC section 5-101.H. and submitted quarterly to both the OCD Santa Fe and Aztec Offices:
 - a. Results of the chemical analysis of the injection fluids.
 - b. Monthly average, maximum and minimum values for injection pressures; flow rate and flow volume; and, annular pressure.
 - c. MIT results, submitted with the first quarterly report after completion of the MIT.
 - d. Well workovers, well stimulations, and any other tests submitted with the first quarterly report after completion of the workover test.
14. Monthly Reporting: Monthly reporting of the disposal of produced water will be in accordance with OCD Rule 1120 which requires monthly submittal of Form C-120-A to both the OCD Santa Fe and Aztec Offices.
15. Well Workovers Operations: OCD approval will be obtained prior to performing remedial work or any other workover. Approval will be requested at the OCD Aztec District Office on OCD Form C-103 "Sundry Notices and Reports on Wells" (OCD Rule 1103-A).
16. Closure: The OCD will be notified when operations of the facility is discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for OCD approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.