# GW-048

# General Correspondence

# YEAR(S): 2009 - 2014

## Lowe, Leonard, EMNRD

**From:** Bob Stewart [bstewart@westtexasgas.com]
**Sent:** Thursday, January 21, 2010 6:08 PM
**To:** Lowe, Leonard, EMNRD
**Cc:** Elena Hofmann; Kyle Shelton
**Subject:** RE: GW-048 Permit
**Attachments:** 2010 0121 GW-048 Workplan Denton.pdf → SEE ATTACHMENT

Leonard,

Please find attached the Work Plan for Provision 16 of our renewed Discharge Permit GW-048.
Thank you for your patience sir.

Bob Stewart

From: "Lowe, Leonard, EMNRD" <Leonard.Lowe@state.nm.us>
To: "Elena Hofmann" <Elena.Hofmann@rpsgroup.com>
Cc: "Bob Stewart" <bstewart@westtexasgas.com>, "Kyle Shelton" <SheltonKy@rpsgroup.com>
Date: 01/12/2010 02:34 PM
Subject: RE: GW-048 Permit

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Extension is granted to the date specified below. Notify OCD if that date slips.

llowe

**Leonard Lowe**
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

**From:** Elena Hofmann [mailto:Elena.Hofmann@rpsgroup.com]
**Sent:** Tuesday, January 12, 2010 1:27 PM
**To:** Lowe, Leonard, EMNRD
**Cc:** Bob Stewart; Kyle Shelton
**Subject:** FW: GW-048 Permit

Leonard,

As discussed via phone, we will submit the below permit required plan by January 21st. Thank you for your willingness to allow extra time to respond.

Thanks,
Elena Hofmann

**Elena Hofmann**
**Project Manager - RPS**
14450 JFK Boulevard, Suite 400,
Houston, Texas, 77032
**Tel:** +1 832 239 8015
**Fax:** +1 281 987 3500
**Mob:** +1 713 208 1932
**Email:** Elena.Hofmann@rpsgroup.com
**www:** www.rpsgroup.com

----- Forwarded by Bob Stewart/WTG/JLD on 01/12/2010 01:29 PM -----
From: "Lowe, Leonard, EMNRD" <Leonard.Lowe@state.nm.us>
To: <bstewart@westtexasgas.com>
Cc: "Sanchez, Daniel J., EMNRD" <daniel.sanchez@state.nm.us>, "Jones, Larry" <LarryA.Jones@Williams.com>
Date: 12/08/2009 03:36 PM
Subject: GW-048 Permit

Mr. Stewart,

Here is the Permit for the Davis Gas Plant. Please sign and return by **December 18, 2009.**

Condition 16 within the permit noted a deadline day of December 16 2009 to submit items to the OCD. That dead line has passed. Submit those items by **January 16, 2010.**

Please submit these request in a timely manner.

llowe

**Leonard Lowe**
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

01.21.10 E-Mail attachment from Bob Stewart

1/7

**DAVIS GAS PROCESSING**
211 NORTH COLORADO
MIDLAND, TEXAS 79701-4696
Office: 432-682-6311 Fax: 432-682-4024

January 21, 2010

Mr. Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, NM 87505

Re: Work Plan for Provision 16
Renewal Discharge Permit, GW-048
Denton Gas Plant
Lea County, New Mexico

Dear Mr. Lowe:

Included herein is the work plan developed by West Texas Gas (WTG) for Provision 16 of Permit GW-048 issued by the Oil Conservation Division (OCD) of the New Mexico Energy, Minerals and Natural Resources Department (EMNRD) on October 7, 2009. Since your August site visit and subsequent issuance of the permit, WTG environmental, engineering, and operational personnel have been evaluating methods for implementation of these requirements at our Denton Gas Plant to address observations made and to bolster overall prevention and response capabilities at the facility. We appreciate your guidance and direction in this matter and look forward to working with you to resolve these items. Based on our review of the conditions contained in the permit renewal, the following items are addressed herein:

- Item 16.1 – Cooling Tower Basin pond;
- Item 16.2 – Compressor Building Skid Area;
- Item 16.3 – Disposal of Staged Wastes;
- Item 16.4 – Container Management;
- Item 16.5 – Investigation of Release Areas;
- Item 16.6 – Replacement of Below-Grade Sumps; and
- Item 16 (at end) – Hydrostatic Testing of Belowground Lines.

**Item 16.1 – Cooling Tower Basin**

Item 16.1 requires WTG to re-engineer the old cooling tower basin if WTG wishes to continue using this basin for the storage of liquids. The old cooling tower has been removed and only the pond remains. As evident from your inspection of the facility on August 27, 2009, the basin has good integrity and does retain storm water from the facility to the point that ponded liquids have created an opportunity for mosquito propagation. For this reason, WTG has elected to close the pond and contour the area to prevent ponding.

As an immediate response to your site visit, free liquids that were contained in the basin were removed and disposed of in September 2009. To permanently remove the basin from service, WTG proposes the following additional activities:

- Removal of any liquids that have accumulated in the basin since September 2009, characterization of removed liquids, and disposal at an authorized OCD and/or NMED facility;
- Removal of accumulated sediments from the basin, characterization of the removed sediments, and disposal at an authorized OCD and/or NMED facility;
- Demolish side/retaining walls and leave in place; and
- Backfilling of the area to facilitate drainage.

Since the Cooling Tower Basin has good integrity and has no history of waste management activities, WTG believes that the basin is retaining uncontaminated storm water. Nonetheless, liquids and sediment removed prior to closure will be sampled for benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA SW-846 Method 8260. These constituents capture the general nature of the materials processed at the facility that would facilitate characterization. The analytical results will be compared to appropriate (i.e., industrial) soil screening levels (SSLs) provided in New Mexico Environmental Department (NMED) guidance documents and reported to OCD. If data suggest that SSLs have not been exceeded, then WTG will request authorization to backfill the area as uncontaminated debris. If results are above SSLs, WTG will propose the next course of action for closure and seek prior OCD approval for that action.

**Item 16.2 – Compressor Building Skid Area**

Item 16.2 requires WTG to investigate and remediate releases that may have occurred beneath and adjacent to the containment area of the compressor building with emphasis on the north side of the structure. As an immediate response to your site visit, free liquids that were contained in the containment were removed and disposed of in September 2009. To address the items noted for the area, WTG proposes the following additional activities:

- Removal of liquids that have accumulated in the unit since September 2009, characterization of removed liquids, and disposal at an authorized OCD and/or NMED facility;
- Areas of stained soils on the north side of the unit will be excavated, characterized, and disposed at an authorized OCD and/or NMED facility;
- Removal of any additional soil (stained or not) that may be required to minimize storm water inflows;
- Visual inspection of locations where piping penetrates the "shell" of the unit and applying sealants to these areas to minimize inflow of fluids; and
- As further described below, perform an investigation of soils around the unit to determine if releases have occurred to subsurface soils and/or the need for subsequent remediation.

Based on our evaluation, we believe that there are two primary pathways for water entering the unit. One is through gaps between the piping and unit structure, and one is through overtopping from surface soils and spillover into the unit. We feel that the soil removal actions described above will restore sufficient wall height to prevent storm water overtopping and spillover into the unit. We believe that putting sealants around the piping entrances into the unit will further minimize entry of fluids into the unit.

**Soil Investigation Methodology**

Soil borings will be advanced as close as practical to the unit perimeter on all sides of the structure utilizing hydraulic push technology and/or hand auger methods in areas that are inaccessible to a drilling apparatus. The borings will be observed and field logged for the presence of visual evidence of contamination (e.g., staining), olfactory evidence of contamination (e.g., odors), as well as readings from an organic vapor analyzer (OVA) meter or similar device (e.g., photo ionization detector [PID]). Since the bottom of the unit is approximately 2.5 to 3 feet below grade, borings will be advance a minimum of four feet below ground surface to determine if a release has occurred. If evidence from the above indicators (visual, olfactory, and/or meter readings above background) suggests that a depth of four feet is inadequate to evaluate the vertical extent of potential impacts, the boring will be deepened based on field observations.

Soil cores recovered from each boring location will be logged in the field by a qualified geologist using the Unified Soil Classification System (USCS). Visual observations of staining, olfactory evidence of odors, and meter readings will be noted in the soil descriptions. A minimum of one soil sample will be collected from each soil boring at the location of highest perceived contamination for analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA SW-846 Method 8260. These constituents capture the general nature of the materials processed at the facility and would identify potential environmental impacts.

**Reporting**

After receiving analytical data from the contract laboratory, results will be compared to appropriate (industrial) SSLs provided in NMED guidance documents. Following completion of soil investigation activities, a report will be submitted to OCD for review and approval that summarizes all of the findings and makes recommendations for remediation, where necessary. The report will include a written discussion of the investigation and results obtained from it, appropriate site maps, soil boring logs, analytical reports provided by the contract laboratory, and other supporting documentation that is warranted.

**Subsequent Remediation (if necessary)**

If data suggests that SSLs have been exceeded, then a plan for further remediation will be submitted to OCD for review and approval. If SSLs have not been exceeded, then remediation efforts are complete.

**Item 16.3 – Disposal of Staged Wastes**

Item 16.3 requires WTG to properly dispose of staged wastes that were observed during the August 27, 2009 OCD inspection. These wastes consisted of: (1) Molecular sieve material (mol sieve), (2) "contaminated" soil, and (3) used amine filters. To address the requirements of this item, it requires WTG to remove wastes from the facility for disposal at an off-site facility. As detailed in Provision 6 of our permit, WTG wants to ensure that it explicitly has authorization to do so for all efforts implemented in response to addressing items in Provision 16 of the permit and is hereby specifically requesting case-by-case authorization from OCD to dispose of the following waste streams:

- Water and/or oil mixtures;
- Hydrocarbon impacted soils;
- Molecular sieve materials;

- Contaminated barrels/containers;
- Amine filters; and
- Other hydrocarbon-contaminated debris/materials;

All of the above wastes will be properly classified and managed at facilities having the appropriate OCD and/or NMED authorizations.

Used amine filters are a routinely generated waste stream by the Denton Gas Plant. The particular used amine filters identified in the OCD inspection have been removed from the property by Control Recovery, Inc., Hobbs, New Mexico. The Mol sieve, and "contaminated" soil identified during the OCD inspection are being profiled and are still being stored on site. However, in order to comply with Permit Condition 6.B, the materials have been moved to areas covered by concrete slabs to prevent contact of the materials with the ground surface. WTG is in the process of obtaining an estimate from qualified waste transporters and disposal facilities to remove and properly dispose of these wastes, and they will be removed promptly following approval of this work plan.

A strategy for storing/disposing of these wastes will be implemented at the facility to prevent future occurrences such as the one identified in the August 27, 2009 OCD inspection. Additionally, any structural upgrades to storage areas that are required by permit conditions will be implemented at the site.

**Item 16.4 – Container Management**

Item 16.4 requires the proper management of containers and barrels. The barrels (drums) identified in the inspection have since been relocated to a concrete lined area and have been placed in a horizontal fashion in accordance with Permit Condition 7. Future storage of the barrels (drums) will be done in accordance with applicable permit conditions. When the barrel storage area is near capacity, a waste disposal company will be contacted to remove and properly dispose of contaminated containers. Alternatively, containers that are RCRA empty and/or not contaminated may be sent for recycling.

Areas where drums are stored for active use (e.g., dispensing of materials used on a daily basis), appropriate berms or structural containment (e.g., drip pans) will be provided as required by the permit conditions. The OCD inspection also identified multiple above ground storage tanks that had insufficient berming or other structural containment to prevent releases from impacting adjacent areas. These conditions will be remedied and documented. We would note that the tank reflected in Photo 15 stores fresh water. Accordingly, no secondary containment is required for this tank.

A strategy for storing of containers and barrels is being implemented at the facility to prevent future occurrences such as the one identified in your inspection as well as address the requirements of OCD Rule Part 35. WTG remains in the process of exploring options for improving our container management practices, which include implementing upgrades to storage areas that are required by permit conditions.

**Item 16.5 – Investigation of Release Areas**

Item 16.5 requires development of a work plan for investigating general releases throughout the facility observed during the August 27, 2009 inspection. Specifically, this item referenced Photos 19 – 27, 33 – 36, and 39 as areas of concern. WTG believes that the areas identified in the photos represent shallow, surface impacts from operations. To address the areas noted in the photos, WTG will perform the following activities:

- Visually impacted soils will first be scrapped, removed, placed in appropriate containers, characterized for disposal, and then disposed at an authorized OCD/NMED facility;
- A verification sample from the area will be obtained and compared to industrial SSLs;
- If data suggests that SSLs have been exceeded, then additional soil investigation will occur as detailed below and a plan for further remediation will be submitted to OCD for review and approval; and
- If data suggest that SSLs have not been exceeded, then remediation efforts are complete.

**Soil Investigation Methodology**

Soil borings will be advanced as close as practical to the center of the areas of concern being sampled utilizing hydraulic push technology and/or hand auger methods in areas that are inaccessible to a drilling apparatus. The borings will be observed and field logged for the presence of visual evidence of contamination (e.g., staining), olfactory evidence of contamination (e.g., odors), as well as readings from an OVA meter or similar device (e.g., PID). Borings will be advance a minimum of four feet below ground surface. If evidence from the above indicators (visual, olfactory, and/or meter readings above background) suggests that a depth of four feet is inadequate to evaluate the vertical extent of potential impacts, the boring will be deepened based on field observations.

Soil cores recovered from each boring location will be logged in the field by a qualified geologist using the USCS. Visual observations of staining, olfactory evidence of odors, and meter readings will be noted in the soil descriptions. A minimum of one soil sample will be collected from each soil boring at the location of highest perceived contamination for analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA SW-846 Method 8260. These constituents capture the general nature of the materials processed at the facility that would identify potential environmental impacts.

**Reporting**

After receiving analytical data from the contract laboratory, results will be compared to appropriate (industrial) SSLs provided in NMED guidance documents. Following completion of soil investigation activities, a report will be submitted to OCD for review and approval that summarizes all of the findings and makes recommendations for remediation, where necessary. The report will include a written discussion of the investigation and the results obtained from it, appropriate site maps, soil boring logs, analytical reports provided by the contract laboratory, and other supporting documentation that is warranted.

**Subsequent Remediation (if necessary)**

If data suggests that SSLs have been exceeded, then a plan for further remediation will be submitted to OCD for review and approval. If SSLs have not been exceeded, then remediation efforts are complete.

**Item 16.6 – Replacement of Below-Grade Sumps**

Item 16.6 requires WTG to submit a work plan to replace below-grade tanks that were observed during the August 27, 2009 OCD inspection. The OCD observed a below-grade skimmer pit (inspection photos 28 and 29), buried barrels adjacent to compressors (inspection photo 30), a single wall catchment adjacent to an amine re-boiler (inspection photo 32), and a single wall tank adjacent to an amine skid (inspection photo 31).

As previously discussed for other items, a vacuum truck was contracted in September 2009 to remove the free liquids from below-grade sumps.

A single, existing below ground tank adjacent to the process refrigeration skid is the only below ground tank currently planned to be kept in service; however, it is planned to serve only as a secondary containment structure for a new smaller tank to be placed within. This existing below ground tank will be emptied, cleaned out and integrity tested prior to being restructured as a secondary containment for leak detection.

The skimmer pit has served as a storm water catchment in the past, but revised management practices are being evaluated to accommodate complete removal of the skimmer pit from service. Currently, a gathering system using smaller above ground tanks is being evaluated that may entail placement of a single 1000 bbl tank to receive all the fluids currently collected at the skimmer pit.

The sumps adjacent to the compressors (photo 30) and the single-wall tank adjacent to the amine re-boiler (photo 32) will be removed from service and an alternative system that meets applicable permit conditions is being designed and put into service at each location.

The tank identified in photo 31 is actually an amine skid and not a tank. The photo illustrates the skid holding water, and there are holes in the "star plate" metal that comprises the surface of the skid. Plates will be welded over the openings in the amine skid (these openings are where pumps used to be mounted), and a management system will be implemented to minimize the ponding of water on the surface of the skid.

Above-ground tanks installed as replacements to the aforementioned below-ground tanks will be equipped with secondary containment materials that are relatively impermeable (e.g., liners, clay berms, etc.). Further, the containment volume will be capable of holding the entire contents of the largest tank plus 30%.

**Item 16 (at end) – Hydrostatic Testing of Belowground Lines**

This item requires documentation of hydrostatic testing of drain/process lines. WTG believes that this provision relates to only underground lines such as those described in Permit Provision 12 and not aboveground lines since those are visually inspected for integrity. After replacement of belowground sumps with tanks (as detailed above in Item 16.6), WTG will have only three remaining lines with portions being considered belowground:

- Inlet to the slop oil tank, a two-inch diameter, high-density polyethylene (HDPE), SDR 17 piping;
- Outlet from the skimmer pit, a two-inch diameter, HDPE, SDR 17 piping; that is underground as to not obstruct a vehicular driveway.
- Condensate tank line, a two-inch diameter, steel, Schedule 40 piping that is mostly above ground except for a soil covered driveway segment.

WTG will perform integrity testing of each line in accordance with Permit Provision 12.A, which requires pressure piping to be tested at 150% of normal operating pressure and atmospheric drain piping to be tested at 3 PSI greater than normal operating pressure. The pressure must be maintained for 30 minutes with no more than 1% loss/gain in pressure. Results of this testing will be forwarded to you upon completion.

Further, WTG will ensure that schematic diagrams are in place showing all locations of underground piping, drains, vents, risers, valves, etc. that show the locations of these lines as well as the size, type, and rating of each according to Permit Provision 12.B.

If you have any questions or comments regarding the scope of work discussed herein, please do not hesitate to contact me at 432-682-6311.

Sincerely,

**Davis Gas Processing**

Bob Stewart
Environmental Manager

cc: Elena Hofmann, Project Manager, RPS Group – Houston TX
Kyle Shelton, Corrective Action Manager, RPS Group – Austin TX

## Lowe, Leonard, EMNRD

**From:** Lowe, Leonard, EMNRD
**Sent:** Wednesday, January 19, 2011 9:15 AM
**To:** 'Elena Hofmann'; Hill, Larry, EMNRD
**Cc:** 'Bob Stewart'; 'Kyle Shelton'; VonGonten, Glenn, EMNRD
**Subject:** Condition 16 VIOLATION for GW-048

**Importance:** High

Good morning,

Your recently renewed discharge permit (12/2009) for the Davis Denton Discharge permit Condition 16 noted that the owner/operator of this facility shall submit updates to the Santa Fe NMOCD office by December 15, 2009. NMOCD recognized that the owner/operator had not submitted any information per the original designated date and therefore extended the dead line to **January 16, 2010**. NMOCD Santa Fe office has no record of any information submitted yet.

**GW-048 is currently in violation of their discharge permit.**

Please provide information to the NMOCD on this information.

Thank you for your attention.

llowe

**Leonard Lowe**
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

## Lowe, Leonard, EMNRD

**From:** Elena Hofmann [Elena.Hofmann@rpsgroup.com]
**Sent:** Tuesday, October 27, 2009 2:56 PM
**To:** Lowe, Leonard, EMNRD
**Cc:** Bob Stewart; Kyle Shelton
**Subject:** RE: GW-048, Davis Denton GP
**Attachments:** Denton Discharge Plan corrections w_H2S plan 10.27.09.pdf

Leonard,

A response to your questions is provided along with updates to the Denton Gas Plant's Discharge Plan.

Responses to your questions below are as follows:

1. Yes, the concrete slabs that you show via photo represent where the ammonia plant use to be.
2. The description noted in Section 7 was incorrect. There is no unlined pit where the facility pumps excess rainwater. Please replace Section 7 with the revised Section 7 attached.
3. The description noted in Section 11 regarding "...historical pit at the facility that was used for evaporation..." is incorrect. This statement has been removed. Please replace Section 11 with the revised Section 11 attached.
4. Thanks for the update and please note that this has been corrected in the revised Section 11 being sent to you.
5. The facility meets NMAC 19.15.11.8 Regulatory Threshold for H2S. They conduct daily testing of the inlet H2S concentration which is usually about 1/3 of the plant radius calculation value of 9250 ppm H2S found in the plan.
6. The site's H2S plan has been updated per your request below and is attached. Please replace the original H2S Plan submitted in the site's Discharge Plan application with the revised attached plan.

If you have any additional questions or need more information, please let us know.

Thank you,
Elena

**Elena Hofmann**
**Project Manager - RPS**
14450 JFK Boulevard, Suite 400,
Houston, Texas, 77032
**Tel:** +1 832 239 8015
**Fax:** +1 281 987 3500
**Mob:** +1 713 208 1932
**Email:** Elena.Hofmann@rpsgroup.com
**www:** www.rpsgroup.com

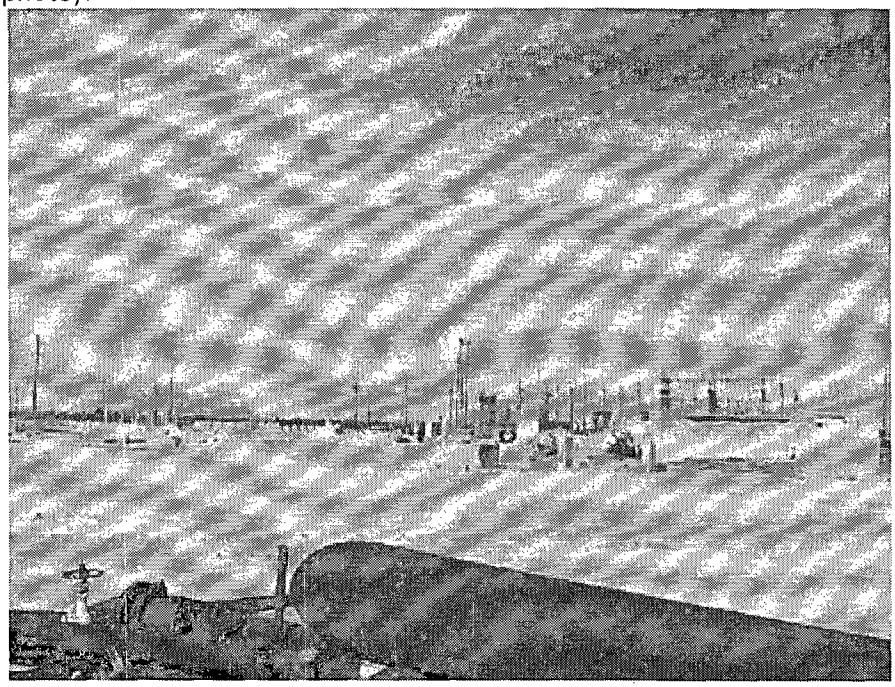
**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
**Sent:** Monday, October 05, 2009 10:31 AM
**To:** Bob Stewart
**Cc:** Elena Hofmann
**Subject:** GW-048, Davis Denton GP

Mr. Stewart,

Good afternoon,

I have a few questions to items stated within the 2009 renewal discharge plan application for the Davis Denton Gas Plant.

1. SECTION 5: 6th paragraph states, "An Idle ammonia plant and an idle/inoperative refrigerated gas plant process unit.." Is this statement referring to the concrete slabs located on the SW side of the Davis Denton facility (see photo)?



2. SECTION 7: Cooling Towers/Fans: "Excess rainwater runoff is pumped to the unlined pit". What unlined pit is this statement referring to? At the time of inspection I did not see a pit on the facility yard. Please clarify. I do not see a "pit" noted on the facility schematic. Please submit an updated facility schematic, not a Process Flow Diagram.
3. SECTION 11: There is a reference to an historical pit at the facility that **was** used for evaporation. Is this pit sill being used? What was placed in the pit?
4. NOTE: OCD RULE 116 IS NOW PART 29.
5. Does the Davis Gas Plant meet NMAC 19.15.11.8 Regulatory Threshold for H2S? Please verify.
6. SUBMITTED Hydrogen Sulfide Contingency Plan, Please add the NMOCD local office number in under "Call List" NMOCD, Hobbs 575-393-6161

The OCD would like to inform Davis Denton Gas Plant that any will full and blatant discharge of any fluids, including wash water, is not permitted under the new discharge permit conditions.

llowe

**Leonard Lowe**
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

# Section 5
# Facility Description

Key components of production process at the Denton Plant are compression, treating, dehydration, and natural gas liquids recovery. Attachment C provides a process flow diagram showing these key elements.

Two 850 HP compressors are available to boost the incoming low-pressure gas to about 850 psig. The gas is treated after the second stage of compression in a 60 GPM DEA (amine) unit to remove $CO_2$ and $H_2S$. After the DEA treatment, the gas is returned to the compressors for the third stage of compression.

Following the inlet separator and each stage of compression, condensate and water are removed from the gas stream and discharged to the condensate recovery system.

High pressure gas, after compression, is dehydrated in a molecular sieve unit and enters the processing equipment. The gas is cooled via heat exchange and supplemental refrigeration and then passes through the expander unit. The expander unit drops the gas pressure to 140 psig which cools the gas to below – 100 F and causes liquid hydrocarbons to drop out.

The residue gas is warmed in the heat exchange equipment and then compressed to 1,000 psig via the rough stage of the inlet gas compressors. The residue gas is sold, and liquid products are removed via pipeline.

An idle ammonia plant and an idle/inoperative refrigerated gas plant process unit are on the same site. These plant processes don no consume/contribute any process liquids and do not result in any wastewater discharges.

RPS

# Section 7
# Sources, Quantities, and Qualities of Effluent

As detailed below, the only two sources of waste waters, which consist of wash waters associated with cleaning the amine unit and the process skid, are discharged to surface soils, and the majority of these waters are typically routed to a storage tank for off-site disposal. All other waste waters are routinely collected in storage tanks/containers and transported for off-site disposal. The following descriptions provide summaries of plant processes that are the sources of effluent at the facility.

*Amine Unit*

Except during cleaning, there are no process waters resulting from the amine unit. The amine contactor is followed by an amine regeneration unit with off gases being routed to a flare.

*Separators/Scrubbers (Produced Water)*

This is low TDS water with traces of soluble/entrained hydrocarbons. The total annual volume is about 270,000 gallons based on 6 MMCFD of inlet gas. This equates to roughly 750 gallons per day. The produced water rate will be higher in the warmer months and less in the cooler months. Water removed in the dehydration unit is commingled with the produced water in the first stage separator. The separator water flows to a 9,000 gallon tank (TK-5) for oil separation and the separated water then flows to a 1,000 barrel storage tank (TK-4) for subsequent truck transport to a disposal well.

*Slug Catchers/Condensate*

There are four stages of section lines, which are each equipped with "slug catchers" that facilitate removal of condensate. In addition, condensate is also produced by the separators/scrubbers. Condensate flows into one of two tanks (TK-2A and TK-2B) with each having a capacity of 210 barrels. Condensate is pumped into trucks for subsequent transport to an authorized off-site facility.

*Crude/Slop Oil*

Crude/slop oil that may result from the separators flows into a 9,000-gallon tank (TK-5) for oil separation and the separated water then flows to a 1,000 barrel storage tank (TK-4) for subsequent truck transport to a disposal well.

*Boilers/Heat Recovery/Cogeneration*

There are no active boilers at the facility, and there are no heat recovery or cogeneration systems.

*Engine Cooling Water-Gylcol*

There is no routine discharge from the engine jacket water system. Depending on the product used, the engine jacket water-glycol mixture may contain a corrosion inhibitor.

Cooling Towers/Fans

There are no active cooling towers at the facility. Cooling is currently provided via forced air fans. The sump of the original cooling tower is used to collect and hold runoff rain water so as to minimize flooding during rainstorms. The runoff water typically is allowed to evaporate. Runoff water would be expected to contain trace levels of hydrocarbons (hydrocarbons from equipment wash effect).

Sewage

All sanitary sewage is handled separately from the process/plant waste water and is discharged to an approved, on-site septic system.

*Other-Wash Water*

The amine treating unit is washed down with a water hose (usually once per month), and the runoff water flows to the soil surface. Detergent is typically not used in the washing, and it is estimated that about 300 gallons of wash water are used (30 min. x 10 gpm). Less than one gallon of amine solution (pump seal drips, samples, etc.), some wind-blown dirt, and trace quantities of oil are estimated to be washed off the amine equipment. This wash water is typically routed to a 1,000 barrel storage tank (TK-4) for subsequent truck transport to a disposal well but may also be discharged to surface soils.

The process skid is typically steam cleaned at six month intervals. A mixture of roughly 250 gallons water to 20 pounds of powder detergent (e.g., "Red Power") is used. There is no hose down after cleaning, but the detergent is cut off and a 30 minute steam only wash is used to finish the job. It is estimated that 125 gallons of water condense and this plus about 15 pounds of the detergent is discharged. The discharge is typically routed to a 1,000 barrel storage tank

(TK-4) for subsequent truck transport to a disposal well but may also be discharged to surface soils. Trace quantities of lube oil and hydrocarbons are anticipated to be entrained in the water.

Similar to the process skid, the compressors are typically steam cleaned once per six months. The cleaner charge is the same 250 gallons water plus about 20 lbs. of powder detergent. After steam cleaning, the compressors are hosed down over a 2 hour interval. At 10 gpm, about 1,200 gallons of wash water are used. Wash water is collected in a sump below the compressor building and transferred first to a concrete 28' x 6' x 8' (deep) skimmer pit for oil separations. The wash water will contain minute quantities of lube oil residue in addition to the detergent. After the sump, the water is pumped to a 210 barrel tank (TK-2A or TK-2B) to settle the oil and then is pumped to the 1,000 barrel tank (TK-4) for subsequent off-site disposal.

*Effluent Quality*

Attachment D provides analytical results obtained by the OCD. These results are indicative of water quality within the plant. As described above, most waste water discharges are routed to the 1,000 barrel water tank (TK-4) for subsequent removal by a commercial third party hauling company with aqueous waste ultimately being disposed of in a disposal well. The following is a summary of the results provided in Attachment D:

- The toxic pollutants per WQCC Section 3-103 address elements such as arsenic, mercury, selenium, chromium, etc., and these pollutants are found only in the process discharge water, which is collected in the 1,000 barrel storage tank (TK-4) and does not contact soil surface. Moreover, concentrations of these pollutants are reported as being well below the established toxicity limit for human health standards.

- Toxic pollutants per WQCC 1-101.UU are present in the process discharge. These are primarily benzene and benzene derivatives. There are no halomethanes reported in the process discharge water, but trace levels of halomethanes are reported in the produced well water. This stream is external to the plant; moreover, the source of the halomethanes is unknown as the plant has never used a halomethane refrigerant. The plant refrigerant system is based on propane.

- No insecticides, PCB;s or radioactive pollutants were reported.

- No detectable toxic pollutants were reported for the cooling tower basin water. The basin acts mainly as a sump for runoff rainwater. The only source of pollutants would be the rainwater "wash" of the process equipment. An oily sheen was noted for the cooling tower basin water, but again, no detectable level of pollutant were reported.

- The waste water flow rate varies mainly with respect to the inlet gas volume, temperature and pressure. Most of the process waste water is water of saturation although a small amount enters irregularly as an incoming "slug".

- The gas rate is slightly higher in winter months due to demand, but the water content is low. The slightly lower gas rates of the summer months contain the highest quantities of process waste water because of the warm gas temperature. Likewise, more water is condensed in the daylight hours than during the cooler night hours and is transported off-site for disposal. Due to the hold time in the system, there is no sudden change on a daily basis. The seasonal change is gradual. Thus, except for equipment or well problems, there is no sudden fluctuation in the discharge water rate.

# Section 11
## Spill/Leak Prevention and Reporting

The Denton Plant does not have a written contingency plan; however, as described below, the facility has procedures in place to prevent spills. However, if a spill or leak results, it will be managed in accordance with the requirements of OCD Rule 29 and WQCC Section 1203. Specifically, the OCD Director and Field Office will be notified by telephone within 24 hours of a significant spill or release. Steps to mitigate impacts to surface and/or ground water will be taken upon initial discovery of the spill/leak followed by source removal activities to minimize impacts.

The Denton Plant has prevention procedures (inspection, maintenance, and reporting) in place to minimize the potential for spills/leaks at the facility. Accordingly, spills and leaks are not likely, but the potential for them to occur does exist. In addition to prevention procedures, other site features exist to minimize impacts of a spill at the facility, and response procedures are used to quickly and effectively manage spills/leaks.

The following specific measures are in place to address containment and cleanup of a major spill at the Denton Plant:

- The primary source of hydrocarbons at the facility is the condensate that is stored in two tanks (TK-2A and TK-2B), which are each 210 barrels in capacity. The two tanks are co-located with a common secondary containment berm having an approximate total capacity of 519 barrels. Factoring in displacement from a 4-inch rainfall yields a containment capacity of roughly 175% of the largest tank.

- If the 1,000 barrel water tank (TK-4) ruptured when full and all contents were lost, the net result would be a "one-time" discharge of relatively innocuous aqueous fluid. Should any of the process vessels rupture, the net effect would be minimal, if any, with respect to the water table. If the 1,000 barrel disposal tank (TK-4) ruptures, no remedial action would be taken. This tank basically contains produced water and a single discharge would not likely be serious. The pit could be used until the leak was repaired or the tank replaced. It is estimated that repair or replacement would require no more than 5 to 10 days.

- The light hydrocarbon product storage tank (TK-3) may contain up to 30,000 gallons of high pressure product, but more normally contains 15,000 to 20,000 gallons. If this tank ruptured, the vast majority of the liquids would vaporize. A fire hazard is the prime concern should this tank rupture. Should this vessel in fact rupture and spill the contents to the soil surface, any badly saturated zone would be dug out and stored for the interim on a plastic tarp. The ultimate disposal would be decided after review of the situation.

- If either of the 210 barrel condensate/water tanks (TK-2A and TK-2B) rupture, any hydrocarbon saturated zone would be dug out, aerated and disposed of in similar fashion described above.

- If the 1,000 barrel condensate tank (TK-5) develops a leak and the leak is contained prior to drainage of the hydrocarbon layer, it is assumed that no remedial action is necessary. If the leak caused the entire tank to drain, thus releasing hydrocarbon condensate, the hydrocarbon saturated soil would be handled as described above.

- Rainwater runoff collected in the cooling tower basin is partially evaporated, then pumped to the unlined pit. This same practice is anticipated for future operations.

- All underground piping is no more than 6 to 12 inches below grade. It is buried mainly to facilitate vehicle and personnel traffic, and is in regularly traveled areas. Any leak would be immediately noticed as a seep. If a leak is detected, the leaking portion of the line will be dug out and replaced.

RPS

# Attachment F

# $H_2S$ Monitoring Plan

# Hydrogen Sulfide Contingency Plan

## PURPOSE

I. **Purpose of Plan** - To provide an organized plan of action for alerting and protecting the public following the accidental release of a potentially hazardous volume of hydrogen sulfide.

II. **Activation of Plan** - This plan shall be activated immediately by plant personnel on duty upon the detection of a potentially hazardous volume of hydrogen sulfide released to the atmosphere.

III. **Area of Exposure** - A major pipeline failure of any gas pipeline transporting gas containing Hydrogen Sulfide ($H_2S$) to or from the Denton Gas Plant will create a hazardous area of exposure in the vicinity of the failure. The plat included in this plan indicates areas of exposure which involve public or private facilities. Pipeline ruptures within these indicated areas of exposure will require immediate action to protect the lives of persons that may be in or may enter into these areas.

IV. **Notification** - A call list is included in this plan which lists telephone numbers of various public services and home telephone numbers of Davis Gas Processing supervisors that the person on duty may notify for timely assistance in handling the emergency.

V. **Shut-off Source of Gas and Evacuate Area** - Personnel on duty at the time of an emergency shall take immediate steps to simultaneously block traffic from entering the area and evacuate the area of persons already in the area. Call for assistance from city officials, if necessary. Since there is one resident and no public buildings in the area, all persons in the area will be transient.

Simultaneously with action to evacuate the area of persons, steps shall be taken to close all block valves on the ruptured pipeline to shut off the supply of gas to the ruptured area. Source of gas to the rupture may be from either the plant or the field, therefore, the proper block valves at the plant and in the field must be closed. See enclosed map of Gathering System, valves and exposure areas.

VI. **Special Considerations** - All $H_2S$ bearing gas entering or leaving the Denton Gas Plant (except the acid gas flare within the Plant fenced area) is lighter than air and, therefore, will tend to rise at the point it is released to the atmosphere. At the point the gas is released to the atmosphere, it (including the $H_2S$ component) will begin a dispersion process within the atmosphere, thereby becoming less and less Concentrated both vertically and horizontally away from the point of release.

The rate of dispersion of the gas into the atmosphere varies with the temperature difference between the gas and atmosphere, the volume of gas, and the wind speed. The table below shows the concentration of $H_2S$ expressed in parts per million by volume in the various gas streams entering the Denton Gas Plant. Also, the table shows estimated $H_2S$ dispersion expressed as the 100 ppm radius of exposure, and the 500 ppm radius of exposure for each gas stream. These latter figures are calculated distances downwind from point of release at which the air would be expected to have $H_2S$ concentration of 100 ppm or 500 ppm by volume. The radial of exposures were calculated using the equations set out in New Mexico Statewide Rule 118.

| **$H_2S$ Concentration** | | **Radius of Exposure, ft.** | |
|---|---|---|---|
| Gas Stream | ppm | 100 ppm | 500 ppm |
| North Denton Inlet | 20,260 | 853 feet | 390 feet |
| South Denton Inlet | 25,380 | 1101 feet | 503 feet |
| C&K / Ship Lateral Inlet | 60 | | |
| High Plains & Austin Lateral Inlet | 0 | | |
| Mesa Inlet | 8 | | |
| Denton Plant | 9,250 | 935 feet | 427 feet |

# CALL LIST

## NEW MEXICO STATEWIDE RULE 118 CONTINGENCY PLAN

**SERVICES**

| | | |
|---|---|---|
| FIRE DEPARTMENT | LOVINGTON, N.MEXICO | 575-396-2359 |
| GENERAL HOSPITAL | LOVINGTON, N.MEXICO | 575-396-6611 |
| POLICE DEPARTMENT | LOVINGTON, N.MEXICO | 575-396-2811 |
| HELICOPTER (DPS) | HOBBS, NEW MEXICO | 575-392-6581 |
| VETERINARIAN | HOBBS, NEW MEXICO | 575-392-5563 |
| HIGHWAY PATROL (DPS) | HOBBS, NEW MEXICO | 575-392-5588 |
| COUNTY SHERIFF | HOBBS, NEW MEXICO | 575-393-2515 |
| ENVIRONMENTAL IMPROVEMENT DIV. | HOBBS, NEW MEXICO | 575-397-5250 |
| N.M.O.C.D (N. M. Oil Conservation Division) | HOBBS, NEW MEXICO | 575-393-6161 |

DAVIS GAS SUPERVISORS

| | | |
|---|---|---|
| DAVID PEPPER<br>Plant Foreman | LOVINGTON, N. MEXICO | 575-396-6022<br>575-369-5945 |
| DAN MEACHAM<br>Oper. Supervisor | BIG LAKE, TEXAS | 325-884-2299<br>432-556-5381 |
| BOBBY ROACH<br>Safety Director | MIDLAND, TEXAS | 432-563-1247<br>432-528-6434 |
| BOB STEWART<br>Environmental Director | MIDLAND, TEXAS | 432-682-6311<br>432-664-0188 |
| MICHAEL DAVIS<br>V.P. OPERATIONS | ABILENE, TEXAS | 325-695-2370<br>325-668-6339 |

PUBLIC NEAR H2S EXPOSURE RADIUS

| | | |
|---|---|---|
| FREDDY WHITMAN | NORTH DENTON LATERAL | 575-398-6678 |

## VII. General

Hydrogen sulfide is one of the most potentially lethal hazards found in the oil and gas industry. Davis Gas Processing intends to make every effort to provide adequate safeguards against harm to persons both on location and in the immediate vicinity from the effects of $H_2S$ released to the atmosphere. In those areas where $H_2S$ is common, the following safety procedures/policies shall be in effect.

1.) This contingency plan shall be read and understood by all Plant personnel. Proper exercise of the Plant's gas leak detection program should assure that no major escape of $H_2S$ bearing gas will ever occur at the Davis Gas Plant. However it is essential and is required by New Mexico Statewide Rule 118, adopted March 15, 1976, that this contingency plan be understood by all plant personnel and at all times be available for personnel referral and use.

2.) During the Plant's regular training sessions regarding use, care, and storage of respiratory equipment, all personnel will be reminded of possible need for the equipment during activation of this contingency plan.

3.) Location of all block valves for shutting off sources of gas to a pipe rupture area as shown on the plat accompanying this plan shall be personally visited by all plant personnel to assure each person's knowledge of exact location.

4.) Gas released from pipeline ruptures may be ignited by automotive ignition and exhaust systems, as well as by persons smoking, and by lightning. The possibility of ignition by whatever means should always be considered and avoided in all efforts to evacuate persons or to control the escape of gas in an area of $H_2S$ exposure.

It should always be remembered that the bulk of gas emitted to the atmosphere will flow with the wind as it disperses, therefore, contact with the gas can be prevented by avoiding positions directly downwind from the point of emission. This fact should always be considered in working in the area (closing valves, etc.) and evacuating persons from the area.

## VIII. Physical Characteristics

Hydrogen sulfide ($H_2S$) is a colorless, flammable gas which may be liquefied under pressure and which occurs in a variety of natural and industrial settings. Typically called "sour gas", hydrogen sulfide is soluble in water, crude oil or petroleum fractions, and is extremely corrosive. The gas can cause severe stress cracking of steel and other metals. Hydrogen sulfide burns with a blue flame to form sulfur dioxide which is also a toxic gas. Hydrogen sulfide is slightly heavier than air and may accumulate to dangerous concentrations in low lying areas and confined spaces. The gas can be dispersed by wind movement or air currents.

## IX. Effects From Exposure

The health effects associated with hydrogen sulfide exposure are primarily determined by the concentration of the gas in the individuals breathing zone, the length of the exposure period(s) and individual susceptibility to the contaminant.

The health effects associated with hydrogen sulfide exposure are most often the result of sudden, excessive exposures experienced over a short time period. For example, a short-term exposure to hydrogen sulfide at a concentration of 500 ppm can result in respiratory arrest, loss of consciousness, and death within minutes.

A most important characteristic of hydrogen sulfide gas is its ability to cause olfactory fatigue or a failure in the sense of smell. At concentrations approaching 100 ppm, exposure to hydrogen sulfide causes a loss of the sense of smell. This effect can result in an individual developing a false sense of security relative to the exposure conditions. High concentrations of hydrogen sulfide, especially those capable of causing death or serious physical injury, cannot be detected by the sense of smell.

## X. Hydrogen Sulfide Work Practices

The incorporation of the following specific work practices discussed below into routine operation and maintenance activities can help prevent overexposure to hydrogen sulfide. These work practices have proven effective in controlling hydrogen sulfide exposure in various Davis Gas operations.

1.) Engineering controls

A. Ventilation

When the potential for hydrogen sulfide exposure occurs during routine operation and maintenance activities, ventilation of the worker's breathing zone is extremely important. Hydrogen sulfide gas is slightly heavier than air and does not readily dissipate. As such the gas may accumulate in low lying areas and confined spaces and may remain for an extended time.

Laboratory operations involving hydrogen sulfide gas or materials containing hydrogen sulfide shall be conducted under a properly functioning laboratory hood or with local exhaust ventilation placed at the source of emission.

For indoor work, such as in buildings containing transfer pumps, gas processing equipment, gas compressors, treaters, LACT, or other equipment the accumulation of hydrogen sulfide gas in these enclosed work areas is prevented through the use of general/dilution ventilation.

2.) Work Practices

If possible, workers shall always remain upwind from the source of hydrogen sulfide gas while completing tasks. Wind direction shall be verified by a wind sock, streamer, or vane prior to initiating work. Wind conditions cannot be relied on, however, as a single means of controlling exposure.

3.) Monitoring

A. Personal Alarm Monitors

When routine and maintenance tasks involve potential exposure to hydrogen sulfide above 10 ppm, the use of continuous reading personal monitors with audible and/or visual alarms is required. When a group of employees is working close together, it is not necessary that each employee wear a monitor. Representative employees shall be selected to wear personal monitors when such group tasks are to be performed. A portable monitor can be substituted for the personal type as long as it adequately samples the work area used by all potentially exposed employees.

Monitors shall be utilized for the complete duration of work activity. It is required that monitors be set to alarm at 10 ppm or less. If the alarm sounds, indicating a concentration at/or above this level, workers shall immediately leave the area. Workers shall withdraw upwind to a position which is considered to be a safe distance from the source of the gas. The alarm will continue to sound until the detector-sensor is cleared of hydrogen sulfide. Depending on the type of monitor and the concentration of the gas, this can take several minutes, even though the monitor is removed to a hydrogen sulfide free atmosphere. Allowing workers to re-enter, and work in the area shall be permitted only if they are wearing a full face pressure-demand airline respirator with egress bottle or self-contained breathing apparatus (SCBA) . This procedure shall be followed, until it has been established that the area is safe from hydrogen sulfide (less than 10 ppm).

B. Fixed (Stationary) Monitors

Continuous fixed area monitors shall be permanently installed in locations where the sudden release of hydrogen sulfide is possible. The monitor sensors shall be placed in proximity to potential sources of a hydrogen sulfide release. Several sensors may be needed at points of possible gas emission and shall be connected to a central monitor. The monitor $H_2S$ warning device, audible and visual, shall be located so that the alarm can be easily recognized throughout the facility. Employees must be instructed to follow established response procedures in the event that an alarm is activated.

Survey measurements shall be made using portable hydrogen sulfide monitors. The following applications are most suitable for survey monitoring with portable devices.

* Monitoring of work areas prior to entry
* Monitoring of confined spaces
* Detection of leak sources
* Monitoring when lines, valves, or vessels are opened

4.) Respiratory Protection

Supplied-air (airline or SCBA) respiratory protection against hydrogen sulfide exposure is required in the following situations:

- When routine or maintenance work tasks involve exposure to $H_2S$ concentrations of 10 ppm or greater.
- When a fixed monitor alarms, and re-entry to the work area is required to complete a job.
- If entry is required into a confined space is necessary and measurable levels of hydrogen sulfide are identified within the confined space.
- During rescue of employees suspected of $H_2S$ overexposure.
- For specific tasks identified with significant exposure potential and outlined in local program guidelines.

All respiratory protection equipment for hydrogen sulfide must be of the supplied-air type, equipped with pressure-demand regulators and operated in the pressure demand mode only and meet the Standard of Industrial Hygiene Practice for Respiratory Protection. This is the only type of respiratory protection recommended for hydrogen sulfide application. If airline units are used, an egress bottle with at least a 5-minute supply shall also be carried. Gas masks or other air-purifying respirators must never be used for hydrogen sulfide due to the poor warning properties of the gas.

Use of respiratory protection shall be accompanied by a written respiratory protection program referenced to Davis Gas' " Respiratory Protection Program"

5.) Confined Space Entry

Work conducted in low lying areas and confined spaces where hydrogen sulfide may accumulate requires specific precautions beyond those described above. These conditions may be encountered during excavation and line repair or tank (vessel) entry or maintenance and inspection. Before starting work, these tasks require that the excavated area or vessel be thoroughly tested with a direct reading hydrogen sulfide instrument, as well as tested for sufficient oxygen and the absence of flammable atmospheres. These measurements are to be included as an integral part of an entry procedure. Furthermore, where entry permits are required these measured levels must be noted on the permit. Combination hydrogen sulfide detectors which also measure combustible gas and oxygen are available. Care must be taken to determine the hydrogen sulfide concentration throughout the complete area.

If hydrogen sulfide levels are determined to be above 10 ppm, entry into a confined space requires respiratory protection. Efforts must be made to ventilate the confined space prior to scheduled entry. When concentrations of hydrogen sulfide remain above 10 ppm, additional forced air venting is required before entry, when time permits. If entry is necessary under the above conditions respiratory protection shall consist of a pressure-demand airline respirator with an egress bottle or an SCBA. A standby person, also equipped with proper respiratory protection, is required to be outside the vessel and in constant audio or visual contact with the worker inside. This precaution is necessary to ensure that rapid rescue of the worker inside can be accomplished.

## XI. Warning Signs

Warning signs for hydrogen sulfide must be posted to remind employees of the potential hazard at each specific location. Additionally, signs must indicate the need for monitors or respiratory protection in areas where such equipment is required. Warning signs shall be posted on all units where the potential for a dangerous release of hydrogen sulfide exists.

## XII. Emergency Procedures

The prompt performance of specific rescue and emergency first aid procedures can very often result in the full recovery of victims overcome by hydrogen sulfide. These victims shall be immediately removed from the contaminated atmosphere by a rescuer wearing full-face pressure-demand supplied air respiratory protection, e.g., SCBA or supplied air with egress unit. Rescue must never be attempted without proper respiratory protection! Many such attempts have resulted in the rescuer also becoming a victim.

Once the victim is safely removed from the contaminated atmosphere, the rescuer is to begin artificial respiration or administer oxygen if breathing has ceased. Caution must be taken during the application of artificial respiration not to inhale air directly from the victim's lungs, as this could also result in the rescuer being overcome. Depending on the length of exposure and concentration of hydrogen sulfide, heart failure may occur within 4 to 6 minutes. If the victim's heart has stopped, cardiopulmonary resuscitation (CPR) must be started immediately. If the victim does not respond to emergency aid, emergency medical aid must be summoned to the scene, and the individual taken, as soon as possible, to a hospital for further treatment. Regardless of apparent condition, all overexposure victims shall receive appropriate medical attention as soon as possible.

## XIII. Training

A. All field personnel, whether regularly assigned, contracted, or employed on an unscheduled basis, shall be $H_2S$ trained and certified. They shall be trained and made familiar with detection equipment, ventilation equipment, prevailing winds, briefing areas, warning systems, and evacuation procedures where appropriate.

B. All Field personnel shall be trained in basic first-aid procedures applicable to victims of $H_2S$ exposure. During subsequent on-site training sessions and drills, emphasis shall be placed upon rescue and first aid for $H_2S$ victims. The training shall consist of the following:

a. Introduction
- Definition
- Dangers of $H_2S$
- Properties of $H_2S$
- Physical Effects
- Sources of $H_2S$

b. Hydrogen Sulfide Detection
- Types of Equipment
- Detector use in the field

c. Protective Breathing Equipment
- Types of Equipment
- Practical exercise in the use of company owned equipment

d. Safety Precautions To Be Used
e. Emergency Procedures
f. Written Examination

C. Safety Precautions to be used when dealing with $H_2S$

***While in the field during normal working conditions employees shall abide by the following rules:***

Davis Gas Processing employee will designate an upwind briefing area where any personnel on location can assemble for a "tailgate' safety meeting or to meet in the event of an emergency situation. A designated vehicle with ample fuel, will be facing an exit with nothing blocking the path, in case of an emergency.

1. Stay upwind of any escaping gas. Be alert to any wind direction changes.
2. Use fresh air breathing equipment when a on tank battery where $H_2S$ gas concentration is KNOWN OR SUSPECTED.
3. OBSERVE AND OBEY all warning signs on location.
4. Use extreme caution when gauging all tanks. Stay on the upwind side of the hatch. Turn your body away from the hatch when opening.
5. Produced water contains $H_2S$. Use the same precautions as with crude oil.
6. Smoking, open flames, etc., are prohibited where gas is present or in a NO SMOKING AREA.
7. IF at any time a job is considered to be hazardous, shut down operations and **contact the company supervisor in charge of the job and a Davis Gas Supervisor.**
8. Do not enter any tank or enclosed vessel without using fresh air breathing equipment. A supervisor MUST be on location at all times, when entering Confined Spaces and a Confined Space Permit will be required.
9. If it does become necessary to enter any tank or enclosed vessel the following conditions must be met:
   a. The individual entering the tank must have in his possession a card stating that he has been trained in Hydrogen Sulfide Procedures and Confined Space Safety.
   b. The tank can be entered only if the employee is wearing a 'breathing air' work unit. The minimum equipment required is: a self-contained emergency fresh air bottle, a harness, and a non-sparking lifeline. The lifeline must be adequate to remove them from the vessel of Confined Space. in the event of failure of their breathing equipment or any other accident that could incapacitate them.
   c. An individual entering vessels must obtain a proper facemask seal.
   d. Breathing equipment must be inspected and face mask seal must be tested by a supervisor before entry.
   e. Backup personnel with proper equipment must be stationed at the entrance of the tank or enclosed vessel. They will man the safety lifeline, maintain communication and keep the individual inside under observation in case of an accident or emergency.

f. A designated supervisor must be on location to monitor conditions of air bottles, manifold, and airline as each bottle in use is depleted. The supervisor will designate the briefing and safe smoking area. He/she is responsible for safety conditions on the job location. He/she will be responsible for the cleaning and disinfecting of the breathing apparatus after and before storage.

10. All Davis Gas Processing owned fresh air breathing equipment will be inspected monthly by the Plant Personnel and quarterly by a designated outside company determined by the Safety Department. A record of the inspections will be maintained. Any equipment found to be unserviceable shall be tagged "OUT OF ORDER" and turned in for repairs.

**D. In the event of escaping gas or a hydrogen sulfide emergency, these procedures should be used:**

1. Immediately go to the upwind briefing area and determine if all crew members and other personnel working on the location are safe and accounted for.
2. Notify the Davis Gas Processing supervisor and the plant supervisor /personnel as soon as possible.
3. Under no circumstances attempt to rescue anyone that has been overcome by gas unless #2 has been completed and wearing fresh air breathing equipment in use while making the rescue.
4. After protective breathing equipment is in use move any victims to a safe location upwind from the $H_2S$ source.
5. If the victim is unconscious and not breathing, trained personnel shall immediately apply mouth-to-mouth artificial respiration and continue it until normal breathing is restored.
6. After a victim is revived do not leave him alone. $H_2S$ victims can have irritations or suffer other complications from $H_2S$ exposure.
7. All $H_2S$ victims should receive medical attention. Keep victims under observation until examined by a doctor.
8. Keep everyone away from the scene of the $H_2S$ danger until supervisory personnel can take charge of the location.

**E. Hydrogen Sulfide Work Procedures**

1. Employees working in areas of 10 to 100 ppm shall use $H_2S$ detection monitors while performing work at these locations. Should the monitor alarm, the employee shall go to a safe area (up or cross wind) and shall not re-enter without supplied air respirator or until the levels are less than 10ppm. Any well, tank, battery, or work area where $H_2S$ may be in the atmosphere, should be approached form upwind if possible. Windsocks must be clearly visible and should be displayed at a height of at least eight feet.

2. Where the level of $H_2S$ is 100 to 299 ppm employees shall use $H_2S$ detection monitors while performing work in these locations. Should the monitor alarm, the employee shall egress to a safe area (up or cross wind) and shall not re-enter without supplied air respirator or until the levels are less than 10 ppm. Notify your supervisor when the potential for $H_2S$ is above 10 ppm before re-entry with respiratory protection. Respiratory Protection equipment shall be available in adequate

numbers and strategically located for quick and easy access. SCBA or airline respirators shall be donned before performing specific tasks such as:

a. Where employee exposure exceeds or is expected to exceed, 10 ppm measured in the work-area atmosphere.
b. For confined space entry work when the concentration has not yet been determined and entry is required to perform the initial check. Persons shall not enter a tank, vessel, enclosed area or confined space, or any other area suspected to have H2S accumulation without addressing confined space entry permitting.
c. During emergency rescue where a worker may have been overcome by $H_2S$.
d. When opening a system or bleeding down a systems vessels, lines or scrubbers and the concentration of $H_2S$ gas in the work-area atmosphere is at or suspected to be at 10 ppm or greater.

3. Employees who are required to work in areas where the atmosphere contains $H_2S$ concentrations of **300 ppm or greater** shall use monitors while performing work in these areas. Employees shall approach an open source only while wearing a SCBA or airline respirator and at least one standby person must be present and equipped with a SCBA or airline respirator.

4. Davis Gas Processing requires, back up personnel when $H_2S$ levels are greater than 100 ppm.

**F. Electronic Monitors**

1. $H_2S$ monitors are required whenever personnel are working in an area with potential exposure to hydrogen sulfide gas is at or above the Permissible Exposure Limit (PEL) of 10 parts per million (PPM) in the atmosphere. Employees assigned to a sour gas lease must have an electronic $H_2S$ monitor available for his/her use. All Davis Gas Processing employees, when working in a suspected $H_2S$ area, MUST utilize an $H_2S$ monitor, that registers an alert at a $H_2S$ level greater than 10 ppm. Crews can share a monitor's coverage if all the workers are within 6 feet of a portable $H_2S$ monitor, when they are on the same level (no worker breathing zones below sensor levels), when there is an unimpeded line of sight between each individual and the sensor, and when the sensor is generally upwind from each individual.

2. $H_2S$ monitors must be calibrated so that the first alarm reacts to $H_2S$ levels equal to or less than 10 ppm (permissible exposure limit, PEL), with the second alarm reacting to $H_2S$ levels equal to or less than 15 ppm (short term exposure limits, STEL). $H_2S$ monitors must have both an audible and a visual alarm.

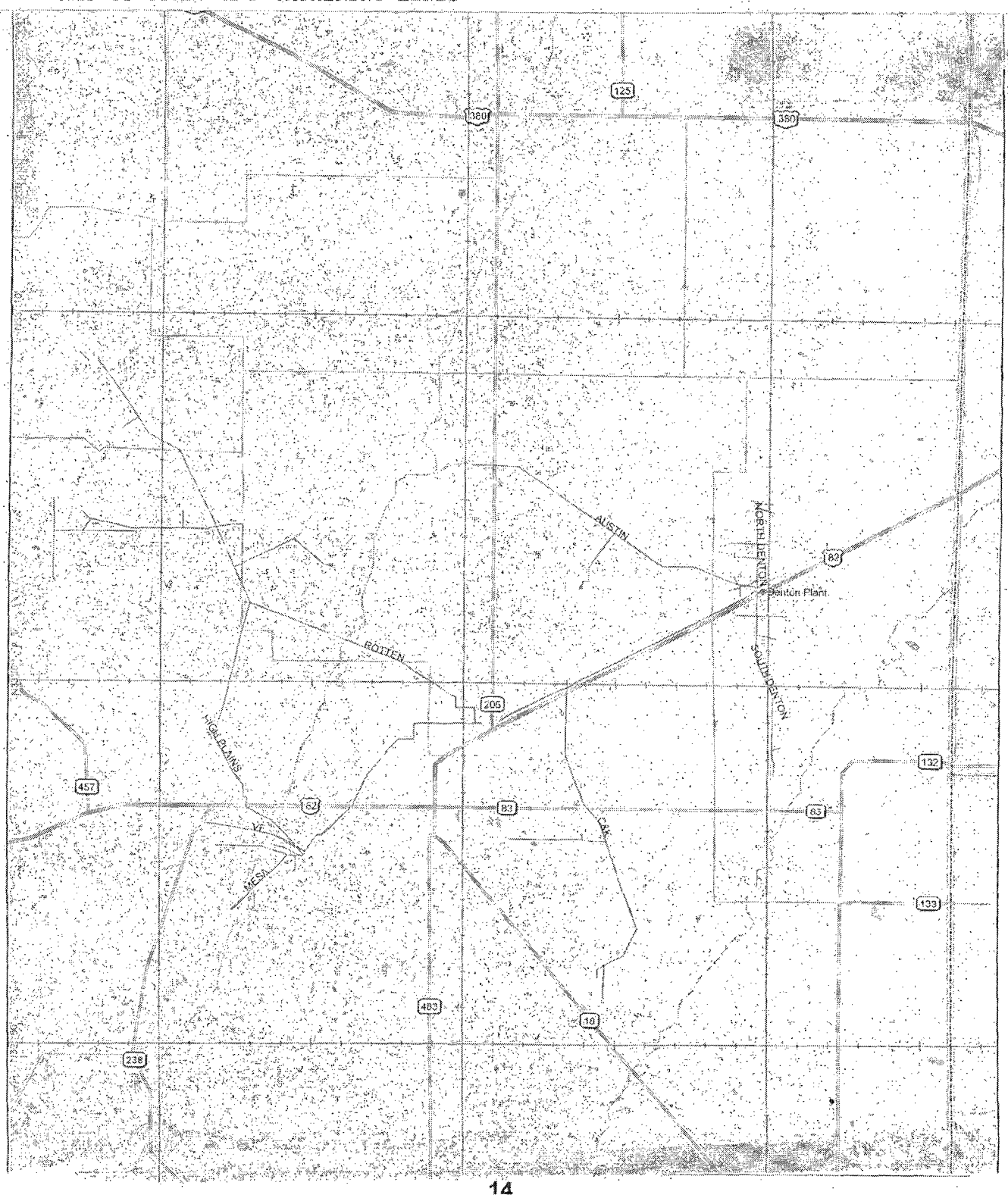
3. $H_2S$ monitors shall be tested daily by the user to assure the monitor is functional, turning the monitor off, then on or pushing a test button will initiate the alarm sequence. If the alarm does not sound, the monitor shall be returned to the issuer for repairs. Monitors must be bump tested or calibrated as to the manufacturer's recommendations. Generally calibrations are required whenever the battery or sensor is replaced and every month or before use, whichever is less frequent. If the manufacturer recommends a calibration interval of less than 30 days, follow the manufacturer's recommendation.

4. Documentation of bump test and calibrations shall be maintained for 5 years.

Safety and Loss Prevention Standard

Davis Gas Processing
Denton Plant

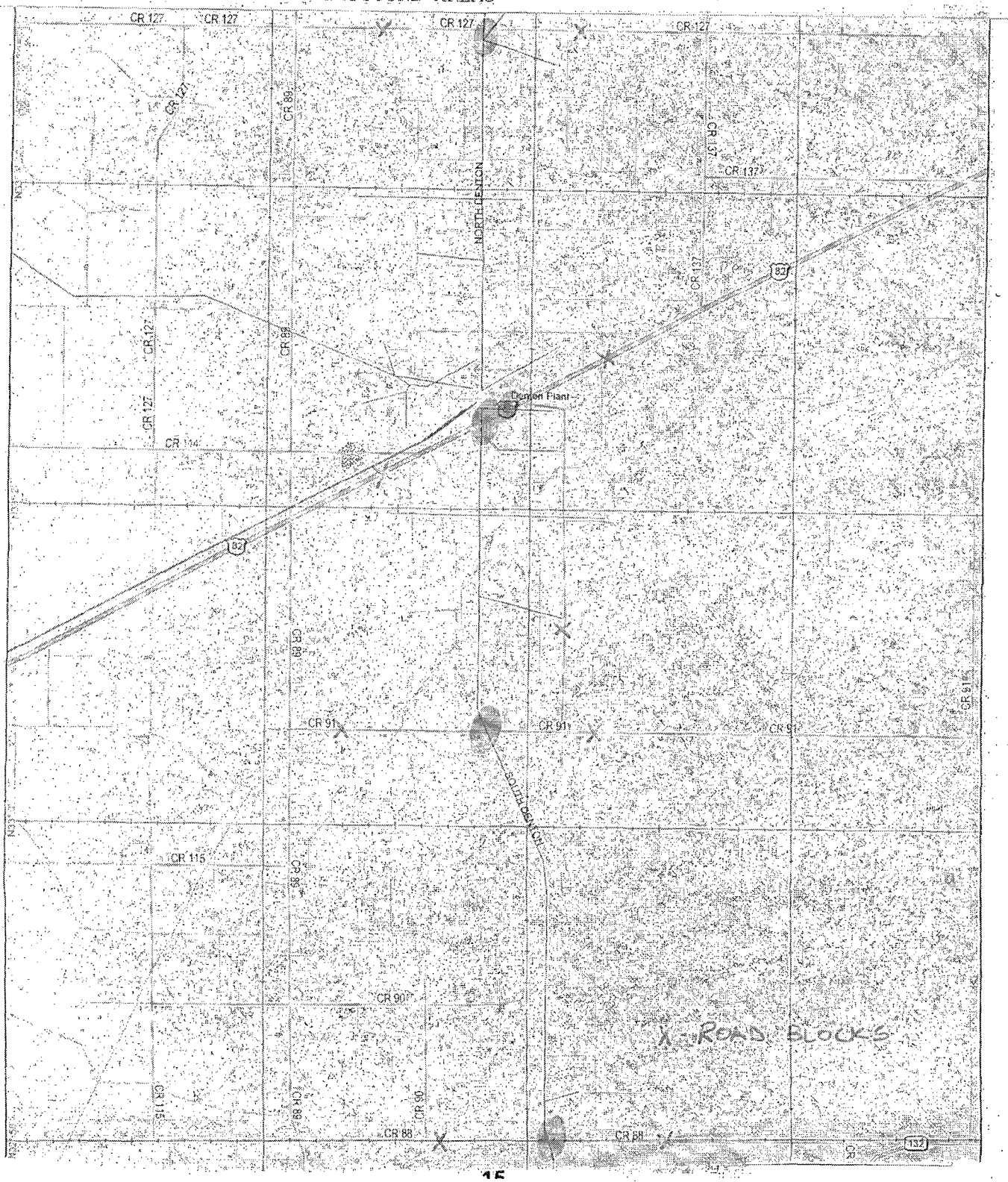
MAP OF PLANT AND GATHERING LINES



Safety and Loss Prevention Standard

Davis Gas Processing
Denton Plant

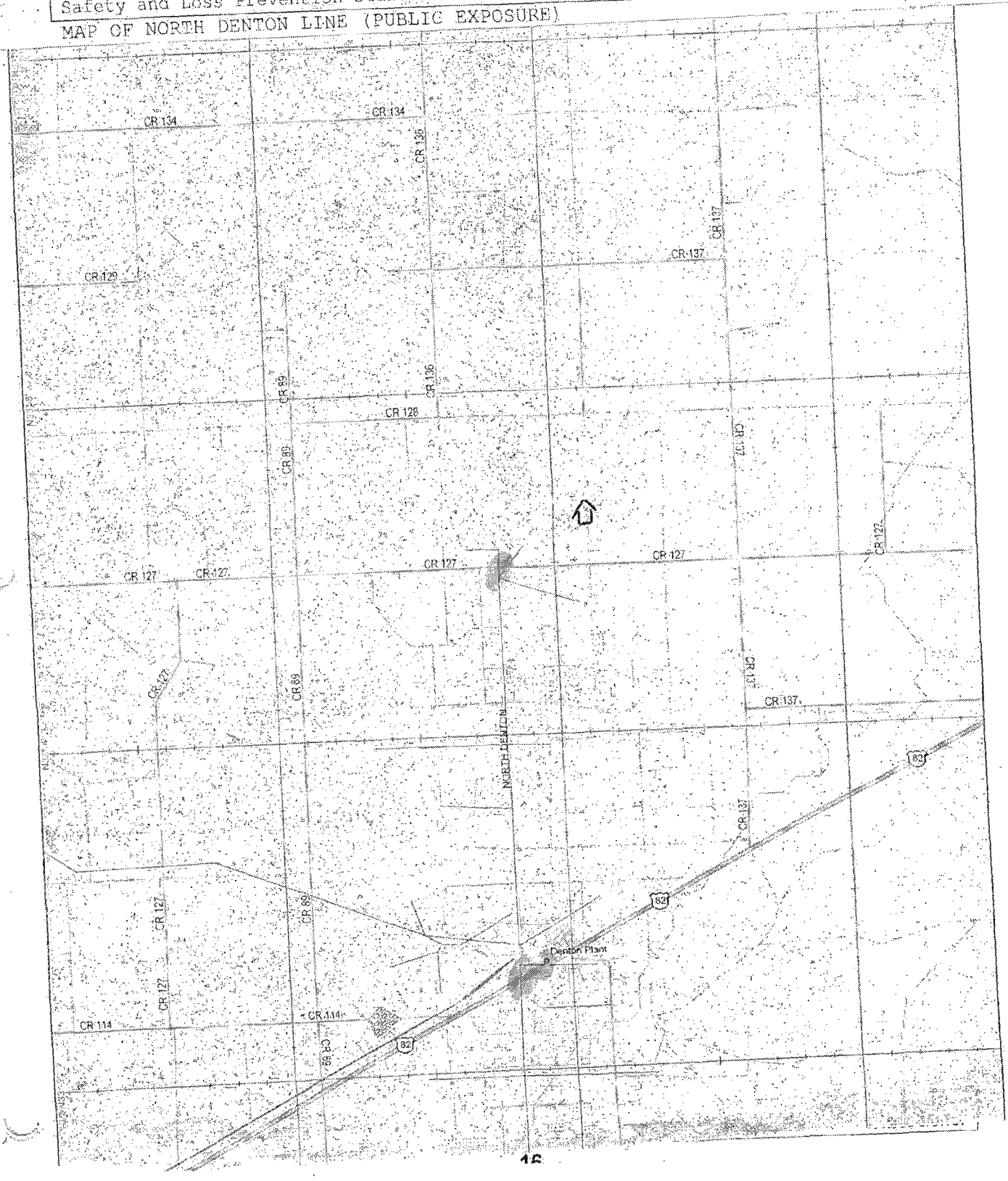
MAP OF RADIUS OF H2S EXPOSURE AREAS



Safety and Loss Prevention Standard

Davis Gas Processing
Denton Plant

MAP OF NORTH DENTON LINE (PUBLIC EXPOSURE)



# Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

Legal Notice

was published in a regular and entire issue of **THE LOVINGTON LEADER** and not in any supplement thereof, for one (1) day, beginning with the issue of August 25, 2009 and ending with the issue of August 25, 2009.

And that the cost of publishing said notice is the sum of $85.98 which sum has been (Paid) as Court Costs.

Joyce Clemens

Subscribed and sworn to before me this 3rd day of September 2009

Debbie Schilling

Debbie Schilling
Notary Public, Lea County, New Mexico
My Commission Expires June 22, 2010

LEGAL NOTICE
PUBLIC NOTICE

Davis Gas Processing, Inc., 211 N. Colorado, Midland, TX 79701, has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for a discharge plan permit renewal (GW-048) for their Denton, New Mexico gas processing plant located in the SE/4 of Section 2, Township 15 South, Range 37 East in Lea County, New Mexico. The physical address of the facility is approximately 11 miles east of Lovington, New Mexico, 88130 on the north site of US Highway 82.

The facility provides compression, storing, and distribution of oil and gas related material. Materials generated or used at the facility include pipeline condensate liquid, engine cooling water, and other wash down water. Approximately 4,000 gallons of wash down water are discharged to surface soil annually. All other liquids utilized at the facility are stored in dedicated above ground storage tanks prior to offsite disposal or recycling at an OCD approved site.

The aquifer most likely to be affected is 40 to 105 feet in depth, and the total dissolved solids concentration of this aquifer is approximately 610 to 1,600 mg/l.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.
Published in the Lovington Leader August 25, 2009.

LEGAL NOTICE
AVISO PUBLICO

Davis Gas Processing, Inc., 211 Colorado N., Midland, TX 79701, ha Presentado Una aplicación para el Departamento de (OCD) recursos Naturales, Minerales y energía de Nuevo México, División de conservación de petróleo para un applicación de alta permiten renovación (GW-048) para su gas de Denton, Nuevo México procesadora ubicada en el SE/4 de la sección 2, Township 15 Sur, Range 37 oriental en Condado de Lea. La dirección física de la instalación es aproximadamente 11 millas al este de Lovington, Nuevo México, 88130 en el sitio norte de EEUU Highway 82. El servicio proporciona compresión, almacenar, y material relacionado con distribución de petróleo y gas. Materiales generados o utilizados en las instalaciones incluyen canalización condensado líquido, motor de agua de refrigeración y otro lavado hacia abajo de agua. Aproximadamente 4.000 galones de lavado hacia abajo de agua se vierten al suelo superficial anualmente. Todos los otros líquidos utilizados en las instalaciones se almacenan en dedicada por encima de tanques de almacenamiento terreno antes a disposición de fuera del sitio o reciclaje en un OCD aprobado sitio. El acuífero más probabilidad de ser afectados es 40 a 105 pies de profundidad, y la concentración de sólidos disueltos totales de este acuífero es aproximadamente 610 a 1.600 mg/l. Cualquier persona interesada puede obtener información, enviar comentarios o solicitar que se coloquen en una lista de correo específica de la facilidad para que las futuras notificaciones poniéndose en contacto con Leonard Lowe en la OCD de Nuevo México en 1220 Sur St Francis Drive, Santa Fe, Nuevo México 87505, teléfono (505) 476-3492. El OCD aceptará comentarios y declaraciones de interés en relación con la renovación y creará una lista específica de la facilidad para las personas que deseen recibir avisos de futuros.
Published in the Lovington Leader August 25, 2009.

## PUBLIC NOTICE

Davis Gas Processing, Inc., 211 N. Colorado, Midland, TX 79701, has submitted an application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for a discharge plan permit renewal (GW-048) for their Denton, New Mexico gas processing plant located in the SE/4 of Section 2, Township 15 South, Range 37 East in Lea County, New Mexico. The physical address of the facility is approximately 11 miles east of Lovington, New Mexico, 88130 on the north site of US Highway 82.

The facility provides compression, storing, and distribution of oil and gas related material. Materials generated or used at the facility include pipeline condensate liquid, engine cooling water, and other wash down water. Approximately 4,000 gallons of wash down water are discharged to surface soil annually. All other liquids utilized at the facility are stored in dedicated above ground storage tanks prior to offsite disposal or recycling at an OCD approved site.

The aquifer most likely to be affected is 40 to 105 feet in depth, and the total dissolved solids concentration of this aquifer is approximately 610 to 1,600 mg/l.

Any interested person or persons may obtain information; submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.



#2 ? Send E-mail to Kyle Shelton

# Affidavit of Publication

State of New Mexico,
County of Lea.

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

of 1 issue(s).
Beginning with the issue dated
August 07, 2009
and ending with the issue dated
August 07, 2009

EDITOR
Sworn and subscribed to before me
this 10th day of
August, 2009

Notary Public

My commission expires
June 16, 2013
(Seal)

OFFICIAL SEAL
Linda M Jones
NOTARY PUBLIC - STATE OF NEW MEXICO
My Commission Expires: _____

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

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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-048) Mr. Bob Stewart, Environmental Coordinator, Davis Gas Processing Inc. 211 North Colorado, Midland Texas 79701, has submitted a renewal application for the previously approved discharge plan for their Denton Davis Gas Plant located in NW/4 SW/4 of Section 2, Township 15 South, Range 37E East, NMPM, Lea County. The facility compresses, treats, dehydrates and performs natural gas recovery. Approximately 750 gallons/day of produced water and 210 bbls/day of condensate are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 40 - 105 feet, with a total dissolved solids concentration of approximately 610 - 1600 mg/L.

(GW-355) Transwestern Pipeline Company P.O. Box 1717, Roswell N.M. 88202-1717, has submitted a renewal application for the previously approved discharge plan for their Abatement of ground water and vadose zone contamination at oil and gas sites, identified at the non-operational Bell Lake Gas Plant located in the SW/4 NE/4 of Section 1, Township 24 South, Range 33 East, NMPM, Lea County. The remediation consists of pumping groundwater with elevated concentrations of Benzene in to yet to be approved ponds. Proposed effluents to be located on site will be stored in the ponds. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 90 - 95 feet, with a total dissolved solids concentration of approximately 800 mg/L.

(GW-164) Mr. Mike Schornick, Environmental Engineer, Wood Group ESP, Inc. 6205 Sooner Road, Oklahoma City, Oklahoma 73135 has submitted a renewal application for the previously approved discharge plan for their Oil and Gas Service Company at 8426 N. Dal Paso, Hobbs, located in the NW/4 WW/4 of Section 35, Township 17 South, Range 38 East, NMPM, Lea County. The facility is a service center for reconditioning electric submersible pumps used in the oil and gas industry. Approximately 6000 gal/month of rinsate waste water, 1000 gal/month of waste water, 275 gallons of neutralized acid waste are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 56 feet, with a total dissolved solids concentration of approximately 458 mg/L.

Ms. Diane Kocis, Senior Environmental Specialist, DCP Midstream LP, 370 17th Street, Suite 2500, Denver CO 80202 has submitted a renewal application for the previously approved discharge plan for their:
(GW-162) Antelope Ridge Gas Plant located in SW/4 SE/4 of Section 15, Township 23 South, Range 34 East, NMPM, Lea County. The facility is a natural gas processing plant that removes liquids from natural gas. Approximately 10 bbls/month of waste water, 10 bbls/year of waste oil, and 10 bbls/month of wash water are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 400 feet, with a total dissolved solids concentration of approximately 55 mg/L. (GW-167) Malaga Compressor Station, located in the SW/4 NE/4 of Section 3, Township 24 South, Range 28 East, NMPM, Eddy County. The facility is currently non operational but is capable to provide compression of natural gas for the Carlsbad gathering system. Storm water is the only effluent produced at this facility and is properly stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 39 feet, with a total dissolved solids concentration of approximately 5140 mg/L.

The discharge plan 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.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m. Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

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

Para obtener más información sobre esta solicitud en espan_ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

THE SANTA FE
# NEW MEXICAN
Founded 1849

RECEIVED

2009 AUG 13 AM 11 53

NM EMNRD OIL CONSERV
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00294153 ACCOUNT: 00002212
LEGAL NO: 87815 P.O. #: 52100-00000206

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|---|---|
| 470 LINES 1 TIME(S) | 460.53 |
| AFFIDAVIT: | 7.00 |
| TAX: | 37.69 |
| TOTAL: | 505.22 |

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, V.Wright, 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 # 87815 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/12/2009 and 08/12/2009 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 12nd day of August, 2009 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ V Wright
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 12nd day of August, 2009

Notary Mary Margaret Vigil-Weideman

Commission Expires: 11-13-2012

OFFICIAL SEAL
Mary Margaret Vigil-Weideman
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 11-13-12

**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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

**(GW-048) Mr. Bob Stewart, Environmental Coordinator, Davis Gas Processing Inc. 211 North Colorado, Midland Texas 79701, has submitted a renewal application for the previously approved discharge plan for their Denton Davis Gas Plant located in NW/4 SW/4 of Section 2, Township 15 South, Range 37E East, NMPM, Lea County. The facility compresses, treats, dehydrates and performs natural gas recovery. Approximately 750 gallons/day of produced water and 210 bbls/day of condensate are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 40 - 105 feet, with a total dissolved solids concentration of approximately 610 - 1600 mg/L.**

**(GW-355) Transwestern Pipeline Company P.O. Box 1717, Roswell N.M. 88202-1717, has submitted a renewal application for the previously approved discharge plan for their Abatement of ground water and vadose zone contamination at oil and gas sites, identified at the non-operational Bell Lake Gas Plant located in the SW/4 NE/4 of Section 1, Township 24 South, Range 33 East, NMPM, Lea County. The remediation consists of pumping groundwater with elevated concentrations of Benzene in to yet to be approved ponds. Proposed effluents to be located on site will be stored in the ponds. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 90 - 95 feet, with a total dissolved solids concentration of approximately 800 mg/L.**

**(GW-171) Ms. Jennifer Lange of BP America Production Company, 200 Energy Court, Farmington NM 87401has submitted a renewal application for the previously approved discharge plan permit for their 3-C Compressor Station located in the SW/4 SE/4 of Section 29, Township 29 North, Range 12 West, NMPM, San Juan County, approximately one mile southwest of McGee Park and on the west side of Gallegos Canyon. The facility compresses gas from 50 psi to 300 psi and is able to handle 10 million SCF of gas per day. Approximately 300 gallons of lube oil, 400 bbls of produced water and 21 bbls of waste water are stored and/or generated onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 200 - 250 feet, with a total dissolved solids concentration of approximately 1000 mg/L.**

**(GW-164) Mr. Mike Schornick, Environmental Engineer, Wood Group ESP, Inc. 6205 Sooner Road, Oklahoma City, Oklahoma 73135 has submitted a renewal application for the previously approved discharge plan for their Oil and Gas Service Company at 8426 N. Dal Paso, Hobbs, located in the NW/4 WW/4 of Section 35, Township 17 South, Range 38 East, NMPM, Lea County. The facility is a service center for reconditioning electric submersible pumps used in the oil and gas industry. Approximately 6000 gal/month of rinsate waste water, 1000 gal/month of waste water, 275 gallons of neutralized acid waste are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 56 feet, with a total dissolved solids concentration of approximately 458 mg/L.**

**(GW-051) Val Verde Gas Gathering Company L.P. has submitted a renewal application for the previously approved discharge plan for their Val Verde Gas Plant located in the SE/4 SE/4 of Section 11, Township 29 North, Range 11 West, NMPM, San Juan County. The facility removes CO2 from natural gas. Approximately 250 gallons/month of used oil, 300 bbls/year of pigging liquids, and 1000 bbls/month of waste water are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 26.5 - 55.5 feet, with a total dissolved solids concentration of approximately 5330 - 7620 mg/L.**

**Ms. Diane Kocis, Senior Environmental Specialist, DCP Midstream LP, 370 17th Street, Suite 2500, Denver CO 80202 has submitted a renewal application for the previously approved discharge plan for their:**

**(GW-162) Antelope Ridge Gas Plant located in SW/4 SE/4 of Section 15, Township 23 South, Range 34 East, NMPM, Lea County. The facility is a natural gas processing plant that removes liquids from natural gas. Approximately 10 bbls/month of waste water, 10 bbls/year of waste oil, and 10 bbls/month of wash water are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 400 feet, with a total dissolved solids concentration of approximately 55 mg/L. (GW-167) Malaga Compressor Station, located in the SW/4 NE/4 of Section 3, Township 24 South, Range 28 East, NMPM, Eddy County. The facility is currently non operational but is capable to provide compression of natural gas for the Carlsbad gathering system. Storm water is the only effluent produced at this facility and is properly stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 39 feet, with a total dissolved solids concentration of approximately 5140 mg/L.**

**Mr. John Cannon, Environmental Specialist, Chevron USA, 332 Road 3100, Aztec N.M. 87410 has submitted a renewal application for the previously approved discharge plan for their:**

**(GW-165) La Plata CDP # 2 compressor station located in the NE/4 SW/4 of Section 25, Township 32 North, Range 13 West, NMPM, San Juan County. The facility compresses field natural gas. Approximately 30 bbls/month of produced water, 75 gallons/6 months of wash down water and 80 gallons/month of waste oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 26 feet, with a total dissolved solids concentration of approximately 748 mg/L. (GW-166) La Plata CDP # 7 compressor station located in the NE/4 SE/4 of Section 1, Township 31 North, Range 13 West, NMPM, San Juan County. The facility compresses field natural gas. Approximately 30 bbls/month of produced water, 70 gallons/3 months of wash down water and 50 gallons/month of waste oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 26 feet, with a total dissolved solids concentration of approximately 748 mg/L.**

**The discharge plan 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.**

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

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

Para obtener más información sobre esta solicitud en espan_ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of August 2009.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire,
Director
Legal#87815
Pub. August 12, 2009