GW - 16

GENERAL CORRESPONDENCE

YEAR(S):

2007-1989

Chavez, Carl J, EMNRD

To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD
Subject: Duke Energy Field Services- Note to File

On January 5, 2007, Wayne Price and Carl Chavez of the Oil Conservation Division (OCD) contacted Ruth Lang of Duke Energy Field Services at (303) 605-1713 and left a phone message regarding the large number of expired facilities (see attachment) where the discharge plan was not renewed within 120 or in advance of their expiration. Wayne Price referred to Ms. Lang's December 21, 2006 e-mail message regarding "Duke Energy Field Services Expired Discharge Plan Facilities."

Mr. Price informed Ms. Lang that all discharge plan renewal applications need to be submitted to the OCD for review by March 1, 2007. In addition, she was informed that the OCD will be issuing an Notice of Violation for neglecting to renew its discharge plan permits with the OCD.

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

Permit ID	Facility	Company	Status	Expired	Contact	phone	e-mail	Comments
150	Pure Gold "28" CS	Duke	A	11/22/03	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
162	Antelope Ridge Gas Plant	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
167	Malaga CS	Duke	A	7/25/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
311	Cotton Draw CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
316	Hat Mesa CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
176	Boot Leg CS	Duke	A	1/20/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
227	Lee CS	Duke	I	12/28/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Submitted correspondence to Ben Stone during meeting in Sept. 2006
168	Feagen Booster Station	Duke	I	12/27/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 2/1/05
177	Maljamar CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
178	Wonton CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
24	Avalon Gas Plant	Duke	A	9/18/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
163	Apex CS	Duke	A	4/29/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
175	Hobbs Gas Process Plant	Duke	A	1/9/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
16	Eunice Gas Plant	Duke	A	4/25/09	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
139	CP-1 CS	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 10/15/03
42	Indian Hills Gas Plant	Duke	I	4/6/2002	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Dismantled

GW-016

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 391-5705 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant (Amanda Booster) API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.5152339 Longitude -103.28778 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☑ Private ☐ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 11.9 bbl Type of fluid: Rain water Construction material: Fiberglass Double-walled, with leak detection? Yes ☑ If not, explain why not. Engine Scrubber Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☑, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-21-04
Printed Name/Title Ronnie Gilchrest/Field Supervisor Signature Ronnie Gilchrest

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

GW-016

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 391-5705 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant (Amanda Booster) API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.5152339 Longitude -103.28778 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☑ Private ☐ Indian ☐

Pit	**Below-grade tank**
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 11.9 bbl Type of fluid: Rain water Construction material: Fiberglass Double-walled, with leak detection? Yes ☑ If not, explain why not. Engine Scrubber Sump

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☑, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-21-04
Printed Name/Title Ronnie Gilchrest/Field Supervisor Signature Ronnie Gilchrest

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 391-5705 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant (Amanda Booster) API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.5152339 Longitude -103.28778 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☑ Private ☐ Indian ☐

Pit	**Below-grade tank**
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 11.9 bbl Type of fluid: Produced water, incidental leakage of engine lube oil and antifreeze Construction material: Fiberglass Double-walled, with leak detection? Yes ☑ If not, explain why not. Oil/Separator Sump

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☑, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-21-04
Printed Name/Title Ronnie Gilchrest/Field Supervisor Signature Ronnie Gilchrest

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 49 bbl Type of fluid: Amine waste, rain water, wash water Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. Tank was installed in 1974-75 prior to effective date of 19.15.1.18 NMAC (09/23/1985) and 19.15.2.50 NMAC (02/13/04) and prior to the OCD May 28, 2004 Pit and Below-Grade Tank Guidelines. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Amine Waste Sump

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Harold Venham

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness _____mil Clay ☐ Pit Volume _____bbl	Volume: 10 bbl Type of fluid: Rain water, condensed glycol reboiler water, turbine/engine skid leaks (incidental lube oil, antifreeze) Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. Tank was installed in 1974-75 prior to effective date of 19.15.1.18 NMAC (09/23/1985) and 19.15.2.50 NMAC (02/13/04) and prior to the OCD May 28, 2004 Pit and Below-Grade Tank Guidelines. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Open Drain System Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Harold Venham

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 10 bbl Type of fluid: Rain water, condensed glycol reboiler water, turbine/engine skid leaks (incidental lube oil, antifreeze) Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. Tank was installed in 1974-75 prior to effective date of 19.15.1.18 NMAC (09/23/1985) and 19.15.2.50 NMAC (02/13/04) and prior to the OCD May 28, 2004 Pit and Below-Grade Tank Guidelines. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Open Drain System Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Harold Venhn

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 10 bbl Type of fluid: Rain water, condensed glycol reboiler water, turbine/engine skid leaks (incidental lube oil, antifreeze) Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. Tank was installed in 1974-75 prior to effective date of 19.15.1.18 NMAC (09/23/1985) and 19.15.2.50 NMAC (02/13/04) and prior to the OCD May 28, 2004 Pit and Below-Grade Tank Guidelines. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Open Drain System Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Kevin Gerber

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 10 bbl Type of fluid: Rain water, condensed glycol reboiler water, turbine/engine skid leaks (incidental lube oil, antifreeze) Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. Tank was installed in 1974-75 prior to effective date of 19.15.1.18 NMAC (09/23/1985) and 19.15.2.50 NMAC (02/13/04) and prior to the OCD May 28, 2004 Pit and Below-Grade Tank Guidelines. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Open Drain System Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Kevin Gerber

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 10 bbl Type of fluid: Rain water, condensed glycol reboiler water, turbine/engine skid leaks (incidental lube oil, antifreeze) Construction material: Concrete Double-walled, with leak detection? Yes ☐ If not, explain why not. Tank was installed in 1974-75 prior to effective date of 19.15.1.18 NMAC (09/23/1985) and 19.15.2.50 NMAC (02/13/04) and prior to the OCD May 28, 2004 Pit and Below-Grade Tank Guidelines. When tank is replaced, replacement tank will be installed in accordance with 19.15.2.50 NMAC. Open Drain System Sump	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Harold Venham

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☐ Indian ☐

Pit	**Below-grade tank**	
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Volume: 4 bbl Type of fluid: Rain water, condensed glycol reboiler water, turbine/engine pad leaks (incidental lube oil, antifreeze) Construction material: Fiberglass Double-walled, with leak detection? Yes ☑ If not, explain why not. Skimmer Overflow Tank	
Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☑, a general permit ☐, or an (attached) alternative OCD-approved plan ☐.**
Date: 4-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Harold Venham

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-144
June 1, 2004

For drilling and production facilities, submit to appropriate NMOCD District Office.
For downstream facilities, submit to Santa Fe office

Pit or Below-Grade Tank Registration or Closure

Is pit or below-grade tank covered by a "general plan"? Yes ☐ No ☑
Type of action: Registration of a pit or below-grade tank ☑ Closure of a pit or below-grade tank ☐

Operator: Duke Energy Field Services, LP Telephone: (505) 394-5003 e-mail address:
Address: PO Box 66, Oil Center, NM 88240
Facility or well name: Eunice Gas Plant API #: U/L or Qtr/Qtr SE/NE Sec 5 T 21S R 36E
County: Lea Latitude 32.51215 Longitude -103.2860033 NAD: 1927 ☐ 1983 ☑ Surface Owner Federal ☐ State ☐ Private ☑ Indian ☐

Pit	**Below-grade tank**
Type: Drilling ☐ Production ☐ Disposal ☐ Workover ☐ Emergency ☐ Lined ☐ Unlined ☐ Liner type: Synthetic ☐ Thickness ____mil Clay ☐ Pit Volume ____bbl	Molten sulfur Volume: 4500cf ~~bbl~~ Type of fluid: Construction material: Carbon steel Double-walled, with leak detection? Yes ☐ If not, explain why not. Sulfur Pit

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet 50 feet or more, but less than 100 feet 100 feet or more ✔	(20 points) (10 points) (0 points)
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes No ✔	(20 points) (0 points)
Distance to surface water: (horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet 200 feet or more, but less than 1000 feet 1000 feet or more ✔	(20 points) (10 points) (0 points)
	Ranking Score (Total Points)	0

If this is a pit closure: (1) attach a diagram of the facility showing the pit's relationship to other equipment and tanks. (2) Indicate disposal location: (check the onsite box if your are burying in place) onsite ☐ offsite ☐ If offsite, name of facility_____. (3) Attach a general description of remedial action taken including remediation start date and end date. (4) Groundwater encountered: No ☐ Yes ☐ If yes, show depth below ground surface_____ft. and attach sample results. (5) Attach soil sample results and a diagram of sample locations and excavations.

Additional Comments:

I hereby certify that the information above is true and complete to the best of my knowledge and belief. **I further certify that the above-described pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐, or an (attached) alternative OCD-approved plan ☑.**
Date: 9-23-04
Printed Name/Title Kevin Gerber/Plant Supervisor Signature Harold Venhuis

Your certification and NMOCD approval of this application/closure does not relieve the operator of liability should the contents of the pit or tank contaminate ground water or otherwise endanger public health or the environment. Nor does it relieve the operator of its responsibility for compliance with any other federal, state, or local laws and/or regulations.

Approval:
Printed Name/Title_____ Signature_____ Date: _____

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

May 22, 2003

Lori Wrotenbery
Director
Oil Conservation Division

Ms. Karin Char Kimura
Senior Environmental Specialist
Duke Energy Field Services Inc
P.O. Box 5493
Denver, Colorado 80217

MAY 27 2003
Duke Energy
a/Ho

RE: Minor Modification
GW-016 Eunice Gas Plant
Lea County, New Mexico

Dear Ms. Kimura:

The New Mexico Oil Conservation Division (OCD) has received Duke Energy Field Services Inc. letter dated May 16, 2003 requesting a modification to the Eunice Gas Plant (GW-016) discharge permit. The Duke Energy Field Services Inc. request to install a single-walled, carbon steel tank for the storage of sulfur is considered a minor modification to the above referenced discharge permit and public notice will not be issued. **The requested minor modification is hereby approved.**

The Application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3107.C and is approved pursuant to WQCC Regulation 3109.

Please note that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to 20 NMAC 3107.C Duke Energy Field Services Inc. is required to notify the Director of any facility expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

Note, that OCD approval does not relieve Duke Energy Field Services Inc. of liability should Duke Energy Field Services Inc. operations result in contamination of surface waters, ground waters or the environment.

If you have any questions please feel free to call W. Jack Ford at (505)-476-3489.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

cc: OCD Hobbs District Office

cc: Facility Env. File 5.2.1: Eunice Gas Plant (via Kevin Gerber)
Reg. Env. File 5.2.1: Eunice Gas Plant (via Lynn Ward)
Corp. Env. File 5.2.1: Eunice Gas Plant
Mark Nault
Von McCallum
Ruth Lang (w/o attachment)
Jennifer Fuqua (w/o attachment)

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202

303 595 3331

May 16, 2003

UPS Next Day Air *(Tracking No. 1Z F46 915 22 1000 8087)*

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

SUBJECT: Eunice Gas Plant
Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) requests the approval for the installation of a below-grade tank at the Eunice Gas Plant. In accordance with 19.15.1.18A NMAC and NMOCD "Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks" (revised October 1991), DEFS submits the enclosed below-grade tank installation application.

If you have any questions regarding this below-grade tank installation application, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

Enclosure

bcc: Mark Nault
Von McCallum
Jennifer Fuqua (w/o enclosure)
Ruth Lang (w/o enclosure)

Facility Env. File 5.2.1: Eunice Gas Plant (via Kevin Gerber)
Reg. Env. File 5.2.1: Eunice Gas Plant (via Lynn Ward)
Corp. Env. File 5.2.1: Eunice Gas Plant, NM

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 2500
Denver, CO 80202

303 595 3331

March 15, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED *(Article No. 7002 2030 0006 2471 1575)*

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Eunice Gas Plant
Discharge Plan GW-009
Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has received NMOCD's March 9, 2003 approval of DEFS' discharge plan renewal application dated November 20, 2003. Per the stipulation to submit a closure plan for the out of service former surface impoundments (evaporation pit and skimmer pit) in the March 9, 2003 approval, DEFS submits the following documentation which were submitted to Mr. Larry Johnson, NMOCD District 1 Office regarding the backfilling of the two former surface impoundments:

- DEFS' September 12, 2003 notice to backfill the former surface impoundments; and
- DEFS' February 20, 2004 notice of backfill completion of the former surface impoundments.

With the December 2003 completion of the backfilling of these two former surface impoundments, there are no discharges of effluent, leachate, water contaminants, or toxic pollutants at the Eunice Gas Plant, nor are any such discharges planned or intended. All wastes generated at this facility are disposed of offsite and in compliance with applicable regulations, either by DEFS or by third parties who have contracted with DEFS to perform such services. Under these circumstances, the WQCC regulations do not require a discharge permit or plan. Therefore, DEFS requests that the NMOCD cancel Discharge Plan GW-009.

If you have any questions concerning the Eunice Gas Plant Discharge Plan, please contact me at (303) 605-1717. Please send all correspondence regarding this Eunice Gas Plant Discharge Plan renewal to me at 370 17th Street, Suite 2500, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

Enclosures

cc: NMOCD District 1 Office *(Certified Mail Return Receipt Requested Article No.7002 2030 0006 2471 1568)*
1625 N. French Drive
Hobbs, NM 88240

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202

303 595 3331

Sent via UPS #1ZF469153710005918

September 12, 2003

Mr. Larry Johnson
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, NM 88240

RE: Notice to Backfill Two Former Surface Impoundments
Duke Energy Field Services, LP Eunice Gas Plant
Lea County, New Mexico

Dear Mr. Johnson,

During an internal audit completed in May 2003, Duke Energy Field Services, LP (DEFS) discovered that two former surface impoundments at the Eunice Gas Plant, located two miles north of Oil Center in Lea County, New Mexico, may not have been properly backfilled in accordance with its discharge plan (DW-16). The two impoundments, the skimmer pit and the evaporation pit, were formerly part of the Plant's wastewater management system. The two wastewater ponds have been out of service since October 1982.

DEFS is notifying the New Mexico Oil Conservation Division (OCD) of its plans to backfill, grade, and contour the former surface impoundments, as specified in the August 1983 discharge plan application. The application describes closing the wastewater ponds by covering them with local earthen material and mounding to prevent ponding. A letter report will be developed that documents all of the activities completed according to this notice.

On October 20, 1989, the former plant owner, Phillips Petroleum Company (Phillips), submitted a renewal letter for the Discharge Plan, requesting the OCD's approval for disposing inert wastes periodically generated by the plant as fill material in the abandoned wastewater ponds. The OCD approved the discharge plan renewal application on October 31, 1989. DEFS will discontinue disposing of those inert wastes in the former surface impoundments.

If you have any questions or concerns, please call me at 303-605-1716.

Sincerely
Duke Energy Field Services, LP

Wesley Hill
Sr. Environmental Specialist

Attachments
cc: Joshua Epel, DEFS Legal
Rusty Frishmuth, DEFS Remediation
Louis Rose, Montgomery and Andrews
Lynn Ward, DEFS Midland

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202

Sent via UPS #1ZF469153710005328

February 20, 2004

Mr. Larry Johnson
New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, NM 88240

RE: Backfill Completion of Two Former Surface Impoundments
Duke Energy Field Services, LP Eunice Gas Plant
Lea County, New Mexico

Dear Mr. Johnson,

During an internal audit conducted in May 2003, Duke Energy Field Services, LP (DEFS) discovered two former surface impoundments at the Eunice Gas Plant. The Eunice plant is located two miles north of Oil Center in Lea County, New Mexico (refer to the attached figures). The two impoundments, the skimmer pit and the evaporation pit, were formerly part of the Eunice Plant wastewater management system. The original discharge plan for the Eunice Plant (GW-16), dated August 1983, describes closing the wastewater ponds by covering them with local earthen material and mounding to prevent ponding. DEFS submitted a notice to backfill the former ponds to the New Mexico Oil Conservation Division (NMOCD) on September 12, 2003.

Gandy Corporation of Tatum, New Mexico conducted the backfilling activities at the Eunice Gas Plant during the week of December 8, 2003. The former surface impoundments were backfilled as specified in the original discharge plan. Approximately 5,000 cubic yards of clean imported soil was used to backfill both surface impoundments. The area was contoured and graded to prevent surface water accumulation. Refer to the attached photos showing the backfilled area after final grading.

DEFS submitted a renewal application (GW-009) for the Eunice Gas Plant Discharge Plan to the NMOCD on November 26, 2003. As the former surface impoundments no longer have the potential to discharge, DEFS will be requesting (under a separate cover letter) to withdrawal the renewal application prior to its April 1, 2004 deadline. If you have any questions or concerns, please call me at 303-605-1716.

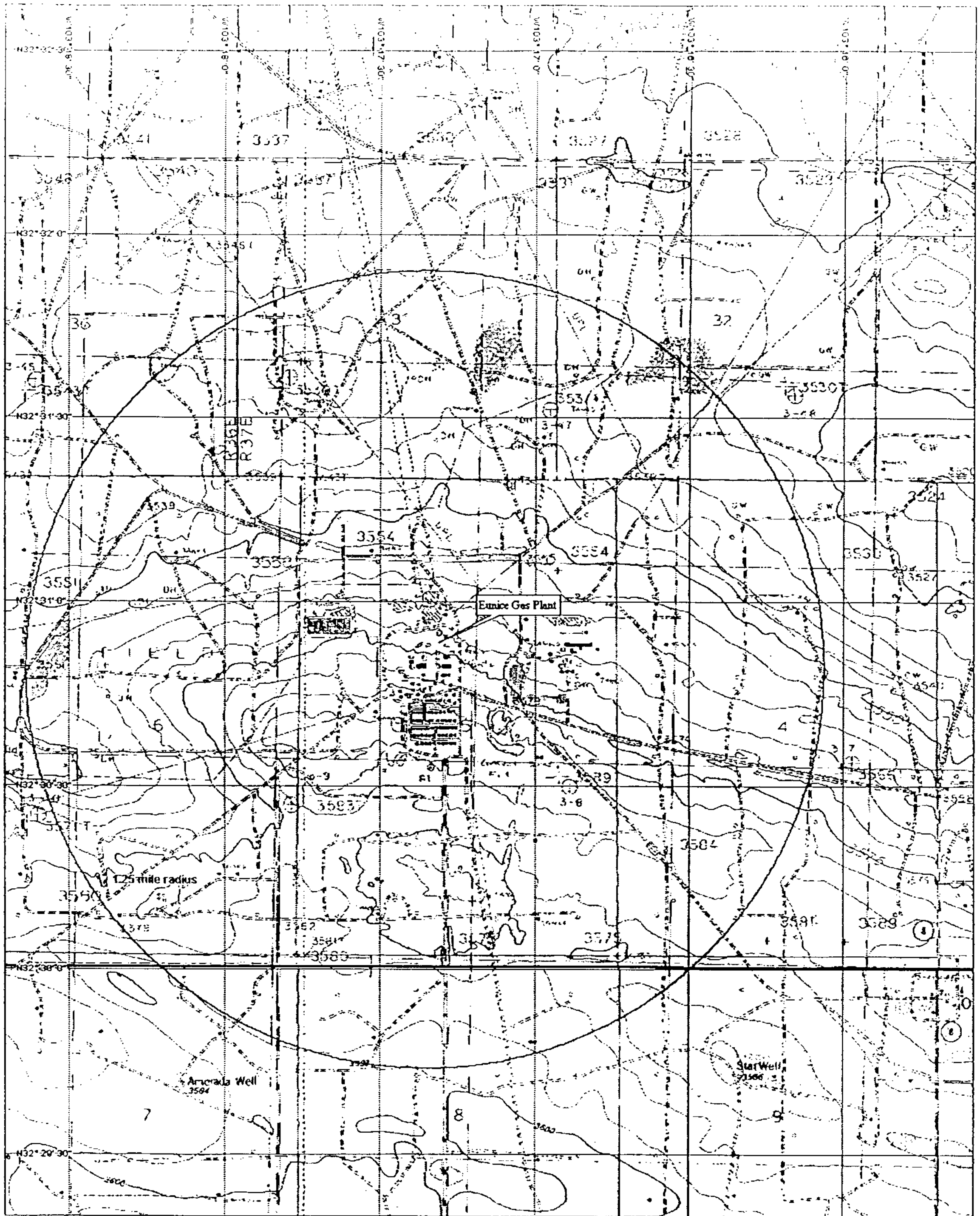
Sincerely
Duke Energy Field Services, LP

Wesley Hill
Sr. Environmental Specialist

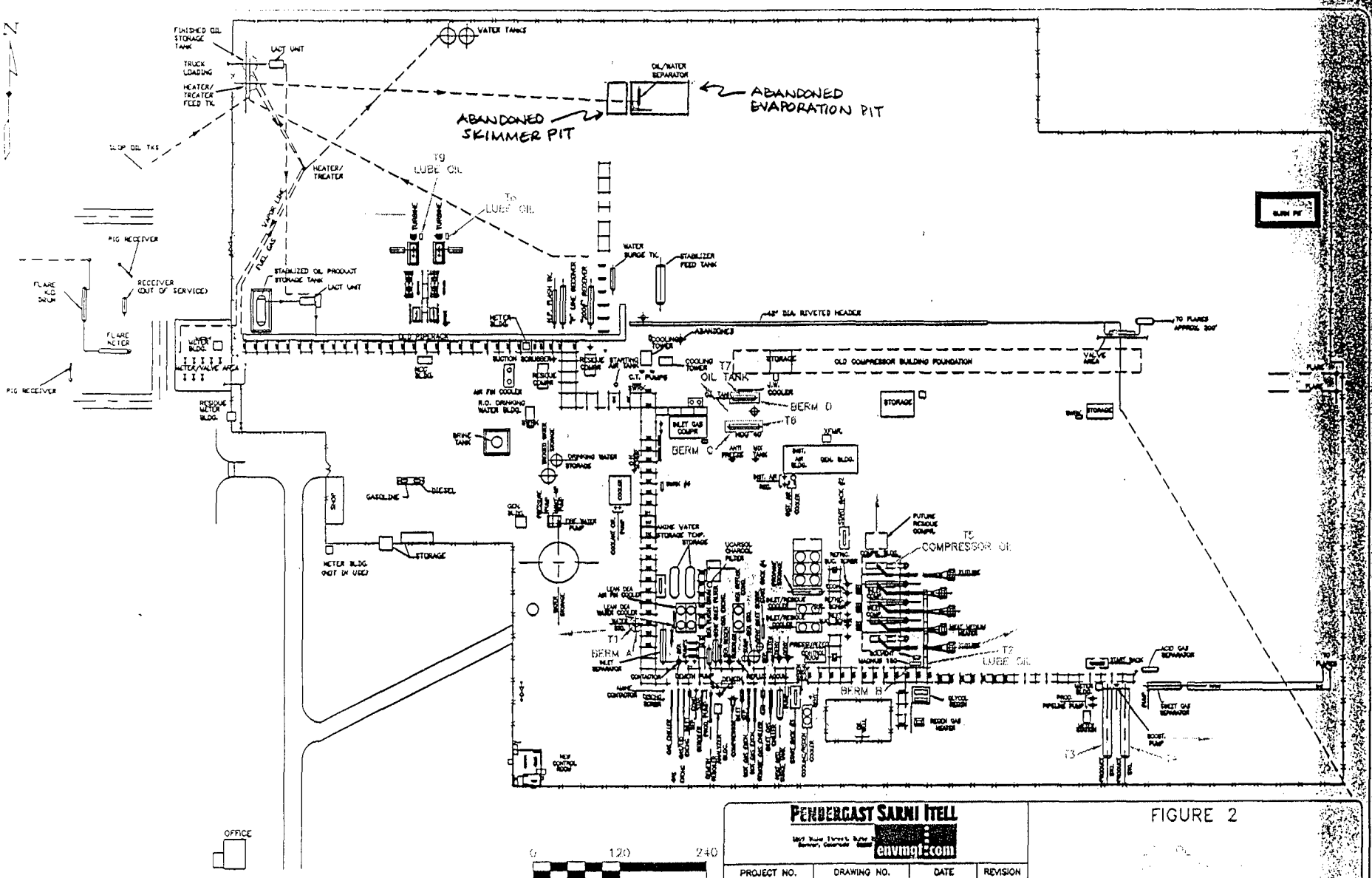
Attachments
cc: Joshua Epel, DEFS Legal
Louis Rose, Montgomery and Andrews
Karin Char Kimura, DEFS Water Waste Permitting
Ruth Lang, DEFS, Water Waste Permitting
Lynn Ward, DEFS Environmental Compliance

FIGURES

Figure 1. Site Location Map – Eunice Gas Plant.



3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS 750 ft Scale: 1 : 25,000 Detail: 13-0 Datum: WGS84



PENDERGAST SARNI ITELL

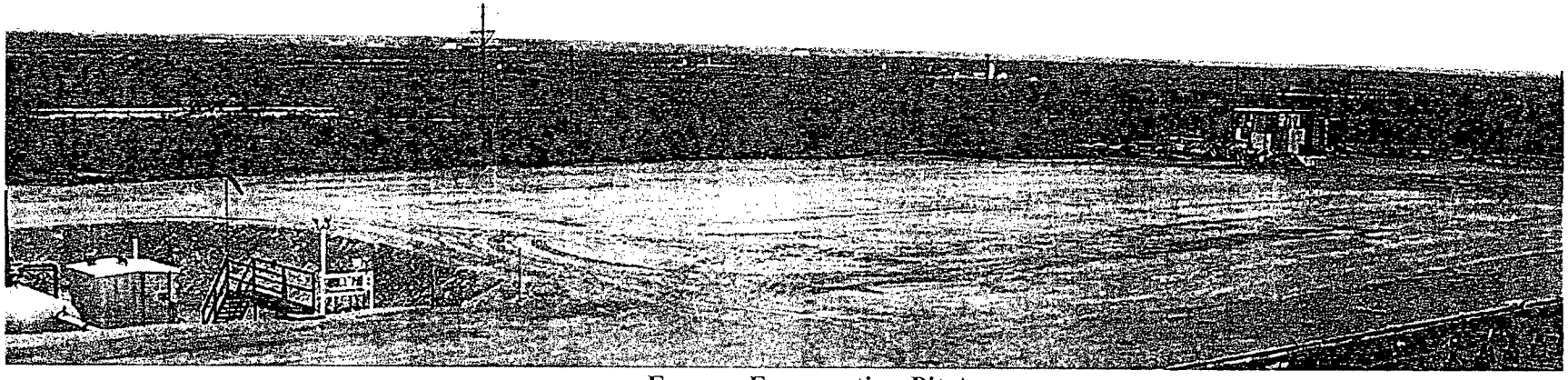
envmgt.com

PROJECT NO.	DRAWING NO.	DATE	REVISION
DUKE.022.00	DUKE-122	11/12/00	A

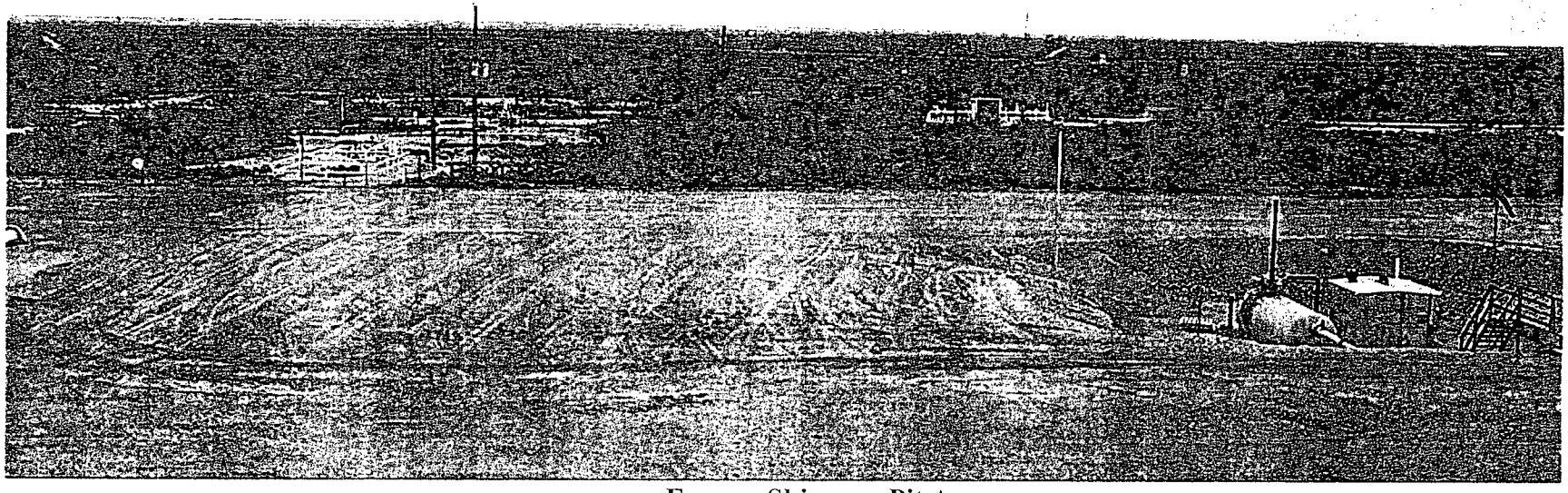
FIGURE 2

PHOTOGRAPHS

Site Photographs
Eunice Gas Plant



Former Evaporation Pit Area



Former Skimmer Pit Area

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite [redacted] 2500
Denver, CO 80202

303 595 3331

December 24, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED *(Article No. 7002 2030 0006 2471 2497)*

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Eunice Gas Plant
Discharge Plan GW-009
Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has provided public notice, in accordance with the Water Quality Control Commission regulations (20.6.2.3108 NMAC), for Eunice Gas Plant discharge plan renewal application.

DEFS submits the following as proof of notice:

- Affidavit of posting in the Hobbs News Sun
- Photograph of the synopsis of public notice in English and Spanish posted on the facility front gate.
- Copy of the synopsis of public notice in English and Spanish posted on the facility front gate

If you have any questions concerning the Eunice Gas Plant discharge plan renewal, please contact me at (303) 605-1713. Please send all correspondence regarding this Eunice Gas Plant Discharge Plan renewal to me at 370 17th Street, Suite 2500, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP

Ruth M. Lang, P.G.
Manager of Water & Waste Programs

Attachments

cc: NMOCD District 1 Office *(Certified Mail Return Receipt Requested Article No.7002 2030 0006 2471 2503)*
1625 N. French Dr.
Hobbs, New Mexico 88240

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 1

_____ weeks.

Beginning with the issue dated

December 9 2003

and ending with the issue dated

December 9 2003

Kathi Bearden

Publisher

Sworn and subscribed to before me this 12th day of

December 2003

Notary Public.

My Commission expires
November 27, 2004
(Seal)

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

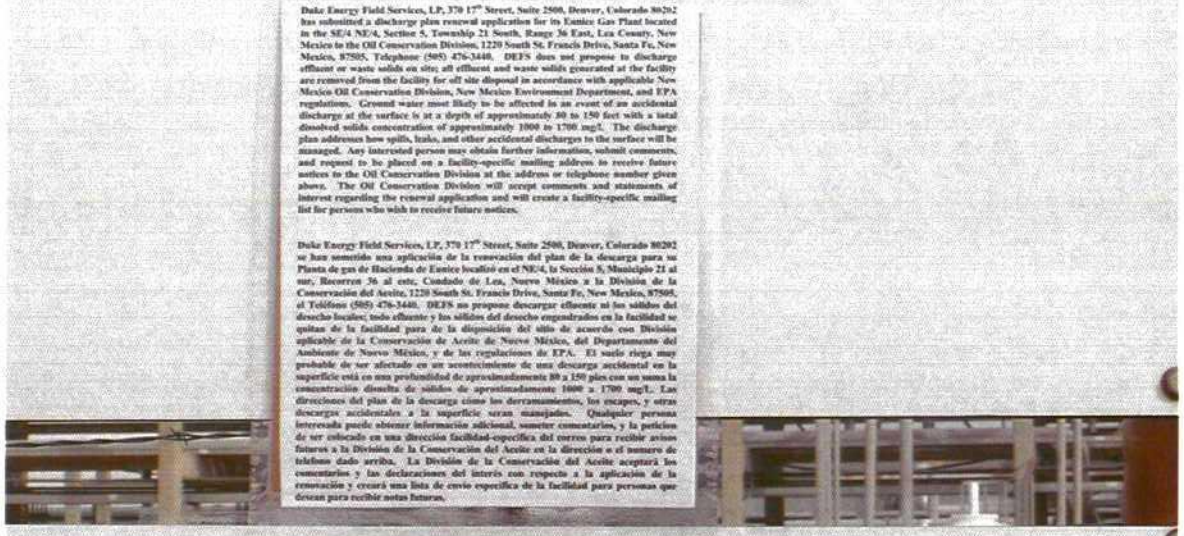
Public Notice

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, Lea County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration of approximately 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.

49100061000 03506883

Duke Energy Field Services
370 17th St., Suite 900
DENVER, CO 80202

Duke Energy Field Services



Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, Lea County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration of approximately 1000 to 1700 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility-specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 se han sometido una aplicación de la renovación del plan de la descarga para su Planta de gas de Hacienda de Eunice localizó en el NE/4, la Sección 5, Municipio 21 al sur, Recorren 36 al este, Condado de Lea, Nuevo México a la División de la Conservación del Aceite, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, el Teléfono (505) 476-3440. DEFS no propone descargar efluente ni los sólidos del desecho locales; todo efluente y los sólidos del desecho engendrados en la facilidad se quitan de la facilidad para de la disposición del sitio de acuerdo con División aplicable de la Conservación de Aceite de Nuevo México, del Departamento del Ambiente de Nuevo México, y de las regulaciones de EPA. El suelo riega muy probable de ser afectado en un acontecimiento de una descarga accidental en la superficie está en una profundidad de aproximadamente 80 a 150 pies con un suma la concentración disuelta de sólidos de aproximadamente 1000 a 1700 mg/L. Las direcciones del plan de la descarga cómo los derramamientos, los escapes, y otras descargas accidentales a la superficie serán manejados. Cualquier persona interesada puede obtener información adicional, someter comentarios, y la petición de ser colocado en una dirección facilidad-específica del correo para recibir avisos futuros a la División de la Conservación del Aceite en la dirección o el número de teléfono dado arriba. La División de la Conservación del Aceite aceptará los comentarios y las declaraciones del interés con respecto a la aplicación de la renovación y creará una lista de envío específica de la facilidad para personas que desean para recibir notas futuras.

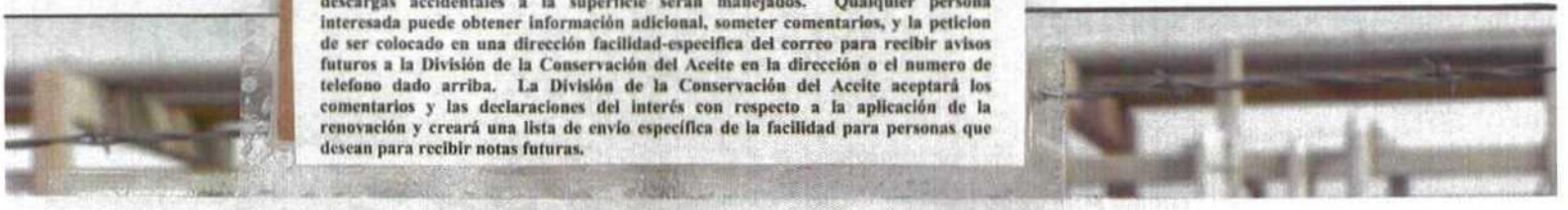
EUNICE PLANT

S5–T21S–R15E	LEA COUNTY
LAT:32:31:15	LONG: -103:17:59

EMERGENCY PHONE: 1-800-847-6427

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, Lea County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration of approximately 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility-specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 se han sometido una aplicación de la renovación del plan de la descarga para su Planta de gas de Hacienda de Eunice localizó en el NE/4, la Sección 5, Municipio 21 al sur, Recorren 36 al este, Condado de Lea, Nuevo México a la División de la Conservación del Aceite, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, el Teléfono (505) 476-3440. DEFS no propone descargar efluente ni los sólidos del desecho locales; todo efluente y los sólidos del desecho engendrados en la facilidad se quitan de la facilidad para de la disposición del sitio de acuerdo con División aplicable de la Conservación de Aceite de Nuevo México, del Departamento del Ambiente de Nuevo México, y de las regulaciones de EPA. El suelo riega muy probable de ser afectado en un acontecimiento de una descarga accidental en la superficie está en una profundidad de aproximadamente 80 a 150 pies con un suma la concentración disuelta de sólidos de aproximadamente 1000 a 1700 mg/L. Las direcciones del plan de la descarga cómo los derramamientos, los escapes, y otras descargas accidentales a la superficie seran manejados. Qualquier persona interesada puede obtener información adicional, someter comentarios, y la peticion de ser colocado en una dirección facilidad-especifica del correo para recibir avisos futuros a la División de la Conservación del Aceite en la dirección o el numero de telefono dado arriba. La División de la Conservación del Aceite aceptará los comentarios y las declaraciones del interés con respecto a la aplicación de la renovación y creará una lista de envío específica de la facilidad para personas que desean para recibir notas futuras.



EUNICE PLANT

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 has submitted a discharge plan renewal application for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, Lea County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. DEFS does not propose to discharge effluent or waste solids on site; all effluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable New Mexico Oil Conservation Division, New Mexico Environment Department, and EPA regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration of approximately 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed. Any interested person may obtain further information, submit comments, and request to be placed on a facility-specific mailing address to receive future notices to the Oil Conservation Division at the address or telephone number given above. The Oil Conservation Division will accept comments and statements of interest regarding the renewal application and will create a facility-specific mailing list for persons who wish to receive future notices.

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 se han sometido una aplicación de la renovación del plan de la descarga para su Planta de gas de Hacienda de Eunice localizó en el NE/4, la Sección 5, Municipio 21 al sur, Recorren 36 al este, Condado de Lea, Nuevo México a la División de la Conservación del Aceite, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, el Teléfono (505) 476-3440. DEFS no propone descargar efluente ni los sólidos del desecho locales; todo efluente y los sólidos del desecho engendrados en la facilidad se quitan de la facilidad para de la disposición del sitio de acuerdo con División aplicable de la Conservación de Aceite de Nuevo México, del Departamento del Ambiente de Nuevo México, y de las regulaciones de EPA. El suelo riega muy probable de ser afectado en un acontecimiento de una descarga accidental en la superficie está en una profundidad de aproximadamente 80 a 150 pies con un suma la concentración disuelta de sólidos de aproximadamente 1000 a 1700 mg/L. Las direcciones del plan de la descarga cómo los derramamientos, los escapes, y otras descargas accidentales a la superficie seran manejados. Qualquier persona interesada puede obtener información adicional, someter comentarios, y la peticion de ser colocado en una dirección facilidad-especifica del correo para recibir avisos futuros a la División de la Conservación del Aceite en la dirección o el numero de telefono dado arriba. La División de la Conservación del Aceite aceptará los comentarios y las declaraciones del interés con respecto a la aplicación de la renovación y creará una lista de envío específica de la facilidad para personas que desean para recibir notas futuras.

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202

303 595 3331

November 26, 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED *(Article No. 7002 2030 0006 2471 1520)*

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Eunice Gas Plant
Discharge Plan GW-009
Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) submits the following:

- Enclosed discharge plan renewal application (original and a copy);
- Enclosed check in the amount of $100 for the discharge plan renewal application filing fee.

If you have any questions concerning the Eunice Gas Plant Discharge Plan renewal, please contact me at (303) 605-1717. Please send all correspondence regarding this Eunice Gas Plant Discharge Plan renewal to me at 370 17th Street, Suite 2500, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

Enclosures

cc: NMOCD District 1 Office *(Certified Mail Return Receipt Requested Article No. 7002 2030 0006 2471 1551)*
1625 N. French Drive
Hobbs, NM 88240

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 11/24/03,

or cash received on _____ in the amount of $ 100 -

from Duke Energy Field Services

for Eunice G.P. (Facility Name) GW-009 016 (DP No.)

Submitted by: _____ Date: 12/2/03

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER WITH VISIBLE FIBERS AND A TRUE WATERMARK ON THE REVERSE SIDE.

Duke Energy Field Services, LP
Accounts Payable
370 17TH ST SUITE 2500
Denver, Colorado 80202

THE CHASE MANHATTAN BANK, N.A.
SYRACUSE, NEW YORK
50-937/213

VENDOR NO.	CHECK DATE	CHECK NUMBER
0000078217	11/24/03	[redacted]

PAY ONLY ONE ZERO ZERO CTS/CTS

NOT NEGOTIABLE AFTER 120 DAYS

CHECK AMOUNT
*******$100.00

TO THE ORDER OF
NEW MEXICO-
WATER MANAGEMENT QUALITY
MANAGEMENT FUND
C/O OIL CONSERVATION DIVISION
Santa Fe,NM 87505

David L Hasse
AUTHORIZED SIGNATURE

■ One hundred and 00/100 Dollars

HOLD BETWEEN THUMB AND FOREFINGER OR BREATHE ON COLORED BOX. COLOR WILL DISAPPEAR, THEN REAPPEAR.

[redacted]

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resou

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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

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

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

☐ New ☑ Renewal ☐ Modification

1 Type: Eunice Gas Plant

Duke Energy Field Services, LP
Acccunts Payable
370 17TH ST SUITE 2500
Denver, Colorado 80202

VENDOR NUMBER
0000078217
VENDOR NAME
NEW MEXICO-

CHECK NUMBER
[redacted]
CHECK DATE
11/24/03

INVOICE NUMBER	INVOICE DATE	NET AMOUNT	DESCRIPTION
discharge plan f	11/20/03	100.00	EUNICE GP
		TOTAL PAID	$100.00

PLEASE DETACH AND RETAIN FOR YOUR RECORDS

Eunice Gas Plant
SE/4 NE/4 T 21S, R 36E, Section 5

DISCHARGE PLAN

This document constitutes a modification application for a Groundwater Discharge Plan for the Eunice Gas Plant (GW-016). This Discharge Plan application has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (revised 12-95) and New Mexico Water Quality Control Commission (WQCC) regulations, 20.6.2.3-104 and 3-106 NMAC.

1 Type of Operation

Out of service former surface impoundments (evaporation pit and skimmer pit) to be backfilled, graded, and contoured.

2 Operator / Legally Responsible Party

Operator
Duke Energy Field Services, LP
3300 N. A Street, Building 7
Midland, TX 79705
(505) 628-0282
Contact Person: Greg Kardos – Asset Manager

Legally Responsible Party
Duke Energy Field Services, LP
370 17th Street, Suite 900
Denver, CO 8020
(303) 595-3331
Contact Person: John Admire – Director, Environmental Protection

3 Location of Discharge / Facility

SE/4, NE/4, Section 5, Township 21S, Range 36E

See Figure 1 – Site Location Map.

4 Landowner

Duke Energy Field Services, LP
370 17th Street, Suite 900
Denver, CO 80202
(303) 595-3331

5 Facility Description

Eunice Gas Plant receives natural gas and natural gas liquids from the natural gas fields. Natural gas passes through condensate separation, condensate reconditioning, cryogenic processing and metering equipment at the plant. Engine driven compressors and/or re-compressors provide gas compression for the facility.

6 Materials Stored or Used

There are no materials that are stored at the facility for the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

7 Sources and Quantities of Effluent and Waste Solids

There are no wastes generated at the facility related to the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Separators/Scrubbers
There are no separators or scrubbers involved in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Boilers and Cooling Towers/Fans
There are no boilers or cooling towers/fans involved in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Process and Storage Equipment Wash Down
Wash down is not generated from the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Solvents/Degreasers
There is no solvent or degreasers used in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Spent Acids/Caustics
No spent acids or caustics are generated from the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Used Engine Coolants
No engine coolants are used in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Waste Lubrication and Motor Oils
Lubrication and motor oils are not used in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Used Oil Filters
Used oil filters are not generated from the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Solids and Sludges
No solids or sludges are generated from the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Painting Wastes
No painting wastes are generated from the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Sewage
Sewage is not generated in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Lab Wastes
Lab wastes are not generated in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

Other Liquids and Solid Wastes
Other liquids and solid wastes are not generated in the backfilling, grading, and contouring of the former surface impoundments (evaporation pit and skimmer pit).

8 Liquid and Solid Waste Collection / Storage / Disposal

Collection/Storage
No collection or storage of waste occurs in the former surface impoundments (evaporation pit and skimmer pit).

On-site Disposal
Disposal of inert wastes into the former evaporation pit as approved by NMOCD in a previous discharge plan renewal has been discontinued. Wastes are not disposed in the former skimmer pit.

9 Proposed Modifications

No proposed modifications.

10 Inspection, Maintenance, and Reporting

The former surface impoundments (evaporation pit and skimmer pit) have been out of service since October 1982.

11 Spill / Leak Prevention and Reporting (Contingency Plans)

DEFS will respond to spills as outlined in the facility's SPCC plan and report spills and leaks according to the requirements of the State of New Mexico found in NMOCD Rule 116, 19.15.C.116 NMAC and WQCC regulation, 20.6.2.1203 NMAC.

12 Site Characteristics

No Changes.

13 Additional Information

All unauthorized releases and discharges will be reported to the NMOCD in accordance with NMOCD Rule 116, 19.15.C.116 NMAC and WQCC regulation, 20.6.2.1203 NMAC.

FIGURES

Figure 1. Site Location Map – Eunice Gas Plant.

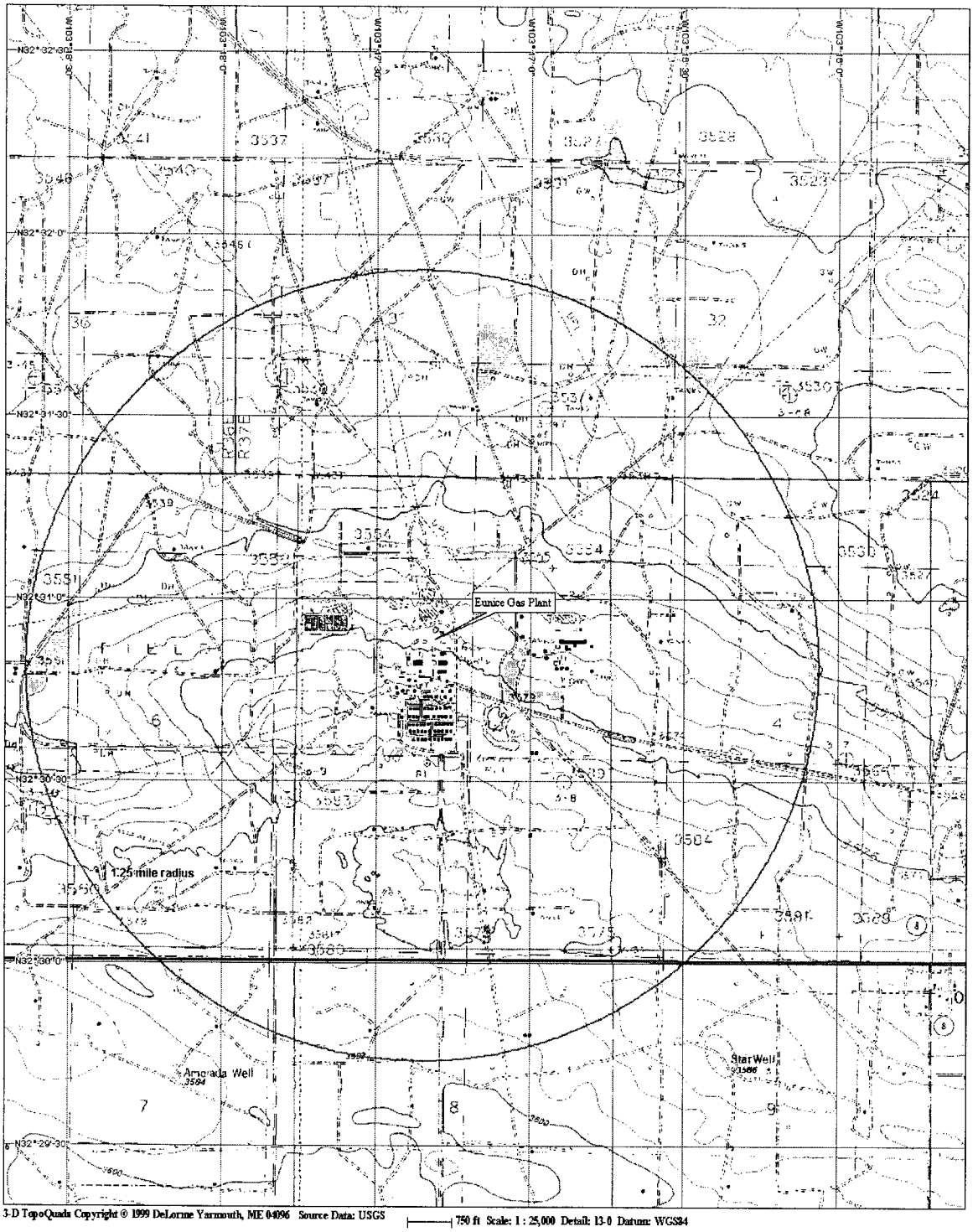
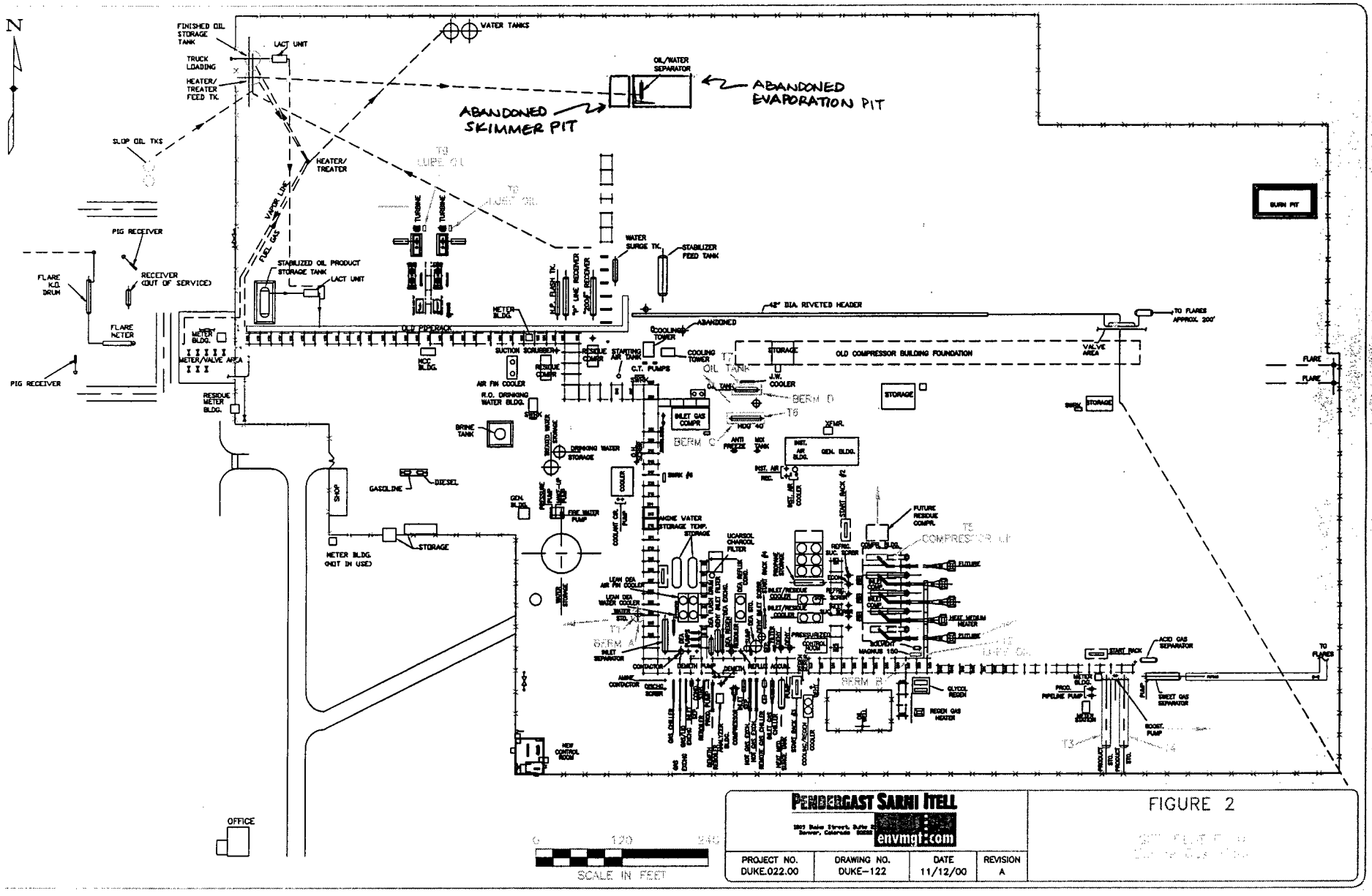


Figure 2. Eunice Gas Plant Site Plan.



PENDERGAST SARNI ITELL

envmgt.com

PROJECT NO.	DRAWING NO.	DATE	REVISION
DUKE.022.00	DUKE-122	11/12/00	A

FIGURE 2

Duke Energy
Field Services

May 7, 2003

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, NM 87505

RE: Groundwater Discharge Permit No. GW-016
Eunice Gas Plant

Dear Mr. Anderson,

Duke Energy Field Services, LP (DEFS) has conducted an internal review of the groundwater discharge permit associated with it's operated Eunice Gas Plant. The review revealed that on January 15, 2001, Mr. Edward Lewis of Fulbright and Jaworski L.L.P submitted written notification of a change in ownership for the Eunice Gas Plant and subsequently, a change to the ownership/operator of the Plant from GPM Gas Company, LLC to Duke Energy Field Services, LP. The notification included a list of the affected groundwater discharge permit. The review of this correspondence revealed that the groundwater discharge permit associated with the Eunice Gas Plant mistakenly identified permit number GW-009. This permit was cancelled. The correct permit number for the groundwater discharge permit for the Eunice Gas Plant is GW-016.

In addition, this letter further services to provide notification that DEFS accepts all permit conditions supplied in the original and renewed discharge permit as submitted by GPM Gas Company, LLC.

If you have any questions about this correspondence, please contact me at (432) 620-4207. DEFS appreciates you cooperation in correcting the groundwater permit number that was previously submitted with the Notification of Name Change correspondence identified above.

Sincerely,
Duke Energy Field Services, LP

Lynn Ward
Environmental Specialist
Western Division

Cc: M. Nault
K. Char
File

Duke Energy®
Field Services

DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202

303 595 3331

May 16, 2003

UPS Next Day Air *(Tracking No. 1Z F46 915 22 1000 8087)*

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

SUBJECT: Eunice Gas Plant
Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) requests the approval for the installation of a below-grade tank at the Eunice Gas Plant. In accordance with 19.15.1.18A NMAC and NMOCD "Guidelines for the Selection and Installation of Below-Grade Produced Water Tanks" (revised October 1991), DEFS submits the enclosed below-grade tank installation application.

If you have any questions regarding this below-grade tank installation application, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

Enclosure

Duke Energy Field Services, LP
Eunice Gas Plant
Below-grade Tank Installation Application

Tank Selection

The below-grade tank (sulfur pit) will be a single-walled, carbon steel tank with an operating capacity of approximately 4,500 cubic feet. Refer to Figure 1 – Drawing No. V-7 Vessel Modification Sulfur Storage Pit, Figure 2 – Drawing No. P-3131 Piping Plan Sulfur Pit Relocation, and Figure 3 – Drawing No. P-3132 Piping Plan Sulfur Pit Relocation for the tank design and piping information.

Installation

Refer to Figure 4 – Facility Plot Plan for the below-grade tank (sulfur pit) installation location. The vessel will be buried in the ground with a flowable fill (light concrete) or sand to function as an insulation barrier to maintain the heat of the tank for the molten sulfur.

Function

The below-grade tank (sulfur pit) will collect and store molten sulfur for transfer into trucks for transportation off site. The below-grade tank will be heated with steam coils to keep the sulfur hot and to allow transfer via pumps for truck loading. The below-grade tank will have a throughput of approximately 35 tons (~575 cubic feet) per day.

Maintenance

Inspection of the below-grade tank will be performed as necessary. If any problems are noted, repairs will be made in the most expeditious manner possible.

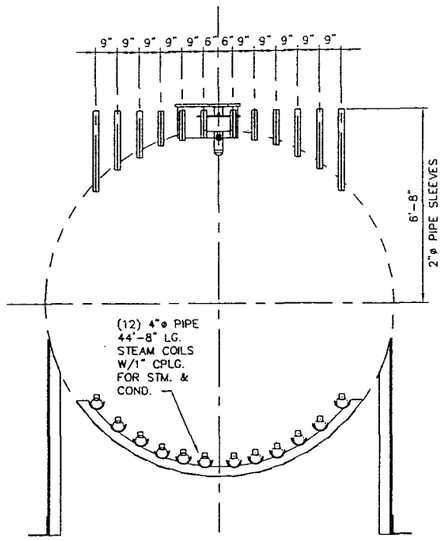
Contingency Plan

In the event of a tank leak, the molten sulfur released will cool and harden immediately acting as a self-sealing agent for the tank.

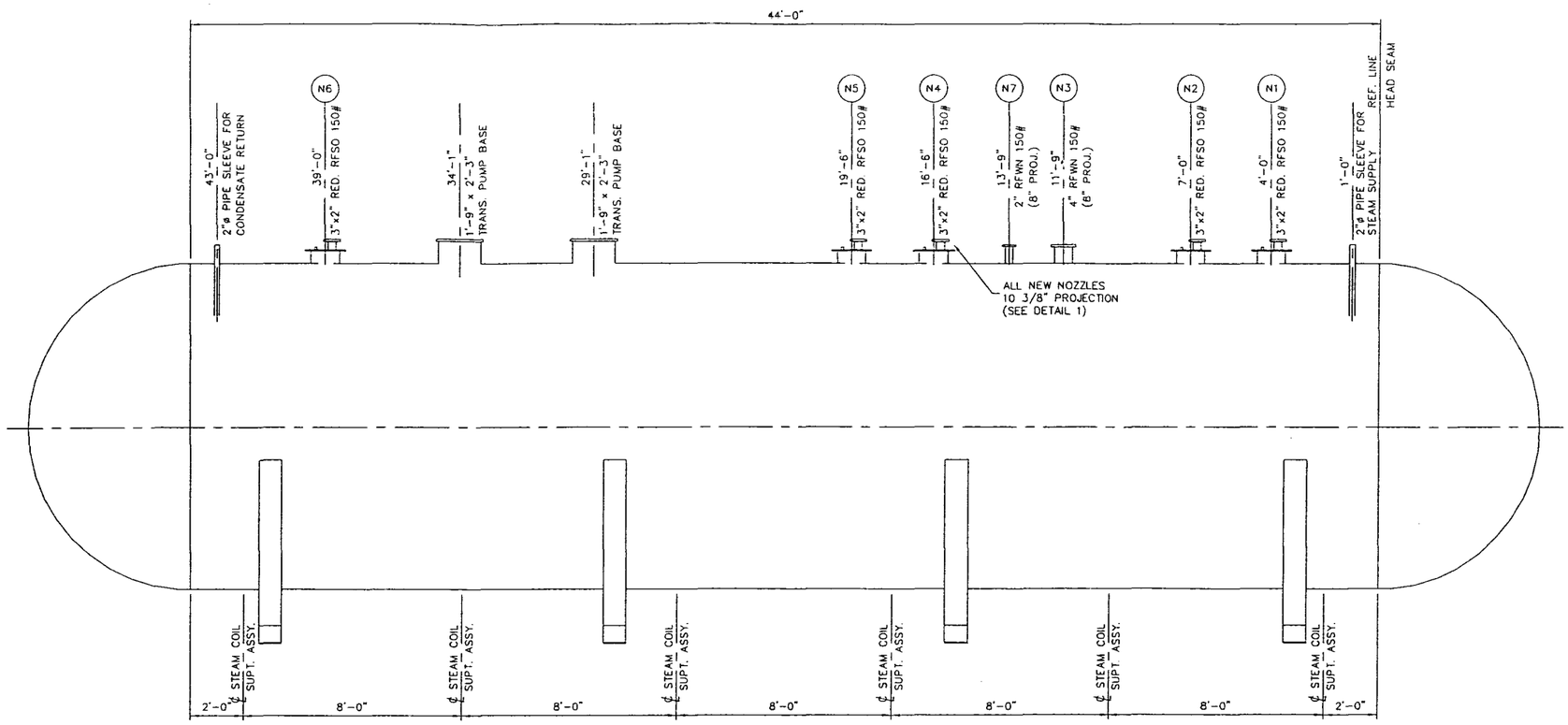
In the event of a leak that reaches the surface of the ground, the first on-site responder will contact emergency responders for containment and clean-up, if necessary.

Figures

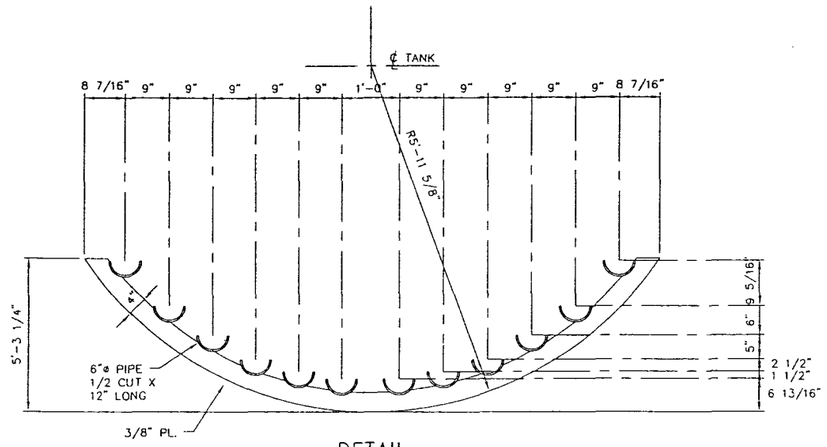
Figure 1. Drawing No. V-7 Vessel Modification Sulfur Storage Pit: Below-grade Tank Construction and Design Details.



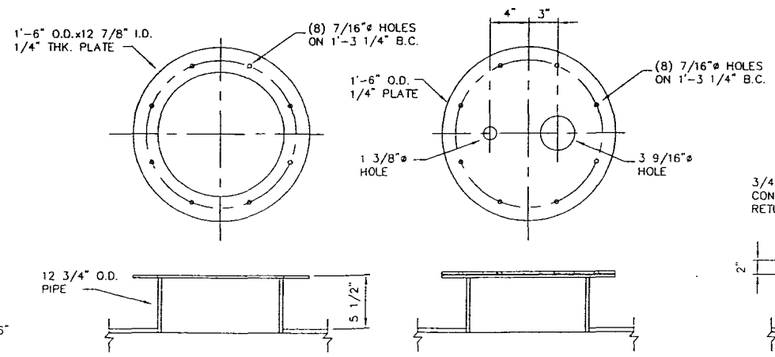
END VIEW



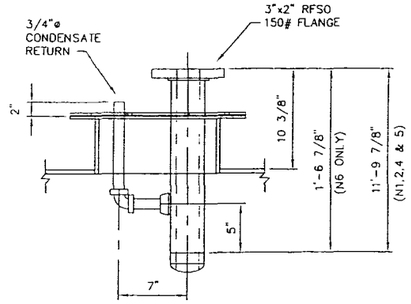
ELEVATION VIEW



DETAIL
STEAM COIL
SUPPORT ASSY.
(6 REQ'D.)
SCALE: 3/4"=1'-0"



DETAIL 1
FABRICATED
SULFUR NOZZLE
(5 REQ'D.)
SCALE: 1 1/2"=1'-0"



REV.	DATE	REVISION	BY	CHK'D	ENGR.	REV.	DATE	REVISION	BY	CHK'D	ENGR.
A	2/26/03	ISSUED FOR APPROVAL	wrt								

NOTES:
REF. DWG. GED-399-V-209 SWEET GAS FLARE SEPARATOR VESSEL
07306-P-3131 PIPING PLAN

Duke Energy® Field Services

VESSEL MODIFICATION SULFUR STORAGE PIT

EUNICE PLANT
DRAWN: wrt DATE: 2/7/03

JA NO.	FILE NAME 07306p3131
AFE NO.	SCALE 3/8"=1'-0"
BASE NO.	07-3-06
DWG. NO.	V-7 /A

PLOT TIME: March 07 2003 - 9:46 am

Figure 2 – Drawing No. P-3131 Piping Plan Sulfur Pit Relocation: Below-grade Tank Construction and Design Details.

2'-11 1/2" 11'-6" 11'-10" 1'-8" 3'-0" 5'-0" 9'-10" 3'-0" 9'-6" 3'-0" 3'-9"

DRAWING LIMITS

TIE-IN 03-09

℄ PS 3131-1

℄ PS 3131-2

℄ PS 3131-3

℄ PUMP (RELOCATED)

℄ PUMP (NEW)

3"x2"-S-4020-151-1"H

3"x2"-S-4021-151-1"H

8'-8"

A P-3132

℄ NEW PIT

11'-6"

2"-CO-4023-152-1"H

3"x2"-S-4019-151-1"H

11'-6"

EXISTING PUMP (RELOCATE)

TIE-IN 03-08

EXIST. 2" COND. HDR.

3"x2"-S-4018-151-1"H

3"x2"-S-4017-151-1"H

3"x2"-S-4016-151-1"H

3"x2"-S-4015-151-1"H

3"x2"-S-4014-151-1"H

4"-ST-4022-152-1.5"H

20'-0"

TIE-IN 03-07

℄ EXIST. PIT

EXIST. 4" STEAM HDR.

TIE-IN 03-04

TIE-IN 03-03

TIE-IN 03-02

TIE-IN 03-01

SDS "D"

SDS "B"

A

SDS "C"

SDS "A"

DRAWING LIMITS

TIE-IN 03-06

TIE-IN 03-05

SDS "E"

DRAWING LIMITS

DRAWING LIMITS

REV.	DATE	REVISION	BY	CHK'D	ENGR.	REV.	DATE	REVISION	BY	CHK'D	ENGR.
A	2/26/03	ISSUED FOR APPROVAL	wrt								

NOTES:

REF. DWG. 07306-MF-57 MECHANICAL FLOW DIAGRAM
07306-V-7 SULFUR PIT MODIFICATION

Duke Energy® Field Services

EUNICE PLANT

PIPING PLAN SULFUR PIT RELOCATION

DRAWN: wrt DATE: 2/7/03

JA NO. FILE NAME 07306P3131

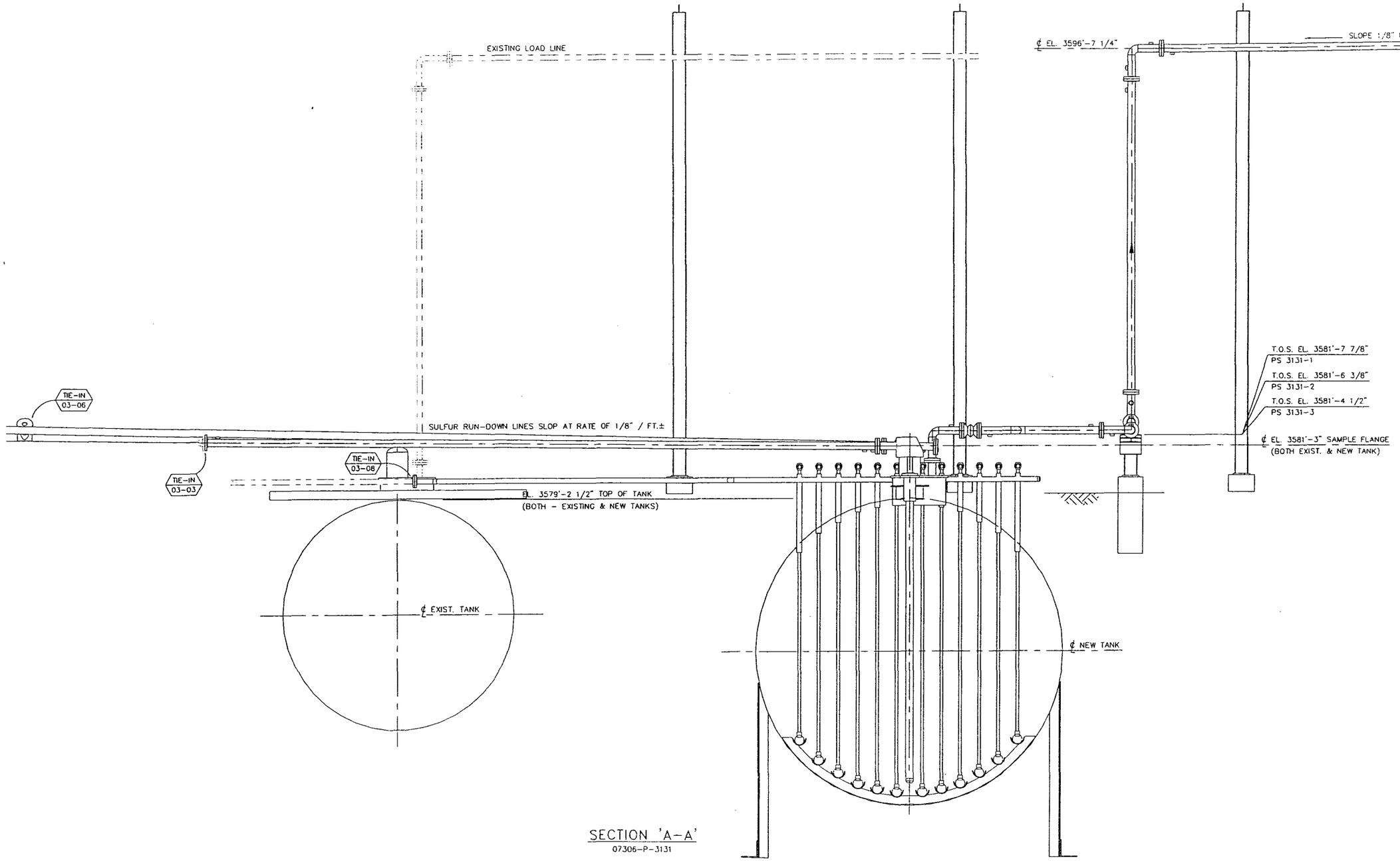
AFE NO. SCALE 3/8"=1'-0"

BASE NO. 07-3-06

DWG. NO. P-3131 A

PLOT TIME: February 26 2003 - 11:24 am

Figure 3 – Drawing No. P-3132 Piping Plan Sulfur Pit Relocation: Below-grade Tank Construction and Design Details.



SECTION 'A-A'
07306-P-3131

REV.	DATE	REVISION	BY	CHK'D	ENGR.	REV.	DATE	REVISION	BY	CHK'D	ENGR.
A	2/26/03	ISSUED FOR APPROVAL	wrt								

NOTES:
REF. DWG. 07306-P-3131 PIPING PLAN

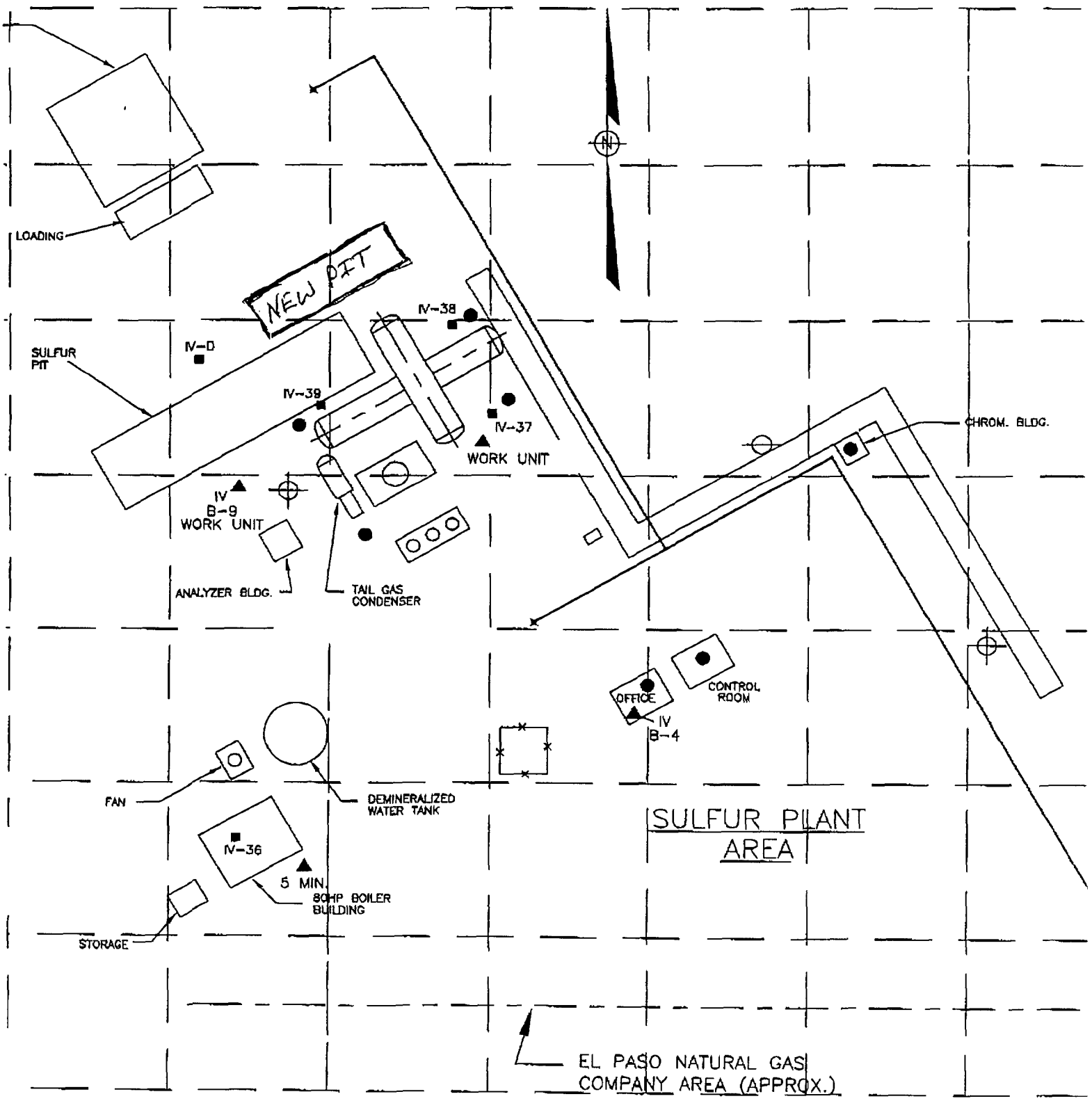
Duke Energy® Field Services

PIPING SECTION
SULFUR PIT
RELOCATION

EUNICE PLANT
DRAWN: wrt | DATE: 2/7/03

JA NO.	FILE NAME 07306P3131
AFE NO.	SCALE 1/2"=1'-0"
BASE NO.	07-3-06
DWG. NO.	P-3132 A

Figure 4. Facility Plot Plan of the Sulfur Plant Area.


C
D
E
F
G
N
LOADING
NEW PIT
IV-38
IV-D
SULFUR PIT
IV-39
IV-37
WORK UNIT
CHROM. BLDG.
IV B-9 WORK UNIT
ANALYZER BLDG.
TAIL GAS CONDENSER
OFFICE
CONTROL ROOM
IV B-4
FAN
DEMINERALIZED WATER TANK
SULFUR PLANT AREA
IV-36
5 MIN.
80HP BOILER BUILDING
STORAGE
EL PASO NATURAL GAS COMPANY AREA (APPROX.)

FULBRIGHT & JAWORSKI L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
1301 MCKINNEY, SUITE 5100
HOUSTON, TEXAS 77010-3095

TELEPHONE: 713/651-5151
FACSIMILE: 713/651-5246

WRITER'S INTERNET ADDRESS:
elewis@fulbright.com

WRITER'S DIRECT DIAL NUMBER:
713/651-3760

HOUSTON
WASHINGTON, D.C.
AUSTIN
SAN ANTONIO
DALLAS
NEW YORK
LOS ANGELES
MINNEAPOLIS
LONDON
HONG KONG

January 15, 2001

Re: Notification of Name Change to Duke Energy Field Services, LP

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

In a February 16, 2000 letter addressed to you from Mel Driver of GPM Gas Company, LLC, Mr. Driver informed you that GPM Gas Company, LLC and Duke Energy Field Services, LLC were planning to undergo an internal corporate reorganization later in the year. As a result of this corporate reorganization, which has now taken place, facilities that were formerly operated under the name of GPM Gas Company, LLC are now being operated under the name of Duke Energy Field Services, LP. A chart that lists facilities with New Mexico Oil Conservation Division permits that are affected by this change is enclosed with this letter. Please update your records to reflect Duke Energy Field Services, LP as the permit holder for the facilities listed on the enclosed chart.

Thank you for your assistance, and please feel free to call me at (713) 651-3760 if you have any questions.

Very truly yours,

Eddie Lewis

Edward C. Lewis

ECL/jnr

cc: Ms. Nelda Morgan
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

Ms. Vicki Gunter
Duke Energy Field Services, LP
P. O. Box 50020
Midland, Texas 79710

FACILITY NAME	PERMIT NUMBER	CURRENT NAME	NEAREST CITY
Artesia Plant	GW-168	GPM Gas Company, LLC	Artesia
Avalon Plant	GW-024	GPM Gas Company, LLC	Carlsbad
Eunice Plane	GW-009 GW-016	GPM Gas Company, LLC	Eunice
Feagen	GW-168	GPM Gas Company, LLC	Artesia
Hat Mesa	GW-128	GPM Gas Company, LLC	Hobbs
Hobbs	GW-044	GPM Gas Company, LLC	Hobbs
Indian Hills	GW-042	GPM Gas Company, LLC	Carlsbad
Lee Plant	GW-002	GPM Gas Company, LLC	Lovington
Linam Ranch Plant	GW-015	GPM Gas Company, LLC	Hobbs
Maljamar	GW-177	GPM Gas Company, LLC	Lovington
Sand Dunes	GW-142	GPM Gas Company, LLC	Loving
Won Ton	GW-178	GPM Gas Company, LLC	Lovington
Zia Plant	GW-145	GPM Gas Company, LLC	Maljamar

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

MEMORANDUM OF MEETING OR CONVERSATION

✓ Telephone ____ Personal Time 11:45 Date 9-26-00

Originating Party: Kevin Gerber, Duke Energy, Cell Phone call Back # 505-369-7099

Other Parties: Martyne Kieling, OCD, Transfer From Florene D.

Subject: Pipeline Rupture Estimated Volume 1½ to 2 million C.f. Location: Duke Energy Eunice Gas Plant at Oil Center New Mexico. NO FIRE they Have Shut Down the Plant

Discussion: I took Down the Above Information and Gave Kevin Gerber The Hobbs office Phone # (505) 393-6161 and asked Him to Call them and Report the Insedent. No Fire occured But the Ruptuer Did occure within the Gas Plant and they Have Shut Down the Plant.

- Send DP renewal to Midland address

Apr. '94 ↓ Current

Conclusions or Agreements

Distribution

Signed Martyne J Kieling

November 11, 1999

GPM GAS CORPORATION

3300 N "A" ST. BLDG 7
MIDLAND, TX 79705-5421

P.O. BOX 50020
MIDLAND, TX 79710-0020

Notification of Venting and Flaring
For Period of October 15 thru 31, 1999

Tim Gum, Supervisor and Oil & Gas Inspector
State of New Mexico Oil Conservation Commission
811 S. First Street
Artesia, New Mexico 88210

Dear Mr. Gum:

Rule 116(a), of the State of New Mexico Oil Conservation Division (OCD) Rules and Regulations requires GPM Gas Corporation (GPM) to notify the OCD of venting and flaring. In compliance with Rule 116(a), GPM hereby notifies the State of New Mexico OCD of the following attached account of the events.

If you should need additional information please do not hesitate to contact me at (915) 620-4144. Thank you.

Sincerely,

Vicki Gunter

Vicki Gunter
Regulatory Compliance Assist.
New Mexico Region

Date	Duration	County	Facility	MCF Amt	Reason	Corrective Measure
10/29/99 04:30 PM	5.7	Eddy	Gas Dehydration Unit	744.00	Artesia Plant experienced an operational upset when high H2S carried over into the Regen Gas.	To correct the upset, opertions flashed the H2S out of the regeneration bed, regenerated and returned to normal service.
10/27/99 01:30 PM	1.5	Eddy	Gas Dehydration Unit	262.00	Artesia Plant experienced an operational upset due to Transwestern loosing the Atoka unit, which shut us out and we flared regen gas.	To correct the upset, operations rerouted the gas to El Paso.
10/22/99 03:10 PM	3.6	Eddy	Gas Dehydration Unit	582.00	Artesia Plant experienced a high H2S reading in the in Regen gas.	To correct the operational upset, operations had to flash the H2S out of bed and regenerate it, returning it to service when completed.
10/22/99 10:00 AM	4.0	Eddy	Fitz Booster	124.00	Fitz booster experienced an upset condition when a crew that was working on an electrical conduit line which had liquid in it. A short caused the booster to go down on high scrubber level.	To correct the upset, when the conduit line was cleaned out, and the electricians repaired the wire which caused the short, operations put the booster back on line.
10/21/99 10:45 PM	0.5	Eddy	Residue Delivery Unit	50.00	Artesia plant experienced an upset condition when the low pressure gas system startup.	To correct the upset, operations adjusted the operations by increasing the expander speed.
10/21/99 12:01 AM	15.5	Eddy	Sulfur Recovery Unit	542.00	Eunice Plant experienced excess emissions due to a planned maintenance shut down of the Sulfur Recovery Unit.	The unit was brought back into service when repairs were completed.
10/20/99 08:30 PM	0.8	Eddy	Shugart Booster	170.00	Shugart booster experienced an upset due to a purchase power failure. Lost air compressors and instrument air.	To correct the upset, when the power was restored, the operator restarted the booster.
10/20/99 09:19 AM	0.0	Eddy	Sulfur Recovery Unit	290.00	Eunice Plant experienced excess emissions due to a planned maintenance shut down of the Sulfur Recovery Unit.	Unit still down. Working 24 hour round cloc to complete work as soon as possible.
10/19/99 09:11 AM	0.0	Eddy	Sulfur Recovery Unit	367.00	Eunice Plant experienced excess emissions due to a planned maintenance shut down of the Sulfur Recovery Unit.	Unit still down. Working 24 hour round clock to hasten repairs.
10/18/99 11:49 AM	0.0	Eddy	Sulfur Recovery Unit	426.00	Eunice Plant experienced excess emissions due to a planned maintenance shut down of the Sulfur Recovery Unit.	Unit still down. Working round clock 24 hour day to hasten repairs.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

March 1, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9290

Mr. Mel Driver
GPM Gas Company, LLC
P.O. Box 50020
Midland, Texas 79710-0020

RE: WASTE WATER CLASSIFIER REMOVAL
EUNICE GAS PROCESSING PLANT, GW-016

Dear Mr. Driver:

The New Mexico Oil Conservation Division (OCD) has reviewed GPM Gas Company's (GPM) February 23, 2000 letter work plan for the removal of a below grade classifier tank located at the Eunice Gas Processing Plant, GW-016. The work plan specified the procedures GPM would follow during the removal, the soil sampling, analytical laboratory analyses and the backfilling of the tank pit The above referenced work plan **is herewith approved with the following conditions:**

1. All soil and ground water samples shall be sampled and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures.

2. All wastes generated during the investigation and remediation activities shall be disposed of at an OCD approved facility.

3. Summary tables of all soil sampling analytical results obtained from the tank pit sampling during the removal of the classifier tank and copies of all laboratory analytical data sheets and associated QA/QC data.

4. The disposition of all wastes generated shall be reported.

5. One copy of a report of the results of all activities relating to the work plan shall be furnished to the OCD Santa Fe office and one copy to the OCD Hobbs District office within 30 days from completion of the work plan.

Please be advised that OCD approval does not relieve GPM of liability should the work plan fail to adequately delineate the limits of soil and/or ground water contamination related to GPM's activities, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions, please call me at (505) 827-7156.

Sincerely,

W. Jack Ford, C.P.G.
OCD Environmental Bureau

xc: OCD Hobbs District Office

UNITED STATES POSTAL SERVICE

MIDLAND/ODESSA TX 797 03/03/01

03 MAR 2000

First Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Environmental Bureau
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

GPM GAS CORPORATION

3300 N "A" ST. BLDG 7
MIDLAND, TX 79705-5421

P.O. BOX 50020
MIDLAND, TX 79710-0020

February 23, 2000

Mr. Jack Ford
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RE: Work Plan for WasteWater Classifier Removal
Eunice Gas Processing Plant, GW-016

Dear Mr. Ford:

GPM is herewith submitting a work plan to remove a below grade classifier tank located at its Eunice Natural Gas Plant. The classifier has been out of service since spring of 1997. Its primary function was for use as a flow through tank prior to discharge to the RICE disposal system. GPM has modified its liquids handling system making the flow through tank redundant. GPM is proposing to disconnect and flange the two lines leading into and out of the tank. The tank will be removed by hoisting it above ground by crane. Any contaminated soil will be remove to an OCD approved facility. A bottom hole and three wall samples will be collected and analyzed for TPH using Method 418.1 to determine if contamination is present. GPM proposes to backfill the hole with clean soil once the hole is deemed clean. The tank will be cleaned and inspected for leaks and breaks. The cleaned tank will remain onsite to be used as a confined space training vessel. A new wastewater line will be tied directly into the RICE disposal line.

If you have any questions concerning this work plan please do not hesitate to contact me at (915) 620-4142.

Sincerely,

Mel P. Driver

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

GPM GAS CORPORATION

3300 N "A" ST. BLDG 7
MIDLAND, TX 79705-5421

MAILING ADDRESS
P.O. BOX 50020
MIDLAND, TX 79710-0020

February 16, 2000

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Subject: Notification of Name Change to **GPM Gas Company, LLC**

Dear Mr. Anderson:

This letter is to notify you that on February 1, 2000, GPM Gas Corporation underwent a **name change**. The name of the company is now **GPM Gas Company, LLC**. This name change relates to a change in corporate status which occurred in anticipation of the expected merger between GPM and a unit of Duke Energy. GPM and Duke currently expect that, if all necessary regulatory approvals are obtained, the merger should be completed in April of this year.

Submitted with this letter is a listing of all environmental permits that are affected by this name change. Please take the actions necessary to reflect this name change on your records.

As a matter of general information, we wanted also to advise you of the possibility of a further name change in the coming months. In connection with the expected merger, it is possible that a further change in name or in corporate status could take place. We will advise you of any future changes that occur.

We appreciate your assistance in this matter.

GPM Gas Company, LLC

Mel P. Driver

Mel P. Driver
Environmental Engineer
New Mexico Region

Attachment

Facility Name	Permit Number	Expiration Date	Issued by	Held by	Nearest City
Artesia Plant	GW-168	7/1/00	NMED OCD	GPM Gas Corporation	Artesia
Avalon Plant	GW-024	9/1/00	NMED OCD	GPM Gas Corporation	Carlsbad
Eunice Plant	GW-009	4/1/04	NMED OCD	GPM Gas Corporation	Eunice
Feagen	GW-168	12/1/99	NMED OCD	GPM Gas Corporation	Artesia
Hat Mesa	GW-128	11/1/02	NMED OCD	GPM Gas Corporation	Hobbs
Hobbs	GW-044	12/1/02	NMED OCD	GPM Gas Corporation	Hobbs
Indian Hills	GW-042	4/1/02	NMED OCD	GPM Gas Corporation	Carlsbad
Lee Plant	GW-002	3/1/01	NMED OCD	GPM Gas Corporation	Lovington
Linam Ranch Plant	GW-015	4/1/04	NMED OCD	GPM Gas Corporation	Hobbs
Maljamar	GW-177	3/1/00	NMED OCD	GPM Gas Corporation	Lovington
Sand Dunes	GW-142	5/1/03	NMED OCD	GPM Gas Corporation	Loving
Won Ton	GW-178	3/1/00	NMED OCD	GPM Gas Corporation	Lovington
Zia Plant	GW-145	7/1/03	NMED OCD	GPM Gas Corporation	Maljamar

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3-9-99,

or cash received on _____ in the amount of $ 1,717.50

from GPM Gas Corporation

for Eunice Gas Plant (Facility Name) GW-016 (DP No.)

Submitted by: [signature] Date: 3-30-99

Submitted to ASD by: [signature] Date: 3-30-99

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ___ Renewal X

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 99

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

THIS IS WATERMARKED PAPER - DO NOT ACCEPT WITHOUT NOTING WATERMARK - HOLD TO LIGHT TO VERIFY WATERMARK

GPM GAS CORPORATION
BARTLESVILLE, OKLAHOMA 74004

86-82/1031

WESTSTAR BANK
BARTLESVILLE OK

B000027604 03/09/99 [redacted] $1,717.50

PAY TO THE ORDER OF EXACTLY *******$1,717DOLLARS AND 50 CENTS

NEW MEXICO ENVIRONMENTAL DEPT
WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE NM 87505

GPM GAS CORPORATION 51

[signature]

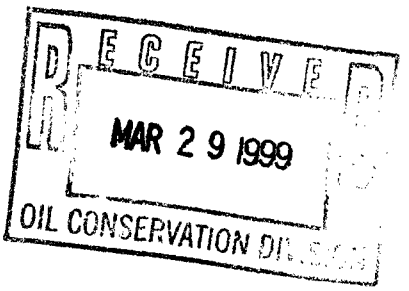
Treasurer

[redacted]

March 26, 1999

GPM GAS CORPORATION

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY



Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

RE: Eunice Gas Plant
Discharge Plan GW-145
Renewal Fee

Dear Mr. Anderson:

GPM is submitting the required flat fee of $1,667.50 plus filing fee of $50.00 along with a signed copy of the discharge plan approval conditions for the Eunice Gas Plant.

If you have any questions or need additional information, please call me at (915) 620-4142.

Sincerely,

Mel P. Driver

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

cc: Jack Ford

The Santa Fe New Mexican
Since 1849: We Read You.

NM OCD
ATTN: LUPE SHERMAN
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 64373 ACCOUNT:
LEGAL NO: 64728 P.O.#: 99199000357
216 LINES 1 time(s) at $ 86.46
AFFIDAVITS: 5.25
TAX: 5.73
TOTAL: 97.44

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, B. Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTE 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 #64728 a copy of which is hereto attached was published in said newspaper 1 day(s) between 01/13/1999 and 01/13/1999 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 13 day of January, 1999 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
13 day of January A.D., 1999

Notary B Mathie

Commission Expires 3-13-2001

OFFICIAL SEAL
B MATHIE
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires:

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-015) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Linam Ranch Gas Plant located in the NE/4 of Section 6, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 60,000 gallons per day of process waste water with a total dissolved solids concentration of 1200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 120 to 145 feet with a total dissolved solids concentration ranging from 400 to 850 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-016) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Eunice Gas Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of 1750 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of January 1999.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

Legal #64728
Pub. January 13, 1999

Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY 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

Notice Of Publication

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, for one (1) day beginning with the issue of January 13, 1999 and ending with the issue of January 13, 1999.

And that the cost of publishing said notice is the sum of $74.40 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 3rd day of February, 1999

Debbie Schilling
Notary Public, Lea County, New Mexico

My Commission Expires June 22, 2002

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-015)-GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Linam Ranch Gas Plant located in the NE/4 of Section 6, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 60,000 gallons per day of process waste water with a total dissolved solids concentration of 1200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 120 to 145 feet with a total dissolved solids concentration ranging from 400 to 850 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-016) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Eunice Gas Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of 1750 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of January 1999.

STATE OF
NEW MEXICO
OIL
CONSERVATION
DIVISION
LORI WROTENBERY,
Director

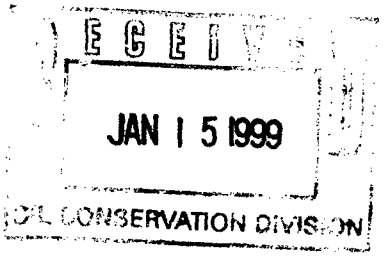
SEAL

Published in the Lovington Daily Leader January 13, 1999.

The Santa Fe New Mexican
Since 1849. We Read You.

NM OCD
ATTN: LUPE SHERMAN
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 64373 ACCOUNT:
LEGAL NO: 64728 P.O.#: 99199000357
216 LINES 1 time(s) at $ 86.46
AFFIDAVITS: 5.25
TAX: 5.73
TOTAL: 97.44



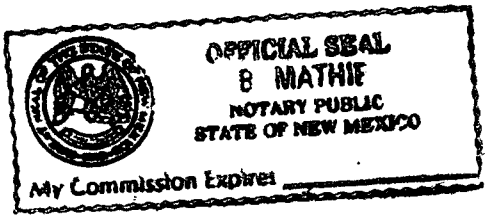
AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, B. Perner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTE 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 #64728 a copy of which is hereto attached was published in said newspaper 1 day(s) between 01/13/1999 and 01/13/1999 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 13 day of January, 1999 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
13 day of January A.D., 1999

Notary B Mathie
Commission Expires 3-13-2001



NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-015) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Linam Ranch Gas Plant located in the NE/4 of Section 6, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 60,000 gallons per day of process waste water with a total dissolved solids concentration of 1200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 120 to 145 feet with a total dissolved solids concentration ranging from 400 to 850 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-016) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Eunice Gas Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of 1750 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of January 1999.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
LORI WROTENBERY,
Director

Legal #64728
Pub. January 13, 1999

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-015) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Linam Ranch Gas Plant located in the NE/4 of Section 6, Township 19 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 60,000 gallons per day of process waste water with a total dissolved solids concentration of 1200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 120 to 145 feet with a total dissolved solids concentration ranging from 400 to 850 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-016) - GPM Gas Services Company, Mel D. Driver, (915) 368-1142, 4044 Penbrook Street, Odessa, Texas 79762, has submitted a discharge renewal application for the Eunice Gas Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of 1750 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of January 1999.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

for LORI WROTENBERY, Director

December [illegible], 1998

23

GPM GAS CORPORATION

3300 N "A" ST. BLDG 7
MIDLAND, TX 79705-5421
P.O. BOX 50020
MIDLAND, TX 79710-0020

Eunice Gas Processing Plant
Discharge Plan GW-16
Discharge Plan Renewal

FAXED

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

Dear Mr. Anderson:

Submitted herewith is the application to renew the ground water discharge plan (GW-16) for GPM's Eunice Gas Processing Plant in Lea County, New Mexico in accordance with Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals.

GPM has operated Eunice Gas Processing Plant in accordance with the terms and conditions of Groundwater Discharge Plan GW-16. GPM has made no major changes to Eunice Gas Plant that would change the quantity or quality of the discharges since the original discharge plan went into effect and would like to renew the discharge plan under the present terms of the existing permit.

Please do not hesitate to contact me at (915) 620-4142 should you have any questions or require additional information.

Sincerely,

Mel P. Driver

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

UNITED STATES POSTAL SERVICE
RECORDING LIBRARY 95 YEARS 87 11/23/98

First-Class Mail
Postage & Fees Paid
USPS 28
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

Environmental Bureau
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

57

GPM GAS CORPORATION

GPM GAS CORPORATION

4044 PENBROOK
ODESSA, TEXAS 79762

NEW MEXICO REGION

May 27, 1998

GPM Eunice Gas Plant
Spent Engine Lube Oil
Classifier Effluent
Discharge Plan GW-16

Mr. Roger Anderson
Oil Conservation Division
2040 South Pacheco
P.O. Box 6428
Santa Fe, New Mexico 87505-5472

Dear Mr. Anderson:

GPM Gas Corporation (GPM) Eunice Gas Plant submits the following waste water analysis from its classifier effluent as per the requirements of Discharge Plan GW-016. Item 5 of the Dischage Plan Requirements, requires GPM to test the spent engine lube oil (or the wastewater stream into which it is placed) for TCLP constituents.

GPM request that this annual testing requirememet be removed since the lube oil stream makes up less than one percent of the total waste stream and historically the lube oil waste stream has tested below detection for the TCLP constituents.

If you have any questions or need additional information , please call me at (915) 368-1142.

Sincerely,

Mel P. Driver

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

Attachment

6-10-98
Discussed by telephone - Renewal of DP will catch next analysis period - no written response to this letter required.

ATTACHMENT TO THE DISCHARGE PLAN GW-016 APPROVAL
GPM GAS CORPORATION
EUNICE GAS PLANT
DISCHARGE PLAN REQUIREMENTS
(April 25, 1994)

1. Sump Integrity Test Methods: All existing sumps within the gas processing plant, including the catch basin, shall be visually inspected at least annually for leaks. Reports of inspections shall be maintained at the gas plant for a minimum of five years. Annual integrity tests of the Anti-freeze Make-up/Holding Tank shall be conducted according to procedures outlined in Attachment 3-4 of GPM's March 23, 1994 response to OCD comments.

   Any new sumps or below-grade tanks will incorporate leak detection in their designs.

2. Pressure Testing: A proposal outlining procedures and schedule for testing all below-grade drain system pipelines shall be submitted to the OCD by June 25, 1994. Positive pressure testing of the plant drain system shall be performed in accordance with the procedures once approved by the OCD.

   The Driscopipe polyurethane wastewater pipeline does not require integrity testing during the current discharge plan period. During the 1999 renewal, pipeline structure integrity will be reviewed to determine future testing requirements.

3. Spills: All spills and/or leaks shall be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

4. Eunice EP Compressor Station: Use of all compression and process equipment, tanks, below-grade tanks, sumps and underground discharge drain system associated with the Eunice EP Compressor Station shall be discontinued and taken out-of-service by April 1, 1995, and the OCD notified of completion of this work by May 1, 1995.

5. Spent Lube Oil: Spent engine lube oil (or the wastewater stream into which it is placed) shall be tested for TCLP constituents by May 1st of each calendar year and results submitted to the OCD within thirty days.

6. Drum Storage: All chemical and lubrication drums shall be stored on pad and curb type containment.

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
GPM GAS CORP.
ATTN: MEL DRIVER
4044 PENBROOK
ODESSA, TX 79762
FAX TO: 915-368-1163

Receiving Date: 05/07/98
Reporting Date: 05/11/98
Project Number: NOT GIVEN
Project Name: OCD LUBE OIL EXCHANGE
Project Location: EUNICE GAS PLANT
Lab Number: H3633-1
Sample ID: EUNICE CLASSIFIED H_2O

Analysis Date: 05/08/98
Sampling Date: 05/07/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: BC
Analyzed By: BC

TCLP VOLATILES (ppm)	EPA LIMIT	Sample Result H3633-1	Method Blank	QC	%Recov.	True Value QC
Vinyl Chloride	0.20	<0.005	<0.005	0.097	97	0.100
1,1-Dichloroethylene	0.7	<0.005	<0.005	0.094	94	0.100
Methyl Ethyl Ketone	200	4.20	<0.050	0.112	112	0.100
Chloroform	6.0	<0.005	<0.005	0.104	104	0.100
1,2-Dichloroethane	0.5	<0.005	<0.005	0.095	95	0.100
Benzene	0.5	5.60	<0.005	0.102	102	0.100
Carbon Tetrachloride	0.5	<0.005	<0.005	0.101	101	0.100
Trichloroethylene	0.5	<0.005	<0.005	0.098	98	0.100
Tetrachloroethylene	0.7	<0.005	<0.005	0.095	95	0.100
Chlorobenzene	100	<0.005	<0.005	0.097	97	0.100
1,4-Dichlorobenzene	7.5	<0.005	<0.005	0.102	102	0.100

>10x

% RECOVERY	
Dibromofluoromethane	88
Toluene-d8	90
Bromofluorobenzene	94

METHODS: EPA SW 846-8260, 1311

Burgess J.A. Cooke, Ph. D.

5/11/98
Date

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
GPM GAS CORP.
ATTN: MEL DRIVER
4044 PENBROOK
ODESSA, TX 79762
FAX TO: 915-368-1163

Receiving Date: 05/08/98
Reporting Date: 05/11/98
Project Number: NOT GIVEN
Project Name: OCD LUBE OIL EXCHANGE
Project Location: EUNICE GAS PLANT
Lab Number: H3633-1
Sample ID: EUNICE CLASSIFIED H_2O

Analysis Date: 05/08/98
Sampling Date: 05/08/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: BC

TCLP SEMIVOLATILES (ppm)	EPA LIMIT	Sample Result H3633-1	Method Blank	QC	% Recov.	True Value QC
Pyridine	5.00	<0.020	<0.005	0.021	42	0.050
1,4-Dichlorobenzene	7.50	<0.020	<0.005	0.036	72	0.050
o-Cresol	200	0.026	<0.005	0.040	80	0.050
m, p-Cresol	200	0.021	<0.005	0.038	76	0.050
Hexachloroethane	3.00	<0.020	<0.005	0.033	66	0.050
Nitrobenzene	2.00	<0.020	<0.005	0.046	92	0.050
Hexachloro-1,3-butadiene	0.500	<0.020	<0.005	0.038	76	0.050
2,4,6-Trichlorophenol	2.00	<0.020	<0.005	0.049	98	0.050
2,4,5-Trichlorophenol	400	<0.020	<0.005	0.050	100	0.050
2,4-Dinitrotoluene	0.130	<0.020	<0.005	0.046	92	0.050
Hexachlorobenzene	0.130	<0.020	<0.005	0.050	100	0.050
Pentachlorophenol	100	<0.020	<0.005	0.047	94	0.050

	% RECOVERY
Fluorophenol	32
Phenol-d5	26
Nitrobenzene-d5	87
2-Fluorobiphenyl	73
2,4,6-Tribromophenol	50
Terphenyl-d14	87

METHODS: EPA SW 846-8270, 1311, 3510

Burgess J. A. Cooke, Ph. D.

5/11/98
Date

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
GPM GAS CORP.
ATTN: MEL DRIVER
4044 PENBROOK
ODESSA, TX 79762
FAX TO: 915-368-1163

Receiving Date: 05/08/98
Reporting Date: 05/14/98
Project Number: NOT GIVEN
Project Name: OCD LUBE OIL EXCHANGE
Project Location: EUNICE GAS PLANT

Sampling Date: 05/08/98
Sample Type: WASTEWATER
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP/JC

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		05/11/98	05/14/98	05/14/98	05/14/98	05/14/98	05/14/98	05/11/98	05/11/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3633-1	EUNICE CLASS. H2O	<1	<1	<10	<0.1	<1	<1	<0.02	<0.1
Quality Control		0.197	2.092	53.16	2.056	5.174	2.875	0.0207	0.198
True Value QC		0.200	2.000	50.00	2.000	5.000	3.000	0.0200	0.200
% Recovery		98	104	106	102	103	95	104	99
Relative Standard Deviation		2.2	0.1	0.3	0.5	2.9	5.4	5.1	2.5
METHODS: EPA 1311, 600/4-91/0		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

05/14/98
Date

Date April, 1986

MATERIAL SAFETY DATA SHEET

Product Name:

MAGNUS OILS (All Grades)

PHILLIPS 66 COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY
Bartlesville, Oklahoma 74004
Emergency Phone Nos.
918-661-3865 (during business)
918-661-8118 (after hours)

USA AND CANADA

WORLDWIDE

OTHER COUNTRIES

PRODUCT IDENTIFICATION

Synonyms: NE

Chemical Name: Mixture

Chemical Family: Hydrocarbon

Chemical Formula: Mixture

CAS Reg. No: Mixture

Product No: NE

Product and/or Components Entered on EPA's TSCA Inventory: Yes [X] No [ ]

HAZARDOUS COMPONENTS

Ingredients	CAS Number	% By Wt.	OSHA PEL	ACGIH TLV
Solvent Refined Heavy Paraffinic Distillate Plus Additives	Various	100	5 mg/m³*	5 mg/m³*

**As oil mist.*

PERSONAL PROTECTION INFORMATION

Ventilation: Use adequate ventilation.

Respiratory Protection: Not generally required.

Eye Protection: Use safety glasses with side shields.

Skin Protection: No special garments required. Avoid unnecessary skin contamination with material.

NOTE: Personal protection information shown above is based upon general information as to normal uses and conditions. Where special or unusual uses or conditions exist, it is suggested that the expert assistance of an industrial hygienist or other qualified professional be sought.

HANDLING AND STORAGE PRECAUTIONS

Avoid inhalation and skin and eye contact. Wear protective equipment described above if exposure conditions warrant. Wash hands after handling. Launder contaminated clothing before reuse.

Store in a cool, well-ventilated area away from ignition sources.

REACTIVITY DATA

Stability: Stable [X] Unstable [ ] Conditions to Avoid:

Incompatibility (Materials to Avoid): Oxygen and strong oxidizing agents.

Hazardous Polymerization: Will Not Occur [X] May Occur [ ] Conditions to Avoid:

Hazardous Decomposition Products: Carbon oxides and various hydrocarbons formed when burned.

HEALTH HAZARD DATA

RECOMMENDED EXPOSURE LIMITS: See Hazardous Components Section (Page 1).

ACUTE EFFECTS OF OVEREXPOSURE:

EYE: Minimal, transient irritation.

SKIN: Practically non-toxic by skin absorption. No skin effects expected.

INHALATION: None expected.

INGESTION: Practically non-toxic.

SUBCHRONIC AND CHRONIC EFFECTS OF OVEREXPOSURE:
No known applicable information.

OTHER HEALTH EFFECTS:
Pressurized injection of product under the skin can lead to seriously inflammed tissue. If left untreated injury can become gangrenous.

HEALTH HAZARD CATEGORIES:

	Animal	Human		Animal	Human
Known Carcinogen	☐	☐	Toxic	☐	☐
Suspect Carcinogen	☐	☐	Corrosive	☐	☐
Mutagen	☐	☐	Irritant	☐	☐
Teratogen	☐	☐	Target Organ Toxin	☐	☐
Allergic Sensitizer	☐	☐			
Highly Toxic	☐	☐			

Specify _____

_____

FIRST AID AND EMERGENCY PROCEDURES:

EYE: Flush eyes with running water for at least 15 minutes. For injection injuries, immediate medical treatment is required. Physicians may call (918) 661-4845.

SKIN: Wash with soap and water. For injection injuries, immediate medical treatment is required. Physicians may call (918) 661-4845.

INHALATION: Remove from exposure. If illness or adverse symptoms develop, seek medical attention.

INGESTION: Give 2 glasses of water and induce vomiting. Seek medical attention.

PHYSICAL DATA

Appearance: Amber liquid
Odor: Mild
Boiling Point: NE
Vapor Pressure: <1 mm Hg at 20°C
Vapor Density (Air = 1): 12+
Solubility in Water: Negligible
Specific Gravity (H_2O = 1): 0.86-0.89 at 60/60°F
Percent Volatile by Volume: Negligible
Evaporation Rate (_____ = 1): Negligible
Viscosity: 150-970 SUS at 100°F

FIRE and EXPLOSION DATA

Flash Point (Method Used): >365°F (>185°C) (COC, ASTM D 92).
Flammable Limits (% By Volume in Air): LEL NE UEL NE
Fire Extinguishing Media: Dry chemical, foam or carbon dioxide (CO_2).

Special Fire Fighting Procedures: Evacuate area of all unnecessary personnel. Shut off source, if possible. Use NIOSH/MSHA approved self-contained breathing apparatus and other protective equipment and/or garments described on Page 2 if conditions warrant. Water fog or spray may be used to cool exposed containers and equipment. Do not spray water directly on fire — product will float and could be reignited on surface of water.

Fire and Explosion Hazards: Carbon oxides and various hydrocarbons formed when burned.

SPILL, LEAK and DISPOSAL PROCEDURES

Precautions Required if Material is Released or Spilled: Contain spill Protect from ignition. Keep out of water sources and sewers. Absorb in dry, inert material (sand, clay, sawdust, etc.). Transfer to disposal drums.

Waste Disposal (Insure Conformity with all Applicable Disposal Regulations): Incinerate or otherwise manage in a permitted waste management facility.

DOT TRANSPORTATION

Shipping Name: NA
Hazard Class: NA
ID Number: NA
Marking: NA
Label: NA
Placard: NA
Hazardous Substance/RQ: NA
Shipping Description: NA
Packaging References: NA

RCRA CLASSIFICATION *(FOR UNADULTERATED PRODUCT AS A WASTE)*

NA

PROTECTIVE MEASURES DURING REPAIR AND MAINTENANCE OF CONTAMINATED EQUIPMENT

NA

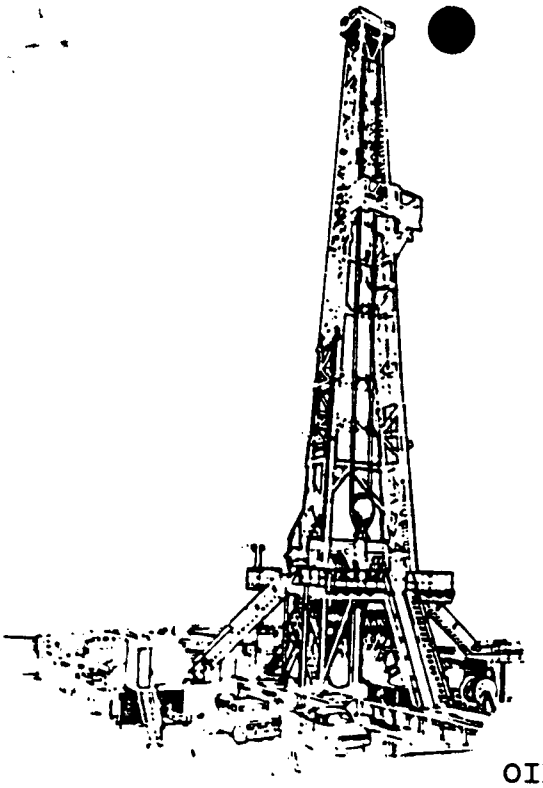
HAZARD CLASSIFICATION

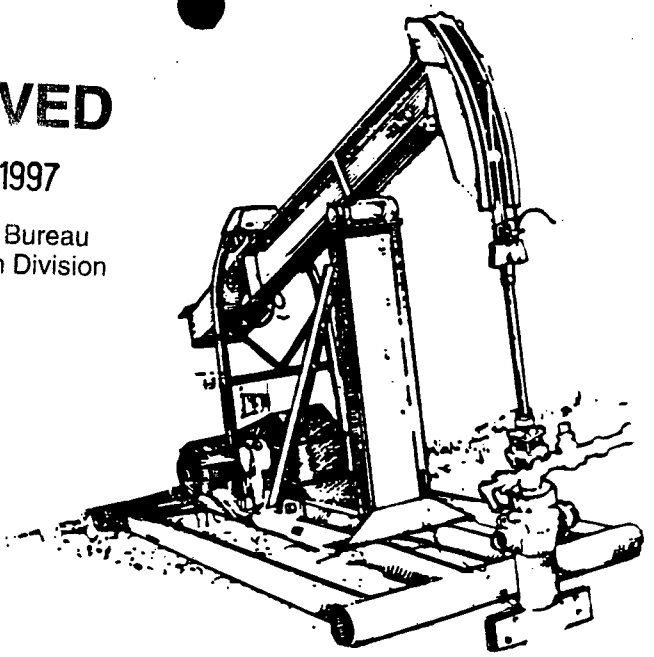
THIS PRODUCT MEETS THE FOLLOWING HAZARD DEFINITION(S) AS DEFINED BY OCCUPATIONAL SAFETY AND HEALTH REGULATIONS (29 CFR PART 1910. 1200):

- [X] Not Hazardous
- [ ] Combustible Liquid
- [ ] Compressed Gas
- [ ] Flammable Gas
- [ ] Flammable Liquid
- [ ] Flammable Solid
- [ ] Flammable Aerosol
- [ ] Explosive
- [ ] Health Hazard (See Page 3)
- [ ] Organic Peroxide
- [ ] Oxidizer
- [ ] Pyrophoric
- [ ] Unstable
- [ ] Water Reactive

ADDITIONAL COMMENTS (Continued)

Continuous skin contact with used motor oils has caused skin cancer in laboratory animals. Avoid prolonged skin contact with used motor oils.





STATE OF NEW MEXICO

OIL CONSERVATION DIVISION
PHONE: (505) 393-6161
FAX: (505) 393-0720

SHOULD YOU HAVE TROUBLE RECEIVING THIS TRANSMISSION, PLEASE CALL **(505) 393-6161.**

TO: Pat Sanchez

COMPANY:

FROM: Wayne Price - OCD - Hobbs

DATE: 3/4/97

PAGES INCLUDING COVER PAGE: 3

COMMENTS:

To: Scott Seeby - GPM
FAX # 915-368-1163

Wayne Price

From: Wayne Price
To: Pat Sanchez
Cc: Jerry Sexton
Subject: GPM Eunice Gas Plant. GW-009 (soil report)
Date: Tuesday, March 04, 1997 2:31PM
Priority: High

Dear Pat,

I am sending you a copy of a recent spill report. I have discussed this with Scott Seeby and GPM is going to excavate the contaminated soil . GPM will call me to witness the bottom hole sampling. I have recommended they run TPH and BTEX. They will send in closure report to your office for approval with a copy to the District.

We did not discuss time frames, but I will CC Scott and indicated they will have 60 days to submit closure report.

Please let me know if this will suffice or if additional info is required.

Thanks!

cc: Scott Seeby-GPM

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To	From
Mr. Wayne Price	Scott Seeby
Co. Oil Conservation Div.	Co. GPM
Dept. Environmental	Phone # (915) 368-1142
Fax # (505) 393-0720	Fax # (915) 368-1163

cc: JERRY SEXTON
KAREN SHARP
PAT SANCHEZ - GW-009
OCD HOBBS OFFICE

MAR 04 1997
RECEIVED

NEW MEXICO OIL CONSERVATION COMMISSION
NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWOUTS

NAME OF OPERATOR: GPM Gas Services Company					ADDRESS: 4044 Penbrook, Odessa, TX 79762			
REPORT OF:	FIRE	BREAK	SPILL: X	LEAK	BLOWOUT		OTHER *	
TYPE OF FACILITY:	DRLG WELL	PROD WELL	TANK BTTY	PIPE LINE	GASO PLT	OIL RFY	OTHER *	
NAME OF FACILITY: Eunice Natural Gas Processing Plant								
LOCATION OF FACILITY: SE 1/4 NE 1/4	(QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTION)				SEC. 5	TWP. 21S	RGE. 36E	COUNTY LEA
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK: Approximately 7 miles Northwest of Eunice, New Mexico								
DATE AND HOUR OF OCCURANCE: December 19, 1996 Approximately 8:30 am, MST					DATE AND HOUR OF DISCOVERY: December 19, 1996, Approximately 9:30 am, MST			
WAS IMMEDIATE NOTICE GIVEN?	YES: X	NO	NOT REQ'D	IF YES, TO WHOM? Mr. Jerry Sexton, Supervisor and Oil and Gas Inspector, OCD				
BY WHOM? Ms. Vicki Gunter, Environmental Assistant, GPM					DATE AND HOUR: Approximately 10:50 am, MST			
TYPE OF FLUID LOST: Produced water and hydrocarbons					QUANTITY OF LOSS: Approximately 100 bbls		VOLUME RECOVERED: Approximantely 90 bbls	
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO: X	QUANTITY: N.A.					
IF YES, DESCRIBE FULLY:** N.A.								

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN:**

Subfeezing temperatures resulted in accummulation of extraordinary volume of liquids in gathering system pipelines. Accumulated liquids from gathering system pipelines surged to plants storage tanks due to pressure drop. Bypass valve was left open on water surge tank to control incoming liquids. Storage tank water drain line froze, causing tank to over flow liquids into storage tanks earthen containment.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN:**

Pipeline liquids (produced water and hyderocarbons) overflowed into storage tanks earthen containment. Recovered approximately 90 bbls of pipeline liquids from earthen containment with vacuum truck.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Natural Gas Processing Plant Property

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
			X			X	

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

Temperature: 20 degrees F Precipitation: None Winds: Five miles per hour from the North

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Scott Seeby by Vicki Gunter TITLE NMR Envir. Engineer DATE 2-28-97

*SPECIFY **ATTACH ADDIDITONAL SHEETS IF NECESSARY

TOTAL P.01

GPM GAS CORPORATION

GPM GAS CORPORATION

FAX

Date: **4/24/98**

Number of pages including cover sheet: 3

To:

W. Jack Ford
Oil Conservation Division
2040 S. Pacheco Street
Santa Fe, NM 87505

Phone: 505-827-7156
Fax phone: 505-827-8177
CC:

From:

Mel P. Driver
4044 Penbrook
Odessa, TX 79762
email: mpdrive@ppco.com

Phone: 915-368-1142
Fax phone: 915-368-1163

REMARKS: ☐ Urgent ☐ For your review ☒ Reply ASAP ☐ Please comment

Jack, please find to follow the analytical data for Eunice Gas Plant cooling tower wood. I mistakenly faxed you the result for Linam Ranch Cooling tower sludge. Coincidentally the analysis were the same they were both non-detect. Please go ahead with the request for onsite burial.

Mel

Eunice Cooling Tower
Demolition Results

ANALYTICAL RESULTS FOR
GPM GAS CORP.
ATTN: TONY CANFIELD
HCR 61 BOX 66
OIL CENTER, NM 88240
FAX TO: 505-397-5679

Receiving Date: 04/06/98
Reporting Date: 04/14/98
Project Owner: GPM / Eunice
Project Name: AMANDA COOLING TOWER REMOVAL
Project Location: OIL CENTER, NM

Sampling Date: 04/06/98
Sample Type: SOLID (SAWDUST)
Sample Condition: COOL & INTACT
Sample Received By: JS
Analyzed By: GP

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		04/08/98	04/09/98	04/08/98	04/09/98	04/09/98	04/09/98	04/13/98	04/08/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3560-1	AMANDA BOOSTER	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
Quality Control		0.047	4.943	18.94	1.994	2.71	5.188	0.0095	0.203
True Value QC		0.050	5.000	20.00	2.000	2.50	5.000	0.0100	0.200
% Recovery		94	99	95	100	108	104	95	102
Relative Standard Deviation		0.8	0.5	0.1	0.8	0.3	0.3	5.3	0.2
METHODS: EPA 1311, 600/4-91/010		206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

Date

H3560.XLS

GPM GAS SERVICES COMPANY

4044 Penbrook
Odessa, TX 79762
(915) 368-_____
Fax: (915) 368-1163

FAX TRANSMISSION COVER SHEET

Date: 4-3-98

To: Jack Ford

Company: OCD

Fax: 827-8177

Re: Cooling Tower Wood Sample Analysis

Sender: Mel Driver

YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (915) 368-1061.

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR
GPM GAS CORP.
ATTN: FRED MOORE
11525 CARLSBAD HWY
HOBBS, NM 88240
FAX TO: 505-397-5781

Receiving Date: 03/18/98
Reporting Date: 04/03/98
Project Number: NOT GIVEN
Project Name: LINAM GAS PLANT
Project Location: COOLING TOWER

Sampling Date: 03/18/98
Sample Type: SLUDGE
Sample Condition: COOL & INTACT
Sample Received By: GP
Analyzed By: GP

TCLP METALS

LAB NUMBER	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se ppm
ANALYSIS DATE:		04/01/98	04/02/98	04/02/98	04/02/98	04/02/98	04/02/98	04/02/98	04/01/98
EPA LIMITS:		5	5	100	1	5	5	0.2	1
H3514-1	S. END-N. TOWER	<1	<1	<5	<1	<1	<1	<0.02	<0.1
H3514-2	PUMP END-N. TWR.	<1	<1	<5	<1	<1	<1	<0.02	<0.1
Quality Control		0.201	4.891	20.28	1.999	4.961	5.151	0.0112	0.206
True Value QC		0.200	5.000	20.00	2.000	5.000	5.000	0.0100	0.200
% Recovery		101	98	101	100	99	103	112	103
Relative Standard Deviation		2.7	0.1	5.0	0.4	0.4	0.8	3.1	3.9
METHODS:	EPA 1311, 600/4-91/010	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gayle A. Potter, Chemist

04/03/98
Date

GPM GAS CORPORATION
4044 PENBROOK
ODESSA, TEXAS 79762

March 23, 1994

COPY
3 pages

Mr. William J. LeMay
Director, State of New Mexico
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

RE: DISCHARGE PLAN RENEWAL APPLICATION FOR GW-16

Dear Mr. LeMay:

As a continuation of our request for renewal of Groundwater Discharge Plan GW-16 for the Eunice Gas Plant (March 4, 1994), GPM Gas Corporation is pleased to respond to the New Mexico Oil Conservation Division's (OCD) letter to GPM, dated October 8, 1993. This letter was written after OCD's inspection of the Eunice Gas Plant and the Eunice EP Compressor Station in September 1993. In the letter, OCD approved the inclusion of both of these facilities under one discharge plan, GW-16. OCD also provided comments and requests for additional information specific to discharge plan compliance. GPM's response to each of OCD's comments and/or requests for additional information is provided below.

Eunice EP Compressor Station

Comment 1. page 2, paragraph 2: The August 1989 groundwater discharge plan included procedures to conduct annual integrity tests for the oil storage tank and the sump at the northwest corner of Building 1 (re: Phillips April 13, 1988, letter, response to comment #1). Have these tests been implemented? If so, please submit copies of test procedures and results.

Response to Comment 1. By April 1, 1995, GPM will discontinue use of the Eunice EP Compressor Station. The oil storage tank and the sump will be taken out-of-service at that time. If the oil storage tank and sump are placed back in use, GW-16 will be modified appropriately and annual integrity testing of the tank and sump will be reinstated.

Comment 2. page 2, paragraph 3: Annual inspections are required for all below-grade tanks and sumps to ensure mechanical integrity. As part of the discharge plan, GPM should submit procedures for annual inspections to ensure mechanical integrity of the Classifier, Slop Oil and Contingency tanks.

Response to Comment 2. By April 1, 1995, GPM will discontinue use of the Eunice EP Compressor Station. All below-grade tanks and sumps will be taken out-of-service by this date. If GPM places these tanks back in service, GW-16 will be modified appropriately and annual integrity testing of the Classifier, Slop Oil and Contingency Tanks will be reinstated.

Comment 3. page 2, paragraph 4: Five year inspections are required for the underground discharge drain system. OCD understands that, in August 1992, GPM completed replacement of the existing steel drain piping with welded polyurethane pipe, which has a 20-year structural integrity guarantee. If GPM wishes to be exempt from the five-year inspection requirements, a request should be submitted as part of the discharge plan, along with manufacturer's data for review.

Response to Comment 3. By April 1, 1995, GPM will discontinue use of the Eunice EP Compressor Station. The only piping to remain in operation after shutdown of the Eunice EP Compressor Station will be the buried drain pipe to Rice Engineering's Eumont salt water disposal system. This pipe is part of the system of steel drain piping that was replaced with Phillips Drisco welded polyurethane piping. Attachment 1 is the manufacturer's specifications regarding integrity of this piping.

Comment 4. page 2, paragraph 5: The lube oil filter pads at Building 1 need curbs added to contain oil spills. The existing spills need to be cleaned up.

Response to Comment 4. By April 1, 1995, GPM will discontinue use of the Eunice EP Compressor Station. The lube oil filters will no longer be in operation. If GPM places these filters back in service, GW-16 will be modified appropriately to address curbing of the filter pads. Stained soil in this area was cleaned up on October 1, 1993.

Comment 5. page 2, paragraph 6: General housekeeping is needed in some areas of the facility. In particular, oil staining of the ground occurs beneath the inlet/outlet gas lines at Buildings 1 and 2, plus some oil staining around the raw gas scrubber and the Building 1 sump pump.

Response to Comment 5. On October 1, 1993, GPM cleaned up stained soil from beneath the inlet/outlet gas lines at Buildings 1 and 2, the raw gas scrubber, and the Building 1 sump pump.

Eunice Gas Processing Plant

Comment 6. page 2, paragraph 7: Annual inspections are required for underground oil/water separators to ensure mechanical integrity. As part of the plan, GPM should submit procedures for annually determining the mechanical integrity of the oil/water separator.

Response to Comment 6. GPM believes comment 6 was made in error. There are no underground oil/water separators at the plant site. Below-grade oil/water separators associated with the old and new engine rooms were removed in 1992 and 1993, respectively. The oil/water separator currently in use is an aboveground storage tank. This tank is visually inspected to ensure mechanical integrity on a routine basis.

Comment 7. page 3, paragraph 1: During the site visit, it was mentioned that the wastewater draining from the main process pad drains to a storage tank, and is then hauled to a Class I well (because of potential amine

contamination). Is this a below-grade storage tank? If so, an annual inspection should be included in the discharge plan renewal application. Also, the OCD is unaware of any Class I wells in New Mexico. Please identify the well to which the wastewater is hauled.

Response to Comment 7. GPM believes comment 7 resulted from a misunderstanding during OCD's inspection in September of 1993. The wastewater draining from the main process pad drains to a concrete catch basin. The catch basin receives storm water runoff from the area surrounding the amine tanks. When full, the basin is pumped to an aboveground holding tank before it is trucked to a Class II injection well. The catch basin is pumped dry and visually inspected, annually, to ensure mechanical integrity. The procedure for inspection is provided in attachment 2.

Comment 8. page 3, paragraph 2: The wall containing the sour water tank has no bottom and should be padded.

Response to Comment 8. GPM evaluated comment 8 and based upon the fact that this tank is normally empty, concluded that placing the sour water tank on a pad is unnecessary. The sour water tank is equipped with overflow protection; however, it has never experienced an overflow or leak.

Attachment 3 is a revision of the Eunice Plant system description submitted to OCD on April 12, 1989, within the previous discharge plan renewal application. Modifications and changes to the gas conditioning process, plant water, plant drain and disposal, and solid waste disposal systems are included in this updated version of the system description.

GPM thanks you for the opportunity to respond to OCD's request for more information on Discharge Plan GW-16. We believe we have sufficiently addressed the concerns of the October 8, 1993, letter. If you require additional information or have any questions, please call me at (915) 368-1085.

Sincerely,

Vince Bernard
Safety & Environmental Supervisor
New Mexico Region

/sm
Attachments

Attachment 1

Manufacturer's Specifications on Phillips
Drisco Polyurethane Piping

GPM GAS CORPORATION

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

July 7, 1995

Eunice Natural Gas Processing Plant
Discharge Plan GW-016
Wastewater TCLP Results

Mr. Roger C. Anderson
Environmental Bureau Chief
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Anderson:

In accordance with the attachment to Discharge Plan GW-016 for Eunice Natural Gas Processing Plant, please find attached TCLP results for the EP Compressor Station spent engine lube oil wastewater stream.

The OCD's time and energy in reviewing the TCLP results is greatly appreciated. Please contact me at (915) 368-1142 should you have any questions regarding this submittal.

Sincerely,

Scott Seeby

Scott Seeby
Environmental Engineer
New Mexico Region

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

TCLP ANALYSIS REPORT

Company:	GPM	Date:	5/5/95
Address:	4044 Penbrook	Lab #:	H2015
City, State:	Odessa, TX 79762		
Project Name:	Discharge Plan GW 016		
Location:	Eunice Nat. Gas Proc. Plant		
Sampled by:	JW	Date:	4/18/95
Sample Type:	Water	Sample Condition:	Intact
Sample ID:	Wastewater Stream into which Spent Lube Oil is Discharged		

TCLP INORGANICS (Leachate)

PARAMETER	RESULT	EPA LIMIT	UNITS
Silver	<0.1	5	ppm
Arsenic	0.13	5	ppm
Barium	0.12	100	ppm
Cadmium	<0.1	1	ppm
Chromium	<0.1	5	ppm
Mercury	<0.0002	0.2	ppm
Lead	<0.1	5	ppm
Selenium	<0.01	1	ppm

METHODS: TCLP INORGANICS (Leachate) - EPA 1311/7000

Hope Moreno
Hope Moreno

5-5-95
Date

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Comapny:	GPM	Date:	5/5/95
Address:	4044 Penbrook	Lab #:	H2015
City, State:	Odessa, TX 79762		
Project Name:	Discharge Plan GW 016		
Location:	Eunice Nat. Gas Proc. Plant		
Sampled by:	JW	Date:	4/18/95
Sample Type:	Water	Sample Condition:	Intact
Sample ID:	Wastewater Stream into which Spent Lube Oil is Discharged		

TCLP VOLATILES

PARAMETER	RESULT	UNITS
Benzene	0.014	ppm
Carbon tetrachloride	<0.001	ppm
Chlorobenzene	<0.001	ppm
Chloroform	<0.001	ppm
1,2-Dichloroethane	<0.001	ppm
1,1-Dichloroethylene	<0.001	ppm
Methyl ethyl ketone	0.129	ppm
Tetrachloroethylene	<0.001	ppm
Trichloroethylene	<0.001	ppm
Vinyl chloride	<0.001	ppm
1,4-Dicholorobenzene	<0.001	ppm

METHOD: TCLP VOLATILES - EPA 1311/8260

Hope Moreno

Hope Moreno

5-5-95

Date

March 31, 1995

GPM GAS CORPORATION

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

Discharge Plan GW-016
Eunice Plant Compressor Station Closure

Mr. William LeMay
Director, State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. LeMay:

In accordance with Discharge Plan GW-016 for the Eunice Gas Plant located in Lea County, New Mexico, GPM Gas Corporation (GPM) herein submits the closure plans for the Eunice EP Compressor Station. GPM plans to inactivate the compressor station in the fourth quarter of 1995. The sulfur plant will remain in operation.

As part of the closure of the compressor station, the following equipment will be inactivated:

- engines and compressors
- engine and compressor related process equipment
- tanks with exception of the Contingency tank
- sumps
- underground discharge drain system with the exception of piping for wastewater from the sulfur plant to Rice Engineering's Eumont salt water disposal system

The Classifier tank and the Slop Oil tank will be disposed in place. Although these tanks are not regulated as underground storage tanks (UST) under NMED (phone conversation between GPM's consultant, GCL, and NMED UST Bureau- Santa Fe and Roswell), GPM prepared the closure plan in accordance with the NMED underground storage tank regulations (NMED, 1990) and the American Petroleum Institute's recommended practice for disposal of underground storage tanks (API, 1987).

If you have any questions regarding the contents of this letter or the enclosed document, please call me at (915) 368-1142. Thank you.

Sincerely,

Scott Seeby

Scott Seeby
Environmental Engineer
New Mexico Region

EUNICE/LEMAY02.LTR

Eunice EP Compressor Station Closure

1.0 Introduction

GPM Gas Corporation will inactivate all compression, compression related process equipment, and tanks, including the Classifier and Slop Oil tanks at the Eunice EP Compressor Station located in Lea County, New Mexico. Inactivation of the compressor station is tentatively scheduled for the fourth quarter of 1995. The underground discharge drain piping to the Rice Engineering Disposal System will remain in operation to accept disposal of wastewater from the sulfur plant. The Contingency tank will continue to provide overflow capacity in the event that the Rice system shuts down.

2.0 Current Operation

The Classifier tank has a capacity of 500 barrels. This tank serves as the collection and separation tank for several waste streams which include: crude, condensate, and water from pipeline pigging operations; compressor room waste oils; wastewater; RO reject water and sulfur scrubber water. Wastewater from the Classifier is pumped to the Rice Engineering Eumont salt water system for final disposal. Crude, condensate, and waste oils from the Classifier overflow to the 210 barrel Slop Oil tank and are contained until removal and transportation by Phillips 66 Transportation Company to the GPM Hobbs Treater for recycling.

3.0 Compressor Station Closure Plan

Upon closure of the compressor station, GPM will idle the engines, compressors, and wastewater treatment system. The sulfur plant will remain in use and wastewater from the sulfur plant will be piped directly to the Rice disposal system. The Contingency tank will provide storage capacity in the event of shutdown of the Rice system.

3.1 Drain System Piping

Wastewater from the sulfur plant is composed of boiler blowdown, RO reject water, backwash water, boiler room floor drain water, and wastewater from the inlet scrubber. GPM will use the existing buried drain pipe to Rice Engineering's Eumont salt water disposal system and install approximately 100 feet more of new pipe to complete the connection. The existing pipe is welded polyurethane manufactured by Phillips' Driscopipe Division and the new pipe also will be Phillips' Driscopipe.

The existing drain pipe to Rice Engineering's disposal well is part of the system of steel drain piping that was replaced with Driscopipe in 1975 when the plant switched from oil absorption to a cryogenic plant. Manufacturer's specifications on Driscopipe were provided to OCD with the Eunice Plant Discharge Plan Renewal Application GW-16 (GPM, March 23, 1994). Under a subsequent letter from GPM to OCD (Discharge Plan Renewal Application for GW-16: Response to Request for Additional Information, April 21, 1994), GPM submitted a letter of warranty on Driscopipe and ASTM technical notes on Driscopipe's safety factor.

3.2 Contingency Tank Inspection

In the event of shutdown of the Rice system, the existing Contingency tank will store approximately 3000 barrels of wastewater or the equivalent of 1-1/2 days of produced wastewater. If the Eumont disposal system should be shutdown for a longer period of time, the wastewater will be trucked to one of the various salt water disposal systems in the area.

The Contingency tank is an open-top tank and is normally dry. GPM will perform periodic visual inspections of the tank to ensure early detection of tank fissures or breaches. The inspections will be conducted on a yearly basis by operating personnel to observe any signs of structural deterioration, and/or leaks or spills associated with the Contingency tank. A record of the yearly inspections will be maintained on site at the Eunice Gas Plant office for a minimum of five (5) years.

4.0 Disposal In Place

The Classifier and the Slop Oil tanks will be disposed of in place at the Eunice EP Compressor. In the event of operating changes, GPM may, after some undetermined period of time, reactivate the tanks. Therefore, GPM will use the following procedures to properly secure the tanks for the period for which they will be out of service:

1. All lines will be drained into the tanks.

2. Liquids and residues from the tank may be removed by using explosion-proof or air-driven pumps. Pump motors and suction hoses will be bonded to the tank or otherwise grounded to prevent electrostatic ignition hazards. A hand pump may be used to remove the last few inches of liquid from the bottom of the tank.

   If a vacuum truck is used for removal of liquids or residues, the area of operation for the vacuum truck will be vapor-free. The truck will be located upwind from the tank and outside the path of probable vapor travel.

3. Liquids will be transported to the GPM Hobbs Treater for recycling.

5. The Contingency tank and the Slop Oil tank will be vapor-free before being disposed of in place. All tank openings will be tightly plugged or capped, with one plug having a 1/8-inch vent hole to prevent each tank from being subjected to excessive differential pressure caused by temperature changes. The tanks will be stored with the vented plug at the highest elevated point.

6.0 Record Keeping

GPM will keep a permanent record of the tank locations, the date of disposal in place, and the method of conditioning the tanks for disposal. Records will be maintained at either the Eunice Plant office or the Odessa office.

7.0 References

American Petroleum Institute Recommended Practice 1604, "Removal and Disposal of Used Underground Petroleum Storage Tanks," 2nd ed., December 1987

GPM Gas Corporation, "Eunice Plant Discharge Plan GW-16 Renewal Application," March 23, 1994

GPM Gas Corporation, "Discharge Plan Renewal Application for GW-16: Response to Request for Additional Information (4/05/94)," April 21, 1994

State of New Mexico Environment Improvement Board, "Underground Storage Tank Regulations," July 26, 1990

G:\3023\EUNICE\EPCLOS02.DOC

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal	Time	Date
	2:00 pm	1-12-~~94~~95

Originating Party	Other Parties
CHRIS EUSTICE	VINCE BERNARD (GPM)

Subject Delinquent filing & flat fees for Eunice GP (GW-016)

Discussion

I called Vince to tell him payments were late for the filing (50.00) and renewal flat fee (1667.50) for the Eunice GP (GW-016).

Letter of approval was conditioned upon payment of these fees.

Conclusions or Agreements

Vince says "the check will be in the mail today".

Distribution

Signed Chris Eustice

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MEMORANDUM

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

TO: Roger Anderson, Environmental Bureau Chief

FROM: Bobby Myers, Petroleum Engineer Specialist

DATE: May 18, 1994

SUBJECT: Delinquent Discharge Plan Fee Payment

Below is a chronological list of discharge plan recipients who have failed to pay their discharge plan filing and/or plan fee.

DP #	Company	Facility	Fee Owed	Date Due
GW-099	Halliburton	Farmington SC	1380	12/30/92
BW-018	Unichem	Trucker #2 BW	690	2/11/93
GW-069	Continental	Carlsbad GP	667	4/29/93
GW-113	Transwestern	Eunice CS	740	6/22/93
GW-150	Llano	Pure Gold CS	690	11/22/93
GW-157	P & A	Farmington SC	1380	12/28/93
GW-115	Halliburton	Artesia SC	1380	1/13/94
GW-161	Associated NG	Rosa CS	690	4/ 7/94
GW-016	GPM	Eunice GP	1717.50	4/25/94
GW-137	Continental	Carrasco CS	276	4/28/94
GW-069	Continental	Carlsbad GP	667	4/29/94
GW-141	Parker&Parsley	Loving GP	667	5/ 6/94
		TOTAL OWED	10944.50	

Note that the last five have recently been due and probably are not really late. However, the Continental Carrasco compressor station fee is a incremental fee, so they had one year since last payment to prepare to submit it.

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 9:30	Date April 25, 1994
Originating Party		**Other Parties**
Vince Bernard GPM		Bobby Myers

Subject Eunice GP DP renewal remaining issues

Discussion

1) underground lines in GP area are steel → will need 5yr test program since 25-yr age exemption no longer valid
- will include this in renewal w/ deadline for submitting procedures & schedule

2) GPM still not exactly sure how they wish to dispose of spent mole sieve & carbon - spread on roads? (mole sieve dangerous) or start landfarm in pit? or off-site → will address @ future date, outside this DP renewal, but as part of this renewal w/ no add'l fee charge

Conclusions or Agreements

Distribution
file

Signed Robert Myers

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

June 29, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-148

Mr. Scott Seeby
GPM Gas Corporation
4044 Penbrook
Odessa, Texas 79762

Re: Discharge Plan (GW-016)
Closure of Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Seeby:

The Oil Conservation Division (OCD) has received GPM Gas Services Company's (GPM) closure plan, dated March 31, 1995, for the Eunice Compressor Station. The following request for additional information is based upon review of that plan and will allow the review process to continue.

1. An OCD inspection of the facility on September 28, 1993 addressed the presence of a sump at the northwest corner of Building 1. How does GPM propose closure of the sump?

2. The September 28, 1993 inspection noted stained areas within the facility and a lube filter pad (located at building 1) in need of housekeeping. How does GPM plan the assessment and potential remediation of any stained and/or contaminated areas within the facility?

Submission of the above requested information will allow the review process to continue. If you have any questions please call me at (505) 827-7153.

Sincerely,

Chris Eustice
Geologist

xc: OCD Hobbs Office - W. Price
OCD Hobbs Office - J. Sexton

April 21, 1994

GPM GAS CORPORATION
4044 PENBROOK
ODESSA, TEXAS 79762

Mr. William J. LeMay
Director, State of New Mexico
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

RE: DISCHARGE PLAN RENEWAL APPLICATION FOR GW-16: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (4/05/94)

Dear Mr. LeMay:

GPM Gas Corporation is pleased to provide additional information in support of the renewal application for Groundwater Discharge Plan, GW-16, for the Eunice Gas Processing Plant located in Lea County, New Mexico. In a letter to GPM dated April 5, 1994, OCD requested further details on several aspects of the discharge plan. GPM has prepared responses to each of these comments and/or requests as provided below:

Comment 1. page 2, paragraph 1: The first several items of this letter (March 23, 1994 application for renewal) refer to the shutdown of the compressor station side of the Eunice Gas Processing Plant by April, 1995. This includes all below-grade tanks and sumps, as well as the associated underground drain lines. Submit procedures for the discontinuance of use of this equipment, including waste removal and disposal.

Response to Comment 1. By April 1, 1995, GPM will discontinue use of the Eunice EP Compressor Station. The plans for implementation and scheduling of the closure of this facility have not been formulated. GPM anticipates that these will be prepared during the second quarter of 1994 and will provide a copy to OCD as soon as practicable.

Comment 2. page 2, paragraph 2: Manufacturer's specifications of the welded polyurethane pipe are provided with the renewal application. However, the specifications only "assures" a service life in excess of fifty years. Without a manufacturer's guarantee, integrity testing of underground drain lines will be required every five years.

Response to Comment 2. Under attachment A, GPM is submitting a letter of warranty on Phillips Driscopipe HDPE pipe and ASTM technical notes on Driscopipe's 2:1 safety factor.

Comment 3. page 2, paragraph 3: The March 1994 discharge plan, Section III.A. Engine Oil Drain Systems, states that spent lube oil is discharged into the open drain system which then flows into the oil/water separator. Spent lube oils are non-exempt waste, and thus any water into which

these have been introduced must be tested annually for TCLP constitutents prior to disposal in a Class II well. Submit procedures for said testing.

Response to Comment 3. Under attachment B, GPM is submitting TCLP results on the spent lube oil discharged into open drain system. The results indicate that all constituents are below RCRA standards (40 CFR Part 261) for hazardous wastes. Mr. Bobby Myers of OCD indicated that analysis of the spent lube oils for RCRA TCLP, excluding pesticides and herbicides, would satisfy the water testing requirement of comment 3 (phone conversation between GPM's consultant, GCL and OCD, April 21, 1994). A grab sample of the spent oil was collected from the open drain system and delivered to Cardinal Laboratories in Hobbs, New Mexico, for RCRA TCLP analysis. Strict chain-of-custody procedures were followed to ensure compliance with EPA protocol. In the future, GPM will conduct annual sampling and analysis of the water discharged to the Class II injection well prior to disposal. A copy of the annual results will be submitted to OCD.

Comment 4. page 2, paragraph 4: Section III.C. of the discharge plan, Open Drain System, indicates that this drain system empties into a "below-grade, aboveground" oil/water separator. Please clarify "below-grade, aboveground."

Response to Comment 4. GPM provides the following clarification of the above wording regarding the oil/water separator in the open drain system: "This drain system empties into an aboveground internally-coated oil/water separator located to the north of the main plant operation."

GPM awaits your response regarding the final review and approval of GW-16 Discharge Plan renewal. If you have any questions, please call me at (915) 368-1085. Thank you for your efforts in the renewal plan process.

Sincerely,

Vince Bernard
Safety & Environmental Supervisor
New Mexico Region

/sm
ATTACHMENTS

Attachment A

Warranty Information on Phillips' Driscopipe HDPE Pipe

PHILLIPS DRISCOPIPE, INC.
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

2929 NORTH CENTRAL EXPRESSWAY, SUITE 300
P.O. BOX 83-3866
RICHARDSON, TEXAS 75083 • 214/783-2666

April 15, 1994

Vincent B. Bernard
Safety and Environmental Supervisor
GPM GAS CORPORATION
4044 PENBROOK
ODESSA, TEXAS 79762

Mr. Bernard,

Phillips Driscopipe, Inc., is pleased to provide additional information on it's pipe and products, especially with regard to warranty.

When used within its pressure and temperature use range and buried and installed according to our manufacturer recommendations, Driscopipe HDPE pipe can provide a very long service life expected to be at least 50 years with a 2:1 safety factor at 73 F based on the stress-life testing per the specification and requirements of ASTM D3837. Driscopipe 6400 is in compliance with ASTM D2837 and ASTM D2513.

Driscopipe 6400 is warranted under the Uniform Commercial Code per the attached copy of our Additional Terms and Condition of Sale.

The composition of the 2:1 safety factor per Driscopipe's Tech Note #18 is also attached.

If we may be of any further assistance please call me at 800-527-0662.

Sincerely,

J. J. Lee
GPM/Phillips
Account Manager

Designation: D 2837 – 92

Standard Test Method for Obtaining Hydrostatic Design Basis for Thermoplastic Pipe Materials[1]

This standard is issued under the fixed designation D 2837; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ε) indicates an editorial change since the last revision or reapproval.

This standard has been approved for use by agencies of the Department of Defense. Consult the DoD Index of Specifications and Standards for the specific year of issue which has been adopted by the Department of Defense.

1. Scope

1.1 This test method describes a procedure for obtaining a hydrostatic design basis for thermoplastic pipe materials, by evaluating stress rupture test data derived from testing pipe made from the subject material. The method is applicable to all known types of thermoplastic pipe and for any practical temperature and medium.

1.2 Unless the data approximate a straight line, when calculated using log-log coordinates, it is not possible to assign a hydrostatic design basis to the material. Data that exhibit high scatter or a "knee" give low (that is, conservative) extrapolated values when evaluated. In addition, the lower confidence level limits are not met and the data are classed as unsuitable.

1.3 The values stated in inch-pound units are to be regarded as the standard.

NOTE 1—Over 1200 sets of data, obtained with thermoplastic pipe and piping assemblies tested with water, natural gas, and compressed air, have been analyzed. None of the compounds in the lists of Recommended Hydrostatic Strengths and Design Stresses for Thermoplastic Pipe and Fittings Compounds in PPI Technical Report TR4, issued at intervals for over 12 years by the Plastics Pipe Institute, exhibit knee-type plots, that is, deviate from a straight line in such a manner that a marked drop occurs in stress at some time when plotted on equiscalar log-log coordinates. Data have been obtained for test periods over 120 000 h. It might be noted that some thermoplastic compounds that are not suitable or recommended for piping components do exhibit knee-type plots at 23°C (73°F); in these cases, very low results are obtained when the data are analyzed by this test method. Futher information on piping compounds may be found in the references at the end of this test method.

1.4 The experimental procedure to obtain individual data points shall be as described in Test Method D 1598, which forms a part of this test method. When any part of this test method is not in agreement with Test Method D 1598, the provisions of this test method shall control.

1.5 General references are included at the end of this test method.

1.6 *This standard does not purport to address all of the safety problems, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.*

2. Referenced Document

2.1 *ASTM Standard:*

D 1598 Test Method for Time-to-Failure of Plastic Pipe Under Constant Internal Pressure[2]

3. Terminology

3.1 *Definitions:*

3.1.1 *pressure*—the force per unit area exerted by the medium in the pipe.

3.1.2 *hoop stress*—the tensile stress in the wall of the pipe in the circumferential orientation due to internal hydrostatic pressure.

3.1.3 The following equations shall be used for the relation between stress and pressure:

$$S = P(D - t)/2t \text{ for outside diameter controlled pipe} \quad (1)$$

or

$$S = P(d + t)/2t \text{ for inside diameter controlled pipe} \quad (2)$$

where:

S = stress,
P = pressure,
D = average outside diameter,
d = average inside diameter, and
t = minimum wall thickness.

3.1.4 *failure*—bursting, cracking, splitting, or weeping (seepage of liquid) of the pipe during test.

3.1.5 *long-term hydrostatic strength (LTHS)*—the estimated tensile stress in the wall of the pipe in the circumferential orientation that when applied continuously will cause failure of the pipe at 100 000 h. This is the intercept of the stress regression line with the 100 000-h coordinate.

3.1.6 *hydrostatic design basis (HDB)*—one of a series of established stress values for a compound. It is obtained by categorizing the LTHS in accordance with Table 1.

3.1.7 *service (design) factor*—a number less than 1.00 (which takes into consideration all the variables and degree of safety involved in a thermoplastic pressure piping installation) which is multiplied by the HDB to give the HDS.

3.1.8 *hydrostatic design stress (HDS)*—the estimated maximum tensile stress in the wall of the pipe in the circumferential orientation due to internal hydrostatic pressure that can be applied continuously with a high degree of certainty that failure of the pipe will not occur.

3.1.9 *pressure rating (PR)*—the estimated maximum pressure that the medium in the pipe can exert continuously with a high degree of certainty that failure of the pipe will not occur.

[1] This test method is under the jurisdiction of ASTM Committee F-17 on Plastics Piping Systems and is the direct responsibility of Subcommittee F17.40 on Test Methods.

Current edition approved June 15, 1992. Published October 1992. Originally published as D 2837 – 69. Last previous edition D 2837 – 90.

[2] *Annual Book of ASTM Standards*, Vol 08.04.

Designation: D 2513 – 93a

Standard Specification for Thermoplastic Gas Pressure Pipe, Tubing, and Fittings[1]

This standard is issued under the fixed designation D 2513; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ε) indicates an editorial change since the last revision or reapproval.

This standard has been approved for use by agencies of the Department of Defense. Consult the DoD Index of Specifications and Standards for the specific year of issue which has been adopted by the Department of Defense.

1. Scope

1.1 This specification covers requirements and test methods for material (see Appendix X1) dimensions and tolerances, hydrostatic burst strength, chemical resistance, and impact resistance of plastic pipe, tubing, and fittings for use in gas mains and services for direct burial and reliner applications. The Annexes provide specific requirements and test methods for each of the materials currently approved. If and when additional materials are available, specific annex requirements will be added. The pipe, tubing, and fittings covered by this specification are intended for use in the distribution of natural gas. Use of polyethylene systems with liquefied petroleum gas is covered in Appendix X2.

1.1.1 This specification does not cover threaded pipe. Design considerations are discussed in Appendix X2. In-plant quality control programs are specified in Annexes A4 and A5.

1.2 The values stated in inch-pound units are to be regarded as the standard. The values given in parentheses are provided for information purposes only.

1.3 The following is an index of the annexes and appendixes in this specification:

Annex	Subject
A1	Polyethylene (PE) Pipe, Tubing, and Fittings
A2	Poly (Vinyl Chloride) (PVC) Pipe, Tubing, and Fittings
A3	Polybutylene (PB) Pipe, Tubing, and Fittings
A4	In-Plant Quality Control for all materials up to 12 in.
A5	In-Plant Quality Control for PE materials between 14 and 24 in.

Appendixes	Subject
X1	New Materials
X2	Design Consideration

1.4 The following precautionary caveat pertains only to the test method portion, Section 6, of this specification. *This standard does not purport to address all of the safety problems, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.*

2. Referenced Documents

2.1 *ASTM Standards:*

2.1.1 *Terminology:*

F 412 Terminology Relating to Plastic Piping Systems[2]

D 1600 Terminology for Abbreviated Terms Relating to Plastics[2,3]

2.1.2 *Test Methods for:*

D 543 Resistance of Plastics to Chemical Reagents[3]

D 638 Tensile Properties of Plastics[3]

D 1598 Time-to-Failure of Plastic Pipe Under Constant Internal Pressure[2]

D 1599 Short-Time Hydraulic Failure Pressure of Plastic Pipe, Tubing, and Fittings[2]

D 2122 Determining Dimensions of Thermoplastic Pipe and Fittings[2]

D 2290 Apparent Tensile Strength of Ring or Tubular Plastics and Reinforced Plastics by Split Disk Method[2]

D 2837 Obtaining Hydrostatic Design Basis for Thermoplastic Pipe Materials[2]

2.1.4 *Practices for:*

D 618 Conditioning Plastics and Electrical Insulating Materials for Testing[3]

D 1898 Sampling of Plastics[4]

D 2657 Heat-Joining Polyolefin Pipe and Fittings[2]

D 2774 Underground Installation of Thermoplastic Pressure Piping[2]

F 699 Accelerated Conditioning of Polybutylene Pipe and Tubing for Subsequent Quality Control Testing[2]

2.2 *ANSI Standards:*

B16.40 Manually Operated Thermoplastic Gas Shutoffs and Valves in Gas Distribution Systems[5]

B31.8 Gas Transmission and Distribution Piping Systems[5]

2.3 *Federal Specifications:*

Fed. Std. No. 123 Marking for Shipment (Civil Agencies)[6]

OPS Part 192 Title 49, Code of Federal Regulations[6]

2.4 *Military Standards:*

MIL-STD-129 Marking for Shipment and Storage[6]

MIL-STD-1235 (ORD) Single- and Multi-Level Continuous Sampling Procedures and Tables for Inspection by Attributes

2.5 *Other Documents:*

Plastic Pipe Institute: TR-3, Policies and Procedures for Developing Recommended Hydrostatic Design[7]

---

[1] This specification is under the jurisdiction of ASTM Committee F-17 on Plastic Piping Systems and is the direct responsibility of Subcommittee F17.60 on Gas.

Current edition approved March 15, 1993. Published July 1993. Originally published as D 2513 – 66. Last previous edition D 2513 – 93.

[2] *Annual Book of ASTM Standards*, Vol 08.04.

[3] *Annual Book of ASTM Standards*, Vol 08.01.

[4] *Annual Book of ASTM Standards*, Vol 08.02.

[5] Available from American National Standards Institute, 1430 Broadway, New York, NY 10018.

[6] Available from Naval Publications and Forms Center, 5801 Tabor Ave., Philadelphia, PA 19120.

[7] Plastic Pipe Institute, Division of Society of the Plastic Industry, Inc., 355 Lexington Avenue, New York, NY 10017.

DRISCOPIPE
TECHNICAL NOTES
PHILLIPS DRISCOPIPE, INC.
A SUBSIDIARY OF PHILLIPS 66

PDI TN-18
August 1, 1989

WHENCE COMETH THE 2.0 DESIGN FACTOR?

by
Frank W. Reinhart
PPI Technical Director

A question has been asked several times in the past few months that apparently needs an answer. The question is "How was the 2.0 design factor developed?" After reviewing old notes, drafts of the design basis method, and the deep dark recesses of my memory, the following recollections are reported. It might be noted that the Committee that developed this factor discussed the problem of the selection at one to two day meetings every month from December 1958 to January 1963 when it was accepted by the letter ballot of the SPI Thermoplastic Pipe Division, which became PPI in June 1963. This point was also considered, but less frequently, until ASTM D2837 was adopted.

The points of possible variability that were considered were as follows:

a. Variations in the test method among laboratories. This was believed to be about 10 percent. Subsequent experience has shown this to be reasonable.

b. Variations among lots of the same compound. This seemed to be 10 percent. Subsequent experience has shown that, in general, this is too high although very infrequently it may approach 10 percent. An overriding factor is that of extrusion quality.

c. Variations among lots of pipe made from the same compound in different plants or from different extruders. This was judged to be insignificant or less than 5 percent in the days of long barrel single screw extruders with pelletized compounds. Experience since then indicates that this could be as much as 10 percent.

d. Variations in compounds of the same class, such as among PVC 1120 compounds. This was set at 5 percent. This low variability was chosen because the design basis for the class was set near the bottom of the range. For example, the range of strengths for the 4000 psi design basis for PVC 1120 compounds is 3830 to 4790 psi. A 5 percent reduction in the 4000 psi basis gives 3800 psi.

e. Variations in departure from optimum handling and installation techniques. This was though to be about 20 percent. Tests made since then with pipe that had been abused to some extent indicate that for normal good handling this allowance is high. For instance, specimens of a sample of relatively thin wall PVC 1120 pipe with scratches that had a depth of 0.010-inch did not differ in hydrostatic tests from that of unscratched specimens taken from the same sample of pipe.

f. Variations in operating pressures due to water surges and water hammer. An allowance of 20 percent was used. It is interesting to note that research work shows that this guess, made 12 years ago is remarkably good. For example, the 20 percent allowance and the maximum water hammer developed for instantaneous closure on a water flow of 5 feet per second in PVC pipe are as follows:

SDR Size	20 Percent Allowance off 4000 psi Design Basis psi	Maximum Pressure Developed psi
26	64	74
21	80	82
17	100	92

g. To give strength-time allowance well beyond 50 years. The slopes of the plots were such at that time that the drop in strength from 100,000 hours to 50 years was generally less than 5 percent which has proven to be true on a broader scale. This allowance was set at 10 percent. Over 1000 sets of long-term test data on over 400 compounds, indicates that a 10 percent allowance gives strength-life times of well over 100 years. The use of a 20 percent allowance gives strength-life times over 1000 years, some as high as well over 10,000 years, for most types of plastics listed in PPI-TR4. For those few types for which the calculations indicate less than 100 years, the predicted life times are well over 500 years. In general, the predicted life increases 10-fold for each additional 10 percent increase in the allowance.

h. The great unknown. This was set at 20 percent. The numerical allowance was set at 20 percent to give a design factor of 2.0. After extensive discussions, it was the consensus to use the 10-Series, Preferred (Renard) Numbers as a reasonable set of engineering design numbers. In this series, each step increases by 25 percent on going up the scale and decreases by 20 percent on going down the scale, i.e. 100, 125, 160, 200, 250, 315, 400, 500, 630, 800, 1000, 1250, etc.

Thus, the overall design factor is 1.00 (base strength at 100,000 hours) + 0.10 (a) + 0.10 (b) + 0.05 (c) + 0.05 (d) + 0.20 (e) + 0.20 (f) + 0.10 (g) + 0.20 (h) to give 2.0.

In summary, although the selection values were "blue sky", it was based on allowances for real sources of possible variability. The guiding principle was to make the selection on a conservative basis but not to be unreasonably conservative. By adding these allowances the degree of overall conservatism is greatly increased.

Although the allowances for the specific factors varied from one discussion to another and none were actually adopted by vote, the values given here represent a rough consensus as near as the author can recall.

ADDITIONAL TERMS AND CONDITIONS OF SALE

(Phillips Driscopipe, Inc., herein called "Seller")

1. Unless otherwise specified on the face hereof, all prices for goods covered hereunder (hereinafter called the "Goods") are on an f.o.b. shipping point basis. Delivery shall occur and title and risk of loss to the Goods shall pass from Seller to Buyer at the shipping point. Prices are those contained in Seller's price list covering the Goods and in effect at the "Date of Sales Order Acceptance" on the face hereof. Freight will be prepaid and allowed by Seller to Extent, if any, provided for in its catalog covering the Goods and in effect at said "Date of Sales Order Acceptance". Where freight is not allowed, the amount will be added to the net amount of the invoice or will be charged separately. Buyer agrees to reimburse Seller for all taxes, excises or other charges which Seller may be required to pay to any government (national, state or local) upon the sale, production or delivery of the Goods.

2. All Goods are payable in U.S. currency at Seller's Dallas, Texas office, or at any other U.S. location designated in writing by Seller. Seller's credit terms require payment of each invoice to be received by the applicable due date. On each invoice not so paid a delinquency charge may be imposed on the unpaid amount.

3. Seller will do its utmost to ship within time indicated; but Buyer agrees that no claim will be made for delays in shipment where Buyer upon receipt of the Goods accepts them. On any rejection of the Goods by reason of delay in shipment, Buyer's exclusive remedy shall be limited to rejection and return of the Goods and a refund of purchase price. Buyer shall have no claim for any additional incidental damages or for any consequential damages.

4. Buyer agrees that a 30-day period after receipt of the Goods is a reasonable time for inspection of the Goods and for discovery of any claim whatsoever. Notice of any claim by Buyer must be given in writing within said 30-day period. Buyer further agrees that notice thereafter is not reasonable and that any complaint which is not made in writing shall not be the basis for a claim, counterclaim or setoff; and, without limitation, no defense, counterclaim or setoff shall be asserted against an action for the price where Buyer has failed to give the aforesaid written notice within 30 days of receipt of the Goods. An action for breach of this contract (except for nonpayment by Buyer) must be commenced within one year after the occurrence of the breach. All claims relating to shipment handling must be made directly to the carrier.

5. No Goods will be accepted for return without the written authorization of Seller and unless routed as indicated by Seller.

6. Notwithstanding anything to the contrary herein (or on the face hereof), Seller shall have the right to require cash in advance before making shipment. If Buyer fails to fulfill any terms of any order, purchase or payment, Seller may, at its option either defer any further shipments on any order until such default is made good or treat such default as a final refusal to accept any further shipments on any order and effect cancellation. Seller, however, shall have the right, even on such cancellation, to require payment for Goods manufactured pursuant to the order.

7. Seller warrants that: (1) the Goods shall be of merchantable quality (as defined by the Uniform Commercial Code); (2) will have been produced in compliance with the requirements of the Fair Labor Standards Act of 1938, as amended; and (3) it will convey good title thereto. THE FOREGOING WARRANTIES ARE EXCLUSIVE, AND ARE IN LIEU OF ALL OTHER WARRANTIES (WHETHER WRITTEN OR ORAL, EXPRESS OR IMPLIED) INCLUDING WARRANTY OF MERCHANTABILITY IN OTHER RESPECTS THAN EXPRESSLY SET FORTH ABOVE AND WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE. Provided, the foregoing shall not be construed to relieve Buyer from any of the other terms and conditions of this contract relating to notices, claims, defenses, counterclaims or setoffs. No claim, counterclaim or set off of any kind whether as to Goods delivered or for nondelivery of Goods, and whether or not based on negligency, shall be greater in amount than the purchase price of the Goods in respect of which such claim, counterclaim or setoff is made. In no event shall Seller be liable for special, indirect or consequential damages, whether or not caused by or resulting from Seller's negligence. Buyer assumes all risk and liability resulting from use of the Goods, whether used singly or in combination with other products or materials.

8. No failure or omission by Seller shall be deemed a breach of this contract nor create any liability for damages if the same shall arise from any cause or causes beyond the control Seller, including, without limitation, the following, which for the purposes of this contract, shall be regarded as beyond Seller's control: any act of federal, state or local government or any agency thereof; compliance with request, recommendations, rules, regulations or orders of any governmental authority or any officer, department, agency or instrumentality thereof; fire; storm; flood; explosion; accident; acts of the public enemy; war; insurrection; riot; sabotage; quarantine restrictions; strike; lockout; disputes or differences with workmen (howsoever arising or from whatever cause); labor shortages; transportation embargoes, failures or delays; exhaustion, reduction, unavailability or delays in deliveries of any product, material, or machinery necessary for the manufacture of the Goods. Similar causes shall excuse Buyer for failure to take the Goods other than for specially fabricated Goods already in process of manufacture, make up, or in transit. In no event shall Seller be obligated to purchase material from others in order to enable it to deliver the Goods.

9. This contract shall be governed as to all matters whatsoever, whether of validity, interpretation, obligation, performance or otherwise, exclusively by the laws of the state wherein the Goods are manufactured.

10. The terms and conditions contained in this acknowledgement constitute the entire contract of sale and purchase of the Goods and may not be amended or otherwise altered, except by written instrument signed by the party claimed to be bound thereby. Notwithstanding any terms and conditions that may be contained in any purchase order, acknowledgement, acceptance, or other form of Buyer, and notwithstanding Seller's manufacture and delivery of the Goods, each delivery of Goods shall be deemed to be only on the terms and conditions contained in this acknowledgement except as they may be amended or otherwise altered in accordance with the preceding sentence.

Attachment B

TCLP Analysis of Spent Lube Oil

CARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TEXAS 79603
PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NEW MEXICO 88240

TCLP ANALYSIS REPORT

Company: GPM
Address: P.O. Box 66
City, State: Oil Center, NM 88266

Date: 4/19/94
Lab # H1608
P.O.# 162009-40-410

Project Name:
Project Location: Eunice Plant
Sampled by: RG
Date: 4/12/94
Type of Sample: Oil
Sample Condition: GIST

Sample ID: Eunice Plant 162009

TCLP ORGANICS

PARAMETER	RESULT	UNITS
Benzene	<0.025	mg/L
Carbon Tetrachloride	<0.025	mg/L
Chlorobenzene	<0.025	mg/L
Chloroform	<0.025	mg/L
1,4-Dichlorobenzene	<0.025	mg/L
1,2-Dichloroethane	<0.025	mg/L
1,1-Dichloroethene	<0.025	mg/L
2,4-Dinitrotoluene	<0.020	mg/L
Hexachlorobenzene	<0.020	mg/L
Hexachlorobutadiene	<0.020	mg/L
Hexachloroethane	<0.020	mg/L
Nitrobenzene	<0.020	mg/L
Pentachlorophenol	<0.100	mg/L
Tetrachloroethylene	<0.025	mg/L
Trichloroethylene	<0.025	mg/L
2,4,5-Trichlorophenol	<0.020	mg/L
2,4,6-Trichlorophenol	<0.020	mg/L
Vinyl Chloride	<0.050	mg/L
Cresol (O,M,P)	5.000	mg/L
Methy Ethyl Ketone	0.435	mg/L
Pyridine	<0.020	mg/L

TCLP ANALYSIS REPORT

Company: GPM
Address: P.O. Box 66
City, State: Oil Center, NM 88266

Date: 4/19/94
Lab#: H1608
P.O.# 162009-40-410

Project Name:
Project Location: Eunice Plant
Sampled by: RG
Type of Sample: Oil

Date: 4/12/94
Sample Condition: GISTZ

Sample ID: Eunice Plant 162009

TCLP INORGANICS (Leachate)

PARAMETER	RESULT	UNITS
Arsenic	<0.002	mg/L
Barium	0.53	mg/L
Cadmium	<0.005	mg/L
Chromium	<0.05	mg/L
Lead	<0.1	mg/L
Mercury	0.0082	mg/L
Selenium	<0.002	mg/L
Silver	<0.01	mg/L

HAZARDOUS WASTE CHARACTERIZATION

PARAMETER	RESULT	UNITS
Ignitability (Pensky-Martens Closed Cup)	>140 Degrees	F
Corrosivity, (pH)	6.38	
Reactivity-S	No Reaction (<0.01)	mg/kg
Reactivity-CN	No Reaction (<0.01)	mg/kg

METHODS: TCLP ORGANICS - EPA 8240/8270
METHODS: TCLP INORGANICS (Leachate) - EPA 1311/3005/7000
METHODS: HWC - EPA SW 846

Michael R. Fowler

4-19-94

Michael R. Fowler

Date

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

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

April 5, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-069

Mr. Vince Bernard
Safety, Environmental Supervisor
GPM Gas Services Company
4044 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-16 Eunice Gas Plant

Dear Mr. Bernard,

The OCD has received your application for renewal of the approved groundwater discharge plan, GW-16, for the Eunice Gas Processing Plant located in the SE/4, NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, of which the current plan is due to expire on April 25, 1994.

On September 28, 1993, OCD personnel visited this facility, along with the Eunice EP Compressor Station, for discharge plan renewal inspections. During this visit, you expressed interest in the feasibility of combining the discharge plans of each of these facilities into one discharge plan. The OCD agreed to combine the discharge plans in my October 8, 1993 letter to GPM, which also identified comments and requests for additional information from the site inspections and the application for renewal of the discharge plan for the Eunice EP Compressor Station.

From this point forward, all communications regarding this gas plant and compressor station should refer to discharge plan GW-16 for the Eunice Gas Processing Plant.

The following comments and requests for additional information are based on the review of the March 23, 1994 application for renewal of GW-16 for the Eunice Gas Processing Plant.

Eunice Gas Processing Plant

1. The first several items of this letter refer to the shutdown of the compressor station side of the facility by April, 1995. This includes all below-grade tanks and sumps, as well as the associated underground drain lines. Submit procedures for the discontinuance of use of this equipment, including waste removal and disposal.

2. Manufacturer's specifications of the welded polyurethane pipe are provided with the renewal application. However, the specifications only "assures" a service life in excess of fifty years. Without a manufacturer's guarantee, integrity testing of underground drain lines will be required every five years.

3. The March 1994 discharge plan, Section III.A. - Engine Oil Drain Systems, states that spent lube oil is discharged into the open drain system which then flows into the oil/water separator. Spent lube oils are non-exempt wastes, and thus any water into which these have been introduced must be tested annually for TCLP constituents prior to disposal in a Class II well. Submit procedures for said testing.

4 Section III.C. of the discharge plan, Open Drain System, indicates that this drain system empties into a "below-grade, aboveground" oil/water separator. Please clarify "below-grade, aboveground."

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan renewal.

If you have any questions, please contact me at (505) 827-4080.

Sincerely,

Robert L. Myers II
Petroleum Engineering Specialist

RLM/rlm

xc: OCD Hobbs Office

UNITED STATES POSTAL SERVICE

MIDLAND TEXAS TPR 04/07/94

OIL CONSERVATION DIVISION
RECEIVED

'94 APR 11 AM 8 49

Official Business

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

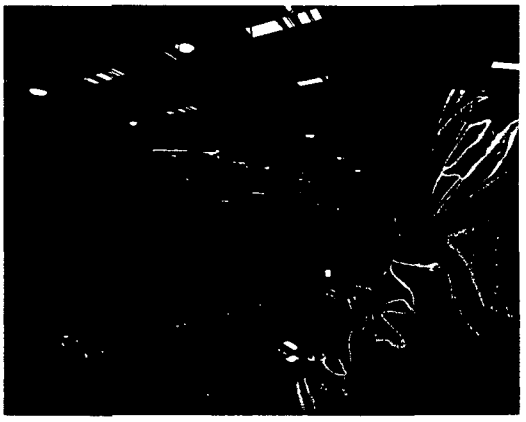
U.S. MAIL

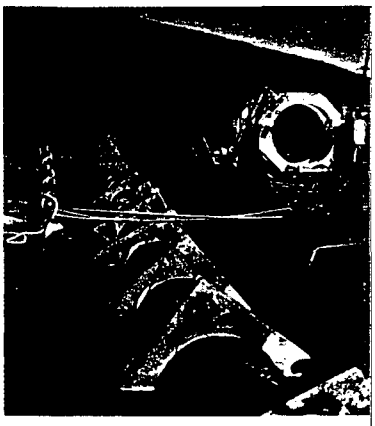
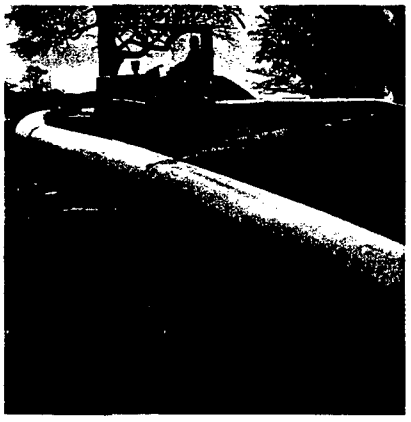
Print your name, address and ZIP Code here

Oil Conservation Division
PO Box 2088
Santa Fe, NM 87504-2088

DRISCOPIPE®

Engineering Characteristics



PHILLIPS 66

Driscopipe® Engineering Characteristics

Introduction

Driscopipe high density polyethylene piping systems offer the modern engineer the opportunity to take advantage of the unusual characteristics of these materials and use them to solve many old problems and to design systems for applications where traditional materials are either unsuitable or too expensive. When compared to the older traditional piping materials, Driscopipe polyethylene piping systems offer a new freedom in environmental design, extended service life, significant savings for installation labor and equipment costs, and reduced maintenance for pipeline systems where operating conditions are within the pressure and temperature capabilities of the material.

This brochure outlines the Engineering Characteristics of Driscopipe high density polyethylene pipe and fittings and points out many of the advantages and benefits to be realized through the use of these systems. The discussion is directed primarily toward the large diameter (3" through 54") Driscopipe 8600 and Driscopipe 1000 Industrial and Municipal product lines. However, these engineering characteristics are also typical of other Driscopipe polyethylene product lines.

Physical Properties

Driscopipe 8600 is manufactured from Marlex M-8000 very high molecular weight high density PE 3408 resin. Pipe and fittings made from Marlex M-8000 are extremely tough and durable, and possess exceptional long term strength. Marlex M-8000 is a proprietary product and is extruded only by Phillips Driscopipe, Inc.

Driscopipe 1000 is manufactured from Marlex TR-480, a PE 3408 polyethylene pipe resin in a molecular weight range which permits the pipe to be extruded by conventional methods. In this respect, Driscopipe 1000 is comparable to other extra high molecular weight, high density, PE 3408 polyethylene pipes commercially available in North America.

Sheets detailing typical physical properties for Driscopipe 1000 and Driscopipe 8600 are available upon request.

Long Term Hydrostatic Strength

One of the outstanding engineering characteristics of Driscopipe high density polyethylene pipe is its long term hydrostatic strength under various thermal and environmental conditions. Life expectancy is conservatively estimated to be in excess of 50 years using the standard design basis. This strength is determined by standardized methods and procedures which the plastic pipe industry has used for many years to evaluate the long term strength of all types of plastic pipe.

Pipe hoop stress versus time to failure plots of long term hydrostatic pressure data for thermoplastic pipe have been studied and analyzed for many years. The mathematical equations used to evaluate the test data and extrapolate values to longer periods of time were chosen after careful evaluation of more than 1,000 sets of long term test data representing more than 400 plastic pipe compounds. Continued testing on new compounds and extended testing of older compounds have proven the validity of these test methods. Actual data from more than 11½ years (100,000 hours) of continuous testing shows the industry methods to be slightly conservative in that actual values are slightly higher than those calculated by the industry-accepted ASTM method.

The reduction in strength which occurs with time, as indicated by the stress-life curves, does not represent a strength degradation of the material but is more in the nature of a relaxation effect. Plastic pipe samples which have been on test for periods up to 70,000 hours have been de-pressurized and checked for permanent reduction of strength by using the quick-burst test. No loss has been found when compared to samples previously quick-burst from the same test lot.

All evidence confirms that the methods used to predict the long term strength of plastic pipe are sound methods. Through the years, these policies and procedures, used to develop recommended hydrostatic design strengths, have influenced manufacturers to research and develop improved piping products such as Driscopipe 8600 and Driscopipe 1000.

Typical calculated long term strengths are shown below:

Long Term Strength @ 73.4°F(23°C)

Time	Hoop Stress, psi
100,000 hrs. (11.43 yrs.)	1635
438,000 hrs. (50 yrs.)	1604
500,000 hrs. (57 yrs.)	1601
1,000,000 hrs. (114 yrs.)	1586

The 114-year long term strength has been included to show more about the nature of the method used by the industry to evaluate the long term strength of plastic pipe and to illustrate the very slow reduction in strength as time progresses.

Long term hoop stresses for design purposes are normally selected at a level which is much lower than the long term strength of the materials. This ensures that the pipe is operating in a hoop stress range where creep (relaxation) of the materials is nil and assures service life in excess of 50 years. Design stress levels are discussed further in the next section.

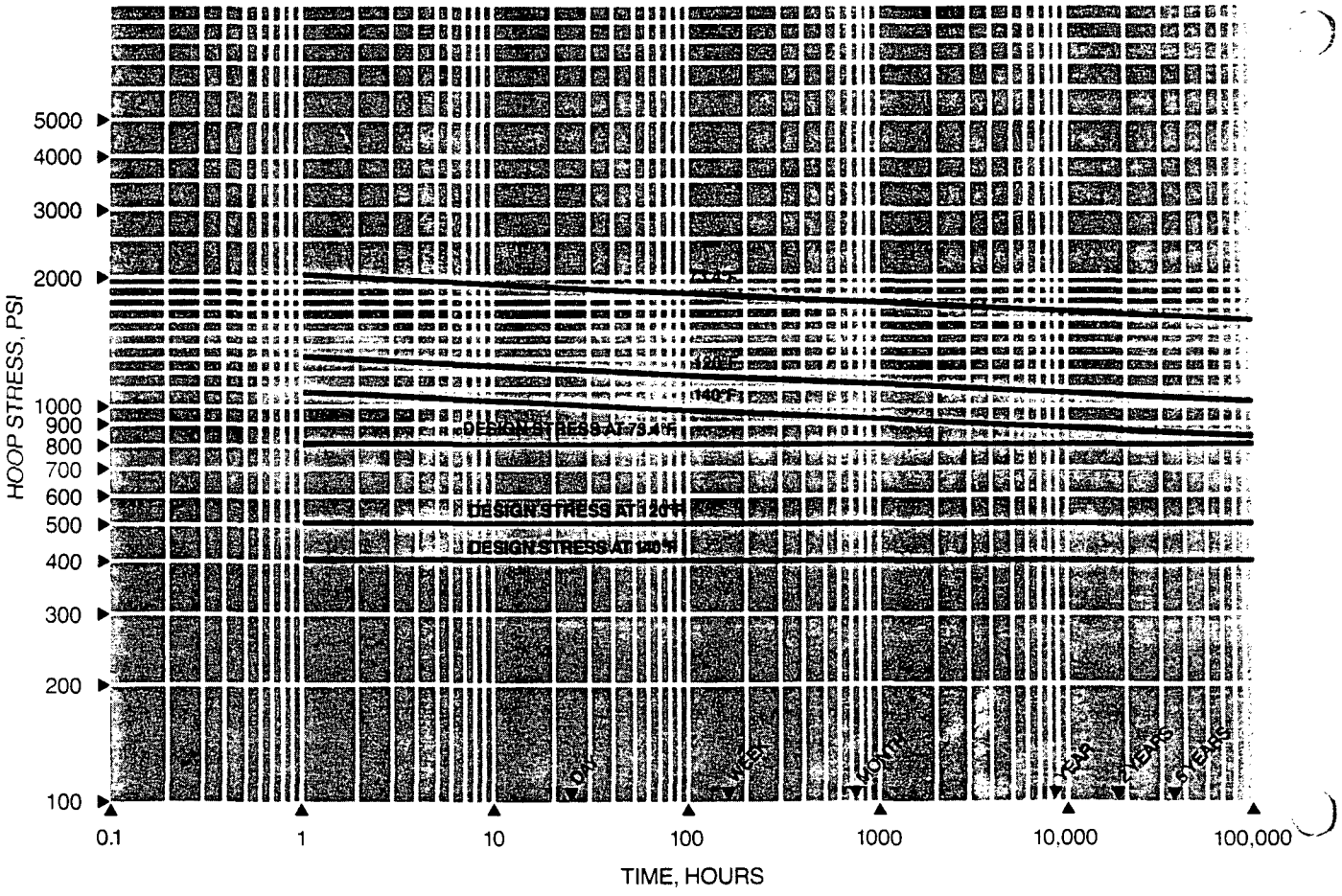
The long term hydrostatic tests are conducted by using ASTM standard test procedures which may be applied to all types of plastic pipe (ASTM D 1598 Test for Time-to-Failure of Plastic Pipe Under Constant Internal Pressure). Stress-life tests are conducted by using numerous pipe samples which are filled with water (or other environmental fluids) and subjected to a controlled pressure at a controlled temperature.

Samples are held on test until they fail. The pressure, temperature and time-to-failure data from all samples are used to calculate and plot stress-life curves for the particular type pipe being tested (ASTM D 2837 Obtaining Hydrostatic Design Basis for Thermoplastic Pipe Materials). This data is then used to predict the probable safe life of the pipe at various stress levels (working pressures) and various temperatures. Because it is not practical to test at all temperature levels, these tests are generally conducted at temperatures of 73.4°F and one or more higher temperatures such as 100°F, 120°F and 140°F.

These stress-life curves give a relationship of the expected life span of the pipe when subjected to various internal stress levels (working pressures) at various temperatures. By comparing stress-life curves, one can compare relative long term performance ability of different plastic pipes. Stress-life curves for Driscopipe 8600 and Driscopipe 1000 are shown in Figure 1.

Figure 1

Stress-Life of Driscopipe® 8600 and Driscopipe® 1000



These stress-life curves were obtained using water as the test medium. However, years of laboratory testing and field experience have shown that these same curves may be used to design Driscopipe systems for natural gas, salt water, sewage and hundreds of other industrial and municipal fluids, mixtures and effluents. The long term strength of Driscopipe indicated by these curves must be de-rated in some environmental circumstances, such as in the presence of liquid hydrocarbons or abrasive fluids, although the pipe is very suitable for use in these environments. An outstanding engineering advantage of Driscopipe is its exceptionally long term service life in the presence of internal and external corrosive service conditions.

Design Pressure Ratings

Since plastic pipe was introduced in the late 50s, the safety factor for design of water systems at standard temperature has been 2 to 1. The 2:1 design factor which was officially adopted by the plastic pipe industry in 1963, was based on allowances for many sources of variation. The guiding principle has always been to make the selection on a conservative basis but not to be unreasonably conservative.

The sources of variation for which allowances are made include ... variation in test methods and procedures among laboratories ... variation among lots of the same compound ... variation of lots of pipe from the compound in different plants and from different extruders ... variation in compounds of the same general class ... variations in handling and installation techniques ... variation in operating pressures (water hammer and surge) ... a strength-time allowance to give service life well beyond 50 years ... and, finally, the great unknown. Each of the factors was judged to reduce the 100,000 hour design strength by 5%-10% or 20% ... for a total of 100% ... or a design factor of 2:1. This is why polyethylene pipe, with a designated 100,000 hour strength of 1600 psi at 73.4°F, has a hydrostatic design strength of 800 psi hoop stress.

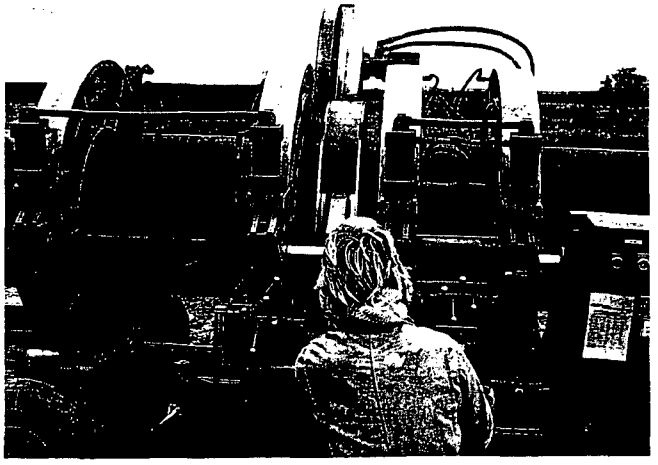
The design pressures for Driscopipe are determined by the following equation, adopted internationally by the industry for this purpose:

$$P = \frac{2S}{SDR - 1} \times F \quad \text{or} \quad P = 2S\frac{t}{D - t} \times F$$

Where:
- D = Specified Outside Diameter, Inches
- P = Design Pressure, psi
- S = Long Term Hydrostatic Strength, psi, at the design temperature
- t = Minimum Wall Thickness, Inches
- F = Service Design Factor
- SDR = Standard Dimension Ratio of D/t

The traditional Service Design Factor for water at standard temperature (73.4°F) is one-half (.5). The Service Design Factor for oil or liquid hydrocarbons is 0.25 @ 73°F. The service design factor may be adjusted by the design engineer to reflect the particular conditions anticipated for the application. The temperature selected for design should consider both internal and external conditions. The design temperature should be based on the temperature of the pipe itself. For practical purposes, it is safer to design to the highest temperature.

The design service factor for water may also be used for solutions of inorganic salts, alkaline fluids, non-oxidizing acids, low concentrations of oxidizing acids and many other solutions. See the discussion on chemical resistance for more information.



Attachment 2

Procedure for Integrity Testing
Concrete Catch Basin

Annual Visual Inspection of Catch Basin

A visual inspection is conducted annually of the catch basin. The contents of the basin are pumped to an aboveground holding tank. The basin is then visually inspected for the following:

1. Deterioration/corrosion of containment walls
2. Corrosion on valves and piping
3. Illicit discharges to basin
4. Leaked material from basin or piping
5. Any unusual odors

Attachment 3

Eunice Plant System Description

Discharge Plan
GPM Gas Corporation
Eunice Gasoline Plant
Sections 5, T-21-S, R-36-E, Lea County
Revised: March 1994

I. General Process Description

Eunice Plant's basic function is to remove the ethane and heavier hydrocarbon fractions from casinghead and gas well gas. The plant receives hydrocarbon gas streams from 550 psi gathering systems. The 550 psi gas from the GPM Compressor Station is commingled with the inlet 550 psi gas stream and sent to a gas treater where the hydrogen sulfide and carbon dioxide in the gas stream is removed. The hydrogen sulfide and carbon dioxide gases are sent to a sulfur recovery unit. The sweet inlet gas is sent to a molecular sieve dehydrator where the gas is dehydrated to a water content of less than 1 ppmv. The gas is then sent to two large gas turbine compressors where it is compressed to a pressure of approximately 900 psi. From the compressors the gas stream flows to a turboexpander plant where it is cooled by propane refrigeration and expansion to a temperature of approximately -140°F. The turboexpander plant produces two hydrocarbon streams, the first being a liquid hydrocarbon stream comprised of approximately 85% of the ethane and all of the propane and heavier hydrocarbons that entered the plant. The liquid hydrocarbon stream has a vapor pressure of approximately 350 psi and is sent to two 144" ID X 91'-3 1/2" S/S, 400 psi MWP vessels for temporary storage before being delivered to a pipeline for sale.

The second hydrocarbon stream produced from the turboexpander plant is comprised primarily of methane gas. This gas stream is compressed to approximately 500 psi before being delivered to El Paso Natural Gas Company, Northern Natural Gas Company and Gas Company of New Mexico for sale. Attachment 3-1 is a general process flow diagram of the Eunice Plant.

II. Plant Water Systems

A. Raw Water

Eunice Plant receives its raw water from a total of nine wells within a 15-mile radius of the plant. The wells produce from the Ogallala formation. Water is used at the plant for cooling tower, boiler and engine jacket water make-up. Attachment 3-2 contains an analysis of the raw water.

B. Potable Water

A side stream from the reverse osmosis (RO) unit is used to supply potable water to the office and control room.

C. Cooling Tower System

The cooling tower system is comprised of two open recirculating cooling towers referred to as the north and south cooling towers. The water in these towers is recirculated approximately four times producing 350 bbl/day of blowdown wastewater. Blowdown from the towers is piped to the plant's wastewater disposal system. The following non-acid chemicals are being added to the cooling tower water for scale, corrosion and biological treatment:

Chemical	
Betz Inhibitor 30K-30944	Betz 49A
Slimicide C-77P	Betz 2025
Slimicide C-77P	Foam-Trol CT
Slimicide C-31	

Material safety data sheets for these chemicals are found in attachment 3-3.

D. Reverse Osmosis Water System (Former Boiler Water System)

The boiler water system is no longer in use. A reverse osmosis (RO) water system comprised of a small zeolite water softener and an RO unit produces pure water for make-up into the gas treater and engine jacket cooling system.. The raw make-up water to this system passes through a zeolite softener where the calcium and magnesium in the make-up water are removed. The soft water from the zeolite softener flows to a holding tank before being pumped into the RO unit.

E. Engine Jacket Cooling System - Old Power Room

The old power room was removed from service in 1991.

F. Anti-Freeze Engine Jacket Cooling System (Formerly New Power Room)

An ethylene glycol anti-freeze cooling system is used to cool three engines: two power the inlet gas compressors and one powers the residue gas compressors. The cooling systems for each of these engines are totally self-contained. A below-grade tank, which is common to all the engines, is used as an anti-freeze make-up/holding tank. If an engine is being worked on, its anti-freeze charge is drained to this tank. When the work is completed, the anti-freeze is pressurized back to the engine. The below-grade tank is annually inspected for mechanical integrity. The test procedure for the inspection is provided as attachment 3-4.

III. Plant Drain and Disposal System

A. Engine Oil Drain Systems

The engine oil drain sumps were removed in 1991 and 1993. Spent lube oil is now discharged into the open drain system which then flows into the oil/water separator.

B. Closed Drain System

The closed drain system is a pressure drain system constructed of buried, externally-coated schedule-40 steel pipe. This drain system empties into an aboveground, horizontal flare separator. The liquid from this separator is pumped into aboveground, vertical oil/water separator where the oil overflows into a 1,000 bbl storage tank from where it is trucked for sale. The water from the closed drain system oil/water separator flows into the open drain system's oil/water separator. The closed drain system was revised and new piping installed in 1975 when the plant switched from oil absorption to a cryogenic process. Attachment 3-5 is a process flow sheet of this system.

C. Open Drain System

The open drain system is an atmospheric drain system constructed of buried, externally-coated, schedule-40 steel pipe. This drain system empties into a below-grade, aboveground internally-coated oil/water separator. The oil from this vessel is pumped to the closed drain oil/water separator. The water from this vessel is pumped into a 500 bbl holding tank before disposal into Rice Engineering's Eumont salt water disposal system. The open drain system was revised and new piping installed in 1975 when the plant switched from oil absorption to a cryogenic process. Attachment 3-5 is a process flow sheet of this system.

D. Final Wastewater Disposal System

This system is comprised of two 500 bbl, internally-coated stock tanks. Approximately 350 bbls/day of wastewater from the open drain oil/water separator and blowdown from the cooling towers flow into one of these tanks before flowing, by gravity, into Rice Engineering's Eumont salt water disposal system. These tanks have approximately 1-1/2 days of storage time should the Eumont system be shutdown. If the Eumont disposal system should be shutdown for longer than this time period, the wastewater will be trucked to one of the various salt water disposal systems in the area. Attachment 3-6 is a location map of the salt water disposal system. Attachment 3-7 is a drawing of Rice Engineering's Eumont disposal system well. Attachment 3-8 is an analysis of the wastewater being delivered to the Rice system.

IV. Solid Waste Disposal

A. General Waste

All of GPM's Class II solid waste is hauled to an off-site landfill by Waste Management of New Mexico, Inc.

B. Spent Molecular Sieve

Approximately every 4 to 5 years the molecular sieve dehydrators at the plant are recharged. The spent molecular sieve (attachment 3-9) is disposed of on-site. Approximately 52,400 pounds of this material is disposed each time the beds are recharged.

C. Sock/Bulk Carbon Filtration (formerly Spent Precoat Material)

The gas sweetening process employs a sock filter and carbon filter system to remove fine particulate matter that the treating solution removes from the inlet gas. The sock and granular activated carbon filters operate until a certain pressure differential across the filters is reached. At this time, the filters are backwashed using RO water. The spent sock filters are collected and disposed of by Waste Management of New Mexico, Inc., in an approved landfill. The spent carbon is disposed of on-site.

V. Miscellaneous Information

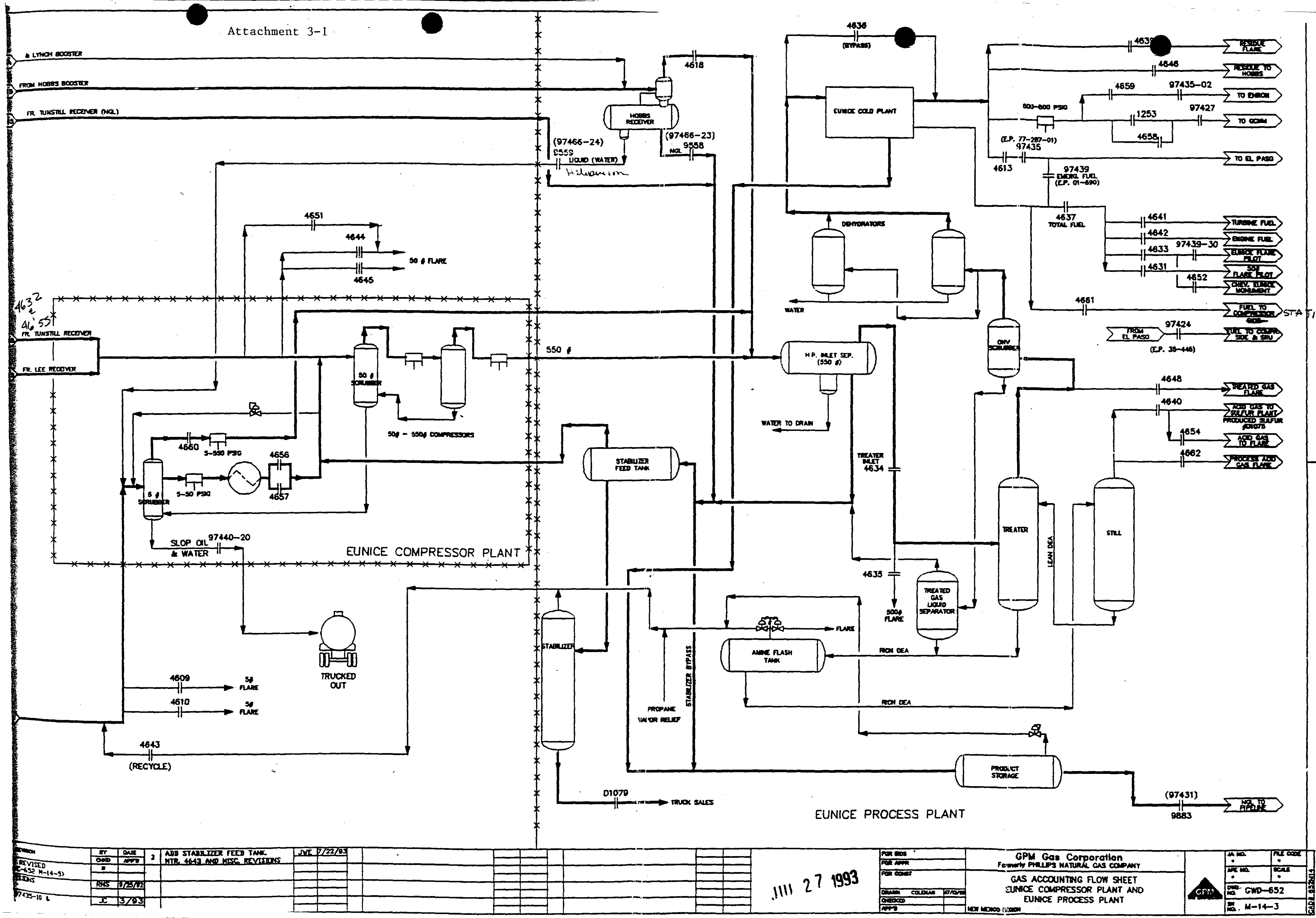
A. Groundwater Monitoring

Groundwater monitoring wells have been installed at the plant around the abandoned evaporation pond. The NMOCD has been furnished a copy of the groundwater monitoring well installation report and analyses of the water samples taken from the wells.

B. Topography

Attachment 3-10 is as topographic map of the area surrounding Eunice plant. As seen from this map, there are no bodies of water or watercourses within a one mile radius of the plant.

Attachment 3-1



O BOX 4468
NS, TEXAS 79736
1234 OR 563-1049

WATER CONDITIONING
BACTERIAL AND CHEMICAL ANALYSES

MIDLAND, TEXAS
PHONE 683-4

Attachment 3-2

To: Mr. Marvin Stevenson
4001 Penbrook
Odessa, Texas

Laboratory No. 98192
Sample received 9-4-81
Results reported 9-14-81

Company: Phillips Petroleum

Project: Eunice Plant in Lea County, New Mexico

Subject: To make determinations listed on raw water
Samples taken by James C. Powell, Martin Water Labs., Inc. on 9-4-8

DETERMINATION, mg/l	
A. Human Health Standards	
Arsenic, as As	0.000
Barium, as Ba	0
Cadmium, as Cd	0.00
Chromium, as Cr	0.01
Cyanide, as CN	0.0
Fluoride, as F	1.0
Lead, as Pb	0.0
Total Mercury, as Hg	0.000
Nitrate, as N	3.4
Selenium, as Se	0.00
Silver, as Ag	0.00
B. Other Standards for Domestic Water Supply	
Chloride, as Cl	51
Cooper, as Cu	0.00
Iron, as Fe	0.62
Manganese, as Mn	0.00
Phenols	0.00
Sulfate, as SO_4	45
Total Dissolved Solids	480

DETERMINATION, mg/l	
Zinc, as Zn	0.10
pH	7.0

C. Standards for Irrigation Use

Aluminum, as Al	0.0
Boron, as B	0.4
Cobalt, as Co	0.00
Molybdenum, as Mo	0
Nickel, as Ni	0.0

Remarks: The undersigned certifies the above to be true and correct to the best of his knowledge and belief.

Waylan C. Martin, M. A.

Martin Water Laboratories, Inc.

Attachment 3-3

MSDS
Cooling Tower Chemicals

Attachment 3-4
Procedure for Integrity Testing
Anti-Freeze Make-up/Holding Tank

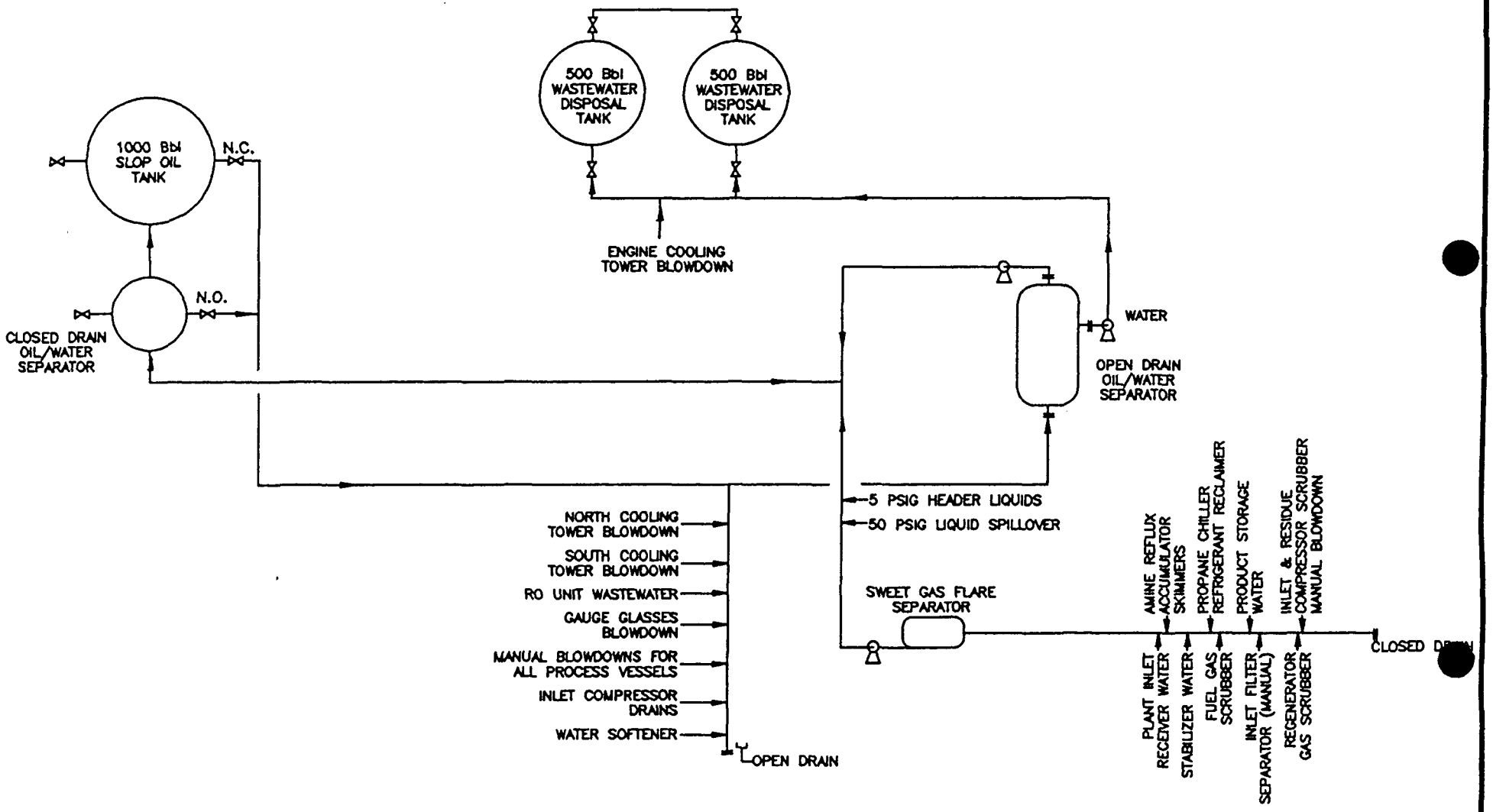
An annual integrity test of the anti-freeze make-up/holding tank will be conducted and documented using the following method:

1. Isolate the tank.

2. Install a 6' riser pipe on top of the tank.

3. Fill the tank and riser pipe with water.

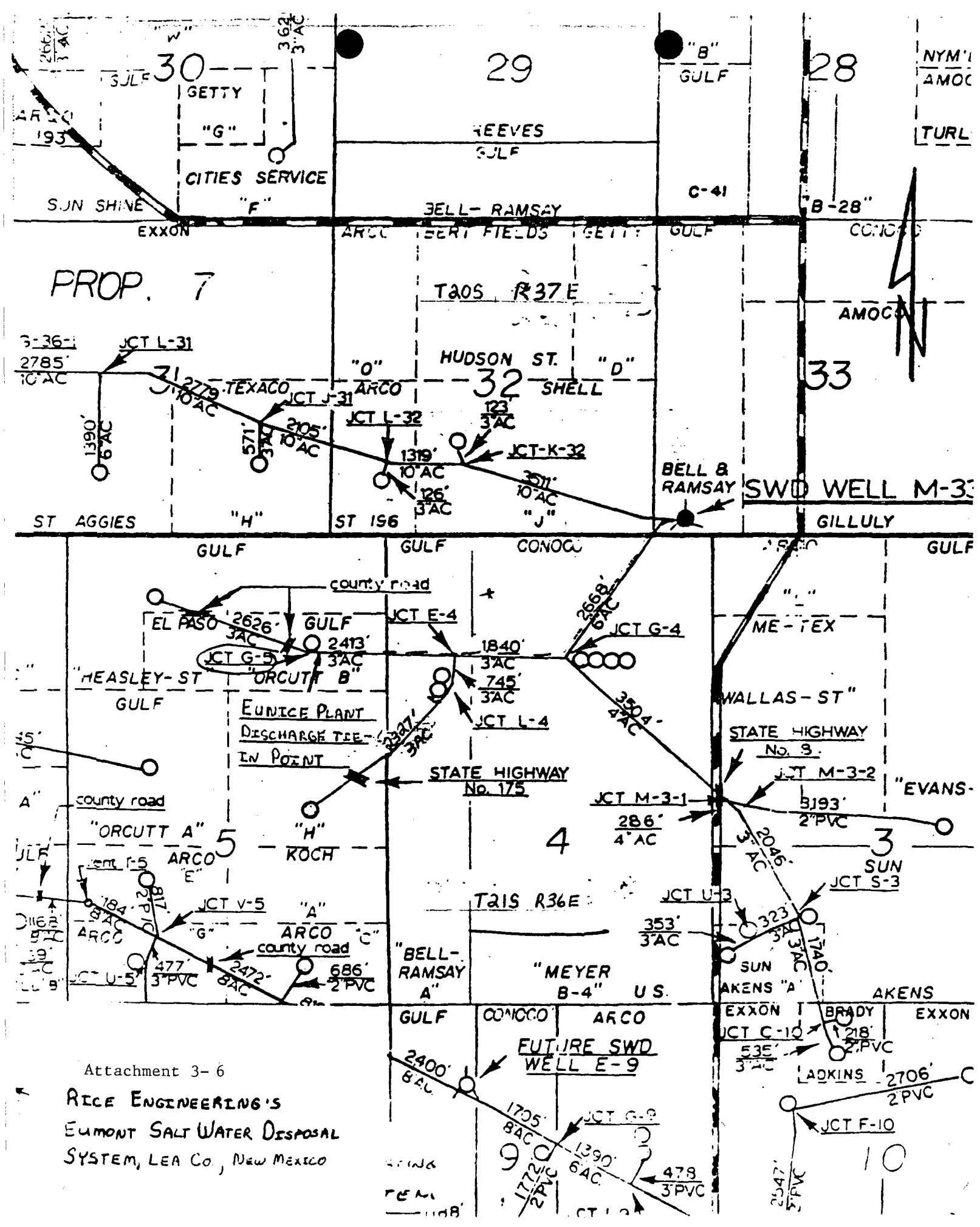
4. Monitor the fluid level in the riser pipe for a twelve-hour period. If the fluid level remains the same over the twelve-hour period, tank integrity testing has been proven.



GCL

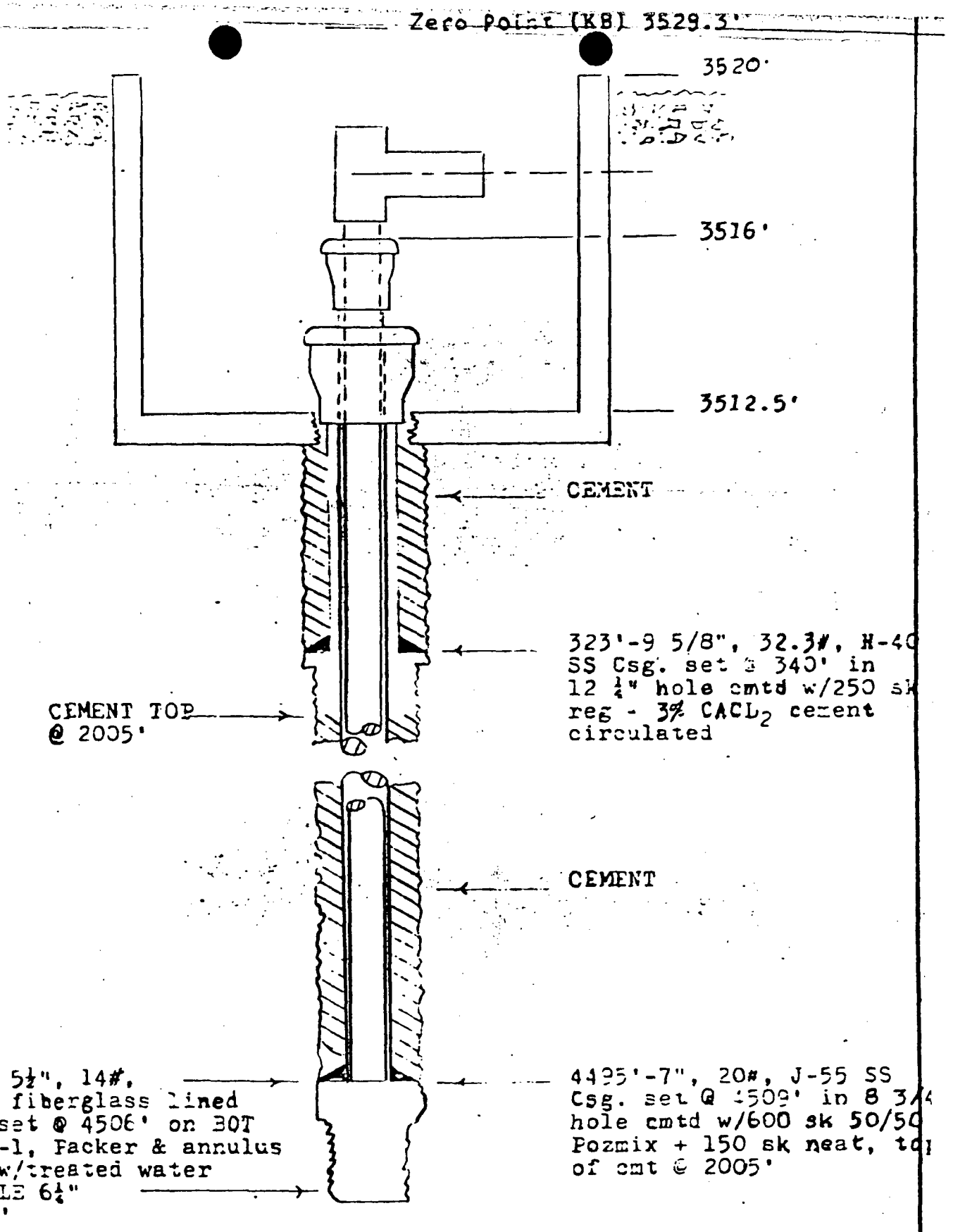
CLIENT: GPM	
DATE: 3/23/94	REV. NO.: 0
AUTHOR: STUBBS	DRAWN BY: HCC
CK'D BY: M.G.	FILE: DRNSYSTM

EUNICE GAS PLANT OPEN/CLOSED DRAIN SYSTEM FLOW SHEET ATTACHMENT 3-5



Attachment 3-6

RICE ENGINEERING'S
EUMONT SALT WATER DISPOSAL
SYSTEM, LEA CO., NEW MEXICO



DWN	DB	12-15-80	APPROVED	E-M-E SWD System Well M-33 Location - 165' FSL & 165' FWL, Sec. 33, T20S, R37E, Lea County,	SCALE NONE
REVD	RA	6-1-81			
Attachment 3-7				New Mexico Rice Engineering & Operating, Inc. Great Bend, Kansas	DWG. NO. A-98

Attachment 3-8

119904

SOUTHWESTERN LABORATORIES

Materials, environmental and geotechnical engineering, nondestructive, metallurgical and analytical services

1703 W. Industrial Avenue (915-683-3348) • P.O. Box 2150 • Midland, Texas 79701

File No. C-1950-W
Customer No. 3355796
Report No. 35058

Report Date 1-24-84

Report of tests on: Water

Date Received 1-10-84

Client: Phillips Petroleum

Identification: Eunice Plant, Wastewater

		mg/L
Aluminum	Less Than	2
Arsenic	Less Than	0.05
Barium	Less Than	1
Boron		0.9
Cadmium	Less Than	0.01
Chromium		0.10
Cobalt	Less Than	0.1
Copper		0.4
Iron		0.9
Lead	Less Than	0.05
Manganese		0.07
Mercury	Less Than	0.002
Molybdenum	Less Than	1
Nickel	Less Than	0.5
Selenium	Less Than	0.01
Silver	Less Than	0.05
Zinc		1.6
Sulfate		810
Chloride		163
Fluoride		3.2
Nitrate		48
Cyanide		0.008
Phenols	Less Than	0.001
Total Dissolved Solids @ 180° C		1754

Technician: KLH,PCB,GMB

Copies 3 cc: Phillips Petroleum Co.
Attn: Mike Ford

SOUTHWESTERN LABORATORIES

Gary M. Burnett

Molecular Sieve Type 4A — Product Information

Description

ZEOCHEM Molecular Sieve Type 4A is an alkali aluminosilicate; it is the sodium form of the Type A crystal structure. Type 4A has an effective pore opening of about 4 angstroms.

Chemical Formula:

$Na_2O \cdot Al_2O_3 \cdot 2SiO_2 \cdot X\ H_2O$

Applications

ZEOCHEM Molecular Sieve Type 4A is used to dehydrate most fluids. Applications include both static and dynamic drying. Static applications (non-regenerative)include drying of refrigerant gases, usage in desiccant packages, and in insulating glass units. Dynamic applications (regenerative) include drying of natural gas, LPG, air, inert gases, and solvents. ZEOCHEM Molecular Sieve Type 4A will adsorb molecules with a kinetic diameter of less than 4 angstroms and exclude those larger.

Regeneration

ZEOCHEM Molecular Sieve Type 4A can be regenerated by evacuating or purging, usually at elevated temperatures. The purge gas temperature must be sufficiently high to bring the molecular sieve to a level of 400 to 600°F, but not exceeding in any case 1000°F. Higher temperatures could cause physical alteration of the molecular sieve structure. The degree of regeneration depends on the temperature and humidity of the purge gas.

Typical Properties

Nominal pore diameter	4 angstroms
Type of crystal structure	cubic
Bulk density	47 lbs/cuft
Equilibrium water capacity (theoretical)	23% wt.
Water content (as shipped)	1.5% wt. (max.)
Heat of adsorption (max.)	1,800 BTU/lb H_2O
Specific heat (approx.)	0.23 BTU/lb/°F

Commercial bead sizes (nominal)	1/8"	1/16"	
mesh	4×7	7×10	10×18
mm	3-5	2-3	1-2
crush strength, lbs.	18	9	4

ZEOCHEM Molecular Sieve 4A is available in powder form upon request.

Shipping Information

ZEOCHEM Molecular Sieve Type 4A beads are shipped in non-returnable drums as follows:

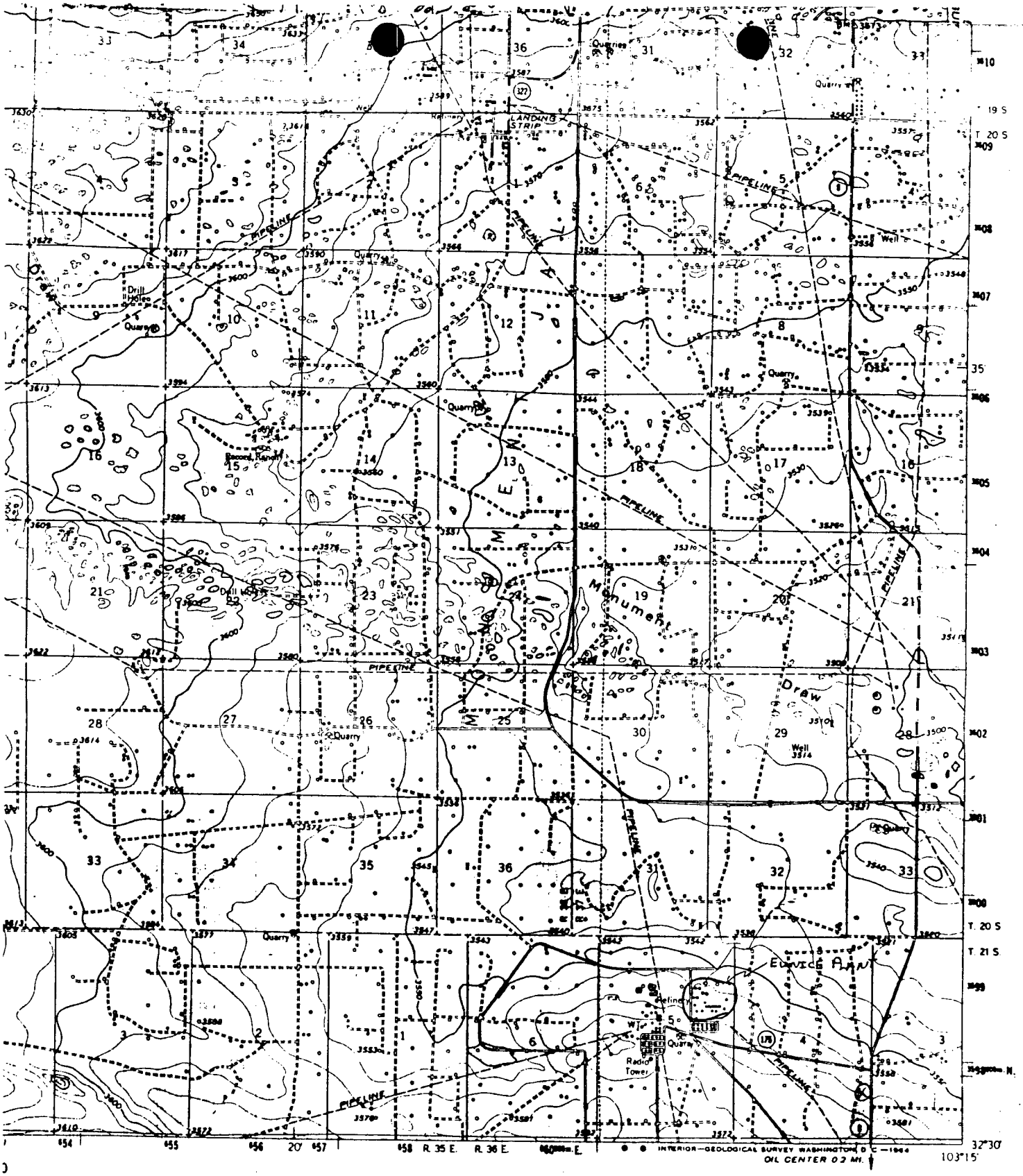
55 gal. steel drum containers — 300 lb. net
23 gal. fiber drum containers — 120 lb. net
5 gal. pails — 25 lb. net

Chemische Fabrik Uetikon and United Catalysts Joint Venture

ZEOCHEM

P.O. Box 35940, Louisville, Kentucky 40232, Telephone 502-634-8384, Telex 204190 239

Molecular Sieve Type 4A ZEOCHEM



Attachment 3-10

MONUMENT, N. MEX.

1963

ACCURACY STANDARDS
COLORADO OR WASHINGTON 25, D.C.
MBOLS IS AVAILABLE ON REQUEST

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

March 28, 1994

Director
Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Sir:

This responds to your Notice of Publication dated March 4, 1994, for the application for the renewal of a discharge plan for the Eunice Gas Plant located in the SE/4, NE/4 of Section 5, T. 21, S. 36, located in Lea County, New Mexico. Approximately 15,000 gallons per day of processed waste water with a total dissolved solids concentration of approximately 1,750 mg/1 is disposed of in a UIC-permitted, Class II disposal well. Groundwater most likely affected by a spill, leak or accidental discharge to the surface is located at a depth between 80 to 150 feet. This groundwater has a total dissolved solids concentration from 1,000 to 1,700 mg/1. Dissolved solids will be primarily calcium and sodium complexes.

As long as the discharge plan addresses techniques for containing spills, leaks, and other accidental discharges and remediation of such occurrences, and disposal of waste oil and solid wastes, our office has no objection to the renewal of the discharge plan. If you have any questions regarding the above determination, please contact Mr. Mark Wilson at (505) 883-7877.

Sincerely,

Jennifer Fowler-Propst

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas

Affidavit of Publication

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

JOyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY 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

Notice Of Publication

and numbered ..... in the Court of Lea County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) day consecutive weeks, beginning with the issue of March 9, 19 94 and ending with the issue of March 9, 19 94

And that the cost of publishing said notice is the sum of $ 39.60 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 17th day of March, 19 94

Mrs Jean Jeanes

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 94

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505)827-5800:

(GW-016) - GPM Gas Corporation, Vince Bernard, Safety and Environmental Manager, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for the renewal of a discharge plan for the Eunice Gas Plant located in the SE/4, NE/4, Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of approximately 1750 mg/l is disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth from 80 to 150 feet with a total dissolved solids concentration from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of March, 1994.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,

Director
SEAL

Published in the Lovington Daily Leader March 9, 1994.

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-016) - GPM Gas Corporation, Vince Bernard, Safety and Environmental Manager, 4044 Penbrook, Odessa, Texas, 79762, has submittd an application for the renewal of a discharge plan for the Eunice Gas Plant located in the SE/4, NE/4, Section 5, Township 21 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of approximately 1750 mg/l is disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth from 80 to 150 feet with a total dissolved solids concentration from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wasts.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of March 1994.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WALLIAM J. LEMAY, Director

Journal: March 17, 1994

STATE OF NEW MEXICO
County of Bernalillo ss

Bill Tafoya being duly sworn declares and says that he is Classified Advertising Manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 17 day of Mar., 1994 and the subsequent consecutive publications on ,1994

Bill Tafoya

OFFICIAL SEAL
Bernadette Ortiz
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 1-31-98

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 17 day of, Mar 1994.

PRICE $30.85

Statement to come at end of month.

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

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-016) - GPM Gas Corporation, Vince Bernard, Safety and Environmental Manager, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for the renewal of a discharge plan for the Eunice Gas Plant located in the SE/4, NE/4, Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process waste water with a total dissolved solids concentration of approximately 1750 mg/l is disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth from 80 to 150 feet with a total dissolved solids concentration from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of March, 1994.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

March 4, 1994

GPM GAS CORPORATION
4044 PENBROOK
ODESSA, TEXAS 79762

Discharge Plan Renewal
Discharge Plan GW-16
Eunice Gas Plant
Lea County, New Mexico

William J. LeMay
Director, State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Dear Mr. LeMay:

Pursuant to Section 3-109.G.4, New Mexico Water Quality Control Commission Regulations, GPM Gas Corporation requests renewal of Groundwater Discharge Plan GW-16, Eunice Gas Plant. The Eunice Plant is located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. This approved groundwater discharge plan will expire on April 25, 1994.

Additional information regarding any discharge and/or process changes will follow within the next few weeks.

Your time and energy in renewing Groundwater Discharge Plan GW-16, Eunice Gas Plant is greatly appreciated. Please contact me at (915) 368-1085 should you have any questions regarding this submittal.

Sincerely,

Vince Bernard
Safety & Environmental Supervisor
New Mexico Region

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

October 8, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-035

Mr. Vince Bernard
Safety, Environmental Supervisor
GPM Gas Services Company
4044 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-16 Eunice Gas Plant
Discharge Plan GW-9 Eunice EP Compressor Station

Dear Mr. Bernard,

On July 19, 1993 the New Mexico Oil Conservation Division (OCD) notified you that the approved groundwater discharge plan, GW-16, for the Eunice Gas Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, would expire on April 25, 1994. Also, the OCD has received your application for renewal of the approved groundwater discharge plan, GW-9, for the Eunice EP Compressor Station located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico, of which the current plan is due to expire on October 11, 1993.

On September 28, 1993, OCD personnel visited each of these facilities for discharge plan renewal inspections. During this visit, you expressed interest in the feasibility of combining the discharge plans of each of these facilities into one discharge plan. The request was based on the premise that 1) the compressor station was originally owned by El Paso Natural Gas Company, and purchased by GPM (Phillips) in 1986, and 2) the compressor station and gas plant have contiguous right-of-way boundaries.

Based on these facts, **OCD agrees to combine the discharge plans for these facilities.** This will be done under discharge plan GW-16, which is due to expire on April 25, 1994. The number of the discharge plan for the Eunice EP Compressor Station, GW-9, is to be

vacated effective as of this date, and all terms and conditions of the previously approved discharge plan, as of this date, have been incorporated into discharge plan GW-16.

The following comments and requests for additional information are based on the review of the application for renewal of GW-9 for the Eunice Compressor Station and observations made during the OCD site visits on September 28. Note that since GPM does not currently have an application for renewal of GW-16 submitted to the OCD, these comments can be incorporated into that application rather than responding directly.

Eunice EP Compressor Station

- The August 1989 groundwater discharge plan included procedures to conduct annual integrity tests of the oil storage tank and the sump at the northwest corner of the Building 1 (re: Phillips April 3, 1989 letter, response to comment #1). Have these tests been implemented? If so, please submit copies of test procedures and results.

- Annual inspections are required for all below-grade tanks and sumps to ensure mechanical integrity. As part of the discharge plan, GPM should submit procedures for annually determining the mechanical integrity of the Classifier, Slop Oil and Contingency Tanks.

- Five-year inspections are required for underground discharge drain systems. OCD understands that, in August 1992, GPM has completed replacement of the existing steel drain piping with welded polyurethane pipe, which has a 20-year structural integrity guarantee. If GPM wishes to be exempt from the five-year inspection requirements, a request should be submitted as part of the discharge plan, along with manufacturer's data for review.

- The lube oil filter pads at Building 1 need curbs added to contain oil spills. The existing spills need to be cleaned up.

- General housekeeping is needed in some areas of the facility. In particular, oil staining of the ground occurs beneath the inlet/outlet gas lines at Buildings 1 and 2, plus some oil staining around the raw gas scrubber and Building 1's sump pump.

Eunice Gas Processing Plant

- Annual inspections are required for underground Oil/Water Separators to ensure mechanical integrity. As part of the

discharge plan, GPM should submit procedures for annually determining the mechanical integrity of the Oil/Water Separator.

- During the site visit, it was mentioned that the wastewater draining from the main process pad drains to a storage tank, and then hauled to a Class I well (because of potential amine contamination). Is this a below-grade storage tank? If so, an annual inspection should be included in the discharge plan renewal application. Also, the OCD is unaware of any Class I wells in New Mexico. Please identify the well to which the wastewater is hauled.

- The wall containing the sour water tank has no bottom and should be padded.

Additional comments may be forthcoming for the gas processing plant pending submittal and review of the discharge plan renewal application. Plans and proposed completion schedules are to be submitted for the mechanical integrity inspections, and for the installation of any curbs and/or pads.

If you have any questions, please contact me at (505) 827-4080.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/rlm

xc: OCD Hobbs Office

UNITED STATES POSTAL SERVICE

Official Business

OIL CONSERVATION DIVISION
RECEIVED

'93 OCT 12 AM 9 04

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

U.S. MAIL

Print your name, address and ZIP Code here

ENERGY AND MINERALS DEPARTMENT
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

October 4, 19

GPM GAS CORPORATION

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

Diethanolamine (DEA) Spill
Eunice Natural Gas Processing Plant
Section 19, Township 21 S, Range 36 E
Lea County, NM

Regional Administrator
Environmental Protection Agency
Region VI
1445 Ross Avenue
Dallas, TX 75202

Dear Regional Administrator:

This letter is a formal confirmation that a diethanolamine (DEA) spill was reported to the National Response Center (NRC). The following list shows the federal, state, and local agencies notified of the spill.

National Response Center U.S. Coast Guard 400 Seventh Street S.W. Washington, D.C. 20950	Contacted Mr. Long of the NRC by telephone at 5:30 p.m., CST, on September 14, 1993 (Report # 197691).
EPA Region VI 1445 Ross Avenue Dallas, TX 75202	Contacted Ms. Cherry Swartz, Branch Secretary, Emergency Response Bureau, on September 15, 1993.
State of New Mexico Environment Department Harold Runnels Building P.O. Box 26110 Santa Fe, NM 87502	Contacted Mr. Ed Horst, Hazardous and Radioactive Material Bureau, on September 16, 1993.
State of New Mexico Oil Conservation Division Land Office Building P.O. Box 2088 Santa Fe, NM 87504	Contacted Mr. William Olson, Hydrogeologist, Environmental Bureau, on September 15, 1993.
State of New Mexico Oil Conservation Division 1000 W. Broadway P.O. Box 1980 Hobbs, NM 88240	Contacted Ms. Bonny Pritchard, Secretary, District I, on September 15, 1993.

City Hall Lea County, NM 300 N. Turner Hobbs, NM 88240	Contacted Mr. David Hooten, Local Emergency Planning Commission Chairperson, on September 14, 1993.
Name of Person Reporting:	Scott Seeby
Company name, address and telephone number:	GPM Gas Corporation 4044 Penbrook Odessa, TX 79762 (915) 368-1142
Location of Spill:	Eunice Natural Gas Processing Plant Section 19, Township 21 S, Range 36 E Lea County, NM
Date of Spill:	Discovered at 6:45 p.m. on September 13, 1993.
Source:	DEA pump seal and valve failed. Approximately 6,000 gallons of a solution composed of 40% DEA and water released into a concrete containment area. One thousand gallons of the solution spilled over the concrete containment to adjacent soil.
Amount and type of material spilled:	Approximately 1,000 gallons of a solution composed of 40% DEA and water.
Possibility of imminent danger or damages:	None
Weather conditions:	Sunny, no rain, five mph wind from the southwest
Clean-up:	Recovered approximately 5,000 gallons of the solution from the concrete containment with a vacuum truck and placed in a storage tank. Removed approximately five yards of soil to be land farmed with other contaminated soil. Land farmed spilled area until consistent with surrounding soil.

Sincerely,

Scott Seeby
Staff Environmental Analyst
New Mexico Region

cc: National Response Center
U.S. Coast Guard
400 Seventh Street S.W.
Washington, D.C. 20950

Mr. Ed Horst
State of New Mexico
Environment Department
Hazardous & Radioactive Materials
Harold Runnels Building
P.O. Box 26110
Santa Fe, NM 87502

Mr. William Olson
State of New Mexico
Oil Conservation Division
Environmental Bureau
Land Office Building
P.O. Box 2088
Santa Fe, NM 87504

Ms. Bonny Pritchard
State of New Mexico
Oil Conservation Division
District I
1000 W. Broadway
P.O. Box 1980
Hobbs, NM 88240

Mr. David Hooten
City Hall
Lea County, NM
300 N. Turner
Hobbs, NM 88240

NEW MEXICO OIL CONSERVATION COMMISSION
NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWOUTS

NAME OF OPERATOR GPM Gas Corporation					ADDRESS 4044 Penbrook; Odessa, TX 79762		
REPORT OF:	FIRE	BREAK	SPILL X	LEAK	BLOWOUT	OTHER*	
TYPE OF FACILITY:	DRLG WELL	PROD WELL	TANK BTTY	PIPELINE	GASO PLNT X	OIL RFY	OTHER*
NAME OF FACILITY Eunice Natural Gas Processing Plant							
LOCATION OF FACILITY (QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTION) SE 1/4, NE 1/4					SEC 19	TWP 21S	RGE 36E / COUNTY Lea
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK Approximately 2 miles Northwest of Oil Center, New Mexico							
DATE AND HOUR OF OCCURENCE September 13, 1993 at approx. 6:45 pm					DATE AND HOUR OF DISCOVERY Septemer 13, 1993 at approx. 7:00 pm		
WAS IMMEDIATE NOTICE GIVEN?	YES X	NO	NOT REQ'D	IF YES, TO WHOM? William Olson, OCD Santa Fe and Bonnie Pritchard, OCD Dist I			
BY WHOM? Scott Seeby					DATE AND HOUR September 15, 1993 approx 9:30 am		
TYPE OF FLUID LOST Solution of 40% Diethanolamine & water					QUANTITY OF LOSS approx 6,000 Gallons	VOLUME RECOVERED approx 5,000 Gallons	
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO X	QUANTITY N.A.				
IF YES, DESCRIBE FULLY:** N.A.							
DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN:**Cause: Diethanolamine pump seal and valve failed. Approximately 6,000 gallons of a solution composed of 40% diethanolamine and water released into a concrete containment area. 1,000 gallons of the solution spilled over the concrete containment onto adjacent soil. Remedial action taken: Repaired pump seal and valve.							
DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN:** An area North of the control room 30' in width widening to 240' in width was covered with the solution. Another area North of the sour water storage four feet in width widening to 30' in width extending 180' in length was covered with the solution. Recovered approximately 5,000 gallons of the solution from the concrete containment with a vacuum truck and placed in a storage tank. Removed approximately five yards of soil to be land farmed with other contaminated soil. Land farmed spilled area until consistent with surrounding soil.							

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Industrial

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
		X	X			X	

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**
Sunny, no precipitation , 5 MPH wind from the southwest, temperature approximately 80 degrees F.

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED Jessie J Tadlock TITLE Environmental Analyst DATE September 16, 199

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

NEW MEXICO OIL CONSERVATION COMMISSION
NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWOUTS

NAME OF OPERATOR GPM Gas Corporation					ADDRESS 4044 Penbrook; Odessa, TX 79762		
REPORT OF:	FIRE	BREAK	SPILL X	LEAK	BLOWOUT	OTHER*	
TYPE OF FACILITY:	DRLG WELL	PROD WELL	TANK BTTY	PIPELINE	GASO PLNT X	OIL RFY	OTHER*
NAME OF FACILITY Eunice Natural Gas Processing Plant							
LOCATION OF FACILITY (QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTION) SE 1/4, NE 1/4					SEC 19	TWP 21S	RGE 36E
COUNTY Lea							
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK Approximately 2 miles Northwest of Oil Center, NM							
DATE AND HOUR OF OCCURENCE September 16, 1993; hour unknown					DATE AND HOUR OF DISCOVERY September 16, 1993; approximately 7:30 am		
WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQ'D X	IF YES, TO WHOM? NA			
BY WHOM? NA					DATE AND HOUR NA		
TYPE OF FLUID LOST Salt water and light crude oil					QUANTITY OF LOSS approximately 23 bbls.	VOLUME RECOVERED approximately 20 bbls.	
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO X	QUANTITY NA				
IF YES, DESCRIBE FULLY:** NA							

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN:**

Cause: Waste water pump seal failed. Approximately 23 barrels of a mixture of salt water and light crude oil released to the surrounding and adjacent soil.

Remedial action taken: repaired waste water pump seal.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN:**

An area North of the waste water pump two feet in width widening to 20 feet in width extending 100 feet in length was covered with a mixture of salt water and light crude oil.

Recovered approximately 20 barrels of the mixture with a vacuum truck and placed in slop oil tank. Land farmed spilled area until consistent with surrounding soil.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER* Industrial

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
		X	X				

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

Sunny, no precipitation, five MPH wind from the southwest, temperature about 70 degrees F.

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED [signature] TITLE Environmental Analyst DATE September 17, 199

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

NEW MEXICO OIL CONSERVATION COMMISSION
NOTIFICATION OF FIRE, BREAKS, SPILLS, LEAKS AND BLOWOUTS

NAME OF OPERATOR GPM Gas Corporation					ADDRESS 4044 Penbrook; Odessa, TX 79762		
REPORT OF:	FIRE	BREAK	SPILL X	LEAK	BLOWOUT	OTHER*	
TYPE OF FACILITY:	DRLG WELL	PROD WELL	TANK BTTY	PIPELINE	GASO PLNT	OIL RFY	OTHER* Compressor Station
NAME OF FACILITY Grayburg compressor station							
LOCATION OF FACILITY (QUARTER/QUARTER SECTION OR FOOTAGE DESCRIPTION) SE1/4, SE 1/4, NW 1/4					SEC 18	TWP 17S	RGE 30E / COUNTY Eddy
DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK Approx. 2 miles Northwest of Loco Hills, NM							
DATE AND HOUR OF OCCURENCE August 22, 1993, Approx. 6:00 am					DATE AND HOUR OF DISCOVERY August 22, 1993, Approx. 6:45 am		
WAS IMMEDIATE NOTICE GIVEN?	YES	NO	NOT REQ'D X	IF YES, TO WHOM?			
BY WHOM?					DATE AND HOUR		
TYPE OF FLUID LOST Light crude oil					QUANTITY OF LOSS Approx 20 Bbls	VOLUME RECOVERED Approx 15 Bbls	
DID ANY FLUIDS REACH A WATERCOURSE?	YES	NO X	QUANTITY NA				

IF YES, DESCRIBE FULLY:**

NA

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN:**

Producers heater treater malfunctioned filling GPM's compressor station slop oil tank. Producer corrected malfunctioning heater treater.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN:**

An area 45' in length and 15' in width adjacent to the slop oil tank was saturated with crude oil. Crude oil was vacuumed off ground and placed in tank. Saturated soil was mixed with added and adjacent soil until consistent with surrounding soil.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*
		X		

SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY	ROCKY	WET	DRY	SNOW
		X				X	

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

No precipitation. Temperature approximately 95 degrees F.

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED [signature] TITLE Environmental Analyst DATE Aug. 30, 1993

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

October 5, 1993

Permit #GW93032

Mr. William J. Lemay
Director, State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on September 15, 1993, regarding the Oil Conservation Division (OCD) discharge plan application submitted by GPM Gas Corporation on fish, shellfish, and wildlife resources in New Mexico.

The Service has the following comments on the issuance of the following discharge permit.

> (GW-9) - GPM Gas Corporation, Eunice EP Gas Plant located in the NW/4, Section 1, Township 20 South, Range 36 East, Lea County, New Mexico. Approximately 44,100 gallons per day of process waste water will be collected and stored in above ground steel tanks prior to disposal at an OCD approved offsite commercial disposal facility.

The above ground steel tanks capacities should be able to contain all the water produced during periods of inclement weather when it is not possible to drain the tank on a regular schedule. The tanks should also exhibit strong corrosion resistance to those fluids the tank will store. The tanks should be exposed entirely to visually detect leaks. If leaks are detected surface soil monitoring and runoff prevention measures should be implemented. The permit requests also did not disclose whether the tanks were completely closed. If the top is open, the tank should be netted so as to not present a potential threat to endangered species or to migratory birds that may be found in the area.

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,

for Jennifer Fowler-Propst
State Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas

Affidavit of Publication

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

Joyce Clemens being first duly sworn on oath deposes and says that he is **Adv. Director** of THE LOVINGTON DAILY 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

Notice Of Publication

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, for **one (1) day**, beginning with the issue of **September 15**, 19**93** and ending with the issue of **September 15**, 19**93**.

And that the cost of publishing said notice is the sum of $**38.52** which sum has been (Paid) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this **2erd** day of **September**, 19**93**

Mrs. Jean Lewis
Notary Public, Lea County, New Mexico

My Commission Expires **Sept. 28**, 19**94**

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-9) - GPM Gas Corporation, Vincent Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for renewal of its previously approved discharge plan for their Eunice EP Gas Plant located in the NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 44,100 gallons per day of process waste water with a total dissolved solids concentration of 1300mg/1 will be collected and stored in above ground steel tanks prior to disposal at an OCD approved offsite commercial disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth ranging from 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of September, 1993.
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
(SEAL)
Published in the Lovington Daily Leader September 15, 1993.

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-9) - GPM Gas Corporation, Vincent Bernard, Safety Environmental Supervisor, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for renewal of its previously approved discharge plan for their Eunice EP Gas Plant located in the NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 44,100 gallons per day of process waste water with a total dissolved solids concentration of 1300 mg/l will be collected and stored in above ground steel tanks prior to disposal at an OCD approved offsite commercial disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth ranging from 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of September, 1993.

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

Journal: September 22, 1993

STATE OF NEW MEXICO
County of Bernalillo ss

OIL CONSERVATION DIVISION
RECEIVED
'93 SEP 30 AM 8 43

Paul D. Campbell being duly sworn declares and says that he is National Advertising Manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 22 day of Sept., 1993, and the subsequent consecutive publications on ,1993

Paul D Campbell

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 22 day of Sept 1993.

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

PRICE $31.62 CE

Statement to come at end of month.

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

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

July 19, 1993

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-227

Mr. Vincent Bernard
GPM Gas Services Company
Safety and Environmental Supervisor
4044 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-16
Eunice Plant
Lea County, New Mexico

Dear Mr. Bernard:

On June 29, 1993 the New Mexico Oil Conservation Division (OCD) notified you that the OCD approved groundwater discharge plan, GW-16, for the Eunice Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, would expire on October 11, 1993.

The expiration date listed in the correspondence of June 29, 1993 is incorrect. The actual expiration date for the ground water discharge plan for this facility is **April 25, 1994.**

If you have any questions, please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,

Roger C. Anderson for
Environmental Bureau Chief

xc: OCD Hobbs Office

UNITED STATES POSTAL SERVICE

Official Business

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

U.S. MAIL

MIDLAND, TX 1 PM JUL 1993

OIL CONSERVATION DIVISION
RECEIVED

'93 JUL 26 AM 9 07

Print your name, address and ZIP Code here

ENERGY AND MINERALS DEPARTMENT
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

United States Postal Service

Official Business

OIL CONSERVATION DIVISION
RECEIVED

'93 JUL 7 AM 8 39

U.S.MAIL

PENALTY FOR PRIVATE
USE, $300

Print your name, address and ZIP Code here

ENERGY AND MINERALS DEPARTMENT
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

07-02-93 19:37

Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA.cee
xc: OCD Hobbs Office

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

June 29, 1993

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-227

Mr. Vincent Bernard
GPM Gas Services Company
Safety and Environmental Supervisor
4044 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-16
Eunice Plant
Lea County, New Mexico

Dear Mr. Bernard:

On April 25, 1983, the original groundwater discharge plan , GW-16 for the Eunice Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The discharge plan was renewed April 25, 1988. The approval will expire on October 11, 1993. April 25 94

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operations, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, please include these modifications in your application for renewal.
Current WQCC Regulations do not allow for an expired discharge plan to receive an extension. Therefore you should submit the renewal application in ample time before the expiration date to allow the review process to be complete prior to expiration to avoid operating out of compliance (without an approved discharge plan).

September 8, 1993

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

Discharge Plan Renewal
Discharge Plan GW-9
Eunice (EP) Plant
Lea County, New Mexico

William J. LeMay
Director, State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Dear Mr. LeMay:

Pursuant to Section 3-109.G.4, New Mexico Water Quality Control Commission Regulations, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) requests renewal of Groundwater Discharge Plan GW-9, Eunice (EP) Plant. Eunice (EP) Plant is located in the NW/4 of Section 5, Township 21, Range 36 East NMPM, Lea County, New Mexico.

In accordance with New Mexico Water Quality Control Regulations, discharges remain consistent with the terms and conditions of Groundwater Discharge Plan GW-9. Additionally, no significant change in discharge water quality or volume has occurred due to facility expansion, production increase, or process modification. An improvement/upgrade to the existing discharge system was completed in August of 1992. Due to its deteriorating condition, the steel underground drain piping was replaced with welded polyurethane pipe.

Your time and energy in renewing Groundwater Discharge Plan GW-9, Eunice (EP) Plant is greatly appreciated. Please contact me at 915-368-1085 should you have any questions regarding this submittal.

Sincerely,

Vincent B. Bernard
Safety, Environmental Supervisor

/sm

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-9) - GPM Gas Corporation, Vincent Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for renewal of its previously approved discharge plan for their Eunice EP Gas Plant located in the NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 44,100 gallons per day of process waste water with a total dissolved solids concentration of 1300 mg/l will be collected and stored in above ground steel tanks prior to disposal at an OCD approved offsite commercial disposal facility. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth ranging from 80 to 150 feet with a total dissolved solids concentration ranging from 1000 to 1700 mg/l.The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of September, ~~1991.~~ 1993

CE

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

October 8, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-035

Mr. Vince Bernard
Safety, Environmental Supervisor
GPM Gas Services Company
4044 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-16 Eunice Gas Plant
Discharge Plan GW-9 Eunice EP Compressor Station

Dear Mr. Bernard,

On July 19, 1993 the New Mexico Oil Conservation Division (OCD) notified you that the approved groundwater discharge plan, GW-16, for the Eunice Gas Plant located in the SE/4 NE/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, would expire on April 25, 1994. Also, the OCD has received your application for renewal of the approved groundwater discharge plan, GW-9, for the Eunice EP Compressor Station located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico, of which the current plan is due to expire on October 11, 1993.

On September 28, 1993, OCD personnel visited each of these facilities for discharge plan renewal inspections. During this visit, you expressed interest in the feasibility of combining the discharge plans of each of these facilities into one discharge plan. The request was based on the premise that 1) the compressor station was originally owned by El Paso Natural Gas Company, and purchased by GPM (Phillips) in 1986, and 2) the compressor station and gas plant have contiguous right-of-way boundaries.

Based on these facts, **OCD agrees to combine the discharge plans for these facilities.** This will be done under discharge plan GW-16, which is due to expire on April 25, 1994. The number of the discharge plan for the Eunice EP Compressor Station, GW-9, is to be

vacated effective as of this date, and all terms and conditions of the previously approved discharge plan, as of this date, have been incorporated into discharge plan GW-16.

The following comments and requests for additional information are based on the review of the application for renewal of GW-9 for the Eunice Compressor Station and observations made during the OCD site visits on September 28. Note that since GPM does not currently have an application for renewal of GW-16 submitted to the OCD, these comments can be incorporated into that application rather than responding directly.

Eunice EP Compressor Station

- The August 1989 groundwater discharge plan included procedures to conduct annual integrity tests of the oil storage tank and the sump at the northwest corner of the Building 1 (re: Phillips April 3, 1989 letter, response to comment #1). Have these tests been implemented? If so, please submit copies of test procedures and results.

- Annual inspections are required for all below-grade tanks and sumps to ensure mechanical integrity. As part of the discharge plan, GPM should submit procedures for annually determining the mechanical integrity of the Classifier, Slop Oil and Contingency Tanks.

- Five-year inspections are required for underground discharge drain systems. OCD understands that, in August 1992, GPM has completed replacement of the existing steel drain piping with welded polyurethane pipe, which has a 20-year structural integrity guarantee. If GPM wishes to be exempt from the five-year inspection requirements, a request should be submitted as part of the discharge plan, along with manufacturer's data for review.

- The lube oil filter pads at Building 1 need curbs added to contain oil spills. The existing spills need to be cleaned up.

- General housekeeping is needed in some areas of the facility. In particular, oil staining of the ground occurs beneath the inlet/outlet gas lines at Buildings 1 and 2, plus some oil staining around the raw gas scrubber and Building 1's sump pump.

Eunice Gas Processing Plant

- Annual inspections are required for underground Oil/Water Separators to ensure mechanical integrity. As part of the

discharge plan, GPM should submit procedures for annually determining the mechanical integrity of the Oil/Water Separator.

- During the site visit, it was mentioned that the wastewater draining from the main process pad drains to a storage tank, and then hauled to a Class I well (because of potential amine contamination). Is this a below-grade storage tank? If so, an annual inspection should be included in the discharge plan renewal application. Also, the OCD is unaware of any Class I wells in New Mexico. Please identify the well to which the wastewater is hauled.

- The wall containing the sour water tank has no bottom and should be padded.

Additional comments may be forthcoming for the gas processing plant pending submittal and review of the discharge plan renewal application. Plans and proposed completion schedules are to be submitted for the mechanical integrity inspections, and for the installation of any curbs and/or pads.

If you have any questions, please contact me at (505) 827-4080.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/rlm

xc: OCD Hobbs Office

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal	Time 0915	Date 9/15/93

Originating Party	Other Parties
Scott Seeby - 6PM	Bill Olson - Envir Bureau

Subject

Spill at 6PM Eunice Gas Plant

Discussion

Spill of 6000 gallons of 40% Diethylamine from pump seal. Containment structure (concrete) held 5000 gallons which was vacuumed up and put in their waste tank. 1000 gallons was lost to ground

He is going to site to inspect and determine remedial action probably will want to landfarm onsite

Conclusions or Agreements

He will request OCD approval for remedial action

Distribution

Signed Bill Olson

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

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

June 29, 1993

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-217

Mr. Vincent Bernard
GPM Gas Services Company
Safety and Environmental Supervisor
4044 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-9
Eunice (EP) Plant
Lea County, New Mexico

Dear Mr. Bernard:

On October 11, 1983, the original groundwater discharge plan , GW-9 for the Eunice (EP) Plant located in the NW/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The discharge plan was renewed October 11, 1988. The approval will expire on October 11, 1993.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operations, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, please include these modifications in your application for renewal.
Current WQCC Regulations do not allow for an expired discharge plan to receive an extension. Therefore you should submit the renewal application in ample time before the expiration date to allow the review process to be complete prior to expiration to avoid operating out of compliance (without an approved discharge plan).

United States Postal Service

Official Business

OIL CONSERVATION DIVISION
RECEIVED
'93 JUL 7 AM 8 39

U.S. MAIL

PENALTY FOR PRIVATE USE, $300

Print your name, address and ZIP Code here

ENERGY AND MINERALS DEPARTMENT
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

HAVE A SAFE JULY 4TH 797 07-02-93 19:37

Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA.cee
xc: OCD Hobbs Office

PHILLIPS 66 **PHILLIPS PETROLEUM COMPANY**

December 27, 1991

Robert C. Koch
Promoter
Phillips Gas Company

Effective 11:59 p.m., January 31, 1992, the responsibility, coverage, and liability for the permits listed in the attachment will be transferred from Phillips Petroleum Company to Phillips Gas Company, a corporation being created pursuant to Delaware law.

Please reflect this change in your records. Please contact M. C. Wofford at 918-661-6500 if you need further information.

Very truly yours,

PHILLIPS PETROLEUM COMPANY

John N. Scott

John Scott
Vice President
Quality, Environment, and Safety

JS:MCW:tr
Attachment: GW Permit List

I acknowledge receipt of the above notice.

Robert C. Koch
Promoter
Phillips Gas Company

xc: New Mexico Oil Conservation Division
State Land Office Building
Attention: Roger Anderson
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

New Mexico Oil Conservation Division

Facility	Permit Description	Permit Number
Artesia Gas Plant	Discharge	GW-23
Eunice Gas Plant	Discharge	GW-16
Hobbs Booster	Discharge	GW-44
Lee Gas Plant	Discharge	GW-2

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY
ODESSA, TEXAS 79762
4001 PENBROOK

May 29, 1991

Kathy Brown
Environmental Bureau
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Ms. Brown:

Thank you for your comments and the discussion concerning the testing of water drainage piping discharge systems. Phillips appreciates such regulatory guidance.

In confirmation of our telephone conversation yesterday, Phillips understands that such water drainage piping must be pressure tested after 24 years of service from its date of installation. With respect to Phillips' Eunice Plant, the portion of the water drainage piping discharge system which was installed by El Paso Natural Gas Company in 1982 during their ownership of that portion of the plant is not required to be pressure tested until the year 2007. This is contingent upon El Paso's documentation of the installation date of the piping in question.

Our conversation also indicated that even if the 1982 portion of the system was pressure tested in 1991, it would still be required to be pressure tested in 2007. Please contact me in the near future should this letter contain any discrepancies pertaining to our conversation or any other Oil Conservation Division Rules and Regulations. Again, thank you for your guidance and direction.

Sincerely,

Ralph Y. McCord

Ralph Y. McCord
Environmental Specialist
915-368-1635

RYM:mdp:1034

cc: David G. Boyer, Chief
New Mexico OGD Environmental Bureau

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time	Date 8/2/89

Originating Party	Other Parties
Mike Ford, Phillips Pet	R Anderson

Subject: Sulfuric Acid Spill

Discussion: Mike Ford called to inform the OCD of a 3000 Lb Sulfuric Acid spill at the Eunice E.P. plant. A crane struck and ruptured the tank. The 3000 Lbs of acid was contained on a pad with curbing. The acid will be neutralized prior to disposal at Rice disposal well.

Conclusions or Agreements

Distribution: Eunice E.P. File

Signed: Roger Anderson

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK, PHONE: 915 367-1266

August 14, 1989

Discharge Plan Renewal
Eunice EP Plant
Discharge Plan No. GW-9

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 249

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This is to provide information you requested in order to continue your review of the discharge plan submitted for our Eunice EP Plant. The items of concern contained in your letter of May 5, 1989 with our responses follows:

Item #1 - Pressure testing of underground lines.

Response: We have reviewed the merits of pressure testing the open drain system piping verses replacement. Based on your statement that integrity testing will not be required for 25 years for new drain systems, we feel it is economically beneficial to replace the open drain system piping. The new drain system will be installed by August 1, 1991.

Item #2 - Berming of tanks and paving of process/storage areas.

Response - Per our recent phone conversation, the following is a list of work that will be performed as part of the discharge plan renewal:

1. The lube oil, jacket water chemical and solvent storage tanks will be equipped with pads and curbing. It is understood 130 % containment will not be required for these tanks since they are entirely above ground on saddles. The pads and curbing will be installed by August 1, 1991.

2. A drum storage area consisting of pad and curbing will be constructed and in use by August 1, 1991.

3. The anti-freeze, wastewater filter backwash and brine storage tanks will have earthen or caliche berms constructed around them in order to contain their contents in the event of a tank failure. The berms will be designed to contain 130 % of the volume of the tanks. The berms will be installed by August 1, 1991.

   It is understood the engine jacket water storage and surge tanks will not require berming as they are constructed on concrete pads and the engine jacket water is not considered harmful to fresh water and the environment.

It is also understood 130 % containment is not required for the acid storage tanks since they are placed on saddles with pad/curbing underneath and the pads are equipped with drains connected to the plant's wastewater system.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Representative

MDF

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

May 5, 1989

CERTIFIED MAIL
RETURN RECEIPT NO. P 106-675-526

Mr. Michael D. Ford
PHILLIPS 66 NATURAL GAS COMPANY
4001 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-9
Eunice (EP) Plant
Lea County, New Mexico

Dear Mr. Ford:

The Oil Conservation Division (OCD) has received your response, dated April 3, 1989, to our request for additional information pertaining to the above referenced discharge plan renewal application. The following OCD requirements and commitments by Phillips 66 Natural Gas Company are based on a review of your responses of February 20, 1989 and April 3, 1989, review of the data provided in the plan and the review of the drain line testing proposal dated December 14, 1988:

1. Pressure testing of underground lines: The ultrasonic method for testing the integrity of underground piping must contain the following additional inspection measure before approval can be granted:

   a) The exact route of all underground piping in relationship to all process and storage areas must be detailed on a diagram of the plant provided to OCD.

   b) All portions of the piping that can be or may have been influenced by any spills or leaks of any materials on the surface must be visually inspected to determine the extent of any external corrosion.

If any portions of the underground piping that may have been subjected to external corrosion cannot be visually inspected, a positive pressure testing procedure will be required. Upon completion of the procedure a report of the testing, including which piping was visually inspected, must be submitted.

2) Berming of tanks: The OCD is requiring that above grade tanks that contain materials with constituents that can be harmful to fresh water and the environment, if a sudden and catastrophic spill were to occur, must be contained at the site of the spill and mitigated immediately. Containment in a small area at the tank site allows for maximum recovery of fluids and small volumes of contaminants available for infiltration. Without berming, the rupture of a tank will spread its contents over a large area minimizing the amount that can be recovered and increasing the surface area of contaminated soil available to leach contaminants. All tanks that contain these types of materials must be bermed to prevent migration of the fluids and decrease the potential for infiltration. Therefore a commitment and completion schedule is required for the berming of vessels that contain fluids other than fresh water. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm.

3) Process and storage areas: The purpose of curbing and paving process areas is to prevent migration and infiltration of any spilled or leaked materials from the process units. Submit plans and a completion schedule for paving and berming those portions of the process and storage areas where leaks or spills can occur. The total process area does not need to be curbed and paved. Small containment facilities should be placed under and around valves and pumps. Vessels that have overflowed or leaked or have the potential to overflow or leak should also have containment. All drum storage must be paved and bermed.

If you have any questions, please do not hesitate to call me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Hobbs Office

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN TO

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

Print Sender's name, address, and ZIP Code in the space below.

OCD
310 Old Santa Fe Trail
Santa Fe, New Mexico
87501

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY
ODESSA, TEXAS 79762
4001 PENBROOK

April 3, 1989

Discharge Plan Renewal
Eunice EP Plant
Discharge Plan No. GW-9

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 593

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This is to provide information you requested in order to continue your review of the discharge plan submitted for our Eunice EP Plant. The specific comments and/or questions contained in your letter of 2/20/89 with our responses follows.

Comment #1 - Your response to Section IV, comment 3, and Miscellaneous, comment 1, stated the below grade oil storage tank and the sump at the northwest corner of the No. 1 engine room do not have leak detection and are presently not being tested for integrity. Submit a method for annual inspection of these below grade facilities. Any below grade tanks or sumps that are repaired or replaced must have a leak detection system incorporated in their design. The design must be approved by the O.C.D. prior to installation.

Response - Phillips will conduct an annual integrity test of the oil storage tank and the sump at the northwest corner of the No. 1 engine room using the following method:

1. Isolate the tank.
2. Install a 6' riser pipe on top of the tank.
3. Fill the tank and riser pipe with water.
4. Monitor fluid level in the riser pipe for a twelve hour period. If fluid level remains the same over the twelve hour period, tank integrity has been proven.

Any below grade tanks or sumps that are repaired or replaced will have a leak detection system incorporated in their design. The design will be submitted to the O.C.D. for approval prior to installation.

Comment #2 - The response to comment 1, Section VI, referenced a drain line testing proposal dated December 14, 1988. The purpose of a drain line testing program is to identify any present or potential leaks in the piping. This is the reason a positive pressure test is conducted at a pressure above the maximum working pressure of the pipe. Your proposal for an ultrasonic testing procedure is being evaluated on its ability to assure the integrity of the drain system piping. Please supply the following clarifications for evaluation to continue.

a) You have correctly identified low spots, changes of direction and restrictions as high corrosion and wear points in the piping system, however, you indicate only a selection of these points will be tested. Is it assumed that all the high wear points will corrode and/or erode at the same rate?

Response - To the best of our knowledge, the components of the drain system were all installed at the same time and constructed of the same basic materials. It is assumed for drain line integrity testing purposes that all high wear points will corrode and/or erode at the same rate.

b) Since the pipe is buried and it is infeasible to expose the complete drain system, how does this method give assurance that there are no leaks in portions of the system not tested?

Response - Based upon our testing experience with pressurized hydrocarbon piping, it has been generally found that leaks will first occur in the "high wear" portions of the system as described above.

Comment #3 - The response to comment 2, Miscellaneous, was that above grade tanks are not bermed. The O.C.D. is requiring that above grade tanks that contain materials with constituents that can be harmful to fresh water and the environment if a sudden and catastrophic spill were to occur must be contained at the site of the spill and mitigated immediately. All tanks that contain these types of materials must be bermed to prevent migration of the fluids and decrease the potential for infiltration. Therefore a commitment and completion schedule is required for the berming of vessels that contain fluids other than fresh water. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm.

Response - The plant is manned 24 hours per day. Plant operators inspect the facility during their rounds each shift. Spills which may occur would be detected by the operators and mitigated immediately. It is our contention immediate detection and mitigation of any spills which may occur negates the need for berming of the tanks.

Comment #4 - The response to comment 4, Miscellaneous, states that process and storage areas are not curbed and paved. The purpose for curbing and paving process areas is to prevent migration and infiltration of any spilled or leaked materials from the process units. Submit plans and a completion schedule for paving and berming those portions of the process and storage areas where leaks or spills can occur (i.e. valves, pumps, drum storage area, etc.).

Response - The plant is manned 24 hours per day. Plant operators inspect the facility during their rounds each shift. Spills or leaks which may occur from process areas would be detected by the operators and mitigated immediately. It is our contention immediate detection and mitigation of any spills or leaks which may occur negates the need for curbing and paving process units.

Comment #5 - The response to comment 7, Miscellaneous, was that solid waste is disposed of at the Hobbs landfill. A description of all solid

wastes, other than office trash, must be supplied to the O.C.D.

Response - The solid wastes generated at the plant, other than office trash, which are disposed of at the Hobbs landfill include the following:

1. Oil filters
2. Grease cartridges
3. Used cans of spray paint
4. Respirator filters
5. Gloves
6. Air filters
7. Used gaskets
8. Scrap insulation (non-asbestos)
9. Used cans of hand cleaner
10. Used containers of various gasket sealers
11. Used cans of spray lubricants

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Analyst

MDF

Phillips Eunice

Expander leaking oil on gd. (containment until repair?)
Amine pumps (being repaired)

Glycol regenerator water drum @ Vent
drain line plugged

— Glycol tank (no curbing or contain)

Product pumps - oil leaking off pads - no cont.
Booster @ prod storage pumps " " "

Cronox E200A Storage - no cont

Solar turbine Bldg - good conc pad!
(no curbing - washwater w/o drains off toward
comp bldg (Stained area)

Solvent storage - no cont stain (drain messy)

2 Lube oil & Horiz aboveground tk - no containment

Antifreeze tk - no cont

Brine storage - no cont
Chem TK @ Cond boiler (Liquamine 840) - no cont

South { Sulfuric acid tk - no cont
Cooling Tower Water Tk + Chem Bldg 75K - no cont

North Cooling Tower & Tk Chem
Sulf. acid storage - no cont

Drum storage - no cont.

Pit w/ separator - oil/water
Separator - high level alarm (has alarm now)

Solid waste & end of fold evap pit

Empty drum storage!

Wastewater Tks Before Rue - no cont
Gunbarrel tank storage - no cont

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

February 20, 1989

CERTIFIED MAIL
RETURN RECEIPT NO. P-106 675 477

Mr. Michael D. Ford
PHILLIPS 66 NATURAL GAS COMPANY
4001 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-9
Eunice (EP) Plant
Lea County, New Mexico

Dear Mr. Ford:

The Oil Conservation Division (OCD) has received your response, dated January 26, 1989 to our request for additional information pertaining to the above referenced discharge plant renewal application. The following questions and requirements are based on a review of your responses, the review of the data provided in the plan and the review your drain line testing proposal dated December 14, 1988:

1. Your response to Section IV, comment 3, and Miscellaneous, comment 1, stated the below grade oil storage tank and the sump at the northwest corner of No. 1 engine room do not have leak detection and are presently being tested for integrity. Submit a method for annual inspection of these below grade facilities. Any below grade tanks or sumps that are repaired or replaced must have a leak detection system incorporated in their design. The design must be approved by the OCD prior to installation.

2. The response to comment 1, Section VI, referenced a drain line testing proposal dated December 14, 1988. The purpose of a drain line testing program is to identify any present or potential leaks in the piping. This is the reason a positive pressure test is conducted at a pressure above the maximum working pressure of the pipe. Your proposal for an ultrasonic testing procedure is being evaluated on its ability to assure the integrity of the drain system piping. Please supply the following clarifications for evaluation to continue.

   a) You have correctly identified low spots, changes of direction and restrictions as high corrosion and wear points in the piping system, however, you indicate only a selection of these points will be tested. Is it assumed that all the high wear points will corrode and/or erode at the same rate?

   b) Since the pipe is buried and it is infeasible to expose the complete drain system, how does this method give assurance that there are no leaks in portions of the system not tested?

3. The response to comment 2, Miscellaneous, was that above grade tanks are not bermed. The OCD is requiring that above grade tanks that contain materials with constituents that can be harmful to fresh water and the environment if a sudden and catastrophic spill were to occur must be contained at the site of the spill and mitigated immediately. All tanks that contain these types of materials must be bermed to prevent migration of the fluids and decrease the potential for infiltration. Therefore a commitment and completion schedule is required for the berming of all vessels that contain fluids other than fresh water. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm.

4. The response to comment 4, Miscellaneous, states that process and storage areas are not curbed and paved. The purpose for curbing and paving process areas is to prevent migration and infiltration of any spilled or leaked materials from the process units. Submit plans and a completion schedule for paving and berming those portions of the process and storage areas where leaks or spills can occur (i.e. Valves, pumps, drum storage, etc.).

5. The response to comment 7, Miscellaneous, was that solid waste is disposed of at the Hobbs landfill. A description of all solid wastes, other than office trash, must be supplied to the OCD.

If you have any questions, please do not hesitate to call me at (505) 827-5884.

Sincerely,

Roger C. Anderson

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Hobbs Office

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

MIDLAND TX PM

RECEIVED

MAR - 2 1989

OIL CONSERVATION DIVISION
SANTA FE

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Oil Conservation Div.
PO Box 2088
Santa Fe, NM 87504

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK

January 26, 1989

Discharge Plan Renewal
Eunice EP Plant
Discharge Plan No. GW-9

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 622

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This is to provide information you requested in order to continue your review of the discharge plan submitted for our Eunice EP Plant. The specific comments and/or questions contained in your letter of 12/9/88 with our responses follows.

Section II Plant Water Systems

Comment #1 - Section E lists the chemicals used in the boiler system. Two chemicals, AFG II and Sulfite 3, do not have MSD sheets included in Attachment 3.

Response - MSD sheets for the chemicals AFG II and Sulfite 3 are attached to this letter.

Section II Engine Oil System

Comment #1 - Engine oil is drained into a sump. What is the sump constructed of? Is it lined? Is it equipped with leak detection? How often and what procedure is used to inspect the sump? How is oil transferred to the slop oil tank?

Response - A detailed review of the used engine oil handling procedure was conducted in response to your question. Used oil from all engines in the plant is drained into barrels and then poured into the open funnels located along the open drain line (refer to drawing JEF-1-P10). The drain line is tied into the classifier.

Section IV Wastewater Systems

Comment #1 - Section A states all wastewater is routed to a classifier. The classifier is a below grade tank without leak detection. How often and what procedure is used to inspect the tank for integrity?

Response - A visual inspection of the above ground portion of the classifier is conducted each day by the plant operators. The tank is not currently being integrity tested because it is constructed of epoxy coated steel, is less than ten years old, and the waste fluids contained in the tank are non corrosive.

Comment #2 - Section A also states no open drains which collect storm water are connected to the classifier system. What are they connected to? Where is the storm water disposed?

Response - Further inspection of the plant coupled with a review of El Paso's drain system drawing has shown that no open drains which collect storm water now exist. The relatively small amount of storm water which does occur is allowed to evaporate on site.

Comment #3 - The second paragraph of Section A indicates oil is temporarily stored in an underground tank. Is this tank equipped with leak detection? If not, how is it tested to ensure integrity?

Response - The tank used to store oil is not equipped with leak detection. The tank is not currently being integrity tested because it is constructed of coated steel, is less than ten years old, and the waste oil stored in the tank is non corrosive.

Section V Waste Disposal

Comment #1 - Section B states that the waste catalyst from the sulfur recovery unit is disposed of by landfilling. What is the chemical analysis of this waste?

Response - A MSDS detailing the chemical analysis of the sulfur catalyst is attached for your review.

Section VI Spill/Leak Prevention

Comment #1 - Integrity testing of the drain systems was required for discharge plan renewal pursuant to OCD letter dated March 4, 1985. The plants previous owners have not supplied this office with the results of the drain line tests required for this renewal. Please supply the drawings of, procedures for, and results of a drain line testing program. Include lists and diagrams of all piping replaced as a result of the testing program.

Response - Please see letter dated 12/14/88 for our response to this issue.

Miscellaneous

Comment #1 - Are there any below grade or underground tanks other than the classifier and oil storage tank?

Response - A small below grade sump exists at the northwest corner of the No. 1 engine room. The sump collects oily water coming from the engine blocks. Waste fluid in the sump is periodically pumped into the open drain line.

Comment #2 - Are all above grade tanks bermed to contain one third more than the tank volumes?

Response - All above grade tanks are not bermed to contain one third more than the tank volumes. Any leaks from above ground tanks would be detected by the plant operators and corrective actions taken.

Comment #3 - Are there any tile drainage conduits still in use? How old are they? How are they tested? What areas do they drain and to where?

Response - Tile conduits are used to route sanitary wastes from the plant's lavoratories to the septic tank. Their age is unknown and they are not tested.

Comment #4 - Are all process and storage areas bermed and/or curbed? Are the bermed and/or curbed areas paved to prevent spilled liquid infiltration?

Response - All process and storage areas are not bermed and/or curbed. Areas that are bermed or curbed are not paved.

Comment #5 - Do any of the process or storage areas at the facility drain to a location other than the classifier?

Response - To our knowledge, all of the plant drains are tied into the classifier.

Comment #6 - Is there an SPCC plan in effect at this facility?

Response - An SPCC plan "Documentation of No Requirement" has been completed for the facility and is attached for your review.

Comment #7 - Where and how do you dispose of solid wastes?

Response - Solid wastes are collected in dumpsters at the plant site which are serviced by Waste Control of Hobbs, New Mexico. Waste Control disposes of their material in the Hobbs city landfill.

Comment #8 - All three cooling towers showed evidence of excessive spray drifting and ponding of water at the base of the towers. How do you plan to eliminate or contain and isolate this ponding to prevent infiltration of the water into the ground?

Response - Ponding of the cooling tower water on the ground will be eliminated by rebuilding or installing new level controls to better regulate the amount of water in the cooling tower basins.

Comment #9 - At Pump Room #3 the cooling water surge tank had evidence of overflow and oil stains. What actions are to be taken for cleanup of existing spills and to prevent their reoccurrence?

Response - The oil contaminated soil around the Pump Room #3 cooling water surge tank will be removed and properly disposed of. A high liquid level alarm will be installed on the surge tank to prevent future overflows.

Comment #10 - The storage pads for treatment chemicals at the cooling towers have insufficient containment in the event of tank failure. What actions will be taken to increase containment volume capability?

Response - The storage pad concrete berms will be increased in height to ensure sufficient containment in the event of a tank failure.

Comment #11 - Drum storage areas throughout the facility have no containment or pads. What actions will be taken to prevent any spills or leaks from infiltrating into the ground?

Response - Drums will be placed on stands and will have drip pans located underneath to prevent spilled fluids from infiltrating into the ground.

Comment #12 - The oil cooling water surge tank for the #2 engine room was observed overflowing. The fluid coming from the tank appeared to have some oil in it. The discharge was not contained, and ponded on the ground. What corrective actions will be taken to prevent future overflows or to contain the fluids?

Response - A high liquid level alarm will be installed on the surge tank to prevent future overflows.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Analyst

MDF

Attachments

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : BALANCED POLYMER AFG-II

EFFECTIVE DATE 10-31-88
PRINTED: 2-Dec-1988

PRODUCT APPLICATION : WATER BASED INTERNAL BOILER TREATMENT CHEMICAL.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD IS LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

SODIUM HYDROXIDE***(CAUSTIC SODA);CAS#1310-73-2;CORROSIVE;TOXIC IF ORALLY INGESTED;PEL:2.0MG/M3;TLV:2.0MG/M3(CEILING).

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 13.2	ODOR: MILD
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.078
VAPOR PRESSURE(mmHG): 18	VAPOR DENSITY(AIR=1): <1
VISC cps70F: 5	%SOLUBILITY(WATER): 100
EVAP.RATE: <1 ETHER=1	APPEARANCE: LIGHT YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 28

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: BALANCED POLYMER AFG-II EFFECTIVE DATE 10-31-88

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SLIGHTLY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
MODERATELY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED CONTACT MAY CAUSE PRIMARY IRRITANT DERMATITIS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND/GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER.FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT

PRODUCT: BALANCED POLYMER AFG-II EFFECTIVE DATE 10-31-88
-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------
USE PROTECTIVE EQUIPMENT IN ACCORDANCE WITH 29CFR SECTION 1910.132-134. USE RESPIRATORS WITHIN USE LIMITATIONS OR ELSE USE SUPPLIED AIR RESPIRATORS.
VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST FILTERS.
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
WASH OFF AFTER EACH USE.REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES
-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------
STORAGE INSTRUCTIONS***
KEEP DRUMS & PAILS CLOSED WHEN NOT IN USE.
REASONABLE AND SAFE CHEMICAL STORAGE.PROTECT FROM FREEZING
HANDLING INSTRUCTIONS***
GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
SPECIFIC- ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL.
****
THIS MSDS COMPLIES WITH THE OSHA HAZARD COMMUNICATION STANDARD
HAROLD M. HERSH (ENVIROMENTAL INFORMATION COORDINATOR)
****

APPENDIX: REGULATORY INFORMATION

THE CONTENT OF THIS APPENDIX REPRESENTS INFORMATION KNOWN TO BETZ ON THE EFFECTIVE DATE OF THIS MSDS. THIS INFORMATION IS BELIEVED TO BE ACCURATE. ANY CHANGES IN REGULATIONS WILL RESULT IN UPDATED VERSIONS OF THIS DOCUMENT.

...TSCA: ALL COMPONENTS OF THIS PRODUCT ARE LISTED IN THE TSCA INVENTORY
...REPORTABLE QUANTITY(RQ) FOR UNDILUTED PRODUCT:
7,423GAL (SODIUM HYDROXIDE)
...RCRA: IF THIS PRODUCT IS DISCARDED AS A WASTE,THE RCRA HAZARDOUS WASTE IDENTIFICATION NUMBER IS: D002=CORROSIVE
...DOT HAZARD CLASSIFICATION: NOT APPLICABLE
...DOT SHIPPING DESIGNATION IS: NOT APPLICABLE

...THIS PRODUCT CONTAINS THESE CHEMICALS KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER OR REPRODUCTIVE TOXICITY: NONE PRESENT IN SIGNIFICANT AMOUNTS
...SARA SECTION 302 CHEMICALS: NONE PRESENT IN SIGNIFICANT AMOUNTS
...SARA SECTION 313 CHEMICALS: SODIUM HYDROXIDE(1310-73-2) , 0.1-1.0% ;
...SARA SECTION 312 HAZARD CLASS: IMMEDIATE(ACUTE) AND DELAYED(CHRONIC)
...MICHIGAN CRITICAL MATERIALS: NONE PRESENT IN SIGNIFICANT AMOUNTS
NFPA/HMIS : HEALTH - 1 ; FIRE - 1 ; REACTIVITY - 0 ; SPECIAL - ALK ; PE - B

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : SULFITE 3

EFFECTIVE DATE 10-31-88
PRINTED: 2-Dec-1988

PRODUCT APPLICATION : WATER BASED DISSOLVED OXYGEN SCAVENGER/METAL PASSIVATOR.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD IS LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

SODIUM METABISULFITE***(ANHYDROUS SODIUM BISULFITE);CAS#7681-57-4;IRRITANT; PEL:NONE;TLV:5MG/M3.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 4.1	ODOR: STRONG
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.261
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 4	%SOLUBILITY(WATER): 100
EVAP.RATE: <1 ETHER=1	APPEARANCE: COLORLESS
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 18

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: SULFITE 3 EFFECTIVE DATE 10-31-88

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
MODERATELY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
SEVERE IRRITANT TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED CONTACT MAY CAUSE PRIMARY IRRITANT DERMATITIS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN,TEARING AND PAIN IN EYES(DIRECT CONTACT);MAY CAUSE SEVERE ALLERGIC RESPONSES(HIVES,BRONCHOCONSTRICTION) IN HYPERSENSITIVE INDIVIDUALS.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND/GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER

PRODUCT: SULFITE 3 EFFECTIVE DATE 10-31-88

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

USE PROTECTIVE EQUIPMENT IN ACCORDANCE WITH 29CFR SECTION 1910.132-134. USE RESPIRATORS WITHIN USE LIMITATIONS OR ELSE USE SUPPLIED AIR RESPIRATORS.

VENTILATION PROTECTION***

ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS

RECOMMENDED RESPIRATORY PROTECTION***

IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST FILTERS.

RECOMMENDED SKIN PROTECTION***

RUBBER GLOVES

WASH OFF AFTER EACH USE.REPLACE AS NECESSARY

RECOMMENDED EYE PROTECTION***

SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***

KEEP DRUMS & PAILS CLOSED WHEN NOT IN USE.

PROTECT FROM FREEZING

HANDLING INSTRUCTIONS***

GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE

SPECIFIC- NORMAL CHEMICAL HANDLING

****

THIS MSDS COMPLIES WITH THE OSHA HAZARD COMMUNICATION STANDARD

HAROLD M. HERSH (ENVIROMENTAL INFORMATION COORDINATOR)

****

APPENDIX: REGULATORY INFORMATION

THE CONTENT OF THIS APPENDIX REPRESENTS INFORMATION KNOWN TO BETZ ON THE EFFECTIVE DATE OF THIS MSDS. THIS INFORMATION IS BELIEVED TO BE ACCURATE. ANY CHANGES IN REGULATIONS WILL RESULT IN UPDATED VERSIONS OF THIS DOCUMENT.

...TSCA: ALL COMPONENTS OF THIS PRODUCT ARE LISTED IN THE TSCA INVENTORY

...REPORTABLE QUANTITY(RQ) FOR UNDILUTED PRODUCT:

1558 GAL (SODIUM BISULFITE)

...RCRA: IF THIS PRODUCT IS DISCARDED AS A WASTE,THE RCRA HAZARDOUS WASTE IDENTIFICATION NUMBER IS: NOT APPLICABLE

...DOT HAZARD CLASSIFICATION: NOT APPLICABLE

...DOT SHIPPING DESIGNATION IS: NOT APPLICABLE

...THIS PRODUCT CONTAINS THESE CHEMICALS KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER OR REPRODUCTIVE TOXICITY: NONE PRESENT IN SIGNIFICANT AMOUNTS

...SARA SECTION 302 CHEMICALS: NONE PRESENT IN SIGNIFICANT AMOUNTS

...SARA SECTION 313 CHEMICALS: NONE PRESENT IN SIGNIFICANT AMOUNTS

...SARA SECTION 312 HAZARD CLASS: IMMEDIATE(ACUTE) AND DELAYED(CHRONIC)

...MICHIGAN CRITICAL MATERIALS: NONE PRESENT IN SIGNIFICANT AMOUNTS

NFPA/HMIS : HEALTH - 2 ; FIRE - 1 ; REACTIVITY - 0 ; SPECIAL - NONE ; PE - B

Chemicals Division

Material Safety Data Sheet

ALCOA

Aluminum Company of America
1501 Alcoa Building, Pittsburgh, PA 15219

No. 149D

Common Name	Phone No.	Date	Revised
Activated Aluminas	412-553-4001	1981-01-23	1986-07-30

Hazardous Material (as Defined in 29 CFR 1910.1200)

☐ Flammable ☐ Explosive ☐ Organic Peroxide ☐ Irritant
☐ Combustible ☐ Reactive ☐ Pyrophoric ☐ Sensitizer
☐ Oxidizer ☐ Water Reactive ☐ Compressed Gas ☐ Corrosive

Acute Toxicity: ☐ Ingestion ☐ Inhalation ☐ Absorption

☐ Other Health Hazard *(See Sec. VI)*

■ OSHA or ACGIH Limit

SECTION I. Material Description

Chemical Name & Formula: Aluminum oxide; $Al_2O_3 \cdot xH_2O$

Other Designation: Activated alumina F-1, F-20, F-200, HF-200, S-100, F-1(E), CG-20, OF-2000

CAS No.: Al_2O_3 (1333-84-2)

Manufacturer: Alcoa

SECTION II. Ingredients

	% Typical
Al_2O_3	90.0 - 95.0
*Na_2O	0.3 - 0.6
*SiO_2	0.01 - 0.2
*Fe_2O_3	0.03 - 0.1
Loss on ignition (water)	4.0 - 7.0

*Expressed as oxide equivalent

Occupational Exposure Limits

ACGIH TLVs (1986-87)

Alumina dust:

Total fraction - 10 mg/m³ (TWA)

Respirable fraction - 5 mg/m³ (TWA)

SECTION III. Physical Data

Physical Form: Crystalline or gelatinous granules, pellets, or powder
Boiling Temperature: NA
Freeze-Melt Temperature: 3700°F (2038°C)
Vapor Pressure: NA
Evaporation Rate: NA
Specific Gravity: 3.2
Density: Loose bulk: 44 - 52 lb/ft³
Water Solubility: Insoluble; soluble in concentrated acids and alkalies
pH: ~10 (20% slurry solution)
Color: Off-white
Odor: None

SECTION IV. Fire and Explosion Data

Flashpoint:	Auto-Ignition Temp.:	Flammability Limits in Air:	Lower:	Upper:
NA	NA	NA		

Product is nonflammable.
Not an explosion hazard.

SECTION V. Reactivity Data

With water: Generates heat
With air: None
With heat: None
With strong oxidizers: None
Noncorrosive

F35-13203

No. 1490

Section VI. Health Hazard Information

(See Section II for exposure limits.)

The dessicant properties of Alcoa Activated Alumina may cause irritation to the eyes and upper respiratory tract.

Alumina is a low health risk by inhalation. Alumina should be treated as a nuisance dust, as specified by the American Conference of Governmental Industrial Hygienists (ACGIH).

According to AIHA Hygienic Guide, Alumina:
Toxicity by ingestion: None expected
Skin and eyes: Not an irritant

Section VII. Spill, Leak & Disposal Procedures

Clean up using dry procedures; avoid dusting.
Waste may be considered as inert material, suitable for landfill.

RCRA Hazardous Waste No. Not Federally Regulated

Section VIII. Special Protection Information

Use with adequate ventilation to meet the exposure limits as listed in Section II. Where the exposure limit is or may be exceeded, use NIOSH approved respiratory protection. Select the appropriate respirator (dust respirator, etc.) based on the actual or potential airborne contaminants and their concentrations present.

Section IX. Special Precautions & Comments

Chemical substance components have been reported to the EPA Office of Toxic Substances in accordance with the requirements of the Toxic Substances Control Act (Title 40 CFR Part 710).

D.O.T. Shipping Name, Hazard Class, I.D. No. (if applicable) Not Regulated

Section X. References

American Industrial Hygiene Association (AIHA) Hygienic Guide Series (revised June 1978)

F35-13203

Documentation of no Requirement for

Spill Prevention Control and Countermeasure Plan

A study has been made which indicates that an SPCC Plan need not be filed for the following facility because it could not reasonably be expected to discharge oil into or upon waters of the United States. The reasons for this decision are given below.

1. Name of Facility Eunice Gasoline Plant
2. Type of Facility Onshore Production Facility
3. Location of Facility Lots 7, 8, 9 & 10, Sec. 5, T-21-S, R-36-E, Lea Co., N.M.
4. Name and address of Owner or Operator:

   Name Phillips Petroleum Company

   Address Southwestern Region E&P

   4th and Washington

   Odessa, Texas 79761

5. Reasons for not filing an SPCC Plan:

   The topographic features and soil conditions surrounding the facility and its distance from any waterway eliminates the possibility that oil could be discharged into or upon waters of the United States.

Management Approval

Signature R. L. Gallaugher

Name W. C. Rodgers

Title Area Production Superintendent

I hereby certify that I have examined this facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this facility does not require an SPCC Plan.

J. O. Woodson

Printed Name of Registered Professional Engineer

J. O. Woodson

Signature of Registered Professional Engineer

(Seal)

Registration No. 13806 State Texas

Date October 15, 1976

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY
ODESSA, TEXAS 79762
4001 PENBROOK

December 14, 1988

Drain Line Integrity Testing
Eunice (EP) Plant
Discharge Plan No. GW-9

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 618

Mr. Roger Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe. New Mexico 87501

Dear Mr. Anderson:

Per our conversation during your recent inspection of the Eunice Plant, a discussion of the merits of ultrasonic testing verses positive pressure testing of the drain system piping follows.

Ultrasonic testing would be conducted by uncovering the pipe at selected locations, cleaning the external surface, visually inspecting the external wall and placing an ultrasonic probe at several locations on the pipe surface. The ultrasonic reading would provide a measurement of the pipe wall thickness in thousandths of an inch. The measurement points would be selected on the basis of their probability to produce corrosion or erosion of the pipe wall. Locations would include, but not be limited to, the following points:

1. Low spots in the drain system.
2. Selected change of direction fittings such as ells, tees, etc.
3. Restrictions or downsizing (reducers) in the piping.

The advantages of ultrasonic testing include:

1. Allows for visual, external inspection of pipe where it is exposed providing an indication of pipe's overall condition.
2. Determination of pipe wall thickness and subsequent calculation of maximum allowable working pressure. at the test point
3. Future ultrasonic tests in the same location would allow for the determination of corrosion and/or erosion rates. This would aid in determining overall pipe condition and provide information as to when the piping should be replaced.
4. Less expensive compared to a positive pressure test. OK

The disadvantages of a positive pressure test include:

1. One-time effort not giving an indication of drain pipe condition, thickness or projected life of pipe. OK
2. Cannot be used to predict failure or determine when replacement of drain pipe would be necessary. OK
3. Difficulty in isolating sections of pipe to be tested.

It is our opinion ultrasonic testing would provide the information you need to ensure drain line integrity at a substantially lower cost than a positive pressure test.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Analyst

RHP:MDF

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

December 9, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael D. Ford
PHILLIPS 66 NATURAL GAS COMPANY
4001 Penbrook
Odessa, Texas 79762

RE: Discharge Plan (GW-9)
Eunice E. P. Plant

Dear Mr. Ford:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced discharge plan renewal application. The application, dated October 3, 1988, was received by the OCD on October 6, 1988. The following comments and requests for additional information are based on the review of the application and observations during the OCD site visit on November 30, 1988.

Section II Plant Water Systems

1. Section E lists the chemicals used in the boiler system. Two chemicals, AFG II and Sulfite 3, do not have MSD sheets included in Attachment 3.

Section II Engine Oil System

1. Engine oil is drained into a sump. What is the sump constructed of? Is it lined? Is it equipped with leak detection? How often and what procedure is used to inspect the sump? How is the oil transferred to the slop oil tank?

Section IV Wastewater Systems

1. Section A states all waste water is routed to a classifier. The classifier is a below grade tank without leak detection. How often and what procedure is used to inspect the tank for integrity?

2. Section A also states no open drains which collect storm water are connected to the classifier system. What are they connected to? Where is the storm water disposed?

3. The second paragraph of section A indicates oil is temporally stored in an underground tank. Is this tank equipped with leak detection? If not, how is it tested to ensure integrity?

Section V Waste Disposal

1. Section B states that the waste catalyst from the sulfur recovery unit is disposed of by landfilling. What is the chemical analysis of this waste?

Section VI Spill/Leak Prevention

1. Integrity testing of the drain systems was required for discharge plan renewal pursuant to OCD letter dated March 4, 1985 (enclosed). The plants previous owners have not supplied this office with the results of the drain line tests required for this renewal. Please supply the drawings of, procedures for, and results of a drain line testing program. Include lists and diagrams of all piping replaced as a result of the testing program.

Miscellaneous

1. Are there any below grade or underground tanks other than the classifier and oil storage tank?

2. Are all above grade tanks bermed to contain one third more than the tank volumes?

3. Are there any tile drainage conduits still in use? How old are they? How are they tested? What areas do they drain and to where?

4. Are all process and storage areas bermed and/or curbed? Are the bermed and/or curbed areas paved to prevent spilled liquid infiltration?

5. Do any of the process or storage areas at the facility drain to a location other than the classifier?

6. Is there an SPCC plan in effect at this facility? If so, please provide a copy.

7. Where and how do you dispose of solid wastes (i.e. filter media, sludges, trash, filter elements, etc.)?

9. All three cooling towers showed evidence of excessive spray drifting and ponding of water at the base of the towers. How do you plan to eliminate or contain and isolate this ponding to prevent infiltration of the water into the ground?

10. At Pump Room #3 the oil cooling water surge tank had evidence of overflow and oil stains. What actions are to be taken for cleanup of the existing spills and to prevent their reoccurence?

11. The storage pads for treatment chemicals at the cooling towers have insufficient containment in the event of tank failure. What actions will be taken to increase containment volume capability?

12. Drum storage areas throughout the facility have no containment or pads. What actions will be taken to prevent any spills or leaks from infiltrating into the ground?

13. The oil cooling water surge tank for the #2 engine room was observed overflowing. The fluid coming from the tank appeared to have some oil in it. The discharge was not contained, and ponded on the ground. What corrective actions will be taken to prevent future overflows or to contain the fluids?

The submission of the information requested and commitments to correct deficiencies with reasonable timetables will allow the review of your application to continue.

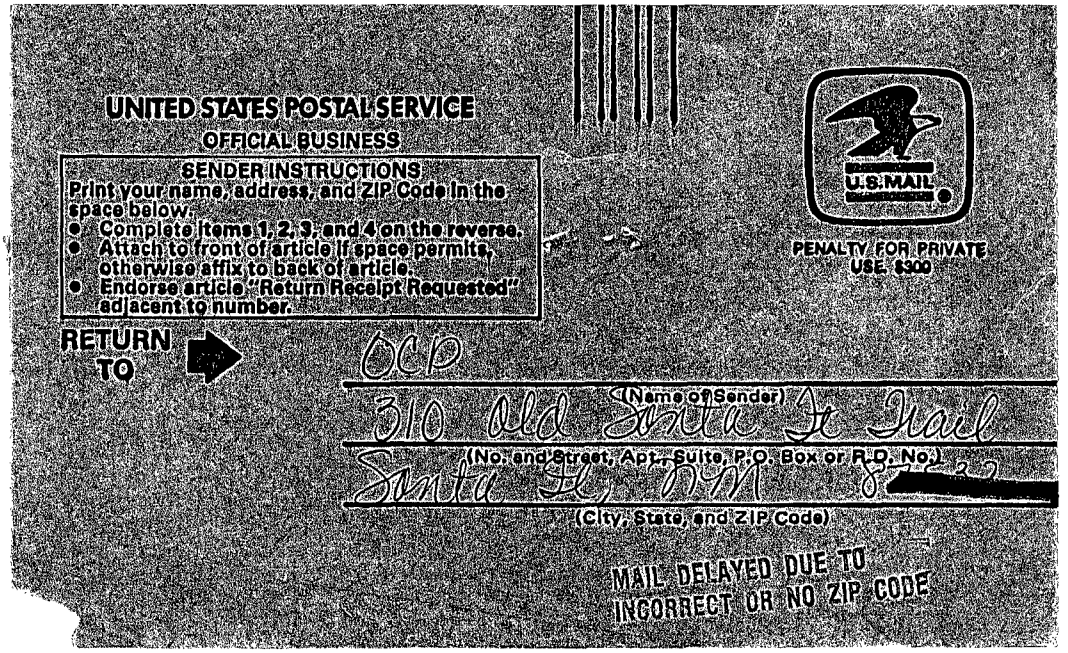
If you have any questions, please contact me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD Hobbs Office



UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S. MAIL

PENALTY FOR PRIVATE USE $300

RETURN TO

OCP

310 Old Santa Fe Trail

(Name of Sender)

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

Santa Fe, NM 8[redacted]

(City, State, and ZIP Code)

MAIL DELAYED DUE TO INCORRECT OR NO ZIP CODE

Eunice EP

~~#1 Eng Rm Cooling tower - Spraypondiing~~

Oil cooling water surge tank #2 Eng Rom
over flow - some oil - no cont

~~#2 Cooling Tower ponding~~

#3 Pump room -

~~Glycol TK - no cont~~
~~Oil cooling water surge TK - overflow -~~
~~oil - no cont - oily oil~~
~~Jacket H_2O Surge TK - no cont~~

~~#3 Cooling Tower~~
~~Ponding + Spray~~

~~Classifier + oil dehydrofier~~
~~no Oil [illegible]~~
~~[illegible] on C-pump~~

Drum Storage between #1 & #2 Cooling tow.
no cont

Cooling tower ~~Contam~~ Chem storage
has contain ment - not enough

Oil TK behind office - no cont

engine oil Storage always tank(s) is EPUG'S P

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

November 15, 1988

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, Room 206
Santa Fe, New Mexico 87503

Dear Mr. Lemay:

This responds to your public notice received October 27, 1988 in which several proposed groundwater discharge plans were described. We have reviewed the plans and have not identified any resource issues of concern to our agency in the following:

GW-8, El Paso Natural Gas Company, Monument Gas Plant, Lea County, NM.
GW-9, Phillips 66 Natural Gas Company, Eunice EP Gas Plant, Lea County, NM.
GW-10, El Paso Natural Gas Company, Jal No. 3 Gas Plant, Lea County, NM.
GW-46, El Paso Natural Gas Company, Eunice Main Line Engine Room, Lea County, NM.
TNT Construction Inc., Rio Arriba County, NM.

Discharge plan GW-49 is for El Paso Natural Gas Company's Blanco Plant located approximately 1 1/2 miles northeast of Bloomfield, New Mexico. El Paso Natural Gas Company proposes to close its unlined process ponds and discharge approximately 119,900 gallons per day of process and cooling tower wastewater to the Bloomfield Municipal Wastewater Treatment Plant.

The Bloomfield Municipal Wastewater Treatment Plant discharges its treated effluent to the San Juan River. The San Juan River from the Hammond Diversion upstream of Bloomfield to Farmington may provide habitat for the Federally endangered Colorado squawfish. Surveys conducted downstream of Farmington have documented the presence of both adult and juvenile squawfish in the San Juan River. The section of the San Juan River from Bloomfield to Farmington has a high likelihood of the presence of squawfish as well as other fish and aquatic organisms of importance to the rivers ecological balance.

The Bloomfield Wastewater Treatment Plant has received NPDES re-authorization (permit number NM0020770), to discharge to the San Juan River in Segment No. 2-401. The Fish and Wildlife Service would object to the addition of any new pollutants into the treatment works from an indirect discharger, such as the El Paso Natural Gas Company's Blanco Plant, that would cause an increase in biochemical oxygen demand, an increase in total dissolved solids, or a pass-through of toxic or hazardous materials. The effluent limitations of NPDES permit number NM 0020770 must not be exceeded as a result of the addition of the process and cooling tower wastewater.

These comments represent the views of the Fish and Wildlife Service. If you have any questions, please contact Tom O'Brien at (505) 883-7877 or FTS 474-7877.

Sincerely yours,

John C. Peterson
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, Environmental Protection Agency, Dallas, Texas
Director, Environmental Improvement Division, New Mexico Health and Environmental Department, Santa Fe, New Mexico
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico

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

GARREY CARRUTHERS
GOVERNOR

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

October 24, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael D. Ford
Environmental Analyst
Phillips 66 Natural Gas Plant
4001 Penbrook
Odessa, TX 79762

RE: Discharge Plan GW-9
Eunice EP Plant,
Lea County, New Mexico.

Dear Mr. Ford:

The Oil Conservation Division has received your application dated October 3, 1988 for renewal of the above-referenced discharge plan. Part of the review process includes a visit to the facility. Members of the Environmental Bureau's staff are planning a trip to southeast New Mexico for the latter part of November and would like to include a visit to the Eunice EP Plant at that time. We will be finalizing our plans the first or second week of November and I will be contacting you concerning convenient times for the visit.

After the facility visit and further OCD review of the plan, specific comments and information can be exchanged. A public notice will be published on or before November 4, 1988.

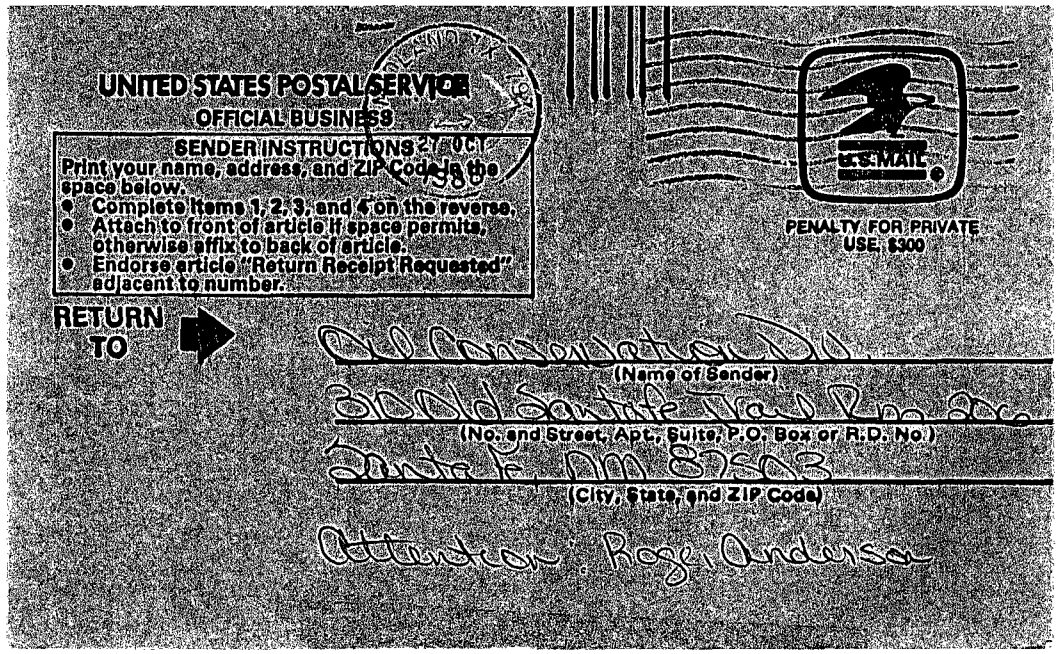
If there are any questions, please do not hesitate to call me at (505) 827-5885.

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/ag

cc: Oil Conservation Division - Hobbs


UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS
SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
• Complete items 1, 2, 3, and 4 on the reverse.
• Attach to front of article if space permits, otherwise affix to back of article.
• Endorse article "Return Receipt Requested" adjacent to number.
RETURN TO
U.S. MAIL
PENALTY FOR PRIVATE USE, $300
(Name of Sender)
(No. and Street, Apt., Suite, P.O. Box or R.D. No.)
(City, State, and ZIP Code)

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES DEPT
OIL CONSERVATION DIV

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

(GW-8) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Monument Gas Plant located approximately 3.5 miles southwest of the town of Monument in the NW/4 of Section 1, Township 20 South, Range 36 East (NMPM), Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 3500 mg/1 is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 35 to 60 feet with total dissolved solids concentrations from 500 to 3000 mg/1.

(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 79762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 44,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/1 is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/1.

(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Jal [illegible] Gas Plant [illegible]

[illegible] process wastewater with a total dissolved solids concentration of approximately 5410 mg/1 is disposed of in an OCD approved disposal [illegible] located on the plant property. [illegible] discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 900 mg/1.

(GW-46) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted an application to renew its previously approved discharge plan for its Eunice Mainline Engine Room located approximately 8 miles Northwest of the City of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was designated GW-9 and is now the responsibility of and is being renewed by Phillips 66 Natural Gas Company. The Mainline Engine Room remains the responsbility of El Paso Natural Gas Company and the portions of the previous discharge plan pertaining to the Mainline Engine Room are being renewed under Discharge Plan GW-46. Approximately 17,000 gallons per day of cooling tower wastewater with a total dissolved solids concentrations of approximately 1300 mg/1 is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharges at the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/1.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October. To be published on or before November 4, 1988.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WILLIAM J. LEMAY, Director

Journal, October 30, 1988

MEXICO } ss
lo

S J. SMITHSON

.... being duly sworn declares and

... ADV. MGR.. of the **Albuquerque Journal,** and that this fied to publish legal notices or advertisements *within the meaning of* Session Laws of 1937, and that payment therefore has been made or that the notice, a copy of which is hereto attached, was published in ar daily edition,

.... times, the first publication being on the ...30........ day

.... ,198.8......, and the subsequent consecutive

.... ,198......

[signature] Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this ..31.... day of October .... ,1988.

PRICE $50.30

Statement to come at end of month.

ACCOUNT NUMBER C80932

EDJ-15 (R-2/86)

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, George W. Moore

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

of

One weeks.
Beginning with the issue dated

October 28, 1988
and ending with the issue dated

October 28, 1988

Publisher.

Sworn and subscribed to before me this 28 day of October, 1988

Notary Public.

My Commission expires

November 14, 1988
(Seal)

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

LEGAL NOTICE
October 28, 1988
NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

(GW-8) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Monument Gas Plant located approximately 3.5 miles southwest of the town of Monument in the NW/4 of Section 1, Township 20 South, Range 36 East (NMPM), Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 3500 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 35 to 60 feet with total dissolved solids concentrations from 500 to 3000 mg/l.

(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 79762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 44,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Jal No. 3 Gas Plant located approximately 12 miles north of the city of Jal in the NW/4 NW/4, N[illegible]/4 of Section 3[illegible]ship 24 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 28,600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5410 mg/l is disposed of in an OCD approved disposal well located on the plant property. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 900 mg/l.

(GW-46) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application to renew its previously approved disharge plan for its Eunice Mainline Engine Room located approximately 8 miles Northwest of the City of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was designated GW-9 and is now the responsibility of and is being renewed by Phillips 66 Natural Gas Company. The Mainline Engine Room remains the responsibility of El Paso Natural Gas Company and the portions of the previous discharge plan pertaining to the Mainline Engine Room are being renewed under Discharge Plan GW-46. Approximately 17,000 gallons per day of cooling tower wastewater with a total dissolved solids concentrations of approximately 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharges at the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October. To be published on or before November 4, 1988

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

(GW-8) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Monument Gas Plant located approximately 3.5 miles southwest of the town of Monument in the NW/4 of Section 1, Township 20 South, Range 36 East (NMPM), Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 3500 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 35 to 60 feet with total dissolved solids concentrations from 500 to 3000 mg/l.

(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 79762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 44,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Jal No. 3 Gas Plant located approximately 5 miles north of the city of Jal in the SW/4 NW/4, NW/4 SW/4 of Section 33, Township 24 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 28,600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5410 mg/l is disposed of in an OCD approved disposal well located on the plant property. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 900 mg/l.

(GW-46) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application to renew its previously approved discharge plan for its Eunice Mainline Engine Room located approximately 8 miles Northwest of the City of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was designated GW-9 and is now the responsibility of and is being renewed by Phillips 66 Natural Gas Company. The Mainline Engine Room remains the responsibility of El Paso Natural Gas Company and the portions of the previous discharge plan pertaining to the Mainline Engine Room are being renewed under Discharge Plan GW-46. Approximately 17,000 gallons per day of cooling tower wastewater with a total dissolved solids concentrations of approximately 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharges at the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October. To be published on or before November 4, 1988.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

S E A L

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK

October 3, 1988

Discharge Plan Renewal
Eunice EP Plant
Discharge Plan No. GW-9

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 603

Mr. David Boyer
Environmental Bureau Chief
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Boyer:

In accordance with the Water Quality Regulations, Phillips 66 Natural Gas Company submits the attached Groundwater Discharge Plan for our Eunice EP Plant, Lea County, New Mexico. The current Groundwater Discharge Plan is scheduled to expire on October 9, 1988. The wastewater disposal system has not been changed from what was approved in the previous plan submitted by El Paso Natural Gas Company.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

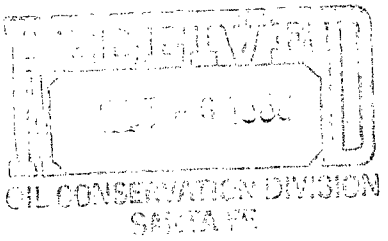
Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Analyst

MDF

Attachments



DISCHARGE PLAN
PHILLIPS 66 NATURAL GAS COMPANY
EUNICE EP PLANT
SECTION 5, TOWNSHIP 21 SOUTH, RANGE 36 EAST, LEA COUNTY

I. GENERAL PROCESS DESCRIPTION

Eunice EP Plant's two basic functions are to compress natural gas and process acid gas for sulfur removal/production. Eunice EP Plant has twenty-three engine driven compressor units totaling 25,500 horsepower with a designed natural gas handling capacity of 123.87 million cubic feet per day. Entrained liquids are removed from the gas stream by gas-liquid separators prior to the various stages of compression. The compressed gas steams are cooled through coil sections in three mechanical draft cooling towers. Engine and compressor jacket water are also cooled through coils in these towers.

The Sulfur Plant consists of a sulfur recovery unit and a stand-by boiler to furnish steam when the unit is not in operation. The sulfur recovery unit has a capacity of seventy-five tons per day.

Attachment 1 is a plot plan of the plant detailing equipment location.

II. PLANT WATER SYSTEMS

A. Raw Water

Eunice EP Plant receives its water from a total of nine wells located north of the plant in Section 13, Township 19 South, Range 36 East and Section 36, Township 18 South, Range 36 East , NMPM. The wells produce from the Ogallala formation. Water is used at the plant for cooling tower, boiler, and engine jacket water make-up. Attachment 2 is an analysis of the raw water.

B. Potable Water

A small fraction of the raw water is used as potable water for the plant's office and control rooms.

C. Water Treating

Water treating consists of chlorination of the total water stream into the plant water storage tanks and treatment of the boiler feedwater through a zeolite water softener. The zeolite softener removes calcium and magnesium and has a maximum capacity of 75 gallons per minute. Wastewater from the zeolite treater is piped to the plant's wastewater disposal system (approx. 20 bbl./day).

D. Cooling Tower System

The cooling tower system is comprised of three mechanical draft cooling towers. Engine and compressor jacket cooling water and lube oil cooling water is circulated through the coils in these towers. Approximately 950 bbl./day of wastewater blowdown is produced by the towers. Blowdown from the towers is piped to the plant's wastewater disposal system. The following chemicals are being added to the cooling tower waters for scale, corrosion and biological treatment:

Chemical
Betz 25K006
Betz C-31
Betz 445
Betz 2020
Betz 562-C
Betz FTCT

Material safety data sheets for these chemicals are found in Attachment 3.

E. Boiler System

The boiler system is comprised of two boilers (one stand-by and one waste heat boiler in the sulfur plant) which produce 50 psig steam and two sulfur plant condensers which also produce 50 psig steam. All condensate produced from the use of the 50 psig steam is returned to the boiler feedwater tank for reuse. Approximately 28 bbl/day of boiler blowdown and sulfur plant wastewater is produced and piped to the plant's wastewater disposal system. The following chemicals are being added to the boiler waters for scale and corrosion treatment:

Chemical
Betz AFG II
Betz Sulfite 3
Betz Liq. 14
Betz MF 305
Betz KI-2

Material safety data sheets for these chemicals are found in Attachment 3.

F. Engine System

A mixture of Betz 66-P, a sodium nitrite based compound, and water is used as coolant in the jacket water systems for the compressor engines. The plant has three separate engine rooms referred to as Eunice EP No. 1, Eunice EP No. 2 and Eunice EP No. 3 Field Compressor Rooms. Each engine room has its own jacket water pumps, storage tanks and coolers.

Coolant from the engines is pressured to the respective jacket water storage tank when an engine is being worked on. The coolant is pressured back to the engine when the work is completed. Attachments 4, 5 and 6 are flow schematics of the three engine room water systems.

III. ENGINE OIL SYSTEM

Lube oil in the compressor engines is changed by draining the "spent" oil charge from an engine into a sump. The spent lube oil in the sump is then transferred to the plant's slop oil storage tanks. Periodically, oil in the slop oil storage tanks is hauled by tank truck to Phillips Hobbs Treater for reclamation.

IV. WASTEWATER SYSTEMS

A. Wastewater Collection and Treatment

All plant industrial and domestic wastewater discharges are routed to an internally and externally epoxy coated steel tank-type classifier. Attachments 7 and 8 show the wastewater-producing processes and the collection systems in schematic form. The arrangement of the wastewater collection/classifier system precludes the possibility of stormwater run-off entering the system and appreciably changing the volume of discharge. No open drains which collect stormwater are connected to the system.

The classifier is used to separate oil and solids from the wastewater stream. The separated oil is stored temporarily in an internally and externally coated steel underground tank. Periodically, the oil is pumped out and transported to Phillips Hobbs Treater for reclamation. Domestic sewage from the plant area septic tanks is chlorinated and then piped to the classifier for disposal with industrial wastewater. The classifier system includes a 95,171 gallon-capacity contingency tank. In the unlikely event this storage contingency would be exceeded, wastewater will be trucked to one of Rice Engineering's other disposal facilities until normal operations resume.

B. Wastewater Disposal

Wastewater is delivered to the Rice Engineering Disposal System, Monument Branch, by means of two vertical, centrifugal-type pumps. The pumps are each sized for full flow and are operated with one running and one on standby. Two anthracite/rock filters are located downstream of the wastewater pumps and are designed with an automatic backwash feature that is based on time or pressure drop and is controlled by a micropro-\ cessor system. The flow from the filters into the Rice Engineering Disposal system is measured utilizing a recording meter. The average daily flow of wastewater to Rice Engineering is 1050 bbl./day. Attachment 9 contains a detailed analysis of the final wastewater stream.

V. SOLID WASTE DISPOSAL

A. General Waste

The small amount of solid waste generated at the plant is placed in a dumpster for periodic pick-up by Waste Control of Hobbs, New Mexico.

B. Spent Sulfur Catalyst

Approximately once every five years the catalyst in the sulfur recovery unit converter beds is replaced. The spent catalyst is disposed of by landfilling.

VI. SPILL/LEAK PREVENTION AND HOUSEKEEPING PROCEDURES

The previous owners of the plant conducted a pressure test of the plant's drain systems as part of the discharge plan renewal process. We propose to test the integrity of the drain systems by uncovering the drain piping at selected intervals and performing an ultrasonic test of the pipe. The ultrasonic test can be used to determine pipe thickness and maximum allowable working pressure. Future ultrasonic tests in the same location will determine if any erosion or corrosion has occurred.

VII. MISCELLANEOUS INFORMATION

A. Sanitary Wastes

The small amount of sanitary wastes from the plant and office are treated by septic tank and then routed to the plant's wastewater disposal system .

B. Plant Topography

A topographic map of the plant area is found in Attachment 10. As can be seen from this map, there are no bodies of water within a one mile radius of the plant.

C. Flooding Potential

None.

VIII. AFFIRMATION

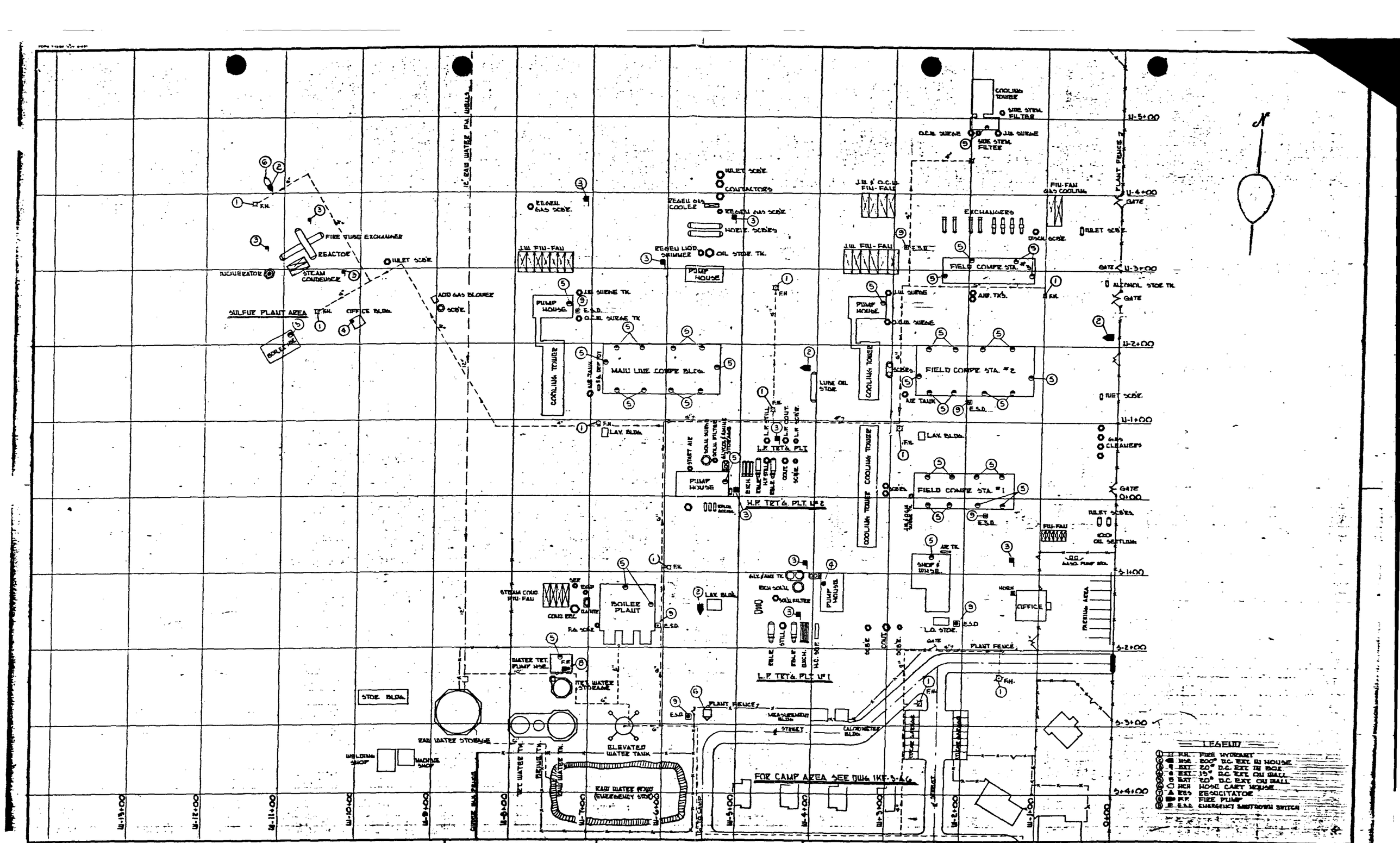
I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true, accurate and complete to the best of my knowledge and belief.

Michael D. Ford — (Signature)

10/3/88 — (Date)

Michael D. Ford — (Name)

Environmental Analyst — (Title)



LEGEND	REFERENCE DRAWINGS		REVISIONS						PRINT RECORD								ENG. RECORD	DATE
	DWG. NO.	TITLE	NO.	DATE	BY	DESCRIPTION	W.O. NO.	APP.	NO.	DATE	TO	W.O. NO.	NO.	DATE	TO	W.O. NO.	DRAWN	3-14-74
	IEF-1-P2	WATER PIPING	A	11-17-76	GA	ADD E.S.D. SWITCHES											CHECKED	
	IEF-1-P304	FIRE SAFETY	B	2-14-84	GA	ADD WATER LINE											CHECKED	
	IEF-10-P23	" "	C	4-22-85	GA	ADD F.H. EXT. & RELOCATE EQUIP.											PROJ. APP.	
																	DESIGN APP.	

Attachment 1
EUNICE FIELD PLANT
PLOT PLAN
FIRE & SAFETY EQUIPMENT LOCATION

SERIES IP 30-01 | DWG. NO. IEF-1-P5 | REV. C

SCALE: 1" = 100'

P. O. BOX 1468
MONAHANS, TEXAS 79756
943-3234 OR 563-1040

WATER CONSULTANTS SINCE 1953
BACTERIAL AND CHEMICAL ANALYSES

709 W. INDIANA
MIDLAND, TEXAS 79
PHONE 683-4521

Attachment 2

To: Mr. Marvin Stevenson
4001 Penbrook
Odessa, Texas

Laboratory No. 98192
Sample received 9-4-81
Results reported 9-14-81

Company: Phillips Petroleum

Project: Eunice Plant in Lea County, New Mexico

Subject: To make determinations listed on raw water
Samples taken by James C. Powell, Martin Water Labs., Inc. on 9-4-81.

DETERMINATION, mg/l	
A. Human Health Standards	
Arsenic, as As	0.000
Barium, as Ba	0
Cadmium, as Cd	0.00
Chromium, as Cr	0.01
Cyanide, as CN	0.0
Fluoride, as F	1.0
Lead, as Pb	0.0
Total Mercury, as Hg	0.000
Nitrate, as N	3.4
Selenium, as Se	0.00
Silver, as Ag	0.00
B. Other Standards for Domestic Water Supply	
Chloride, as Cl	51
Cooper, as Cu	0.00
Iron, as Fe	0.62
Manganese, as Mn	0.00
Phenols	0.00
Sulfate, as SO_4	45
Total Dissolved Solids	480

DETERMINATION, mg/l	
Zinc, as Zn	0.10
pH	7.0

C. Standards for Irrigation Use

Aluminum, as Al	0.0
Boron, as B	0.4
Cobalt, as Co	0.00
Molybdenum, as Mo	0
Nickel, as Ni	0.0

Remarks: The undersigned certifies the above to be true and correct to the best of his knowledge and belief.

Waylan C. Martin, M. A.

Martin Water Laboratories, Inc.

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : INHIBITOR 66P EFFECTIVE DATE 5/84

PRODUCT APPLICATION : WATER-BASED CORROSION INHIBITOR.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

SODIUM NITRITE***;CAS#7632-00-0;OXIDIZER;POTENTIAL BLOOD TOXIN,REPRODUCTIVE TOXIN AND NEUROTOXIN;TOXIC(ORAL INGESTION);PEL:NONE; TLV:NONE.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 13.1	ODOR: MILD
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.230
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 14	%SOLUBILITY(WATER): 100
EVAP.RATE: <1 ETHER=1	APPEARANCE: YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 1

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: INHIBITOR 66P

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
MODERATELY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
SEVERE IRRITANT TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED EXPOSURES MAY CAUSE BLOOD CELL DAMAGE AND REPRODUCTIVE SYSTEM TOXICITY;PROLONGED OVEREXPOSURE MAY CAUSE CNS DEPRESSION.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER

)DUCT: INHIBITOR 66P

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST CARTRIDGES
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL.

---SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
32 GAL.(SODIUM NITRITE), 19,500 GAL.(SODIUM HYDROXIDE)
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D002
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 2 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - ALK

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : INHIBITOR 562C EFFECTIVE DATE 10/85

PRODUCT APPLICATION : WATER-BASED CORROSION INHIBITOR.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

SODIUM HYDROXIDE***(CAUSTIC SODA);CAS#1310-73-2;CORROSIVE;TOXIC IF ORALLY INGESTED;PEL:2.0MG/M3;TLV:2.0MG/M3(CEILING).

1-H-BENZOTRIAZOLE,METHYL***(TOLYLTRIAZOLE;TTA);CAS#29385-43-1; IRRITANT(EYE);TOXIC BY INHALATION;PEL:NONE;TLV:NONE.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 12.8	ODOR: NONE
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.077
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 5.6	%SOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: LIGHT AMBER
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 13

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: INHIBITOR 562C

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SLIGHTLY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
MODERATELY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED CONTACT MAY CAUSE PRIMARY IRRITANT DERMATITIS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER.FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT

PRODUCT: INHIBITOR 562C

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST CARTRIDGES
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
IF FROZEN,THAW COMPLETELY AND MIX THOROUGHLY PRIOR TO USE
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL.

---SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
9,321GAL (SODIUM HYDROXIDE)
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D002
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 2 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - ALK

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : SLIMICIDE C-31 EFFECTIVE DATE 1-85

PRODUCT APPLICATION : SOLVENT-BASED MICROBIAL CONTROL AGENT.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

DODECYLGUANIDINE HYDROCHLORIDE***(DGH);CAS#13590-97-1;CORROSIVE;PEL:NONE; TLV:NONE.

METHYLENE BIS(THIOCYANATE)***CAS#6317-18-6;POTENTIAL REPRODUCTIVE TOXIN; PEL:NONE;TLV:NONE.

ISOPROPYL ALCOHOL***(IPA);CAS#67-63-0;FLAMMABLE LIQUID;CHRONIC OVEREXPOSURE MAY CAUSE LIVER AND KIDNEY TOXICITY;PEL:400PPM;TLV:400PPM.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 3.2	ODOR: NONE
FL.PT.(DEG.F): 120 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.095
VAPOR PRESSURE(mmHG): 24	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 64	%SOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): <-30

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: SLIMICIDE C-31

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SEVERE IRRITANT TO THE SKIN.SKIN SENSITIZER

ACUTE EYE EFFECTS ***
SEVERE IRRITANT TO THE EYES, POSSIBLY CORROSIVE

ACUTE RESPIRATORY EFFECTS *** PRIMARY ROUTE OF EXPOSURE
VAPORS,GASES,MISTS AND/OR AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED EXPOSURES MAY CAUSE REPRODUCTIVE SYSTEM TOXICITY.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
INHALATION MAY CAUSE IRRITATION OF MUCOUS MEMBRANES AND RESPIRATORY TRACT; SKIN CONTACT CAUSES SEVERE IRRITATION OR BURNS.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CLOTHING.WASH AREA WITH LARGE AMOUNTS OF SOAP SOLUTION OR WATER FOR 15 MIN.IMMEDIATELY CONTACT PHYSICIAN

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA.APPLY NECESSARY FIRST AID TREATMENT.IMMEDIATELY CONTACT A PHYSICIAN.

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBANT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER.THE CONTAMINATED ABSORBANT SHOULD BE CONSIDERED A PESTICIDE AND DISPOSED OF IN AN APPROVED PESTICIDE LANDFILL.SEE PRODUCT LABEL STORAGE AND DISPOSAL INSTRUCTIONS.
REMOVE IGNITION SOURCES.FLUSH AREA WITH WATER.SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
BURY IN AN APPROVED PESTICIDE FACILITY OR DISPOSE OF IN ACCORDANCE WITH LABEL INSTRUCTIONS

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER.FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT

DUCT: SLIMICIDE C-31

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY,
USE RESPIRATOR WITH ORGANIC VAPOR,HIGH EFFICIENCY PARTICULATE CARTRIDGES
RECOMMENDED SKIN PROTECTION***
GAUNTLET-TYPE RUBBER GLOVES,CHEMICAL RESISTANT APRON
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES.FACE SHIELD

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
KEEP AWAY FROM FLAMES OR SPARKS.GROUND DRUMS DURING FILLING OR
DISCHARGE OPERATIONS
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
COMBUSTIBLE.ACIDIC.DO NOT MIX WITH ALKALINE MATERIAL.

--SECTION 9----------FEDERAL REGULATIONS----------

FIFRA(40CFR):EPA REG.NO. 3876- 121
OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH
APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED
AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
NOT APPLICABLE
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D001
DOT(49CFR)CLASSIFICATION: COMBUSTIBLE
NFPA/HMIS : HEALTH - 2 ; FIRE - 1 ; REACTIVITY - 0 ; SPECIAL - NONE

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : MAGNI-FORM 305 EFFECTIVE DATE 1/86

PRODUCT APPLICATION : WATER BASED DISSOLVED OXYGEN SCAVENGER/METAL PASSIVATOR.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

TRADE SECRET INGREDIENT;FLAMMABLE LIQUID;CORROSIVE;PEL:NONE;TLV:NONE.

TRADE SECRET INGREDIENT;POTENTIAL SKIN SENSITIZER;EYE IRRITANT;PEL:2MG/M3; TLV:2MG/M3.

TRADE SECRET INGREDIENT;COMBUSTIBLE LIQUID;IRRITANT(EYE AND SKIN); PEL:10PPM(SKIN);TLV:10PPM(SKIN).

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 11.0	ODOR: MILD
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.007
VAPOR PRESSURE(mmHG): 20	VAPOR DENSITY(AIR=1): <1
VISC cps70F: 6.5	%SOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: BROWN
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 18

-----SECTION 3----------REACTIVITY DATA----------

REDUCING AGENT.DO NOT STORE OR MIX WITH OXIDIZING AGENTS.

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: MAGNI-FORM 305

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SEVERE IRRITANT TO THE SKIN.ABSORBED BY SKIN.SKIN SENSITIZER.

ACUTE EYE EFFECTS ***
CORROSIVE TO THE EYES

ACUTE RESPIRATORY EFFECTS *** PRIMARY ROUTE OF EXPOSURE
VAPORS,GASES,MISTS AND/OR AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT. PROLONGED EXPOSURE MAY CAUSE DIZZINESS AND HEADACHE.

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED OVEREXPOSURES MAY CAUSE NERVOUS SYSTEM TOXICITY,AND MAY CAUSE BLOOD CELL DAMAGE OR IMPAIR BLOOD CELL FUNCTION.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
INHALATION MAY CAUSE IRRITATION OF MUCOUS MEMBRANES AND RESPIRATORY TRACT; SKIN CONTACT CAUSES SEVERE IRRITATION OR BURNS.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CLOTHING.WASH AREA WITH LARGE AMOUNTS OF SOAP SOLUTION OR WATER FOR 15 MIN.IMMEDIATELY CONTACT PHYSICIAN

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

I. LATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA.APPLY NECESSARY FIRST AID TREATMENT.IMMEDIATELY CONTACT A PHYSICIAN.

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER

)DUCT: MAGNI-FORM 305

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH ORGANIC VAPOR CARTRIDGES.FOLLOW MANUFACTURERS GUIDELINES FOR VAPORS WITH POOR WARNING PROPERTIES
RECOMMENDED SKIN PROTECTION***
GAUNTLET-TYPE NEOPRENE GLOVES,CHEMICAL RESISTANT APRON
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES.FACE SHIELD

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING.IF FROZEN,THAW COMPLETELY AND MIX THOROUGHLY PRIOR TO USE
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL.

-----SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
NOT APPLICABLE
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# NOT APPLICABLE
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 2 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - NONE

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : LIQUIMINE 14 EFFECTIVE DATE 2/85

PRODUCT APPLICATION : WATER BASED CONDENSATE CORROSION INHIBITOR.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

TRADE SECRET INGREDIENT;FLAMMABLE;CORROSIVE;REPRODUCTIVE TOXIN;TOXIC; PEL:NONE;TLV:10PPM(SKIN).

TRADE SECRET INGREDIENT;FLAMMABLE LIQUID;CORROSIVE;PEL:NONE;TLV:NONE.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 13.0	ODOR: AMINE
FL.PT.(DEG.F): 141 SETA(CC)	SP.GR.(70F)OR DENSITY: 0.977
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 13	%SOLUBILITY(WATER): 100
EVAP.RATE: <1 ETHER=1	APPEARANCE: COLORLESS TO YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 7

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: LIQUIMINE 14

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
CORROSIVE.ABSORBED BY SKIN.SKIN SENSITIZER.

ACUTE EYE EFFECTS ***
CORROSIVE TO THE EYES

ACUTE RESPIRATORY EFFECTS *** PRIMARY ROUTE OF EXPOSURE
VAPORS,GASES,MISTS AND/OR AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT. PROLONGED EXPOSURE MAY CAUSE DIZZINESS AND HEADACHE.

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED EXPOSURES MAY CAUSE TISSUE NECROSIS,MAY CAUSE REPRODUCTIVE SYSTEM TOXICITY,OR MAY CAUSE CNS DEPRESSION.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
INHALATION MAY CAUSE LIGHTHEADEDNESS,SLURRED SPEECH,NAUSEA AND VOMITING(PULMONARY EDEMA MAY RESULT);SKIN CONTACT CAN CAUSE SEVERE IRRITATION OR BURNS.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED OR ABSORBED THROUGH SKIN.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CLOTHING.WASH AREA WITH LARGE AMOUNTS OF SOAP SOLUTION OR WATER FOR 15 MIN.IMMEDIATELY CONTACT PHYSICIAN

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA.APPLY NECESSARY FIRST AID TREATMENT.IMMEDIATELY CONTACT A PHYSICIAN.

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
REMOVE SOURCES OF IGNITION

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER

I DUCT: LIQUIMINE 14

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH ORGANIC VAPOR CARTRIDGES.FOLLOW MANUFACTURERS GUIDELINES FOR VAPORS WITH POOR WARNING PROPERTIES
RECOMMENDED SKIN PROTECTION***
GAUNTLET-TYPE NEOPRENE GLOVES,CHEMICAL RESISTANT APRON
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES.FACE SHIELD

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
KEEP AWAY FROM FLAMES OR SPARKS.GROUND DRUMS DURING FILLING OR DISCHARGE OPERATIONS
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
COMBUSTIBLE.CORROSIVE TO SKIN AND/OR EYES.

-----SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
NOT APPLICABLE
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D002
DOT(49CFR)CLASSIFICATION: CORROSIVE TO SKIN.COMBUSTIBLE
NFPA/HMIS : HEALTH - 2 ; FIRE - 1 ; REACTIVITY - 0 ; SPECIAL - ALK

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : BETZ 445 EFFECTIVE DATE 6-86

PRODUCT APPLICATION : WATER-BASED DEPOSIT CONTROL AGENT.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD IS LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

THIS PRODUCT CONTAINS NO HAZARDOUS INGREDIENTS BY OSHA REGULATIONS OR ANY STATE RIGHT-TO-KNOW REGULATIONS.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 12.5	ODOR: NONE
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.019
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 11.7	%SOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: COLORLESS
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 31

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: BETZ 445

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SLIGHTLY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
MODERATELY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
NO EVIDENCE OF POTENTIAL CHRONIC EFFECTS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER

DUCT: BETZ 445

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY,
USE A RESPIRATOR WITH DUST/MIST CARTRIDGES
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING.IF FROZEN,THAW COMPLETELY AND MIX
THOROUGHLY PRIOR TO USE
HANDLING INSTRUCTIONS***
GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
SPECIFIC- ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL.

--SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH
APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED
AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
NOT APPLICABLE
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D002
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 1 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - ALK

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

REVISIONS HAVE OCCURRED IN SECTION 4.

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : FOAM-TROL CT EFFECTIVE DATE 3/84

PRODUCT APPLICATION : ANTIFOAM.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

MINERAL OIL;***CAS#64742-13-8;POTENTIAL SKIN TUMORIGEN(BASED ON CHRONIC ANIMAL SKIN PAINTING STUDIES);PEL:5MG/M3;TLV:5MG/M3.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: 50% SOL. (APPROX.) 6.8	ODOR: MILD
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 0.841
VAPOR PRESSURE(mmHG): <10	VAPOR DENSITY(AIR=1): >1
VISC cps70F: 18.0	%SOLUBILITY(WATER): 0
EVAP.RATE: <1 ETHER=1	APPEARANCE: OFF WHITE TO AMBER
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): -20

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: FOAM-TROL CT

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SLIGHTLY IRRITATING TO THE SKIN.MAY CAUSE DERMATITIS.

ACUTE EYE EFFECTS ***
MODERATELY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
VAPORS,GASES,MISTS AND/OR AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED EXPOSURES MAY CAUSE DEFATTING-TYPE DERMATITIS; LIFETIME SKIN PAINTING STUDIES IN MICE HAVE PRODUCED SKIN TUMORS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
PROLONGED EXPOSURE MAY CAUSE DRYING AND CRACKING OF SKIN.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

ALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER.FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT

)DUCT: FOAM-TROL CT

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH ORGANIC VAPOR CARTRIDGES.FOLLOW MANUFACTURERS GUIDELINES FOR VAPORS WITH POOR WARNING PROPERTIES
RECOMMENDED SKIN PROTECTION***
NEOPRENE GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
NORMAL CHEMICAL HANDLING

--SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
TREAT AS OIL SPILL
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# NOT APPLICABLE
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 1 ; FIRE - 1 ; REACTIVITY - 0 ; SPECIAL - NONE

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : BETZ 2020 EFFECTIVE DATE 2/85

PRODUCT APPLICATION : WATER-BASED DEPOSIT CONTROL AGENT.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

THIS PRODUCT CONTAINS NO HAZARDOUS INGREDIENTS BY OSHA REGULATIONS OR ANY STATE RIGHT-TO-KNOW REGULATIONS.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 5.3	ODOR: MILD
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.123
VAPOR PRESSURE(mmHG): 20	VAPOR DENSITY(AIR=1): <1
VISC cps70F: 19.5	%SOLUBILITY(WATER): 100
EVAP.RATE: <1 ETHER=1	APPEARANCE: LIGHT YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 26

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: BETZ 2020

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SLIGHTLY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
SLIGHTLY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
NO EVIDENCE OF POTENTIAL CHRONIC EFFECTS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN,IRRITATION AND/OR TEARING OF EYES(DIRECT CONTACT).

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER.FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT

ODUCT: BETZ 2020

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY,
USE A RESPIRATOR WITH DUST/MIST CARTRIDGES
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
NORMAL CHEMICAL HANDLING

-----SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH
APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED
AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
NOT APPLICABLE
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# NOT APPLICABLE
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 1 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - NONE

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : BETZ 25K-25006 EFFECTIVE DATE 9/85

PRODUCT APPLICATION : WATER-BASED CORROSION INHIBITOR/DEPOSIT CONTROL AGENT.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

POTASSIUM HYDROXIDE***(CAUSTIC POTASH);CAS#1310-58-3;CORROSIVE;TOXIC IF ORALLY INGESTED;PEL:NONE;TLV:2.0MG/M3(CEILING).

1-H-BENZOTRIAZOLE,METHYL***(TOLYLTRIAZOLE;TTA);CAS#29385-43-1; IRRITANT(EYE);TOXIC BY INHALATION;PEL:NONE;TLV:NONE.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 12.7	ODOR: NONE
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.297
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 38	%SOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 10

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: BETZ 25K-25006

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SEVERE IRRITANT TO THE SKIN

ACUTE EYE EFFECTS ***
CORROSIVE TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
PROLONGED OR REPEATED CONTACT MAY CAUSE PRIMARY IRRITANT DERMATITIS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
CAUSES SEVERE IRRITATION,BURNS OR TISSUE ULCERATION WITH SUBSEQUENT SCARRING.

PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***
MAY BE TOXIC IF ORALLY INGESTED.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QUANTITY OF SOAP SOLUTION OR WATER FOR 15 MINUTES

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROPRIATE FIRST AID TREATMENT AS NECESSARY

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUTE CONTENTS OF STOMACH USING 3-4 GLASSES MILK OR WATER

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER

PF UCT: BETZ 25K-25006

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY,
USE A RESPIRATOR WITH DUST/MIST CARTRIDGES
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING.IF FROZEN,THAW COMPLETELY AND MIX
THOROUGHLY PRIOR TO USE
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
ALKALINE.CORROSIVE TO EYES.DO NOT MIX WITH ACIDIC MATERIAL.

-----SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH
APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED
AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
1,560 GALS. (POTASSIUM HYDROXIDE)
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D002
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 2 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - ALK

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY
WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS.
WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO
BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH
RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

BETZ LABORATORIES,INC.
4636 SOMERTON ROAD, TREVOSE, PA. 19047
BETZ MATERIAL SAFETY DATA SHEET
24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : BETZ KI-2 EFFECTIVE DATE 7/85

PRODUCT APPLICATION : LIQUID ION EXCHANGE RESIN CLEANER.

-----SECTION 1----------HAZARDOUS INGREDIENTS----------

INFORMATION ON PHYSICAL HAZARDS, HEALTH HAZARDS, PEL'S AND TLV'S FOR SPECIFIC PRODUCT INGREDIENTS AS REQUIRED BY THE OSHA HAZARD COMMUNICATIONS STANDARD ARE LISTED. REFER TO SECTION 4 (PAGE 2) FOR OUR ASSESSMENT OF THE POTENTIAL ACUTE AND CHRONIC HAZARDS OF THIS FORMULATION.

THIS PRODUCT CONTAINS NO HAZARDOUS INGREDIENTS BY OSHA REGULATIONS OR ANY STATE RIGHT-TO-KNOW REGULATIONS.

-----SECTION 2----------TYPICAL PHYSICAL DATA----------

PH: AS IS (APPROX.) 0.9	ODOR: PUNGENT,VINEGAR-LIKE
FL.PT.(DEG.F): >200 SETA(CC)	SP.GR.(70F)OR DENSITY: 1.187
VAPOR PRESSURE(mmHG): ND	VAPOR DENSITY(AIR=1): ND
VISC cps70F: 26	%SOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: COLORLESS
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 18

-----SECTION 3----------REACTIVITY DATA----------

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

PRODUCT: BETZ KI-2

-----SECTION 4----------HEALTH HAZARD EFFECTS----------

ACUTE SKIN EFFECTS *** PRIMARY ROUTE OF EXPOSURE
SLIGHTLY IRRITATING TO THE SKIN

ACUTE EYE EFFECTS ***
MODERATELY IRRITATING TO THE EYES

ACUTE RESPIRATORY EFFECTS ***
MISTS/AEROSOLS MAY CAUSE IRRITATION TO UPPER RESPIRATORY TRACT

CHRONIC EFFECTS OF OVEREXPOSURE***
NO EVIDENCE OF POTENTIAL CHRONIC EFFECTS.

MEDICAL CONDITIONS AGGRAVATED ***
NOT KNOWN

SYMPTOMS OF EXPOSURE ***
MAY CAUSE REDNESS OR ITCHING OF SKIN.

-----SECTION 5----------FIRST AID INSTRUCTIONS----------

SKIN CONTACT***
REMOVE CLOTHING.WASH AREA WITH LARGE AMOUNTS OF SOAP SOLUTION OR WATER FOR 15 MIN.IMMEDIATELY CONTACT PHYSICIAN

EYE CONTACT***
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CONTACT A PHYSICIAN FOR ADDITIONAL TREATMENT

INHALATION EXPOSURE***
REMOVE VICTIM FROM CONTAMINATED AREA.APPLY NECESSARY FIRST AID TREATMENT.IMMEDIATELY CONTACT A PHYSICIAN.

INGESTION***
DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN

-----SECTION 6----------SPILL,DISPOSAL AND FIRE INSTRUCTIONS---------

SPILL INSTRUCTIONS***
VENTILATE AREA,USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL,OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS.
FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO,SPREAD SAND OR GRIT.

DISPOSAL INSTRUCTIONS***
WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER TREATMENT FACILITY,IN ACCORDANCE WITH ANY LOCAL AGREEMENT,A PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT
PRODUCT(AS IS)-
INCINERATE OR BURY IN APPROVED LANDFILL

FIRE EXTINGUISHING INSTRUCTIONS***
FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE).
DRY CHEMICAL,CARBON DIOXIDE,FOAM OR WATER.FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT

PRODUCT: BETZ KI-2

-----SECTION 7----------SPECIAL PROTECTIVE EQUIPMENT----------

VENTILATION PROTECTION***
ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS
RECOMMENDED RESPIRATORY PROTECTION***
IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY,
USE A RESPIRATOR WITH DUST/MIST CARTRIDGES
RECOMMENDED SKIN PROTECTION***
RUBBER GLOVES
REPLACE AS NECESSARY
RECOMMENDED EYE PROTECTION***
SPLASH PROOF CHEMICAL GOGGLES

-----SECTION 8----------STORAGE AND HANDLING PRECAUTIONS----------

STORAGE INSTRUCTIONS***
KEEP CONTAINER CLOSED
PROTECT FROM FREEZING
HANDLING INSTRUCTIONS***
IMMEDIATELY REMOVE CONTAMINATED CLOTHING,WASH BEFORE REUSE
ACIDIC.DO NOT MIX WITH ALKALINE MATERIAL.

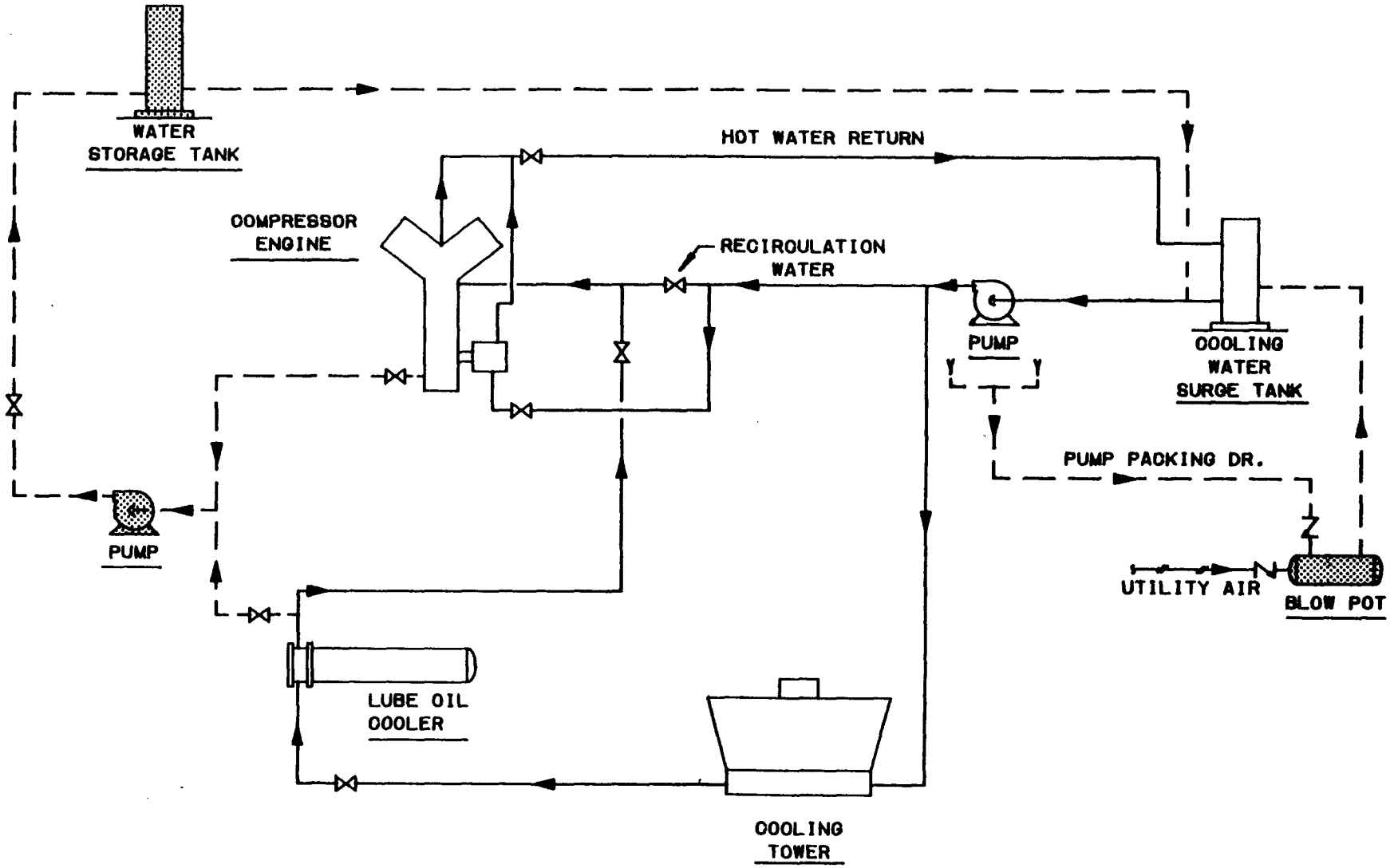
---SECTION 9----------FEDERAL REGULATIONS----------

OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH
APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE,USE SUPPLIED
AIR APPARATUS.
REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE)
NOT APPLICABLE
RCRA(40CFR): IF DISCARDED,THIS MATERIAL BEARS HWI# D002
DOT(49CFR)CLASSIFICATION: NOT APPLICABLE
NFPA/HMIS : HEALTH - 1 ; FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - ACID

****

THIS DOCUMENT IS PROVIDED TO SUPPLY ALL THE INFORMATION NECESSARY TO COMPLY WITH OSHA HAZARD COMMUNICATIONS REGULATIONS, AND RIGHT-TO-KNOW REQUIREMENTS. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH
ENVIRONMENTAL INFORMATION COORDINATOR

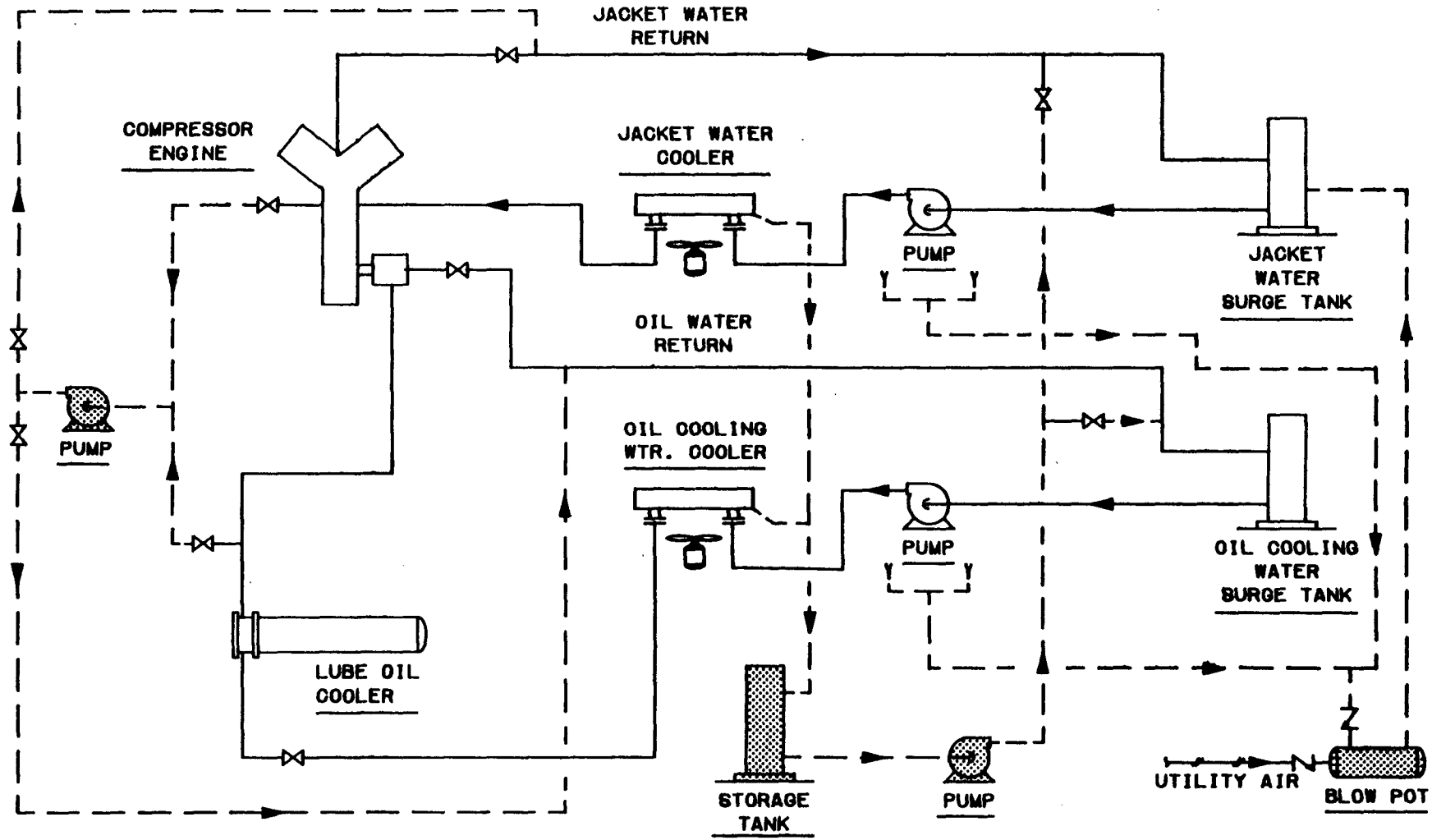


NOTE:
DASHED & SHADED
INDICATES NEW CONSTR.

Attachment 4

EUNICE #1 FIELD COOLING WATER
CONTAINMENT SCHEMATIC

SCALE: NONE	DWG. NO. JEF-L-94	REV.

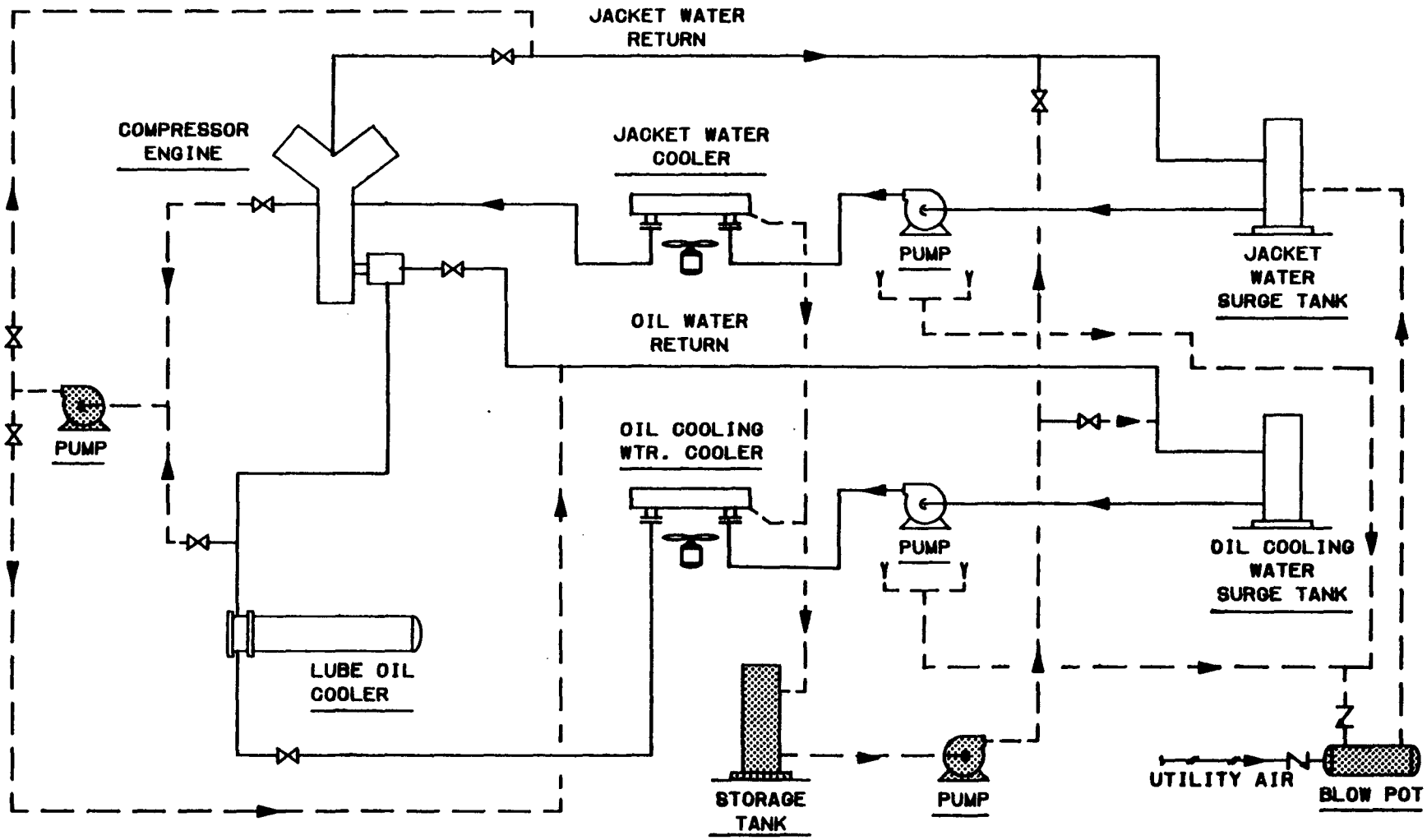


NOTE:
DASHED & SHADED
INDICATES NEW CONSTR.

Attachment 5

EUNICE #2 FIELD COOLING WATER CONTAINMENT SCHEMATIC

SCALE: NONE	DWG. NO. JEF-L-95	REV.

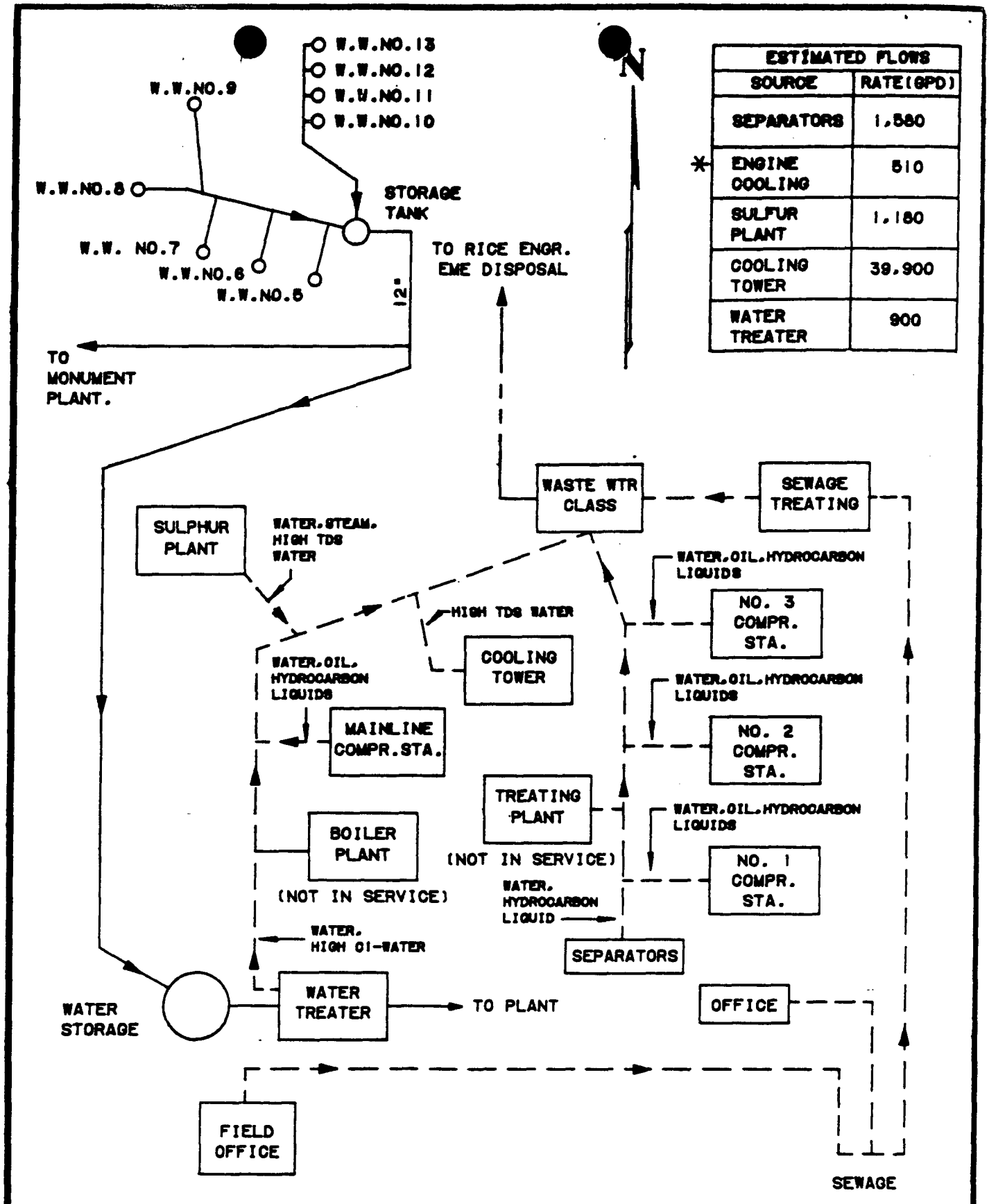


NOTE:
DASHED & SHADED
INDICATES NEW CONSTR.

Attachment 6

EUNICE #3 FIELD COOLING WATER CONTAINMENT SCHEMATIC

SCALE: NONE	DWG. NO. JEF-L-96	REV.



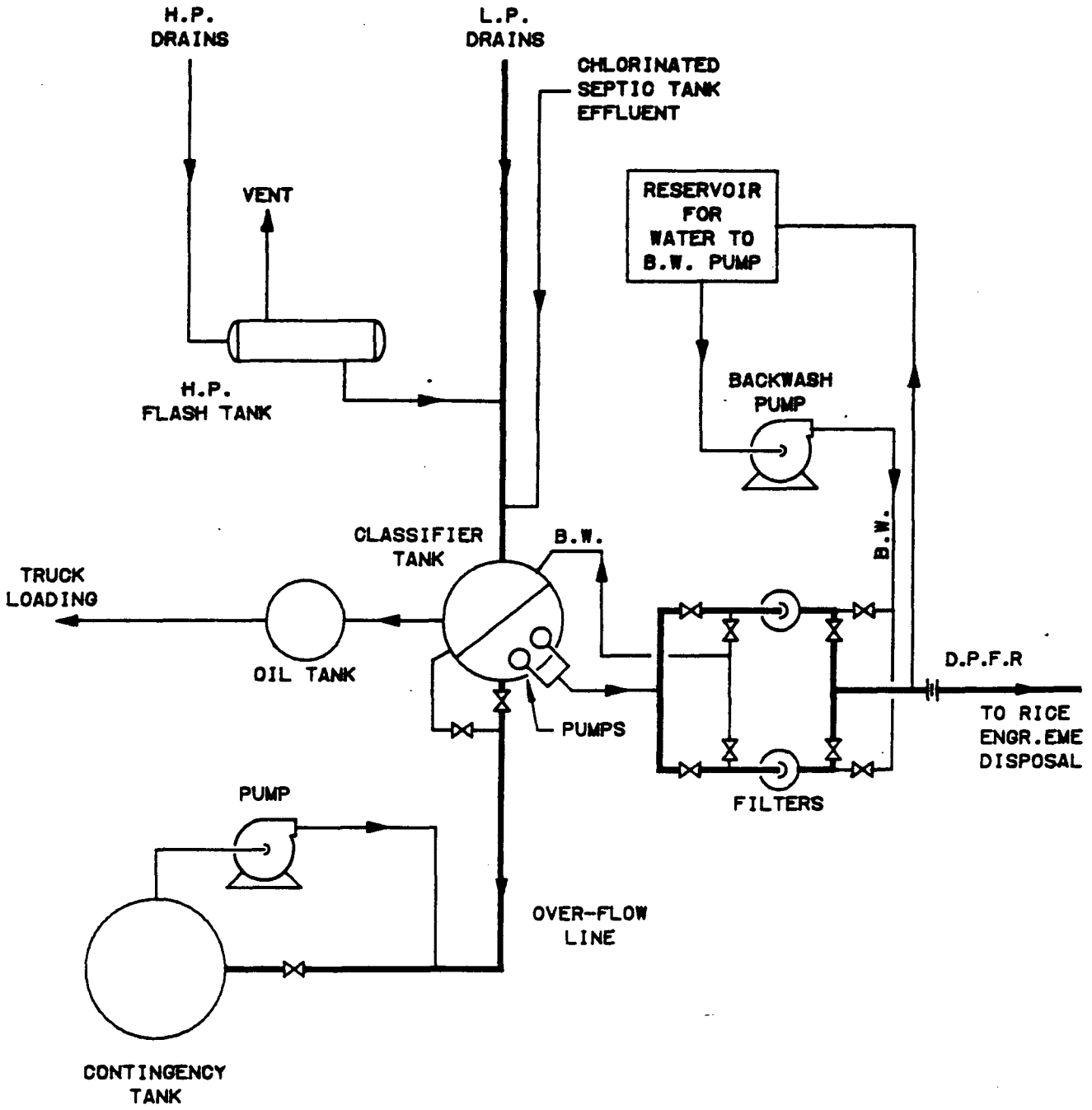
* CLOSED SYSTEM DRAINAGE DISCONTINUED.

NOTE:
IRRIGATION SYSTEM: LAWN SPRINKLERS & GARDEN WATERING

Attachment 7

EUNICE PLANT

WATER AND WASTEWATER FLOW SCHEMATIC



REF.DWG.NO. IEF-1-P301 REV.3

Attachment 8

EUNICE PLANT

WASTEWATER CLASSIFIER-AREA
FLOW DIAGRAM

Attachment 9

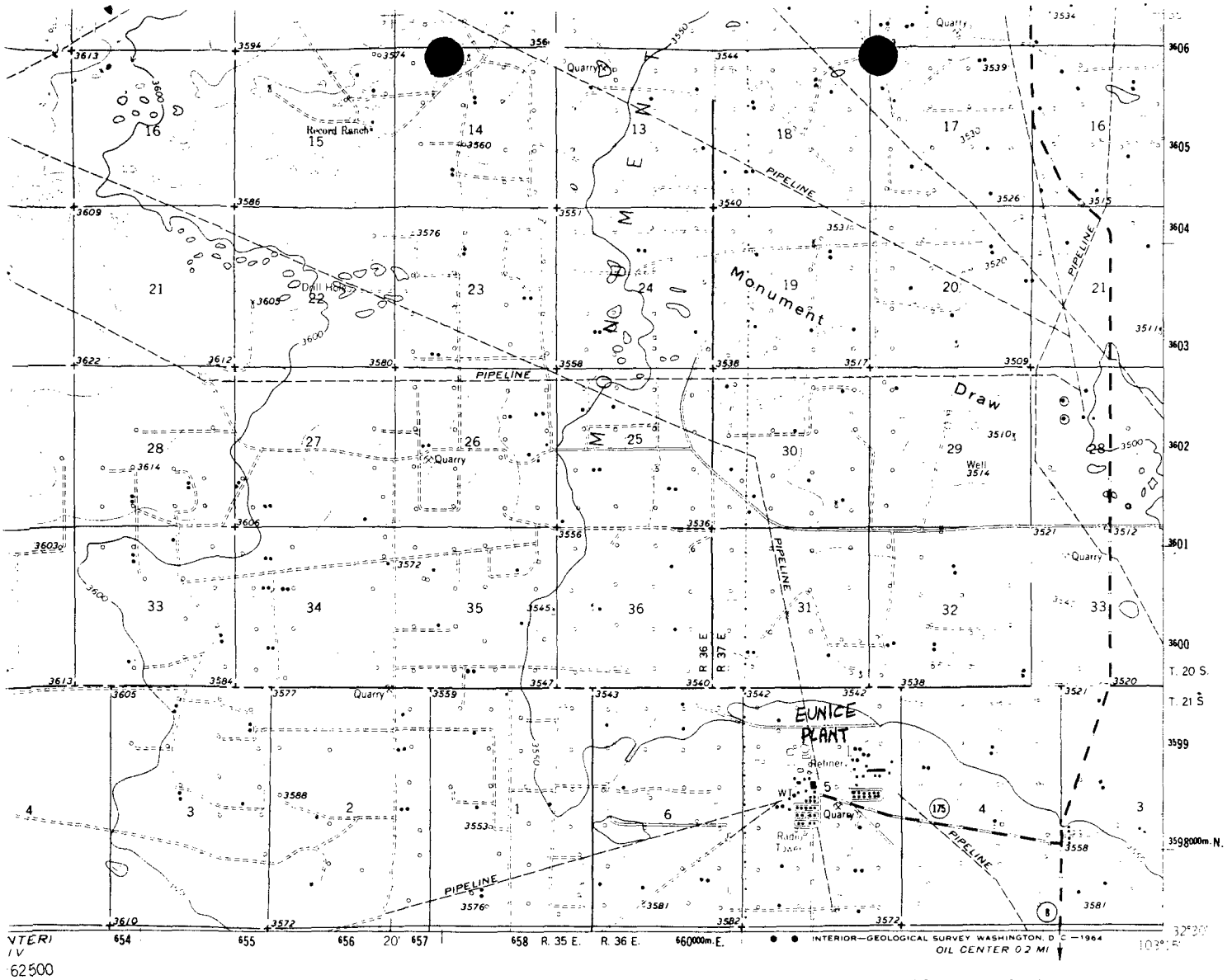
Characterization of Eunice Wastewater
Two (2) 24-hour Composite Analyses

Constituent	July, 1983	
	Sample 1 mg/L [1/]	Sample 2 mg/L [2/]
Cyanide	<0.005	0.005
Fluoride	2.4	2.7
Nitrate as N	22.8	24.1
COD	151.0	121.0
TDS	1280	1240
Sulfate	565	589
Chloride	146	192
Phenol	<0.005	0.1
Benzene	<0.005	0.013
Toluene	<0.005	<0.005
Carbon Tetrachloride	<0.01	<0.01
EDC	<0.01	<0.01
1-1DCE	<0.01	<0.01
PCE	<0.01	<0.01
TCE	<0.01	<0.01
Aluminum	0.07	<0.05
Arsenic	0.01	<0.01
Barium	0.57	0.43
Boron	1.54	4.21
Cadmium	<0.005	<0.005
* Chromium	0.4	0.15
Cobalt	<0.025	<0.025
Copper	0.27	0.15
Iron	1.09	0.55
Lead	<0.01	<0.01
Manganese	0.09	0.07
Mercury	<0.002	0.04
Molybdenum	0.1	0.06
Nickel	0.06	0.04
Selenium	<0.01	<0.01
Silver	<0.005	<0.005
Zinc	4.5	4.1

1/ Sample collected 10a.m.-19th thru 10a.m.-20th.

2/ Sample collected 10a.m.-20th thru 10a.m.-21st.

* Chromium is no longer used at this facility.



62500

2 3 4 MILES

12000 15000 18000 21000 FEET

3 4 5 KILOMETERS

VAL 10 FEET

. SEA LEVEL

ROAD CLASSIFICATION

Heavy-duty — Light-duty

Medium-duty — Unimproved dirt

U.S. Route — State Route

NEW MEXICO

QUADRANGLE LOCATION

MONUMENT, N. MEX.

1963

AMS 6948 - SERIES V781

MAP ACCURACY STANDARDS

ER 25, COLORADO OR WASHINGTON 25, D.C.

AND SYMBOLS IS AVAILABLE ON REQUEST

Attachment 10

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

April 6, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. L. Frantz, Agent
Permian Basin Region
Phillips 66 Natural Gas Co.
4001 Penbrook
Odessa, Texas 79762

RE: Discharge Plan GW-9
Eunice Gasoline Plant
Lea County, New Mexico

Dear Mr. Frantz:

On October 11, 1983, the ground water discharge plan, GW-9, for the Eunice Gasoline Plant located in Lea County was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission Regulations and it was approved for a period of five years. The approval will expire on October 11, 1988. On January 5, 1987 this discharge plan was transferred to Phillips 66 Natural Gas Company with the exception of the "Mainline Engine Room." The OCD will separate the discharge plan into two parts. GW-9 will refer to the processing plant with renewal and compliance with the terms and conditions of the processing plant discharge plan the responsibility of Phillips 66 Natural Gas Company. GW-46 will refer to the mainline engine room with renewal and compliance with the terms and conditions of the "Mainline Engine Room" discharge plan the responsibility of El Paso Natural Gas Company.

If your section of the facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines will be used in review of your renewal application.

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S. MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

ENERGY AND MINERALS DEPARTMENT

Oil Conservation Division (Name of Sender)

P.O. Box 2088

Santa Fe, New Mexico 87501 (No. and Street, Apt., Suite, P.O. Box or R.D. No.)

(City, State, and ZIP Code)

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5885.

Sincerely,

David G. Boyer, Chief
Environmental Bureau

DGB:sl

Enclosure

cc: OCD-Hobbs

STATE OF NEW MEXICO

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

January 5, 1987

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. C. Mikm, Agent
Permian Basin Region
Phillips 66 Natural Gas Co.
4001 Penbrook
Odessa, Texas 79762

Mr. C. W. Hagen, Vice Pres.
El Paso Natural Gas Co.
P. O. Box 1492
El Paso, Texas 79978

Re: Discharge Plan Transfer GW-9
Eunice Gasoline Plant
El Paso Natural Gas Co.
To Phillips 66 Natural Gas Co.

Gentlemen:

Pursuant to your request dated December 15, 1986, and Section 3-111 of the Water Quality Control Commission Regulations, effective December 31, 1986, responsibility for compliance of the terms and conditions of the approved Discharge Plan GW-9, Eunice Gasoline Plant, Lea County, New Mexico, is transferred from El Paso Natural Gas Company to Phillips 66 Natural Gas Company with the following exception:

1. Any spills, leaks, reporting requirements and disposal of any wastes generated in the "mainline engine room" will remain the responsibility of El Paso Natural Gas Company. EPNG must comply with the terms and conditions of discharge plan GW-9 as they apply to the "mainline engine room".

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the director of the facility expansion production increase, or process modification that would result in any significant modification in the discharge of water contaminants.

Discharge plan GW-9 was approved October 11, 1983 and will expire October 11, 1988, and application for renewal should be submitted in ample time for

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S. MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

ENERGY AND MINERALS DEPARTMENT
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504

(Name of Sender)

(No. and Street, Apt., Suite, P.O. Box or R.D. No.)

(City, State, and ZIP Code)

review. Please be advised a requirement for renewal will be testing of all underground piping at facilities in excess of 25 years of age.

An inspection trip by members of the OCD staff will be scheduled with you in the near future.

If there are any questions, please do not hesitate to call Dave Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5885.

Sincerely,

Charles E Roybal

CHARLES ROYBAL
Acting Director

CR:RCA:dp

cc: OCD-Hobbs

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

March 4, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

El Paso Natural Gas Co.
One Petroleum Center/Building Two
3300 North "A" Street
Midland, Texas 79707

Attention: Mr. J. W. Cunningham

Re: EPNG Discharge Plans -
Lea County Plants Drain
Line Testing

Dear Mr. Cunningham:

We have reviewed the results of the drain line testing program which was conducted by EPNG as part of the discharge plan for the Jal No. 3 (GWR-10), Jal No. 4 (GWR-7), Eunice (GWR-9), and Monument (GWR-8) gas processing plants.

Upon analysis of the results and an estimation of the corrosion rates, we concur with your suggestion that yearly testing of the drain systems would be excessive. Therefore, by this letter, hydrostatic testing of the underground drain systems for the Jal No. 3, Jal No. 4, Eunice, and Monument gas processing plants will be required as part of the discharge plan renewal process. The testing program for each plant should be completed prior to the submittal of the discharge plan renewal. The discharge plan renewal shall include drawings of, and procedures for, the testing program as well as the results obtained from the testing program. A list of all piping replaced should also be included.

It should be noted that in the future, all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval or renewal.

If you have any questions concerning this letter and the effect it may have on other EPNG plants, please feel free to call Phil Baca or Dave Boyer at (505) 827-5812.

Sincerely,

R. L. STAMETS
Director

RLS/PB/dp

cc: William F. Lorang, EPNG
OCD-Hobbs Office

GPM GAS CORPORATION

September 28, 1992

INTER-OFFICE CORRESPONDENCE / SUBJECT:

New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

Gentlemen:

Effective October 31, 1992, at 11:59 p.m., the responsibility, coverage, and liability for the following permits will be transferred from GPM Gas Corporation to a new Delaware corporation using the same name, GPM Gas Corporation. The present permit holder (GPM Gas Corporation) will change its name to avoid any confusion.

Facility	Permit Description	Permit Number
Artesia Gas Plant	Discharge	GW-23
Eunice Gas Plant	Discharge	GW-16
Hobbs Booster	Discharge	GW-44
Lee Gas Plant	Discharge	GW-2

Please reflect this change in your records. If you need further information, please contact Mr. Steve Godby at 713/297-5971.

Sincerely,

M. J. Panatier
Sr. Vice President
Chief Operating Officer
1300 Post Oak Blvd.
Houston, TX 77056

I acknowledge receipt of the above notice.

D. W. Casselberry
Promoter
new GPM Gas Corporation

PHILLIPS PETROLEUM COMPANY
BARTLESVILLE, OKLAHOMA 74004 918 661-6600

LEGAL

January 30, 1992

New Mexico Oil Conservation Division
State Land Office Building
Attn: Roger Anderson
310 Old Santa Fe Trail
Santa Fe, NM 87504

Gentlemen:

By agreement dated December 27, 1991 John Scott, Vice President, Quality, Environment, and Safety, Phillips Petroleum Company, and Robert Koch, promoter for the transferee, informed you of the transfer of certain permits, to wit:

Artesia Gas Plant	Permit No. GW-23
Eunice Gas Plant	Permit No. GW-16
Hobbs Booster	Permit No. GW-44
Lee Gas Plant	Permit No. GW-2

from Phillips Petroleum Company to "Phillips Gas Company". However, Phillips Gas Company, the permit transferee, will immediately change its name to "Phillips 66 Natural Gas Company."

Therefore, please have your records reflect that the above permits are to be held by Phillips 66 Natural Gas Company as of February 1, 1992.

Very truly yours,

Michael C. Wofford
Attorney

MCW:klk
/158

PHILLIPS PETROLEUM COMPANY

RECEIVED
JAN 31 1992
OIL CONSERVATION DIV.
SANTA FE

December 27, 1991

Robert C. Koch
Promoter
Phillips Gas Company

Effective 11:59 p.m., January 31, 1992, the responsibility, coverage, and liability for the permits listed in the attachment will be transferred from Phillips Petroleum Company to Phillips Gas Company, a corporation being created pursuant to Delaware law.

Please reflect this change in your records. Please contact M. C. Wofford at 918-661-6500 if you need further information.

Very truly yours,

PHILLIPS PETROLEUM COMPANY

John M. Scott

John Scott
Vice President
Quality, Environment, and Safety

JS:MCW:tr
Attachment: GW Permit List

I acknowledge receipt of the above notice.

Robert C. Koch
Promoter
Phillips Gas Company

xc: New Mexico Oil Conservation Division
State Land Office Building
Attention: Roger Anderson
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

New Mexico Oil Conservation Division

Facility	Permit Description	Permit Number
Artesia Gas Plant	Discharge	GW-23
Eunice Gas Plant	Discharge	GW-16
Hobbs Booster	Discharge	GW-44
Lee Gas Plant	Discharge	GW-2

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY
ODESSA, TEXAS 79762
4001 PENBROOK

May 29, 1991

Kathy Brown
Environmental Bureau
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Ms. Brown:

Thank you for your comments and the discussion concerning the testing of water drainage piping discharge systems. Phillips appreciates such regulatory guidance.

In confirmation of our telephone conversation yesterday, Phillips understands that such water drainage piping must be pressure tested after 24 years of service from its date of installation. With respect to Phillips' Eunice Plant, the portion of the water drainage piping discharge system which was installed by El Paso Natural Gas Company in 1982 during their ownership of that portion of the plant is not required to be pressure tested until the year 2007. This is contingent upon El Paso's documentation of the installation date of the piping in question.

Our conversation also indicated that even if the 1982 portion of the system was pressure tested in 1991, it would still be required to be pressure tested in 2007. Please contact me in the near future should this letter contain any discrepancies pertaining to our conversation or any other Oil Conservation Division Rules and Regulations. Again, thank you for your guidance and direction.

Sincerely,

RYM

Ralph Y. McCord
Environmental Specialist
915-368-1635

RYM:mdp:1034

cc: David G. Boyer, Chief
New Mexico OGD Environmental Bureau

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK, PHONE: 915 367-1266

October 31, 1989

Berming of Gasoline Storage Tank
Discharge Plan Renewal
Eunice Plant
Discharge Plan No. GW-16

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 722

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

Per our recent phone conversation, this is to notify you that the berm around the gasoline storage tank used to fuel our vehicles will be constructed so as to contain 130 % of the volume of the tank.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Representative

MDF

New Mexico Health and Environment Department

GARREY CARRUTHERS
Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

October 25, 1989

Mr. Dave Boyer
Oil Conservation Division
State Land Office Bldg.
P.O. Box 2088
Santa Fe, NM 87504

Dear Mr. Boyer:

Enclosed for your information are copies of EPA's Comprehensive Groundwater Monitoring Reports for the four Phillips Gas Plants - Artisia, Eunice, Lee and Lusk. These reports have not been reviewed by the Hazardous Waste Program and are to be considered as draft reports. At this time no further action is expected on the reports to finalize them.

If you have any questions, or need additional information please call me at 827-0170.

Sincerely,

V. Suzanne Moore-Mayne

Suzanne Moore-Mayne
Water Resource Specialist II
Hazardous Waste Program

SMM/vga

Encl.

— ENVIRONMENTAL IMPROVEMENT DIVISION —
Harold Runnels Building
1190 St. Francis Dr.
Santa Fe, New Mexico 87503

PHILLIPS 66 NATURAL GAS COMPANY
A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK, PHONE: 915 367-1266

October 20, 1989

Discharge Plan Renewal
Eunice Plant
Discharge Plan No. GW-16

CERTIFIED MAIL
RETURN RECEIPT NO. P-512 089 716

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This is to provide information you requested in order to continue your review of the discharge plan submitted for our Eunice Plant. The items of concern contained in your letter of May 9, 1989 with our responses follows:

Item #1 - Plant Water Systems

Section E states engine jacket cooling water is pumped out of a fiberglass lined cement sump. Submit a plan for integrity testing for this sump. Leak detection will be installed at the time of repair or replacement of this sump.

Response: Integrity of the fiberglass lined cement sump will be confirmed by conducting a visual inspection of the fiberglass lining. This inspection will be performed during the annual plant shutdown. Leak detection will be installed at the time of repair or replacement of this sump.

Item #2 - Plant Drain and Disposal System

Section A states that "spent" lube oil is drained to below grade sumps at both the new and old power rooms. What time frame is the lube oil held in these sumps prior to being pumped to the slop oil tank? Submit a plan for the integrity testing of these sumps. Any sumps that are designed to collect fluids must be equipped with leak detection. Leak detection will be installed at the time of repair or replacement of these sumps.

Response: Lube oil is held in the sumps for less than 24 hours. The new power room oil sump was constructed in a concrete lined pit. Any leaks which might occur from this sump would be contained in the pit; therefore, an integrity test should not be required. Integrity testing of the old power room oil sump will be conducted annually using the following method:

1. Isolate the sump.
2. Determine fluid level.
3. Close cover hatch and allow sump to stand inactive for a twelve hour period.
4. Redetermine fluid level at the end of the test period. If the fluid level readings remain unchanged, tank integrity has been proven.

Item #3 - Solid Waste Disposal

Section B and C state spent molecular sieve and spent precoat material are disposed of on site. Specifically, how and where are these materials disposed of at the plant?

Response: Spent precoat material is no longer generated at the plant. Spent molecular sieve has been disposed of and used as fill material in the east end of the abandoned wastewater pond.

As you are aware, the plant was recently removed from the RCRA system and NMEID jurisdiction (see attached letter). We request the abandoned wastewater pond be approved as a solid waste disposal facility for the plant when the new discharge plan is issued. This would allow us to use inert wastes periodically generated by the plant as fill material to close the pond.

Item #4 - Berming of Tanks and Paving of Process/Storage Areas

The OCD is requiring that above grade tanks that contain materials with constituents that can be harmful to fresh water and the environment, if a sudden and catastrophic spill were to occur, must be contained at the site of the spill and mitigated immediately. A commitment and completion schedule is required for the berming of vessels that contain fluids other than fresh water.

The OCD is also requiring paving and curbing of process and storage areas where leaks or spills can occur. Submit a completion schedule for paving and curbing those areas where leaks or spills can occur. This schedule must include all drum storage areas.

Response: The following is a list of work that will be performed as part of the discharge plan renewal:

1. The wastewater, sour water and brine storage tanks will have earthen or caliche berms constructed around them in order to contain their contents in the event of a tank failure. The berms will be designed to contain 130 % of the volume of the tanks.

2. The lube oil, heating oil, anti-freeze, treating chemical, acid and solvent storage tanks will be equipped with pads and curbing. It is understood 130 % containment will not be required for these tanks since they are entirely above ground on saddles.

3. The gasoline and methanol storage tanks will have earthen or caliche berms constructed around them in order to prevent spreading of their contents in the event of a rupture. It is understood 130 % containment will not be required for these tanks since they are above ground and their contents are highly volatile.

4. The area bordered by the west side of the amine pumps to the east side of the amine storage tank, with the north/south border being the ends of the amine surge tank, will be paved and curbed. The curbing will be three inches high which will contain and allow released fluids from the main processing area to gravity feed into the plant's current drain system.

5. The product booster pumps will have an angle iron frame built around the base of the pumps to collect leaked fluids. This collection system will be equipped with a drain connected to the plant's current drain system.

6. A drum storage area consisting of pad and curbing will be constructed.

The aforementioned work will be completed by August 1, 1991.

It should be noted we have installed a high liquid level alarm on the oil/water separator. We also plan to install a six inch angle iron frame around the separators' two pumps to contain any fluid released from the pump seals. In addition, a drain system has been installed around the turbines to prevent spills and wash water from reaching the ground around the turbine building.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

Michael D. Ford

Michael D. Ford
Environmental Representative

MDF

Attachment

New Mexico Health and Environment Department

Dennis Boyd
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

September 13, 1989

William F. Ballard, Manager
Phillips Petroleum Company
12 A4 Phillips Bldg.
Bartlesville, OK 74004

RE: RCRA status Artesia, Eunice, Lee and Lusk Plants-
NMD000709667, NMD000709634, NMD000709675, NMD000709659

Dear Mr. Ballard:

The New Mexico Environmental Improvement Division (NMEID), accepts Phillips Petroleum Company's (Phillips') position presented in their May 17, 1989 correspondence that the four Phillips facilities in New Mexico, Artesia, Eunice, Lee and Lusk are exempt from RCRA regulation based upon EPA's Regulatory Determination of July 6, 1988 Federal Register. NMEID also accepts Phillips' Certificate of No Hazardous Waste Activity included in the May 17, 1989 correspondence.

NMEID's acceptance of Phillips' position does not remove Phillips from regulation under the Hazardous Waste Management Regulations, (HWMR-5, as amended 1989) and the New Mexico Hazardous Waste Act, New Mexico Statutes Annotated 1978, (1989, Supp.), if Phillips transports, treats, stores or disposes of hazardous wastes in the future. To the extent that Phillips generates hazardous wastes, Phillips is subject to the generator requirements of HWMR-5.

If NMEID receives any new information that indicates that Phillips has been or may be regulated under RCRA, enforcement actions will be initiated. With NMEID's acceptance of Phillips' position, compliance with the April 19, 1988 Compliance Order/Schedule is determined to be resolved. However, Phillips may still be subject to EPA enforcement actions.

— ENVIRONMENTAL IMPROVEMENT DIVISION —
Harold Runnels Building
1190 St. Francis Dr.
Santa Fe, New Mexico 87503

A copy of EPA's response to NMEID's request to provide an interpretation of the oil and gas exemption in the July 6, 1988 Federal Register is enclosed for Phillips' information.

If you have any questions or need additional information, please call me at (505) 827-2926.

Sincerely,

Boyd Hamilton
Program Manager
Hazardous Waste Program

BH/SMM/smm

Encl.

cc: Lynn Prince, EPA Region 6
Tracy Hughes, Office of General Counsel, EID
Knut Am, Phillips Petroleum Company
Reese B. Copeland, Phillips Petroleum Company

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

July, 18, 1989

Mr. Boyd Hamilton
Program Manager
Hazardous Waste Program
New Mexico Health and Environment Department
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, New Mexico 87503

Dear Mr. Hamilton:

On June 8, 1989, you requested that the Environmental Protection Agency (EPA) provide an interpretation of the so called oil and gas exemption to the Resource Conservation and Recovery Act (RCRA) as delineated in the Regulatory Determination in the July 6, 1988, Federal Register (FR). Specifically, you asked if the exemption applied to four gas plants operated by Phillips Petroleum Company (Phillips) in eastern New Mexico. This request was prompted by Phillips' assertion, in a letter dated May 17, 1989, that the surface impoundments in question are not RCRA regulated units based on that regulatory determination. Phillips supported this position with a certificate of no hazardous waste activity for the four plants.

In EPA's regulatory determination, on Page 25454, cooling tower blowdown is specifically included in the wastes exempted from RCRA regulation. However, gas plant cooling tower cleaning wastes are specifically excluded from the exemption. These determinations are based on the three criteria included as an attachment to the June 6, 1989, letter from Dan Derkics, (Chief, Large Volume Waste Section EPA Headquarters) to Julie Wanslow, a copy of which was included in your letter to me of June 15, 1989. Mr. Derkics letter states that cooling tower blowdown "... is comprised only of water, scale or other wastes generated by the actual operation of the cooling tower ... included as part of the functional operation of the cooling tower." The Region interprets this to mean that corrosion inhibitors and biological control agents are included in cooling tower blowdown.

Mr. Derkics also clarifies the meaning of cooling tower cleaning wastes as those wastes which, may be generated by any cooling tower and includes "...solvents, scrubbing agents or other cleaning materials introduced

into the process solely to remove buildup or otherwise clean the equipment, and are not included as part of the functional operation of the cooling tower." Such wastes are not intrinsically derived from primary field operations for natural gas production. The Region interprets this to mean that the wastes generated during the periodic cleaning are not exempt.

In their No Hazardous Waste Activity Certificate, Phillips states that both chromate and non-chromate chemicals have been used in the cooling towers since November 19, 1980, as corrosion inhibitors at these sites. They further state that cooling towers must be cleaned on a periodic basis (approximately once every five years) and that this cleaning consists of removing the sludge by vacuum truck from the basin and removing scale from the cooling coil heads and laterals by sandblasting. Phillips also asserts that these materials have been tested and are not hazardous wastes.

One of the reasons that cleaning waste from a cooling tower may be RCRA hazardous waste is due to the chemicals added to the system for corrosion inhibition or control of biological agents. Chromate compounds have been widely used in this application as they have at the Phillips gas plants. Discarded materials generated in the cooling tower would be hazardous waste, as that term is defined in 40 CFR §261.3, when the chromium concentration reaches 5.0 mg/l when tested using the procedures for EP toxicity.

If the waste generated during the periodic cleaning exceeds a concentration of 5.0 mg/l for chromium, then the waste is hazardous waste. Phillips claims the waste is tested in their certificate but they do not provide enough information for a determination of the adequacy of the testing. Should this waste be EP Toxic and should it be placed in the same surface impoundments as the cooling tower blowdown, then the units are RCRA regulated regardless of the exemption for cooling tower blowdown. If on the other hand these conditions are not met, then the material is not hazardous waste. At the very least, the coil heads and laterals have the potential of having significant levels of chromium waste/scale which must be sandblasted off. It is this cooling tower cleaning waste that may make the units regulated, however, such a determination is not possible from the information provided in the certificate.

Some discussion is necessary about a mixture of an exempted waste and a non-exempted waste. EPA has in the past exempted some such mixtures as in the case of ash waste and flue gas emission control waste generated primarily from the combustion of coal and fossil fuels. [40 CFR 261.4(b)(4)] However, the wastes which are co-disposed and also exempt are those materials generated in conjunction with the exempted wastes. The waste materials are not segregated from the combustion wastes. Wastes which

are segregated and disposed of or treated separately from combustion wastes and otherwise meet the definition of a hazardous waste are regulated under RCRA. This determination was made in 1981 in response to the Utility Solid Waste Activities Group.

The clearest exposition of EPA's stand regarding the applicability of the mixture rule when an exempted waste is mixed with a hazardous waste is found in the proposed rule published in the Federal Register on April 17, 1989, for mining waste.

> "EPA has decided, however, that it is appropriate to revise the proposed regulatory status of some mixtures of non-excluded 'characteristic' wastes and Bevill wastes. In these instances, the mixture will be considered a hazardous waste if it exhibits one or more of the same hazardous characterisitcs that are exhibited by the non-excluded waste. If the mixture exhibits one or more hazardous characteristics that are exhibited by the Bevill waste but not by the non-excluded characteristic waste, then the mixture is not hazardous waste.
>
> EPA wishes to make clear, however that in any case, mixing a characteristic hazardous waste with a Bevill waste would require a RCRA treatment, storage or disposal permit.... "

Although this interpretation applies to a proposed mining waste rule, EPA's Office of General Counsel has assured the Region that the same idea applies in the petroleum exclusion.

Clearly, if at any time the cooling tower cleaning waste meets the definition of hazardous waste and it is mixed with the exempted waste, the unit where mixing takes place is a regulated unit.

The interpretations of the exemption contained in this letter are consistent with those of EPA's Office of General Counsel.

I would suggest that EID review Phillip's analysis and all available information to determine if the cooling tower cleaning waste is EP-toxic for chromium or is not. You should also determine what quantity of waste is generated and if this waste is/was placed in the surface impoundments after 1980.

Although further investigation/evidence is required to conclusively determine the regulatory status of these sites, I hope the information provided above will prove useful to your staff. If your staff has any questions, please have them call Court Fesmire at (214) 655-6775.

Sincerely,

Randall E. Brown, Chief
RCRA Enforcement Branch

cc: Tracy Huges
Office of General Counsel
NMEID

Although further investigation/evidence is required to conclusively determine the regulatory status of these sites, I hope the information provided above will prove useful to your staff. If your staff has any questions, please have them call Court Fesmire at (214) 655-6775.

Sincerely,

Randall E. Brown, Chief
RCRA Enforcement Branch

cc: Tracy Huges
Office of General Counsel
NMEID

RECEIVED
JUN 20 1989
OIL CONSERVATION DIV.
SANTA FE

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES DEPT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-16) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas 79762, has submitted an application for renewal of its previously approved discharge plan for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process wastewater is disposed of in an OCD approved contract disposal well. The total dissolved solids content of the wastewater is approximately 1750 mg/l. Ground water most likely to be affected by discharges at the surface is at a depth from 80 to 150 feet with a total dissolved solids concentration from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be handled.

(GW-15) Northern Natural Gas Company, a Division of ENRON Corp., Jimmy D. Harp, Sr. Environmental Project Engineer, P. O. Box 1188, Houston, Texas 77251-1188, has submitted an application for renewal of its previously approved discharge plan for its Hobbs Gas Plant located in the NE/4, Section 6, Township 19 South, Range 39 East, NMPM, Lea County, New Mexico. Approximately 60,000 gallons per day of process wastewater is disposed of in an OCD approved contract disposal well. There is a 2 1/2 acre lined evaporation pond with leak detection on site for emergency storage. The total dissolved solids content of the wastewater is approximately 1200 mg/l. Ground water most likely to be affected by discharges at the surface is at a depth from 120 to 145 feet with a total dissolved solids content from 400 to 850 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be handled.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of June, 1989. To be published on or before June 16, 1989.

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

SEAL

Journal, June 16, 1989

STATE OF NEW MEXICO } ss
County of Bernalillo

THOMAS J. SMITHSON

..... being duly sworn declares and says that he is NATL ADV. MGR. of the **Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for ..... times, the first publication being on the 16 day of June, 1989, and the subsequent consecutive publications on ....., 198.....

Thomas J Smithson

OFFICIAL SEAL
Signature: Angela M Archibeque
ANGELA M. ARCHIBEQUE
NOTARY PUBLIC NEW MEXICO
nd Filed with Secretary of State
sion Expires 6/30/92

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 16 day of June, 1989

PRICE $ 28.99

Statement to come at end of month.

ACCOUNT NUMBER C 80932

EDJ-15 (R-2/86)

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, George W. Moore

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

of

One weeks.
Beginning with the issue dated

June 15, 19 89
and ending with the issue dated

June 15, 19 89

Publisher.

Sworn and subscribed to before me this 21st day of June, 19 89

Notary Public.

My Commission expires

September 30, 19 89
(Seal)

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

LEGAL NOTICE
June 15, 1989

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-16) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas 79762, has submitted an application for renewal of its previously approved discharge plan for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process wastewater is disposed of in an OCD approved contract disposal well. The total dissolved solids content of the wastewater is approximately 1750 mg/l. Ground water most likely to be affected by discharges at the surface is at a depth from 80 to 150 feet with a total dissolved solids concentration from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be handled.

(GW-15) Northern Natural Gas Company, a Division of ENRON Corp., Jimmy D. Harp, Sr. Environmental Project Engineer, P.O. Box 1188, Houston, Texas 77251-1188, has submitted an application for renewal of its previously approved discharge plan for its Hobbs Gas Plant located in the NE/4, Section 6, Township 19 South, Range 39 East, NMPM, Lea County New Mexico. Approximately 60,000 gallons per day of process wastewater is disposed of in an OCD approved contract disposal well. There is a 2½ acre lined evaporation pond with leak detection on site for emergency storage. The total dissolved solids content of the wastewater is approximately 1200 mg/l. Ground water most likely to be affected by discharges at the surface is at a depth from 120 to 145 feet with a total dissolved solids content from 400 to 850 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be handled.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of June, 1989. To be published on or before June 16, 1989.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
William J. LeMay,
Director
(Seal)

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-16) **Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas 79762,** has submitted an application for renewal of its previously approved discharge plan for its Eunice Gas Plant located in the SE/4 NE/4, Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 15,000 gallons per day of process wastewater is disposed of in an OCD approved contract disposal well. The total dissolved solids content of the wastewater is approximately 1750 mg/l. Ground water most likely to be affected by discharges at the surface is at a depth from 80 to 150 feet with a total dissolved solids concentration from 1000 to 1700 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be handled.

(GW-15) **Northern Natural Gas Company, a Division of ENRON Corp., Jimmy D. Harp, Sr. Environmental Project Engineer, P. O. Box 1188, Houston, Texas 77251-1188,** has submitted an application for renewal of its previously approved discharge plan for its Hobbs Gas Plant located in the NE/4, Section 6, Township 19 South, Range 39 East, NMPM, Lea County, New Mexico. Approximately 60,000 gallons per day of process wastewater is disposed of in an OCD approved contract disposal well. There is a 2 1/2 acre lined evaporation pond with leak detection on site for emergency storage. The total dissolved solids content of the wastewater is approximately 1200 mg/l. Ground water most likely to be affected by discharges at the surface is at a depth from 120 to 145 feet with a total dissolved solids content from 400 to 850 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be handled.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and

public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of June, 1989. To be published on or before June 16, 1989.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

S E A L