

# GENERAL CORRESPONDENCE

# **YEAR(S)**:



# Chavez, Carl J, EMNRD

From:Weathers, Stephen W [SWWeathers@dcpmidstream.com]Sent:Monday, January 15, 2007 9:36 AMTo:Chavez, Carl J, EMNRD

Subject: DCP Midstream Remediation Projects

Carl

I would like to set up a meeting with you to go over DCP Midstream Remediation Projects. What would your availability be for next week possibly on Thursday (January 25) or Mid Week the following week to meet and discuss the projects?

Daniel Dick and myself would attend as well as Mike Stewart the Environmental Consultant that does most of our groundwater remediation projects in NM.

Thanks

Stephen Weathers Sr. Environmental Specialist DCP Midstream 303-605-1718 (Office) 303-619-3042 (Cell)

Effective 1/1/07 my email address has changed to swweathers@dcpmidstream.com

Project Summary:

Lee Gas Plant (Discharge Plan GW-2) Unit N, Section 30, Township 17 South, Range 35 East

Summary date: January 2007

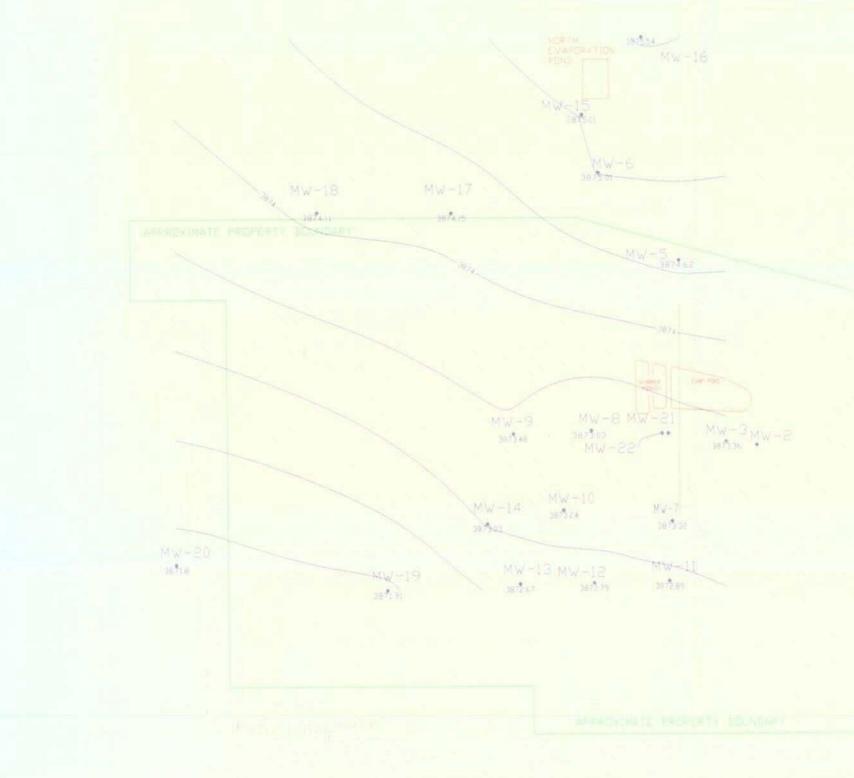
Project history:

- Investigative activities were initiated in April 1988 for Phillips 66 Natural Gas Company.
- DEFS acquired asset in April 2003.
- The groundwater collection system that was used to enhance free phase hydrocarbon (FPH) recovery was shut off in April 2003 for evaluation. The system was subsequently shown to be ineffective in enhancing FPH recovery.
- Remediation continues using an automatic FPH-only recovery system that became operational in three wells in May 2005. Turned off in June 2006 in MW-5 and MW-15 (see attached figure).
- Wells are sampled semi-annually.

Current Project Status:

- FPH removal continues in MW-6.
- FPH removal will be restarted in MW-5 and MW-15 by mid-February 2007.
- Semi-annual groundwater monitoring continues.
- All dissolved-phase hydrocarbons attenuate to below the New Mexico Water Quality Control Commission Groundwater Standards inside of the property boundaries based upon groundwater monitoring that was initiated in June 1991.





# OCD DCP Midstream LP. Sites Discussion Meeting (Stephen Weathers, Daniel Dick, et. al) February 1, 2007

## GPM Artesia GP (GW-23)

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On 5/26/2006, Stephen Weathers PG 303-605-1718 (swweathers@duke-energy.com) submitted a Flare Pit Soil Remediation & Closure Work plan by Conestoga-Rovers & Assoc. to Mike Bratcher. Upon your approval, DEFS will move forward w/ the closure activities. One hard copy of the work plan will also be mailed next week (OCD Santa Fe never received it).

Stephen Weathers, et al. will present the info. during the 1/31/2007 meeting in Santa Fe.

# Lee Compressor Station (GW-227) (Also known as the Gillespie/Feagan) A-24-T17 S 35 E

Closure work plan dated 9/5/2006 mailed to Ben Stone to complete a site closure.

The work plan was develop. Based on DEFS decision to cancel the discharge plan GW-227 and close the site. The closure plan is submitted to the OCD for approval.

Closure Activities: DEFS will remove all remaining equip. from site. The site will be visually inspected to determine if hydrocarb. impacted soil is present at the site. If no HC impacted soils are encountered, the site will be leveled and reseeded with native grass. If HC impacted soils are encountered, the impact soil will be remediated following NMOCD Guidelines for Remed. of Leaks, Spills, & Releases, 8/1993 and using: Benz (10 ppm), BTEX (50 ppm), and TPH (100 ppm). A PID might be used to screen potential HC impacted soil. If headspace is <= 100 ppm, the PID reading will be used as a substitute to lab analysis for benz./BTEX. If the PID is not used for screening confirm. soil samples will be analyzed for BTEX using EPA 8021B.

HC impact soils that are found to be greater than cleanup criteria will be excavated and properly disposed at an NMOCD approved facility. Confirmation soil samples will then be collected within the base and sidewalls of the excavation to confirm that the HC impacted soils have been removed to below the NMOCD cleanup stds. for this site.

After confirmation soil samples confirm the impacted soils has been removed to below the NMOCD cleanup Stds., the excavation will be backfilled with clean fill mtl. and the area reseeded w/ native grass. A closure report will be completed summarizing all field activities and analytical results. The closure report will also request that no further action will be needed at this site. Upon approval of this work plan, field activities will be scheduled. A 48 hr. notice will be given to the NMOCD Hobbs DO informing them of the start up of the field activities.

# LEE GP (GW-2)

Dick Daniel (DIDick@dcpmidstream.com)

Received Q4 2006 GW Monitor Rpt. On 1/30/07 w/ recommendations for certain activities, i.e., free-product recovery in MWs 5 and 15 w/ restart analysis on MW-8 recommended.

Expired DP and OCD msg. to Ruth Lang on 12/21/06: the Lee Compressor Station (GW-227) correspondence dated 12/28/06 indicates that the facility will remain inactive and follow the closure plan to permanently close the facility. Upon receipt of the closure plan info. and verification that contamination exists at the facility with some photos to display what the site currently looks like, the OCD may close the DP?

# **DUKE LINAM RANCH GP (GW-15)**

Third Qtr. 2006 GW Monitoring Report dated January 30, 2007.

GW conditions remain stable. Next monitor event is scheduled for first qtr. 2007. Next annual report for site will be prepared following completion of first qtr. 2007 monitor activities.

On 11/1/2006 Dick Daniel (didick@duke-energy.com) submitted the Annual GW Rpt. 2005-2006. The summary rpt. for Q3 2005 and Q1 2006 GW sampling event. The data indicate that GW conditions remain stable. The next monitor event was performed in 9/2006. The next annual rpt. for the site will be prepared following the completion of the Q1 2007 monitor activities & review & validation of the analytical results. The water tables rose substantially more in MW-1 and 2 than in MW-3, 7 & 9. MW-1 & 2 are located in or adjacent to a natural drainage swale that has been blocked in the S part of site to produce an internally drained condition. The other 3 wells are outside of this area. Unusually high precip in 2004-2005 resulted in more GW mounding beneath the closed drain swale than the rest of the site. The water table in MWs 1 & 2 began to recede after the precip. patterns returned to normal. Water tables in the other 3 wells continue to rise suggesting a more dampened relationship between the precipitation and resulting chgs. in the water table elevations.

MW-7 was not included in the piezometer maps. The level in MW-7 was not included in these maps. Including this well results in a water-table configuration that suggests radial flow from the center of the property. MW-7 has never contained measurable BTEX. This suggests the relatively higher water table in the central part of site is localized so contours should not be carried to the NW. FPH thick measurements for 9/29/2005 (MW-4=0.68 in & MW-6=4.23 in.) and 3/22/2006 (MW-4=0.76 & MW-6=3.69 in.). Only MWs 10 & 10D exceeded BTEX Stds. Any dissolved phase BTEX that emanate from FPH at MW-4 & MW-6 attenuate to below the method reporting limits before migrating to the vicinity of MW-1 (cross gradient) or MW-8 (down gradient). BTEX measured at MW-10 and 10D attenuate to concentrations that are slightly above MW-9 or below the reporting limits (MW-12 & 13) at the interior down gradient wells. The above have remained constant since ~ 6/2001. This indicates that BTEX distribution and attenuating mechanism that controls it are equilibrated.

The affected areas are min. of 1,000 ft. from the nearest down gradient property boundary. Wells containing FPH are in an active gas processing area so the safety risks inherent to restarting FPH collection more than offsets the environmental benefits that would be associated with the activity. The data establishes that dissolved phase releases from the FPH that is present in this area are attenuated approx. 1,000 ft. from the nearest down-gradient property boundary. The next semi-annual GW monitor event is scheduled for the Q3 2006. Contact Michael Stewart PE 303-948-7733 if you have questions.

# **HOBBS BOOSTER CS (GW-44)**

Project Summary: Hobbs Booster Station, (Discharge Plan GW-044) (Units C and D, Section 4, Township 19 South, Range 38 East)

Summary date: October 10, 2006

Project history:

DEFS inherited Hobbs Booster Station (Former Gas Plant) when it acquired the assets of GPM. Site investigation activities began in July 1999. Plume delineation was completed in June 2003.

Two remediation systems are present at the site. An air sparge system was installed in January 2004 to control cross-gradient off site migration of dissolved phase hydrocarbons. It has operated on a near continual basis except for a couple of periods when it was under repair, and the groundwater data verifies that it is controlling off-site migration.

A free phase hydrocarbon (FPH) collection system became operational in January 2005 in the center of the site. It has operated on a regular schedule except for a couple of brief periods when it was down for repairs. The system has effectively remove FPH since it was started. The system is inspected and maintained on a regular basis DEFS is currently evaluating the potential of adding vacuum to the system to increase the production rate and capture zone of each well.

**Current Project Status:** 

The hydrocarbon plume has been delineated to below the method detection limits. There is no evidence of plume expansion. Operation of the air sparge system is necessary to control dissolved-phase hydrocarbon releases to the south. FPH collection will continue indefinitely.

Detection level Groundwater monitoring continues at the site on a quarterly basis. Operation of the air sparge and the FPH collection system will continue indefinitely.

On 12/17/06 Michael Stewart & Steve Weathers notified OCD that Trident Environmental will conduct quarterly monitor well gauging & GW sampling and the following: SWLs in MW, RW and temp. wells using an oil/water interface problem; Collect GW samples for BTEX w/QA/QC; Purge water disposed at NMOCD approved facility. Project site location: 1625 W. Marland, Hobbs (C&D 4-19S-36E). Sampling will begin on 12/20/06.

On 10/30/06, Stephen Weathers 303-605-1718 (swweathers@duke-energy.com) submitted additional vacuum enhancement testing for the free phase hydrocarbon extraction system located at C&D 4-19S-38E. DEFS would like to complete this test early next week. Upon completion of the field activities DEFS will complete an assessment report summarizing the results of the test.

The AEC 10/30/06 summary of initial assessment activities & recom. for further evaluation of adding vacuum enhancement to the free phase hydrocarbon extraction system. Depth (BTOC) is about 50 feet. The above SWL indicate that recent heavy rains have not affected the water table in a fashion similar to 2004 precip. This fact is important because the WT historically declined at a rate of about 1 ft/yr. this trend should continue to expose more of the screened interval in these wells to make them available to vacuum effects.

FPH thickness ranges from about 0.43 in. to 10.63 in. in TW-C, OW-25W & 50W, OW-100W, OW-25S, OW-50S, OW-25 E & OW-25 N. There is a gravel interval at about 34 to 64 feet BGL.

On 10/23/2006, Stephen Weathers 4-303-605-1718 (swweathers@duke-energy.com) submitted an electronic copy of the 2005-2006 Annual GW Monitor Rpt. along w/ a cover letter.

The report is missing & OCD should request another copy.

# **DUKE APEX CS (GW-163)**

old conoco

Trisha Elizondo (ARCADIS) (Trisha.elizondo@arcadis-us.com)

On 1/17/07, notification that ARCADIS will be conducting mo. Product recovery and PCA Junction on 1/22-23/07. Routine product recovery is on-going at site through hand-bailing. MWs at 2 locations will be surveyed to help w/ GW flow & potentiometric surface.

# **DUKE HOBBS GP (GW-175)**

old conoco Stephen Weathers (SWWeathers@dcpmidstream.com)

Project Summary: Hobbs Gas Plant Unit G, Section 36 Township 18 South, Range 36 East

Summary date: October 10, 2006

Project history:

DEFS acquired the Hobbs Gas Plant in March of 2004. Ground water monitoring wells (6 wells) were installed at the site during the due diligence phase of the acquisition. Benzene was identified above the WQCC standards in one of the groundwater monitoring wells.

Current Project Status:

Groundwater monitoring continues at the site on a quarterly basis.

On 1/29/07, 4Q 2006 GW monitor rpt. submitted. Two MWs exhibit elevated benzene levels. SE and E-central portions of site adjacent to process equip. Qtly sampling continues. Results of Q1 2007 sampling will be reported in A1 2007 GW monitor report. Potentiometric surface maps for site in future reports can be expected.

# **Remediation Sites**

# C-line Release Site (1RP-401-0)

Project Summary: C-line Release site (1RP-401-0) (Unit O, Section 31, Township 19 South, Range 37 East)

Summary date: October 10, 2006

Project history: Pipeline Release

Duke Energy Field Services C-Line Pipeline Release occurred in May of 2002. The release occurred on New Mexico State Land. Environmental Plus, Inc. was contracted to complete the soil remediation. Approximately 3,868 cubic yards of impacted soil was excavated. 2,707 cubic yards of impacted soils was properly disposed and the remaining impacted soil was blended/shredded until below cleanup standards and placed back into the excavation. During the soil remediation, groundwater was determined to be impacted with hydrocarbons. The groundwater characterization activities began in fourth quarter 2002. A total of 9 groundwater monitor wells were installed. Active free phase hydrocarbon (FPH) removal initiated in November 2003. A soil vapor extraction system was installed in October 2004. The system was expanded to include a second well in June 2005. No FPH has been measured since March 2006 even after the SVE system was turned off (but remains at the site) in June 2006.

**Current Project Status:** 

All FPH has been removed as discussed above. The hydrocarbon plume has been delineated. There is no evidence of plume expansion, and, in fact, the plume may actually be contracting.

Groundwater monitoring continues at the site on a quarterly basis. Site monitoring could be decreased to semi-annual.

Received Q3 2006 GW monitor rpt. from Stephen Weathers on 12/18/06.

# Eldridge Ranch (AP-33)

Stephen Weathers (SWWeathers@dcpmidstream.com)

Project Summary: Eldridge Ranch, (Abatement Plan AP-33) (Unit P, Section 21, Township 19 South, Range 37 East)

Summary date: October 10, 2006

Project history: Pipeline Release

DEFS initiated investigative activities in June 2002 following notification by NMOCD. Site characterization activities were largely completed by the fourth quarter of 2003. The boundaries of detectable hydrocarbons have been delineated.

DEFS submitted the Stage 1 Abatement Site Investigation Report (ASIR) on February 11, 2004 to the New Mexico Oil Conservation Division (OCD). In the ASIR, DEFS committed to continuing two activities (groundwater monitoring and free phase hydrocarbon (FPH) removal) independent of the ASIR review timeframe. The OCD has not commented on the ASIR. Groundwater monitoring and FPH removal activities continue on a regular basis.

## **Current Project Status:**

FPH recovery has been attempted at the site with limited results. The FPH at the site is generally limited in thickness to less than one foot. In addition, the FPH appears to be relatively immobile based upon the inability of the automatic collection systems to collect the liquids.

The hydrocarbon plume has been delineated to below the method detection limits. There is no evidence of plume expansion; however, concentrations the interior of the plume appears to exhibit nominal increases and decrease in response to seasonal precipitation.

Groundwater monitoring continues at the site on a quarterly basis. Site monitoring could be decreased to semi-annual without jeopardizing environmental impacts. FPH removal continues as site conditions warrant.

On 1/26/07, received Q4 2006 GW monitor rpt. for AP-33 near Monument NM. Some conclusions: FPH mobility appears to be limited based on historic bail down/recovery tests and failure to reappear; FPH thick is less than 0.8 ft. in six wells and less than 0.1 ft in 2 of 6 wells. FPH is relatively immobile at thick less than 1 ft. FH continues to decline in MW-EE from max. thick. of 0.83 ft. in 9/2005. FPH thick in other wells (excepting MW-CC) also exhibit decreasing trends. Benzene horiz. distrib. remain unchanged over duration of project. The benz level in the former house well continues to remain below NM WQCC GW std. Summer 2006 rains did not create a spike in levels at MWs like the heavy 2004-2005 rains. No evidence of plume expansion exists ; thus, natural attenuation stabilizes and removes hydrocarbs as they migrate away from area.

AEC recommends that Q1 2007 monitoring be completed and data reviewed to evaluate changes in GW flow patterns in S-central part of study area.

2

On 12/22/06, received Q3 2006 GW monitor report conclusions: FPH remains in 4 wells in Wcentral part of study area. FPH thick decrease in 3 of 4 wells. FPH present to N in MW-EE at 0.35 ft. FPH continues to decline from max thick of 0.83 ft. in 9/2005. FPH was not measured anywhwere else within study area. FPH mobility appears to be limited based on historic bail down/recovery tests and its failure to reappear in previously affected wells to S. Benz distrib. unchg. over duration of project. Temporal benz distrib. - see charts.

On 10/24/06, Stephen Weathers 303-605-1718 (swweathers@duke-energy.com) submitted GW monitor rpt. for Q2 2006. The former NMG-148C Study Area was combined with the Eldridge Ranch Study Area beginning w/ the Q1 2006. The areas were combined after estab. that hydrocarb plume orig. from NMG-148C had migrated into the Eldridge Ranch Study Area before it attenuated. The combined sites will be treated as a single entity in all subsequent sample events. Activities are governed under AP-33. DEFS submitted the Stage 1 Abatement Site Investigation Rpt. (ASIR) on 2/11/2004 to the OCD. In that rpt., DEFS is committed to continuing 2 activities independ. of the ASIR review timeframe. The activities include GW monitor. & free phase hydrocarb. (FPH) removal when practicable.

GW Monitor activities were completed on 6/19 and 20, 2006 abiding by the OCD approved SAP. SWLs, FPH tick measurements, and GW sampling were completed (see report). The conclusions were: The interpretations are grouped accord. to GW flow, product thick and GW chemistry. 6/2006: data from newly installed MW-28-31 continues to indicate that GW flow beneath the northern part of the Huston property is southward rather than toward the SE.

The WT continues to decline at a uniform rate across the site from a high in 12/2004. The vertical gradient measured between MWs 1s & 1d has not varied substantially over the duration of the project.

Conclusions are: FPH is present in 5 MWs in the w-central part of the study area. The FPH mobility appears to be limited based upon historic bail down/recovery tests & its failure to reappear in previously affected wells to the S. FPH was also present to the N in MW-EE at 0.35 ft. FPH has now declined from a max. thick of 0.83 ft. in 9/2005. FPH was not measured anywhere else within the study area. The Benz distribution has remained essentially unchg. over the duration of the project. MWs 28, 30 & 31 installed in 3/2006 did not contain detectable concentrations of BTEX constituents when they were sampled a second time. MW-29 has detected BTEX. The northernmost NMG-148C plume and moves south. The pattern indicates that the areal extent of the dissolved phase plume assoc. w/ NMG release is not expanding.

The concern. in MW-e & MW-1 located in the S part of this area continue to decline. Samples from the other 4 wells (MW-M, O, Q & M) produced concentrations that were at or slightly higher than the 3/2006 values. This indicates that the S part of the dissolved phase plume in this area appears to be contracting to the N while the remainder of the plume in this area remains constant. None of the data indicates that the plume is expanding.

Benz time concent. for the wells located immed. adjacent to MW-1 or on the Eldridge property (irrigation wells, house well) are shown in Fig. 9. The concentrations in MW-1 and the irrig. well leveled out after an apprec. 1-yr decline. The concent. in the house well has remained consistent over the past 3 sample events. The pattern does not indicate that the dissolved phase plume is expanding in this area. Wells MW-A, 4 & 5 located N of the Huston-Eldridge boundary, remained relatively consistent.

All of the above relationships indicate that natural attenuation is stabilizing & removing hydrocarbs as they migrate away form the src. areas. There is no evidence of plume expansion.

**Recommendations:** 

AEC recommends that a Q3 monitoring be completed and evaluated. The monitor freq. should then be decreased from qtly. to semi-annual if the data results do not vary appreciably. The potential for FPH removal will be evaluated based upon info. gathered during the Q3 monitor event. Recommendations on FPH will be provided as necessary separate from the monitor report. Michael Stewart PE (303-948-7733).

# J-4-2 Release Site

Project Summary: J-4-2 Release Site Unit C, Section 27 Township 19 South, Range 35 East

Summary date: October 10, 2006

Project history: Pipeline Leak

The release at this site was discovered in August 2005. EPI completed a limited soil cleanup and preliminary groundwater investigations between August 2005 and the first quarter of 2006.

A work plan proposing additional site characterization activities was submitted to the NMOCD. The site activities were completed in September 2006 and a report is currently being generated.

Current Project Status:

Preliminary evaluation of the data indicates that the groundwater plume has been defined beyond the limit of detectable concentrations. Additional activities will be proposed as necessary in the pending investigative report.

On 12/28/06, Stephen Weathers e-mailed a AEC Consultants site investigation rpt. (12/26/07). Water table elevations rose by 0.45 to 1 ft. FPH thickness in MW-2 declined from 0.57 to 0.15 between 2/06 and 9/06. Probably due to high precip. summer 2006. I~ 0.006 toward SE. Head at MW-2 slightly higher than at other wells. K~ 90 ft/day based on pump test. n! 0.15. Estimated GW velocity !3.6 ft/day or 1,310 ft/yr. All develop. and purge water was disposed of at the Linam Ranch facility by EPI. All cuttings generated during the drilling process will be stockpiled

and sampled and then disposed of in an appropriate fashion. Unaffected cuttings will be spread thin.

Final field activity completed was to measure physical properties of saturated mtls. Slug tests were completed on all wells that don't contain FPH to estim. saturated K.

Following recommendations from AEC (Michael Stewart 303-948-7733):

A passive bailer should be installed in MW-2 to attempt to remove mobile FPH. GW monitoring should be completed 3 more times on a qtly. basis to compile a data base based upon 4 seasons of measurements; Qtly repts should be generated based upon the results of the 4th qtr. 2006 and Q1 2007 monitor events; A comprehensive report will be compiled follow. completion of Q2 2007 monitor episode. This report. include recom. of both long-term monitor and , if necessary, implementation of active remediation; Additional charact. activities & active remediation activities will not be completed during this time interval unless data indicates hydrocarb. plume is expanding; the next GW monitor event is scheduled fro the Q4 2006.

On 12/20/06, John Furgerson (jmfergerson@grandecom.net) sent msg. that Trident Environ. a subcontractor of Duke's will be conducting monitor well gauging & GW sampling at 1300 MST Thursday, Dec. 21, 2006. They will measure SWLs in all MWs using an oil/water interface probe; purge non-product MW/RWs. Collect GW samples for BTEX; ship samples using COC protocol; and purge water will be disposed at a NMOCD approved facility.

# X-line Site (1RP-400)

Project Summary: X line Release Site (1RP-400) Unit B, Section 7 Township 15 South, Range 34 East

Summary date: October 10, 2006

Project history: Pipeline Release

The release at this site was discovered in January 2002. EPI completed soil cleanup and preliminary groundwater investigations the first quarter of 2002. A preliminary groundwater investigation was completed in May 2002.

The following remediation components were installed at the site:

 $\cdot$  A free phase hydrocarbon (FPH) removal system was installed in MW-8 in July 2003. The system continued to function until the mobile FPH was removed.

 $\cdot$  An air sparge (AS) system became operational in June 2003. The system was operated until hydrocarbon concentrations in the wells (except for the FPH collection well) were all measured below the method detection limits.

• A soil vapor extraction (SVE) system was also installed in June 2003. The SVE system operated regularly until August 2006. No FPH was present in the extraction well in September 2006.

Quarterly monitoring is completed at the site. The last monitoring episode was conducted in September 2006.

Current Project Status:

A report detailing the September 2006 activities at this site will be prepared when the analytical data is received and verified.

DEFS will evaluate the feasibility of initiating air sparge in the FPH recovery well to complete source recovery provided no additional FPH is measured in the well.

Received 4th qtr 2006 GW monitor report for pipeline release on January 30, 2007.

Received Q3 2006 GW monitor report from Stephen Weathers 303-605-1718)) for pipeline release on 12/18/06. X-Line pipeline release on the Etcheverry Ranch at 33 deg 02 min 11 sec, 103 deg 32 min 48 sec. MWs 1 through 8 sampled. SWLs reassured. Unfiltered samples were collected for BTEX. MW-8 is not included in hydrograph because casing elev. has not been established (see report for conclusions, etc.).

On 9/8/2006, Stephen Weathers (swweathers@duke-energy.com) sent Ben Stone the Q2 2006 GW monitor report located on the Etcheverry Ranch near Lovington, NM.

The report is missing and OCD needs another copy.

# **RR Ext**, (**AP-55**)

Project Summary: RR Ext, (Abatement Plan AP-55) Unit C, Section 19 Township 20 South, Range 37 East

Summary date: October 10, 2006

Project history:

DEFS initiated cleanup activities after a December 13, 2005 release. The spill was remediated, and a temporary well was drilled to groundwater during the first quarter of 2006. A sample from the well contained dissolved-phase hydrocarbons.

The NMOCD assigned the site an abatement plan number based upon the groundwater sample. A Stage 1 Abatement Plan Proposal was submitted to the NMOCD on or about May 26, 2006.

Current Project Status:

DEFS is waiting for approval for the Stage 1 Abatement Plan Proposal. DEFS will initiate the required activities following receipt of that approval

# **PCA Junction**

Trisha Elizondo (ARCADIS) (Trisha.elizondo@arcadis-us.com)

On 1/17/07, notification that ARCADIS will be conducting mo. Product recovery and PCA Junction on 1/22-23/07. Routine product recovery is on going at site through hand bailing. MWs at 2 locations will be surveyed to help w/ GW flow & potentiometric surface.

# Monument Booster Station (Gas Compression Facility)

Q3 2006 GW Monitor activities completed on 9/20/06 & submitted 1/30/07. Next monitor event Q1 2007. Next annual rpt. Prepared following completion of Q1 2007.

No measurable free-product was detected in any MWs. However, in the submittal is shows MWs 1 and 5 have free product at 1.6 and 0.55 inches? No BTEX detected in down-gradient boundary wells MW-3 and 4. No BTEX in up gradient MWs 1D and 2. MW-6 showed anomalously high levels of BEX. Will keep in mind next sample event for continuing trend.

On 11/1/2006, Daniel Dick 303-605-1893 (didick@duke-energy.com) submitted Annual GW Monitor Rpt. 2005-2006. A copy of the summary report for Q3 2005 and Q1 2006 GW sampling effort. Data indicates that the GW conditions remain stable. The next monitor episode was performed 9/2006. The next annual report for the site will be prepared following the completion of the Q1 2007 monitor activities & review & validation of he analytical results. FPH thick measurements on 3/16/06 for period since passive FPH collectors were removed at MW-1 (0.37 in.) and MW-5 (0.39). FPH thick may be declining in MW-1 and is stable at MW-5. None of the BTEX constituents were detected in downgrade boundary wells MW-3 and MW-4. BTEX was also not detected in upgrade wells MW-1D & 2. Hydrocarbs were detected in MW-7, but benz was only constituent above WQCC Stds. No sample has exceeded the WQCC Stds for TEX. Only MW-7 samples have exceeded for benz. Since 2/2000. Benz detection sporadic in all wells except MW-7 since 2/2000. BTX concentrations in MW-7 continue to fluctuate.

Further src. control activities should be postponed given the decreasing product thick in MW-1. The Next semi-annual gw monitor event is scheduled for Q3 2006. Reporting will continue on an annual basis unless unusual conditions warrant notification after the Q3 sampling event.

Attachment: DCP Midstream LP Related Facilities

Application No.	Application Type	Order No. (ex., GW-##)	Applicant	Feclifty	Environme ntal Permit Status	Rovd	Order	Exp	legal	County	Reviewer	District	IssuingOff	Notes	Cleanup Status
		$\mathbf{P} \subset \mathbb{C}$	1922			1698 - July 74	<u> 2008</u>				L. S. S. S.		1222-122	G BOLL	
	Discharge Plan Permit			DUKE CAL- MON CS	A	03/29/1993	05/14/1993	05/14/2008	J-35-23 S-31 E	Eddy	Chavez	Artesia	Santa Fe		
	Discharge Plan Permit		L.P.	LG&E HADSON GILLESPIE/F EAGAN CS	Ι		12/28/1995	12/28/2005	A-24-17 S-35 E	Lea	Chavez	Hobbs	Santa Fe		
	Discharge Plan Permit	316		DUKE PAIGE CS	A	08/17/1999	01/06/2000	01/06/2005	O-4-21 S-32 E	Lea	Chavez	Hobbs	Santa Fe		
	Discharge Plan Permit	311	MIDSTREAM	RAPTOR COTTON DRAW	A			01/06/2005		Lea		Hobbs	Santa Fe		
	Discharge Plan Permit	176	MIDSTREAM	duke Bootleg Cs	A	10/27/1994	01/20/1995	01/20/2005	J-18-22 S-33 E	Lea		Hobbs	Santa Fe		
	Discharge Plan Permit	152	MIDSTREAM	DUKE WHITE CITY C.S.	c		12/13/1993		-10-24 S-26 E	Eddy	Chavez	Artesia	Santa Fe	Site is shut down-Llano to submit closure	
	Discharge Plan Permit	213	DCP MIDSTREAM L.P.	DUKE STRATA CS	A	07/18/1995	08/30/1995	08/30/2000	A-22-23 S-34 E	Lea	Chavez	Hobbs	Santa Fe	closure requested need picture and TPH analysis	
	Discharge Plan Permit	145	L.P.	DUKE ZIA GAS PLANT & ZIA BOOSTER STATION	Α		07/06/1993	07/06/2008	A-19-19 S-32 E	Lea	Chavez	Hobbs	Santa Fe	3 below grade tanks registered	
	Discharge Plan Permit		DCP MIDSTREAM	DUKE PARDUE CS	A	10/06/1997	11/24/1997	11/24/2007	J-10-23 S-28 E	Éddy	Chavez	Artesia	Santa Fe	need \$400 fee + sign-off	
	Discharge Plan Permit	167		DUKE P & P Malaga CS	A	05/19/1994	07/25/1994	07/25/2004	G-3-24 S-28 E	Eddy	Chavez	Artesia	Santa Fe	need sign- offs	
	Discharge Plan Permit	162		DUKE ANTELOPE RIDGE GP	A	01/21/1994	04/04/1994	03/23/2004	O-15-23 S-34 E	Lea	Chavez	Hobbs	Santa Fe	rec DP App + \$100 issued PN and Draft DP 1/23/04	
	Discharge Plan Permit	160	DCP MIDSTREAM L.P.	DUKE BRIGHTM FED CS	с	11/29/1993	01/14/1994		C-21-19 S-33 E	Lea	Chavez	Hobbs	Santa Fe	DP terminated 1/22/04	
	Discharge Plan Permit		MIDSTREAM	DUKE PURE GOLD "28" CS	A		11/22/1993	11/22/2003	D-28-23 S-31 E	Lea	Chavez	Hobbs	Santa Fe	Rec DP application + \$100 issued PN 1/23/04 & Draft DP	
	Discharge Plan Permit	296	DCP MIDSTREAM L.P.	DUKE CEDAR CANYON CS	A	03/23/1998	07/15/1998	07/15/2008	P-9-24 S-29 E	Éddy	Chavez	Artesia	Santa Fe		<u>}</u>
	Discharge Plan Permit	237	DCP MIDSTREAM L.P.	DUKE PECOS DIAMOND GP	A	02/05/1996	03/29/1996	03/29/2011	G-3-18 S-27 E	Eddy	Chavez	Artesia	Santa Fe		1 below grade tank registered

pENV000GW0 0254	Discharge Plan Permit	239	DCP MIDSTREAM L.P.	Duke QUINN CS	A	03/08/1996	08/09/1996	08/09/2011	L-16-31 N-8 W	San Juan	Chavez	Aztec	Santa Fe	DP w/ filing fee process, renewed, issued with letter mailed out 10/23/2006. Received \$1700 fee 10/26/06. Signed DP received 1-11 07 Ok.	
	Discharge Plan Permit	77	DCP MIDSTREAM L.P.	Duke MIDDLE MESA CS	A	04/10/1991	11/14/1991	11/14/2006	M-10-31 N-7 W	San Juan	Chavez	Aztec	Santa Fe	+	
	Discharge Plan Permit	2	DCP MIDSTREAM L.P.	LEE GP	A	11/13/1995	03/16/1981	03/16/2011	N-30-17 S-35 E	Lea	Chavez	Hobbs	Santa Fe		
	Discharge Plan Permit	9	DCP MIDSTREAM L.P.	EUNICE CS	C	10/06/1988	10/11/1983		-5-21 8-36 E	Lea	Chavez	Hobbs	Santa Fe	GW-009 vacated and merged into GW-16 OCT 8, 1993	
	Discharge Plan Permit	15	DCP MIDSTREAM L.P.	DUKE LINAM RANCH GP	A	05/17/1989	04/25/1984	04/25/2009	-6-19 S-37 E	Lea	Chavez	Hobbs	Santa Fe	1 below grade concrete tank registered	
	Discharge Plan Permit	16	DCP MIDSTREAM L.P.	DUKE EUNICE GP	A	04/13/1989	04/25/1984	04/25/2009	H-5-21 S-36 E	Lea	Chavez	Hobbs	Santa Fe	10 below grade tanks + 1 sulphur pit registered	
pENV000GW0 0024	1 J	23		GPM ARTESIA GP	A	01/17/1995	07/01/1985	07/01/2010	-7-18 S-28 E	Eddy	Chavez	Artesia	Santa Fé	call&E-mail 1/07/2000 120 day notice. Late flat fee notice sent 1/11/02. Flat fee flact fee flact fee flact fee 1/29/02.	1 classifier, 5 sumps, 1 subhur pit, 2 below grade tanks registered (Flare Pit Soil Remediation & Closure Workplan)
	Discharge Plan Permit	24	DCP MIDSTREAM L.P.	DUKE AVALON GP	1	06/15/1990	09/18/1985	09/18/2005	J-9-21 S-27 E	Eddy	Chavez	Artesia	Santa Fe	Notice of late flat fee sent 1/11/2002.	
	Discharge Plan Permit	42	DCP MIDSTREAM L.P.	GPM INDIAN HILLS GP	1		07/20/1987		L-13-21 S-25 E	Eddy	Chavez	Artesia	Santa Fe	Letter from Duke, dated 12/10/01, notifying site is inactive.	
	Discharge Plan Permit	138	DCP MIDSTREAM L.P.	DUKE TRACHTA CS	c		04/30/1993		-14-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Facility is inactive	<u></u>

pENV000GW0 0079	Discharge Plan Permit	69	MIDSTREAM	DUKE CARLSBAD GP	A	12/28/2006	04/29/1992	04/29/2012	G-10-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Public Notice prepared 1/15/02. Request for additional	4 sumps registered
												doord doornoo yaa aaya aaya aaya aaya		information sent 1/2/02. Received \$100 filing fee & renewal on 12/28/06.	
201-10 Min 10 Mi															
	Permit	178	DCP MIDSTREAM L.P.	DUKE WON TON CS	С			03/21/2005	I-10-17 S-37 E	Lea	Chavez	Hobbs	Santa Fe	1 below grade tank registered	
pENV000GW01 0138	Discharge Plan Permit	127	MIDSTREAM L.P.	DUKE MAGNUM C.S.(BURTO N FLATS GP)	A	08/10/1992	02/03/1993	02/03/2008	G-9-20 S-29 E	Eddy	Chavez	Artesia	Santa Fe	1 below grade tank registered as sump	
pENV000GW0 1 0139 I	Discharge Plan Permit	128	DCP MIDSTREAM L.P.	DUKE PAIGE CS	Ā	08/11/1992	11/19/1992	11/20/2007	0-4-21 S-32 E	Lea	Chavez	Hobbs	Santa Fe	6 mo. Renewal notice sent 7/10/02; renewal application received	
pENV000GW0 I 0148 I	Discharge Plan Permit	137	MIDSTREAM	DUKE CARRASCO CS	A		04/28/1993	04/28/2008	F-14-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	1 skid sump registered	
pENV000GW0   0150	Discharge Plan Permit	139	DCP MIDSTREAM L.P.	DUKE CP-1 CS	c		04/28/1993		1-15-23 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Site inactive, requested closure workplan 1/10/03, WP approved, Closure Approved 10/15/2003	
pENV000GW0 ( 0153 /	Discharge Plan Permit	142	DCP MIDSTREAM L.P.	DUKE SAND DUNES CS	A	03/26/1993	05/17/1993	05/17/2008	P-23-23 S-31 E	Eddy	Chavez	Artesia	Santa Fe	1 below grade tank registered	
pENV000GW0 ( 0155 (	Discharge Plan Permit	144	DCP MIDSTREAM L.P.	DUKE NORTH ( WESTALL) CS	A	05/05/1993	08/19/1993	08/19/2008	E-35-22 S-28 E	Eddy	Chavez	Artesia	Santa Fe	Renewal application dated 4/3/03 - renewal on hold pending legal determination	1 below grade tank registered
pENV000GW01 0179	Dischange Plan Permit	168		DUKE SOUTH FEAGAN CS	C	07/06/1994	12/28/1994	12/27/2004	N-31-19 S-25 E	Eddy	Chavez	Artesia	Santa Fe	Late filing fee and flat fee notice sent 1/11/02. Flat fee received 1/29/02.	
pENV000GW0 I 0188 I	Discharge Plan Permit	177	MIDSTREAM	DUKE MALJAMAR CS	c		03/21/1995	03/21/2005	I-20-17 S-33 E	Lea	Chavez	Hobbs	Santa Fe		
pENV000GW0 I 0046 I	Discharge Plan Permit	44	DCP MIDSTREAM L.P.	HOBBS BOOSTER CS	A		12/23/1987	12/23/2007	-4-19 S-38 E	Lea	Chavez	Hobbs	Santa Fe	renewal notice sent 7/10/02	**************************************

pENV000GW0 0270	Discharge Plan Permit	255	DCP MIDSTREAM	Duke BUENA VISTA CS	A	07/15/1996	09/05/1996	09/05/2011	B-13-30 N-9 W	San Juan	Chavez	Aztec	Santa Fe	DP renewed, issued with	
			L,P.			х.								letter mailed out 10/23/2006. Received \$1700 on 10/26/2006. Signed DP received on 1/11/2007. Ok.	
	Permit	258	DCP MIDSTREAM L.P.	CS	A	07/30/1996	09/30/1996			San Juan	Chavez		Santa Fe	DP renewed, issued with letter mailed out 10/23/2006. Permit fee of \$1700 received on 10/26/2006. Signed DP received on 1//11/07. Ok.	
PENV000GW0 0292	Discharge Plan Permit	277	DCP MIDSTREAM L.P.	CSI-BIG EDDY LATERAL#1 CS	A		02/17/1997	02/17/2007	A-19-21 S-28 E	Eddy	Chavez	Artesia	Santa Pe	Taken over by Duke Energy, Received DP renewal letter dated 10/19/2006 w/ \$100 filing fee. Mailed out final permit 9/16/06. Awaiting \$1700 Compressor Station fee.	1 below grade tank registered
pENV000GW0 0174	Discharge Plan Permit	163	DCP MIDSTREAM L.P.	DUKE APEX CS	A	L.LL-L-L-L-L-L-L-L-L	04/29/1999	04/29/2004	C-36-18 S-36 E	Lea	Chavez	Hobbs	Santa Fe	request GW info and DP renewal by 12/01/04	
PENV000GW0 0186	Discharge Plan Permit	175	DCP MIDSTREAM L.P.	DUKE HOBBS GP	A		01/09/1995	01/09/2005	G-36-18 S-36 E	Lea	Chavez	Hobbs	Santa Fe	Request DP renewal and GW info BY 12/01/04	
	1RP-401-0	, ,,	DCP MIDSTREAM L.P.	C-line Release Site (1RP-401-0)					O-31-19 S-37 E	Lea	?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	AP-33		DCP MIDSTREAM L.P.						P-21-19 S-37 E	Lea	?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
			DCP MIDSTREAM L.P.				_		C-27-19 S-35 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	
	1RP-400		DCP MIDSTREAM L.P.	X-line Pipeline Site (1RP-400)					B-7-15 S-34 E		?	Hobbs	Santa Fe	Meeting w/ company 2/1/07	

(#

AP-55	DCF MID L.P.	STREAM 55)	ТЕхт, (АР- )		C-19-20 S-37 E	?	Hobbs	Meeting w/ company 2/1/07	
2R-043	DCF MID L.P.	STREAM	A Junction		11-20 S-30 E	?	Hobbs	Meeting w/ company 2/1/07	
1R-156	DCF MID L.P.	STREAM Boo Stat			B-33-19 S-37 E (32.6238 -103.2550)	?	Hobbs	Meeting w/ company 2/1/07	

# 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

January 26 2006 and ending with the issue dated

January 26 \_\_\_\_\_ 2006

Publisher Sworn and subscribed to before

me this <u>26th</u> day of

January 2006 Mu Notary Public. My Commission expires February 07, 2009 (Seal) OFFICIAL SEAL DORA MONTZ NOTARY PUBLIC STATE OF NEW MEXICO My Commission Expires:

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 January 26, 2006

#### 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 application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-002)-Duke Energy Field Services, LP, Mr. Tony R. Lee, Asset Manager, 1625 West Mariand, Hobbs, New Mexico 88240, has submitted a discharge plan renewal application for their Snakebite Booster Station located in the SE/4 SW/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Current facility operations are limited to ground water remediar operations and removal of minimal pipe line liquids from the natural gas gathering system. The operator does not propose to discharge effluent or waste solids on site, all ef fluent and waste solids generated at the facility are removed from the facility for off site disposal in accordance with applicable state and federal regulations. Ground water most likely to be affected by an accidental discharge is at a depth of 65 feet with a total dissolved solids concentration of 600 mg/l. The discharge permit addresses how olifield products and waste will be properly handled, stored and disposed of, including how spills, leaks, and other accidental dis charges to the surface will be managed in order to protect fresh water.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, 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 an public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 20th day of January 2006.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

MARK FEISMIER, P.E., Director #22086

> 01100060000 67535763 STATE OF NEW MEXICO OIL & 1220 S. ST. FRANCIS SANTA FE, NM 87505

#### NOTICE OF PUBLICATION

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

Notice is hereby given Notice is hereby given that pursuant to the New Mexico Water Quality Control Com-mission Regulations, the following dis-charge plan applica-tion has been submit-ted to the Director of the Oil Conservation the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-060) - Williams Field Service, Clara Cardoza, Senior Envi-ronmental Specialist, 188 CR 4900, Bloom-field, New Mexico 87413, has submitted a discharge permit re-newal application for their Milagro Gas Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan NMPM. San Juan NMPM, San Juan County, New Mexico. Approximately 1000 to 4000 galions per day of process waste-water will be dis-posed of in open top evenoration tapks posed of in open top evaporation tanks with a synthetic im-pervious liner and leak detection sys-tem. The discharge permit addresses how oilfield products and waste will be property handled. properly handled, stored and disposed of, including how of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed face will be managed in order to protect fresh water. Ground-water most likely to be affected by an ac-cidental discharge is at a depth of 40 feet with a total dissolved solids concentrations of 5800 mg/l. The dis-charge plan ad-dresses how spill, leaks, and other acci-dental discharges to the surface will be managed.

(GW-061) - Williams Field Service, David Bays, Senior Environ-mental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge permit re-newal application for newal application for their Horse Canyon compressor station located in the NE/4 NE/4, Section 27, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approxi-mately 55 gallons per day of exempt waste water is collected and stored in an above ground bermed closed top tank prior to transport to an to transport to an OCD approved off-site disposal facility. The

discharge permit au-dresses how oilfield products and waste will be properly han died, stored and di posed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect fresh water. Ground-water most likely to be affected by an ac-cidental discharge is at a depth of 380 feet with a total dissolved at a depth of 380 feet with a total dissolved solids concentrations of approximately 3150 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed managed.

- Williams (GW-327) Field Service, Mark J. Barets, Senior Envi-Barets, Senior Envi-ronmental Specialist, 188 CR 4900, Bloom-field, New Mexico 87413, has submitted a discharge plan ap-plication for their Blanco compressor station located in the NW/4 SW/4. Section station located in the NW/4 SW/4, Section 32, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. All effluents gener-ated on site are col-lected in containment vessels prior to transvessels prior to trans-port to an OCD ap-proved off-site dis-posal facility. The dis-charge permit ad-dresses how oilfield products and waste products and waste will be properly han-dled, stored and dis-posed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect fresh water. Ground-water most likely to be affected by an acwater most likely to be affected by an ac-cidental discharge is at a depth ranging from 100 to 150 feet with a total dissolved solids concentrations ranging from 200 to solids concentrations ranging from 200 to 2000 mg/l. The dis-charge plan ad-dresses how spill, leaks, and other acci-dental discharges to the surface will be managed managed.

(GW-328) - Williams Field Service, David Bays, Senior Environ-mental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a dis-chame plane mercent nas submitted a dis-charge plan renewal application for their Thompson compres-sor station located in the SE/4 SE/4, Section 4, Township 30 North, Range 12 West, NMPM, San Juan County New Movice NMPM, San Juan County, New Mexico. Approximately 2000 to 4000 barrels per year of waste water with a total dissolved solids. solids concentration in excess of 2000 mg/l is stored in an above ground, closed-top ground, closed-top tank prior to trans-port to an OCD ap-proved off-site dis-posal facility. The dis-charme normit edischarge permit ad-

products and waste will be properly han-died, stored and dis-posed of, including how spills, leaks, and other accidental discharges to the sur-face will be managed in order to protect fresh water. Ground-water most likely to be affected by an ac-cidental discharge is at a depth of approxi-mately 90 feet with a total dissolved solids concentrations of ap-proximately 2000 proximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-331) - Williams Field Service, David Bays, Senior Environmental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a dis-charge plan renewal application for their Chaco compressor station located in the SE/4 SW/4, Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per year of waste water with a total dissolved solids concentration in ex-cess of 2000 mg/l is stored in an above ground, closed-top tank prior to trans-port to an OCD ap-proved off-site dis-posal facility. The dis-charge permit ad-dresses how oilfield products and waste will be properly han-dled, stored and dis-posed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect Chaco compressor station located in the in order to protect fresh water Ground-water most likely to be affected by an ac-cidental discharge is at a depth of approxi-mately 200 feet with a total dissolved solids concentrations of approximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be managed.

(GW-343) -Williams Field Service, David Bays, Senior Environ-mental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a disnas submitted a dis-charge plan applica-tion for their Hare Compressor Station located in the SE/4 NW/4, Section 24, Township 29 North, Range 10 West, NMPM. San Juan NMPM, San Juan County, New Mexico. Approximately 500 Approximately 500 barrels per year of produced water is collected in a covered below grade vaulted tank prior to trans-port to an OCD ap-proved off-site disposal facility. The dis-

dresses how oilfield products and waste will be properly han-Will be propeny nam-dled, stored and di-posed of, includ how spills, leaks, an-other accidental dis-charges to the sur-face will be managed in order to protect in order to protect fresh water. Ground-water most likely to be affected by an ac-cidental discharge is cidental discharge is at a depth of 20 feet with a total dissolved solids concentrations ranging from 200 to 1000 mg/l. The dis-charge plan ad-dresses how spill, leaks, and other acci-dental discharges to the surface will be managed. managed.

(GW-233) - Williams Fleid Service, Mark J. Barets, Senior Envi-ronmental Specialist, 188 CR 4900, Bloom-field, New Mexico 87413, has submitted a discharge plan re-newal application for newal application for their La Jara com-pressor station lo-cated in the NW/4 NW/4, Section 17, Township 30 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. All waste water is col-lected and stored in an above ground berlected and stored in an above ground ber-med closed top tank prior to transport to an OCD approved off-site disposal facil-ity. The discharge permit addresses how olifield products and waste will be properly handled, stored and disposed of, including how of, including how spills, leaks, and other accidental discharges to the sur-face will be managed in order to protect fresh water. Ground-water most likely to be affected by an ac-cidontal discharge is be affected by an ac-cidental discharge is at a depth of approxi-mately 325 feet with a total dissolved solids concentrations of ap-proximately 2000 mg/l. The discharge plan addresses how spill, leaks, and other accidental discharges to the surface will be to the surface will be managed.

(GW-330) - Williams Field Service, David Bays, Senior Environ-mental Specialist, 188 CR 4900, Bloomfield, New Mexico 87413, has submitted a discharge plan renewal application for their application for their Dogie compressor station located in the NW/4 NW/4, Section 4, Township 25 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Ap-proximately 2000 to 4000 barrels per year of waste water with a total dissolved solids concentration in exconcentration in ex-cess of 2000 mg/l is stored in an above ground, closed-top tank prior to trans-port to an OCD ap-

posal facility. The dis-charge permit ad-dresses how oilfield products and waste will-be property han-dist ctored and dis will-be property han-died, stored and dis-posed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect fresh water Ground-water most likely to be affected by an ac-cidental discharge is cidental discharge is at a depth ranging from 15 to 20 feet with a total dissolved sola total dissolved sol-ids concentrations ranging from 2400 to 2500 mg/l. The dis-charge plan ad-dresses how spill, leaks, and other acci-dental discharges to the surface will be managed.

(GW-002) - Duke En-ergy Field Services, LP, Mr. Tony R. Lee, Asset Manager, 1625 West Marland, Hobbs, New Movies 99240 New Mexico 88240, has submitted a discharge plan renewal application for their Snakebite Booster Station located in the SE/4 SW/4, Section 30, Township 17 South, Range 35 East, NMPM, Range 35 East, NMPM, Lea County, New Mex-ico. Current facility operations are limited to ground water re-medial operations and removal of mini-mal pipeline liquids from the natural gas gathering system. Mail pipeline, liquids MARK F. from the natural gas MARK F. gathering system. P.E., The operator does not Legal #78314 propose to discharge Pub. January 2 effluent or waste sol-ids on site, all effluent and waste solids gen-erated at the facility are removed from the facility for off site dis-posal in accordance with applicable state and federal regula-tions. Groundwater most likely to be af-fected by an acciden-tal discharge is at a depth of 85 feet with a total dissolved sol-ids concentration of 600 mg/l. The dis-charge permit ad-demsea bow diffield 600 mg/l. The dis-charge permit ad-dresses how oilfield products and waste will be properly han-dled, stored and dis-posed of, including how spills, leaks, and other accidental dis-charges to the surcharges to the sur-face will be managed in order to protect fresh water.

Any interested person may obtain further in-formation from the Oil Conservation Divi-sion 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 be-tween 8:50 à.m. and 4:00 p.m., Monday thru Friday. Prior to posed discharge pra or its modification the Director of the O Conservation Divisio shall allow at leas thirty (30) days afte the date of public tion of this notice du ing which comment may be submitted t him and public hea-ing may be requeste by any interested pe son. Request for pul-lic hearing shall si forth the reasons wh a hearing shall t a hearing shall t held. A hearing will t held if the director d termines that there significant public I terest.

If no hearing is hel the Director will a prove or disappro the plan based on t the plan based on t information availab If a public hearing held, the Director w approve the bli-based on the inform tion in the plan a information plan sented at the hearin

GIVEN under the Se of New Mexico Ct servation Commision at Santa Fe, Nr Mexico, on this 19 day of Decemt 2005 day 2005.

STATE NEW MEXI OIL CONSERVATI DIVISI SEAL MARK FEISMI

P.E., Direc Pub. January 27, 200





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

303 595 3331

December 22, 2005

UPS Next Day Air (Tracking No. 1Z F46 915 22 1004 538 6)

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

SUBJECT: Lee Gas Plant (n.k.a. Snake Bite Booster Station) Discharge Plan No. GW-002 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 the Snakebite Booster Station discharge plan renewal application.

DEFS submits the following as proof of notice:

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

As you can see from the material no delay was incurred in posting the notices in the Hobbs News Sun, at the facility, and obtaining the photograph. However, we had to request the Copy of Affidavit of Publication in the Hobbs News Sun multiple times, and only received the Affidavit today. We hope that delay has not caused any inconvenience.

If you have any questions concerning the Artesia Gas Plant Discharge Plan renewal, please contact Ruth Lang at (303) 605-1713. Please send all correspondence regarding this discharge plan renewal to my attention at 370 17<sup>th</sup> Street, Suite 2500, Denver, CO 80202.

Sincerely, Duke Energy Field Services, LP

Post M Lang for

Karin Kimura
Senior Environmental Specialist
Attachments
cc: NMOCD District 1 Office (UPS Next Day Air Tracking No 1Z F46 915 22 1004 539 5) 1625 N. French Drive, Hobbs, New Mexico 88240

### AFFIDAVIT OF PUBLICATION

State of New Mexico, County of Lea.

I, Kenneth Norris

#### Advertising Manager

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 \_\_\_

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<u>1</u> issue(s). Beginning with the issue dated

November 19th , 2005 and ending with the issue dated

November 19th .2005

Advertising Manager

Sworn and subscribed to before

16th day of

December 2005 Notary Public. My Commission expires

February 07, 2009 (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.

01101065-000 67534640 DUKE ENERGY FIELD SERVICES 370 17TH SUITE 2500 DENVER CO 80202

#### SATURDAY, NOVEMBER 19, 2005

Human Resource position available for an organized, caring professional with excellent interpersonal skills. Successful candidate will have an excellent work history, career track record of increasing responsibility, and a desire to work for a dynamic not-for-profit organization. Responsible, reliable, able to multi-task and supervise, SHRM preferred. Bachelor's degree required. Competitive salary and benefit package. EOE.

Apply at: CARC, INC., 902 West Cherry Lane, Carlsbad, NM 88220.

Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, Colorado 80202 has submitted a discharge permit renewal application for its Snakebite Booster Station located in Unit N, Section 30, Township 17 South, Range 35 East, Lea County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. Currently facility operations are limited to groundwater remedial operations and removal of minimal pipeline liquids from the natural gas gathering system. Remedial operations include the operation of free phase hydrocarbon recovery wells and groundwater monitoring at the former gas plant. 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 state and federal regulations Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of 85 feet with a total dissolved solids concentration of approximately 600 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.

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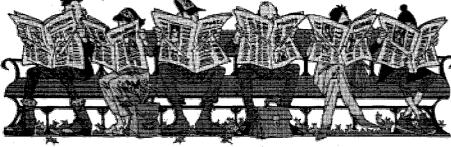
# CRUDE OIL COMPANY DRIVERS

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- Disability Insurance (for employee and spouse)
- Flexible Spending Account
- Paid Vacations & Holidays
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Years driving experience with a Class A CDL with Tank and Haz-Mat Endorsement required.

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# What Are The Benefits Of A Hobbs News-Sun Newspaper Route?



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Route #515 • 109 Customers • Mid Hobbs

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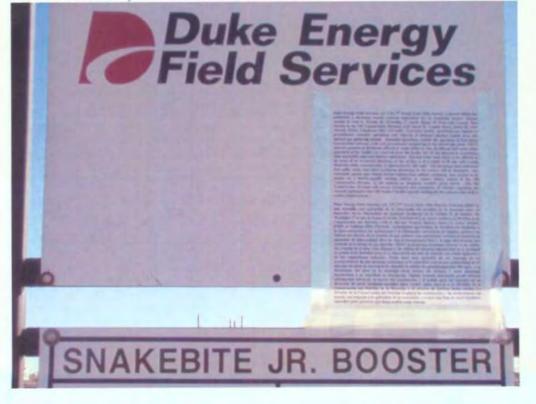
FOUTES NOW AVAILABLE



Public notice sign – Lee Gas Plant (n.k.a. Snake Bite Booster Station (Discharge Plan No. GW-002). Photo taken on 11/21/05.



Close up of public notice sign – Lee Gas Plant (n.k.a. Snake Bite Booster Station (Discharge Plan No. GW-002). Photo taken on 11/21/05.



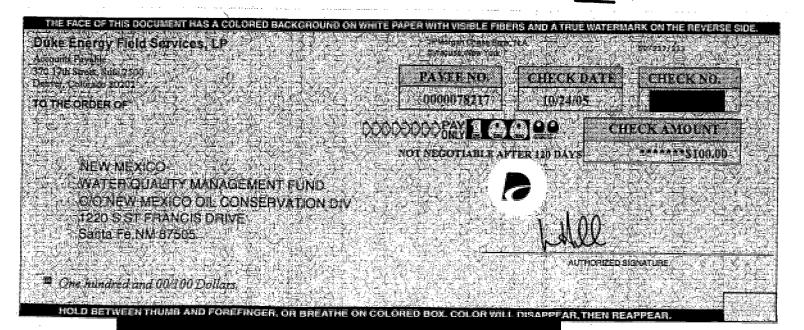
Duke Energy Field Services, LP, 370 17<sup>th</sup> Street, Suite 2500, Denver, Colorado 80202 has submitted a discharge permit renewal application for its Snakebite Booster Station located in Unit N, Section 30, Township 17 South, Range 35 East, Lea County, New Mexico to the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, Telephone (505) 476-3440. Currently facility operations are limited to groundwater remedial operations and removal of minimal pipeline liquids from the natural gas gathering system. Remedial operations include the operation of free phase hydrocarbon recovery wells and groundwater monitoring at the former gas plant. 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 state and federal regulations. Ground water most likely to be affected in an event of an accidental discharge at the surface is at a depth of 85 feet with a total dissolved solids concentration of approximately 600 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 17<sup>th</sup> Street, Suite 2500, Denver, Colorado 80202 se han sometido una aplicación de la renovación del permiso de la descarga para su Repetidor de la Mordedura de serpiente localizado en la Unidad N, la Sección 30, Municipio 17 al sur, la Gama 35 al este, Condado de Lea, nuevo méxico a la División de la Conservación del Petróleo, 1220 S. del sur. Francis Maneja, Santa Fe, nuevo méxico, 87505, el Teléfono (505) 476-3440. Actualmente operaciones de facilidad son limitadas a la agua subterránea las operaciones y la eliminación correctivas de líquidos mínimos de tubería del sistema de la reunión de gas natural. Las operaciones correctivas incluyen la operación de hidrocarburo libre de fase la recuperación bien y la agua subterránea que controla en la planta de gas anterior. DEFS no proponga descargar efluente ni los sólidos del desecho en el sitio; 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 estado aplicable y de las regulaciones federales. Molió agua muy probable de ser afectada en un acontecimiento de una descarga accidental en la superficie está en una profundidad de 85 pies con un suma la concentración disuelta de sólidos de aproximadamente 600 mg/L. Las direcciones del plan de la descarga cómo rocian, los escapes, y otras descargas accidentales a la superficie se manejarán. Alguna persona interesada puede obtener información adicional, se somete los comentarios, y el pedido para ser colocado en un dirección de envío facilidad-específico para recibir notas futuras a la División de la Conservación del Petróleo en la dirección o el número de teléfono dados arriba. La División de la Conservación del Petróleo aceptará los comentarios y las declaraciones del interés con respecto a la aplicación de la renovación y creará una lista de envío facilidadespecífico para personas que desea recibir notas futuras.

# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH I hereby acknowledge receipt of check No. dated 10/24/05, or cash received on \_\_\_\_\_\_ in the amount of \$ 100.00 from Juke Energy Field Serv. for Lee GA In k.a. Snakebite C.S.) GW-002: Submitted by: Data: 10 Submitted to ASD by: Date: Received in ASD by: \_\_\_\_Date: Filing Fee \_\_\_\_ New Facility \_\_\_\_ Renewal \_\_\_\_ Modification \_\_\_\_ Other \_\_\_

Organization Code <u>521.07</u> Applicable Fy <u>2001</u>

To be deposited in the Water Quality Management Fund. Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



# **Duke Energy Field Services, LP**

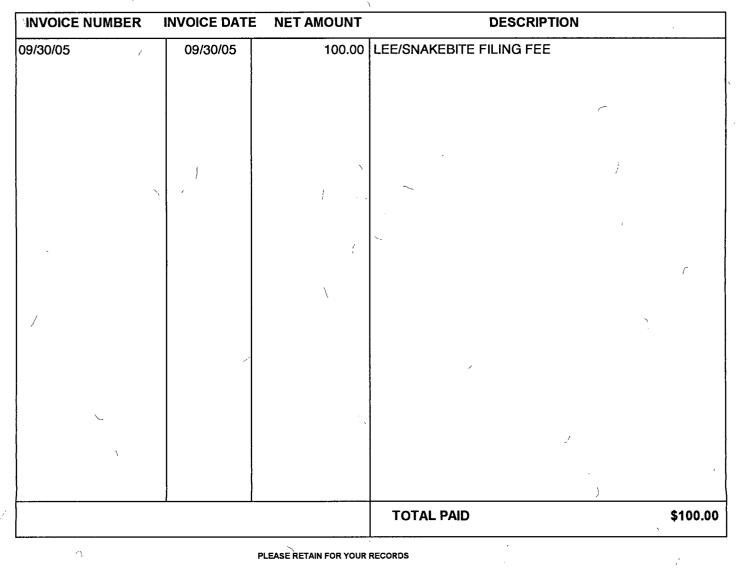
Accounts Payable 370 17th Street, Sute 2500 Denver, Colorado 80202

PAYEE NUMBER 0000078217

PAYEE NAME NEW MEXICO- CHECK DATE

**CHECK NUMBER** 

10/24/05



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

303 595 3331

RECEIVED



October 24, 2005

UPS Next Day Air Saver (Tracking Number 1Z F46 915 23 1002 941 9)

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

SUBJECT: Lee Gas Plant (n.k.a. Snake Bite Booster Station) Discharge Plan No. GW-002 Lea County, New Mexico

Dear Mr. Ford:

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

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

DEFS is submitting this discharge permit renewal application to continue activities to abate groundwater contamination at the site that occurred during active operations, which included discharges to surface impoundments. If you have any questions concerning the Lee Gas Plant Discharge Permit renewal, please contact me at (303) 605-1717. Please send all correspondence regarding this discharge plan renewal to my attention at 370 17<sup>th</sup> Street, Suite 2500, Denver, CO 80202.

Sincerely, Duke Energy Field Services, LP

Karin Kimura Senior Environmental Specialist

Enclosures

 cc: NMOCD District 1 Office (UPS 2nd Day Air Tracking No. 1Z F46 915 37 1002 219 5) 1625 N. French Drive Hobbs, New Mexico 88240

District I 1625 N. French Dr., Hobbs, NM 88240	State of New		Revised June 10, 2003		
District II 1301 W. Grand Avenue, Artesia, NM 88210 District III	Energy Minerals and N		Submit Original Plus 1 Copy		
<u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 District IV	Oil Conservation		to Santa Fe 1 Copy to Appropriate		
1220 S. St. Francis Dr., Santa Fe, NM 87505	Santa Fe, NN		District Office		
AND	OMPRESSOR, GE CRUDE OIL PUN	OTHERMAL FACI	LITES		
	ew 🗹 Renewal	Modification			
1. Type: Snakebite Compressor Station					
2. Operator: Duke Energy Field Services	s, LP				
Address: See enclosed discharge pla	n.				
Contact Person: See enclosed discha	rge plan.	Phone: See enclo	osed discharge plan.		
3. Location:/4	/4 Section 30	Township <u>17S</u> p showing exact location.	Range 35E		
Submit I	arge scale topographic ma	p showing exact location.			
<ol> <li>Attach the name, telephone number a See enclosed discharge plan.</li> <li>Attach the description of the facility of See enclosed discharge plan.</li> <li>Attach a description of all materials s See enclosed discharge plan.</li> <li>Attach a description of present source must be included.</li> <li>See enclosed discharge plan.</li> <li>Attach a description of current liquid See enclosed discharge plan.</li> <li>Attach a description of current liquid See enclosed discharge plan.</li> <li>Attach a description of proposed mod See enclosed discharge plan.</li> <li>Attach a description of proposed mod See enclosed discharge plan.</li> <li>Attach a routine inspection and main See enclosed discharge plan.</li> <li>Attach a contingency plan for reporti See enclosed discharge plan.</li> <li>Attach geological/hydrological infor See enclosed discharge plan.</li> <li>Attach a facility closure plan, and ot rules, regulations and/or orders. See enclosed discharge plan.</li> <li>CERTIFICATIONI hereby certify best of my knowledge and belief.</li> </ol>	with a diagram indicating tored or used at the facility es of effluent and waste so and solid waste collection difications to existing collect tenance plan to ensure per ing and clean-up of spills of mation for the facility. Do her information as is neces	location of fences, pits, dike y. lids. Average quality and da y/treatment/disposal procedu ection/treatment/disposal sys rmit compliance. or releases. epth to and quality of ground ssary to demonstrate complia	aily volume of waste water res. stems.		
Name: Tony Lee		Title: Asset Manager			
Signature: Jony R. L	. el	Date: <u>9-30</u> -	05		
E-mail Address:	Duke-Energy.com	Date: <u>9-30</u> .			

DISCHARGE PERMIT RENEWAL APPLICATION SNAKEBITE BOOSTER STATION (FORMERLY LEE GAS PLANT) LEA COUNTY, NEW MEXICO (Unit N, Section 30, Township 17 South, Range 35 East)

October 2005



# Table of Contents

2

1	Type of Operation	1
2	Operator / Legally Responsible Party	
3	Location of Discharge / Facility	
4	Landowner	2
5	Facility Description	2
6	Materials Stored or Used	2
7	Sources and Quantities of Effluent and Waste Solids	3
8	Liquid and Solid Waste Collection / Storage / Disposal	4
9	Proposed Modifications	4
10	Inspection, Maintenance, and Reporting	4
11	Spill / Leak Prevention and Reporting (Contingency Plans)	5
12	Site Characteristics	5
13	Additional Information	5

# <u>Figures</u>

Figure 1	Site Location Map
Figure 2	Groundwater Remediation System Site Plan
Figure 3	Snakebite Booster Station (formerly known as Lee Gas Plant)
	Remedial Operations Simplified Process Flow Diagram

# DISCHARGE PLAN RENEWAL APPLICATION

Snakebite Booster Station (formerly known as Lee Gas Plant) Unit N, Section 30, Township 17 South, Range 35 East

This document constitutes a renewal application for a Groundwater Discharge Permit for the Snakebite Booster Station *(formerly known as Lee Gas Plant)* Remedial Operations. DEFS has consolidated information on the current remediation activities into this renewal application to aid in the review of the renewal of the discharge plan. This Discharge Permit 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, 20.6.2.3104 and 3106 NMAC.

# **1** Type of Operation

Currently, the facility operations are limited to the groundwater remedial operations and removal of minimal pipeline liquids from the natural gas gathering sytem. Remedial operations include the operation of free phase hydrocarbon (FPH) recovery wells and groundwater monitoring. The site historically included both gas processing and gas compression. The components associated with these operations were demolished in 2003 along with the majority of the other structures. The only remaining site structures are the former office and some warehouse buildings. A brief description of the remedial operations currently in effect at the Snakebite Booster Station is included below.

There are three FPH recovery wells (MW-5, MW-6, and MW-15) and 20 monitoring wells (MW-1, MW-2, MW-3, MW-4, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-16, MW-17, MW-18, MW-19, MW-20, MW-21, MW-22 and MW-23) that are used in remedial operations at Snakebite Booster Station.

#### Free Phase Hydrocarbon Recovery Operations

FPH are extracted from wells MW-5, MW-6 and MW-15. Extraction is completed using commercially-available, FPH only pumps that operate using compressed air. The FPH are routed to closed 55-gallon drums set inside secondary containment structures.

The FPH system is monitored a minimum of at least once per week to ensure that all components are functioning and to document FPH recovery volumes. The system will be operated until the mobile FPH has been extracted. After that, DEFS will assess the efficacy of continuing removal. DEFS may opt to install either passive removal products and/or soil vapor extraction components based upon the results of that evaluation.

#### **Groundwater Monitoring**

Groundwater monitoring is completed semiannually in the first and third quarter of each year. The fluid levels are first measured in all 23 monitoring wells. Samples are collected from the five down gradient boundary wells MW-11, MW-12, MW-13, MW19 and MW-20 during the first quarter monitoring episode. For the third quarter episode, samples are collected from all wells with sufficient water to produce a representative sample except for those that contain measurable FPH.

A basic-data report is produced after the first quarter sampling episode. This report includes a water-table contour map and the results from down gradient boundary wells. The annual report will be prepared following receipt of the third quarter data. This report summarizes all of the data generated for the year, provides interpretations as necessary and recommends remediation program changes.

# 2 Operator / Legally Responsible Party

#### Operator

Duke Energy Field Services, LP 1625 West Marland Hobbs, NM 88240 (505) 397-5520 Contact Person: Tony Lee – Asset Manager

# Legally Responsible Party

Duke Energy Field Services, LP 370 17<sup>th</sup> Street, Suite 2500 Denver, CO 80202 (303) 595-3331 Contact Person: John Admire – Director, Environmental Protection

t)

# 3 Location of Discharge / Facility

Unit N, Section 30, Township 17 South, Range 35 East See Figure 1 – Site Location Map.

## 4 Landowner

Duke Energy Field Services, LP 370 17<sup>th</sup> Street, Suite 2500 Denver, CO 80202 (303) 595-3331

# 5 Facility Description

A description of the remediation system currently in place is described in Section 1 above.

See Figure 2 – Snakebite Booster Station Groundwater Remediation System Site Plan.

## 6 Materials Stored or Used

Material storage is limited to the FPH collected from the three wells. The FPH is collected in closed 55-gallon drums that are located in secondary containment units. The FPH are collected from the drums as they fill for recycling by DEFS.

Table 1 identifies materials and storage containers for substances used and stored at the facility related to the remedial operations at the facility.



Name	Composition	Container	Capacity	Location
FPH	Free product hydrocarbons	AST	2 x 55 gal	MW-5
FPH	Free product hydrocarbons	AST	2 x 55 gal	MW-6
FPH	Free product hydrocarbons	AST	55 gal	MW-15

### 7 Sources and Quantities of Effluent and Waste Solids

Table 2 identifies sources and quantities, quality and disposition of effluent and waste solids generated at the facility related to the remedial operations at the facility.

#### Table 2

Effluent and Solid Waste Sources, Quantity, Quality

Source	Waste/Quality	Quantity
		(gal/month unless otherwise specified)
FPH Recovery Wells (MW-5, MW-6, MW-15)	Free phase hydrocarbons	Maximum 100

#### Separators/Scrubbers

There are no active separators or scrubbers at the facility.

#### **Boilers and Cooling Towers/Fans**

There are no boilers or cooling towers/fans in operation at the facility.

#### **Process and Storage Equipment Wash Down**

Wash down is not generated at the facility.

#### Solvents/Degreasers

There are no solvent or degreasers used in the remedial operations at the facility.

#### **Spent Acids/Caustics**

No spent acids or caustics are generated at the facility.

### **Used Engine Coolants**

No engine coolants are used in the remedial operations at the facility.

#### Waste Lubrication and Motor Oils

Lubrication and motor oils are not used in the remedial operations at the facility.

**Used Oil Filters** Used oil filters are not generated from the remedial operations at the facility.

### Solids and Sludges

No solids or sludges are generated at the facility.

### **Painting Wastes**

No painting wastes are generated at the facility.



Sewage

No sewage is generated at the facility.

### Lab Wastes

The facility is not equipped with a laboratory.

### **Other Liquids and Solid Wastes**

Bailers, gloves and other non-hazardous are generated from the remedial operations at the facility. These investigative wastes are disposed of offsite after each monitoring episode.

Absorbent socks used to remove free product from monitoring wells are generated by the remedial operations at the facility.

### 8 Liquid and Solid Waste Collection / Storage / Disposal

### **Collection/Storage**

The FPH collected from the three monitoring wells is automatically deposited by the pumps into closed 55-gallon drums. All drums are placed in secondary containment vessels.

Bailers, gloves and other non-hazardous trash generated is transported offsite to the Linam Ranch Gas Plant for off-site disposal.

### **Onsite Disposal**

No on-site disposal activities occur at the facility.

### **Offsite Disposal**

THE FPH is collected and recycled by DEFS as the 55-gallon containment drums fill.

### 9 **Proposed Modifications**

Proposed modifications to the programs described above are limited to the substitution of passive FPH collection components and/or a soil vapor collection system to facilitate FPH collection. Any other modifications would first be recommended in the annual groundwater monitoring report prior to implementation.

### 10 Inspection, Maintenance, and Reporting

The remedial system is inspected weekly by DEFS personnel or their contractor. Operation and maintenance and Semi-annual groundwater sampling is conducted DEFS or their contractor. DEFS submits a report of the groundwater sampling analytical results, operational data, and recommendations for system improvement to the NMOCD on a semi-annual basis.

### 11 Spill / Leak Prevention and Reporting (Contingency Plans)

Since the facility is unattended, the remedial system is inspected, at a minimum, on a weekly basis. DEFS will respond to spills as outlined in the facility's SPCC plan and report spills and leaks according to the requirements of 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

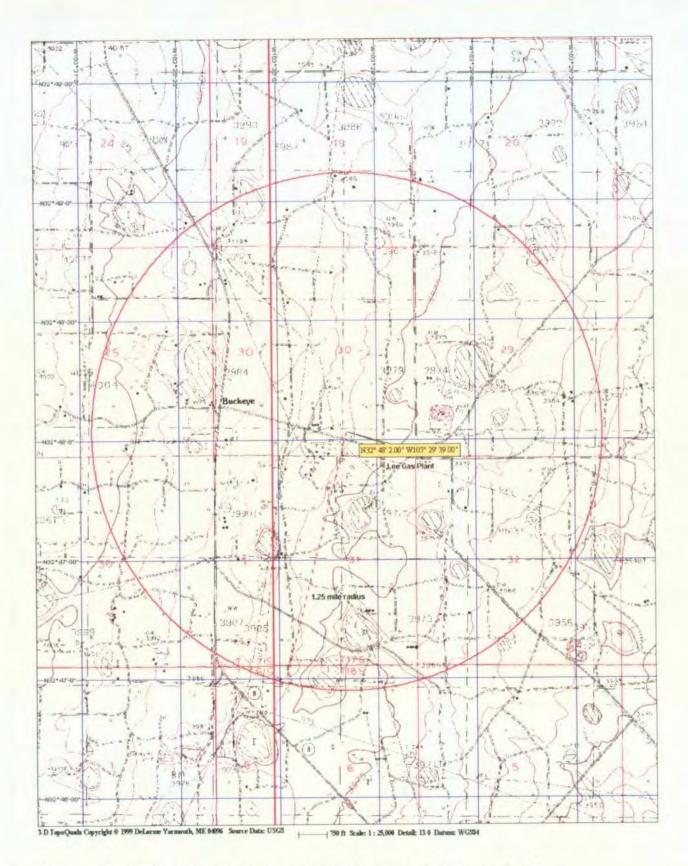
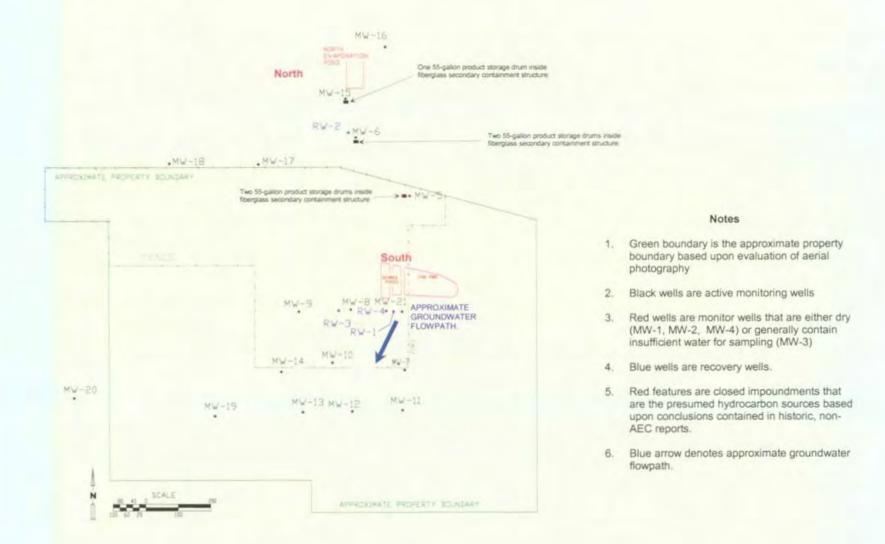


Figure 1. Site Location Map - Snakebite Booster Station (formerly known as Lee Gas Plant)

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### Figure 2. Snakebite Booster Station (formerly known as Lee Gas Plant) Site Plan.

Duke Energy Field Services, LP Snakebite Booster Station (formerly known as Lee Gas Plant) Discharge Plan, October 2005

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### Olson, William

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From:	Michael Stewart [mstewart@remediacon.com]
Sent:	Friday, September 17, 2004 8:44 AM
To:	Larry Johnson; William Olson
Cc:	John Fergerson; Steve Weathers
Subject:	Notification to Complete Gauging & Groundwater Sampling Activity at The DEFS- Lee Gas Plant Project Site

GW-2R

### Gentlemen,

I am notifying the NMOCD by this email that Trident Environmental, a subcontractor to Duke Energy Field Services, will complete the following field activities at the DEFS-Lee Gas Plant project site in Lea County, New Mexico. The activities include:

1. Measure fluid levels in all monitoring wells using a water level indicator.

2. Purge all monitoring wells scheduled for sampling that do not contain free product. Parameter readings to be recorded during purging activity.

3. Collect groundwater samples, for BTEX, after parameter readings have stabilized and a minimum of three well casing volumes of water have been removed. Wells that bail dry will be bailed and allowed time to recover a total of three times before sample collection.

4. Ship samples to the analytical lab using standard chain of custody protocol. 1 duplicate sample and a trip blank will accompany the samples and will be used to evaluate quality control.

5. Purge water will be disposed of at an approved OCD facility.

The project site is located at the following legal description:

6. Unit B Section 31, T17S, R35E

All activities are scheduled to begin at 0800-0900 MDT on September 30, 2004. If you have any questions and/comments please give me a call at my office or cell phone number. Thanks,

ĩ

John M. Fergerson, PG

Trident Environmental

P.O. Box 7624

Midland, Texas 79708

432-682-0008 (Main)

432-262-5216 (Office)

432-638-7333 (Cell)

John@trident-environmental.com

This email has been scanned by the MessageLabs Email Security System. For more information please visit http://www.messagelabs.com/email





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

303 595 3331 RECEIVED

December 8, 2003

DEC 09 2003

**Environmental Bureau** 

Oil Conservation Division Mr. William C. Olson New Mexico Oil Conservation Division – Environmental Bureau 1220 South St Francis Drive Santa Fe, New Mexico 87505-5472

#### RE: 2003 Annual Groundwater Report for the Lee Gas Plant, Lea County New Mexico

Dear Mr. Olson:

Duke Energy Field Services, LP (DEFS) is pleased to submit for your review, one copy of the 2003 Annual Groundwater Report for the Lee Gas Plant located in Lea County, New Mexico. The annual groundwater report incorporates the two semiannual sampling events that were completed during year.

If you have any questions regarding the 2003 Annual Groundwater Report, please call me at 303-605-1718.

Sincerely Duke Energy Field Services, LP

Stephen Weathers Sr. Environmental Specialist

Enclosure

Larry Johnson, OCD Hobbs District cc: Lynn Ward, DEFS Midland **Environmental Files** 

### Olson, William

From:	Gilbert J Van Deventer [kickbooty@juno.com]
Sent:	Monday, September 08, 2003 10:11 AM
To:	swweathers@duke-energy.com; wolson@state.nm.us; PSheeley@state.nm.us;
	LWJohnson@state.nm.us;
	energy.com; LCWard@duke-energy.com
Cc:	jmfergerson@grandecom.net; dale.littlejohn@cox.net
Subject:	Annual groundwater sampling event for Lee Gas Plant

Notice: Annual groundwater sampling event for the Duke Energy Field Services Lee Gas Plant

Location: County Rd 50, Buckeye, Lea County, NM (T17S, R35E, Sec 30 & 31)

Scheduled Date: September 15-16, 2003

Monitoring wells to be sampled and gauged: MW7, MW9 - MW14, and MW16-MW22

Analyses for: BTEX, NO3, SO4, O2, Fe, and Mn

If you have any questions please feel free to call at the numbers listed below.

Gilbert J. Van Deventer, REM gvandeve@umich.edu Trident Environmental Office: 432-682-0808 Fax/Home: 432-682-0727 Mobile: 432-638-3106

### Page 1 of 1

GW-2

### Olson, William

From: Gilbert J Van Deventer [kickbooty@juno.com]

Sent: Tuesday, March 04, 2003 5:12 PM

To: rfgilchrest@duke-energy.com; msnault@duke-energy.com; wolson@state.nm.us; PSheeley@state.nm.us; swweathers@duke-energy.com

Subject: Semi-Annual Sampling Event scheduled for DEFS Lee Gas Plant

The Semi-Annual Sampling Event has been scheduled for the facility described below:

- Facility Name: Duke Energy Field Services-Lee Gas Plant
- Location: T17S, R35E, Sec 30, UL-O, and Sec 31, UL-B & C (Buckeye, NM)
- Date: March 8-9, 2003

All monitoring wells (MW1-MW23) will be gauged for depth to groundwater and LNAPL thickness, if any. Monitoring wells MW-11, MW-12, MW-13, MW-19, MW-20, and MW-21 will be sampled and analyzed for BTEX (EPA Method 8021B).

Monthly operation and maintenance of the on site groundwater remediation system will also be conducted.

If you have any questions please contact:

Gilbert J. Van Deventer, REM <u>gvandeve@umich.edu</u> Trident Environmental Office: 915-682-0808 Fax/Home: 915-682-0727 Mobile: 915-638-3106

### **Olson**, William

From:	Gilbert J Van Deventer [kickbooty@juno.com]
Sent:	Tuesday, August 06, 2002 2:40 PM
То:	jmfergerson@clearsource.net; LWJohnson@state.nm.us; dale.littlejohn@cox.net; msnault@duke-energy.com; wolson@state.nm.us; wprice@state.nm.us; swweathers@duke-
	energy.com
Subject:	Lee Plant annual groundwater sampling

The annual groundwater sampling event for the DEFS - Lee Gas Plant at Buckeye, NM has been scheduled for Mug 13 and 14 2002

has been scheduled for Aug 13 and 14, 2002.

The following wells are scheduled to be sampled: MW 3, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, & 22

As recommended in the 2001 Annual Groundwater Monitoring and Sampling report analysis will include BTEX, dissolved oxygen, nitrate, sulfate, total iron, ferrous iron, and manganese.

Please feel to call me if you have any questions.

Gilbert J. Van Deventer, REM gilvandeventer@yahoo.com Trident Environmental Office: 915-682-0808 Fax/Home: 915-682-0727 Mobile: 915-638-3106

### Olson, William

From:	Gilbert J Van Deventer [kickbooty@juno.com]
Sent:	Friday, February 08, 2002 9:44 AM
То:	msnault@duke-energy.com; wolson@state.nm.us; sdshaver@duke-energy.com; PSheeley@state.nm.us; swweathers@duke-energy.com; jmfergerson@clearsource.net; dale.littlejohn@cox.net

Subject: DEFS Lee & Monument groundwater sampling events

The first quarter groundwater sampling events have been scheduled for the following facilities:

Monday, February 11, 2002 Duke Energy Field Sevices LP - Lee Gas Plant: MW3,11,12,13,19,20,&21 for BTEX, CH<sub>3</sub>, NO<sub>3</sub>, SO<sub>4</sub>, Fe<sup>-2</sup>, Fe<sup>-3</sup>, Mn

Tuesday, February 12, 2002 Duke Energy Field Sevices LP - Monument Booster: MW1d,2,3,4,6,&7 for BTEX,  $CH_3$ ,  $NO_3$ ,  $SO_4$ ,  $Fe^{-2}$ ,  $Fe^{-3}$ , Mn

Gilbert J. Van Deventer, REM <u>gilvandeventer@yahoo.com</u> Trident Environmental Office: 915-682-0808 Fax/Home: 915-682-0727 Mobile: 915-638-3106





P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303 595-3331 Fax: 303 595-0480

## RECEIVED

### APR 1 5 2003

April 11, 2002

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

Mr. William C. Olson New Mexico Oil Conservation Division – Environmental Bureau 1220 South St Francis Drive Santa Fe, New Mexico 87505-5472

# RE: 2002 Annual Groundwater Report for the Lee Gas Plant, Lea County New Mexico

Dear Mr. Olson:

Duke Energy Field Services, LP (DEFS) is pleased to submit for your review, one copy of the 2002 Annual Groundwater Report for the Lee Gas Plant located in Lea County, New Mexico. The annual groundwater report incorporates the two semiannual sampling events that were completed during year.

If you have any questions regarding the 2001 Annual Groundwater Report, please call me at 303-605-1718.

Sincerely Duke Energy Field Services, LP

Stephen Weathers Sr. Environmental Specialist

Enclosure

cc: Paul Sheeley, OCD Hobbs District Lynn Ward, DEFS Midland Environmental Files

### Olson, William

From:	Gilbert J Van Deventer [kickbooty@juno.com]
Sent:	Friday, February 08, 2002 9:44 AM
	-

To: msnault@duke-energy.com; wolson@state.nm.us; sdshaver@duke-energy.com; PSheeley@state.nm.us; swweathers@duke-energy.com; jmfergerson@clearsource.net; dale.littlejohn@cox.net

Subject: DEFS Lee & Monument groundwater sampling events

The first quarter groundwater sampling events have been scheduled for the following facilities:

Monday, February 11, 2002 Duke Energy Field Sevices LP - Lee Gas Plant: MW3,11,12,13,19,20,&21 for BTEX, CH<sub>3</sub>, NO<sub>3</sub>, SO<sub>4</sub>, Fe<sup>-2</sup>, Fe<sup>-3</sup>, Mn

Tuesday, February 12, 2002 Duke Energy Field Sevices LP - Monument Booster:  $MW1d_{2,3,4,6,\&7}$  for BTEX,  $CH_3$ ,  $NO_3$ ,  $SO_4$ ,  $Fe^{-2}$ ,  $Fe^{-3}$ , Mn

in GW-002 GW-044

Gilbert J. Van Deventer, REM <u>gilvandeventer@yahoo.com</u> Trident Environmental Office: 915-682-0808 Fax/Home: 915-682-0727 Mobile: 915-638-3106





Duke Energy Field Services P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303/595-3331

December 12, 2001

Mr. William C. Olsen New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division – Environmental Bureau 2040 South Pacheco Street Santa Fe, New Mexico 87505

# RE: 2001 Annual Groundwater Report for the Lee Gas Plant, Lea County New Mexico

Dear Mr. Olsen:

Duke Energy Field Services, LP (DEFS) is pleased to submit for your review, one copy of the 2001 Annual Groundwater Report for the Lee Gas Plant located in Lea County, New Mexico. The annual groundwater report incorporates the two semiannual sampling events that were completed during year.

If you have any questions regarding the 2001 Annual Groundwater Report, please call me at 303-605-1718.

Sincerely Duke Energy Field Services, LP

Stephen Weathers Environmental Specialist

Enclosure

cc: Paul Sheeley, OCD Hobbs District Becky Moore, DEFS Midland Environmental Files



October 31, 2001

### CERTIFIED MAIL RETURN RECEIPT

Mr. Jack Ford New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87504 Duke Energy Field Services P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303/595-3331

Environmental Bureau Oll Conservation Division

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Environmental Bureau Oil Conservation Division

SUBJECT:Lee Gas Plant (n.k.a. Snake Bite Booster Station)Discharge Plan No. GW-002Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) respectfully submits the enclosed Storm Water Run-Off Plan for Snake Bite Booster Station as required by the discharge plan approval conditions.

If you have any questions regarding this Storm Water Run-Off Plan, please call me at (303) 605-1717.

Sincerely, Duke Energy Field Services, LP

Karin Char Environmental Specialist

Enclosure





### STORM WATER RUN-OFF PLAN

FOR:

Snake Bite Booster Station (formerly Lee Gas Plant) GW-002

Rainwater collected inside containment structures at the facility is lost through evaporation. None of the containment structures at the facility have valves. Good housekeeping is practiced at the facility to help prevent contaminants from leaving the site during a rainstorm.

### 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 application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-002) – Duke Energy Field Services, LP, Ms. Karin Char, Environmental Specialist, P.O. Box 5493, Denver, Colorado 80217, has submitted a discharge plan renewal application for their Lee Gas Plant located in the SW/4 SE/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Any effluent generated is collected in a closed containment prior to disposal at an OCD approved disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 85 feet with a total dissolved solids concentrations ranging from 200 to 600 mg/l. The discharge plan addresses how spill, 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 thru 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. Request for public hearing shall set forth the reasons why a hearing shall be held.

A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 30th day of March, 2001.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL



OIL CONSERVATION DIV.

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Duke Energy Field Services P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303/595-3331

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October 23, 2001

### CERTIFIED MAIL RETURN RECEIPT

Mr. Jack Ford New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87504

SUBJECT: Snake Bite Booster Station (formerly Lee Gas Plant) Discharge Plan No. GW-002 Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) respectfully submits the enclosed check in the amount of \$1700.00 for the Snake Bite Booster Station discharge plan fee.

If you have any questions regarding this discharge plan renewal application, please call me at (303) 605-1717.

Sincerely, Duke Energy Field Services, LP

Karin Char Environmental Specialist

Enclosure

### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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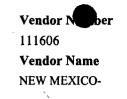
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I hereby acknowledge receipt of che	ack No. $10-17-01$
or cash received on	in the amount of \$ 1,700.00
from Duke Energy Field Service	
for Snake Bite Birster Station	
Submitted by:	- Date: 10-30-01
Submitted to ASD by:	Date:
Received in ASD by:	Date:
Filing Fee New Facility	Renewal V
Modification Other	
Organization Code $52/.07$ To be deposited in the Water Quali- Full Payment $V$ or Annual	ty Management Fund.
THE FACE OF THIS DOCUMENT HAS A COLORED BACK Duke Energy Field Services, LP	THE CHASE MANHATTAN BANK 50-937/213
Denver, CO 80217	Syracuse, NY 300010000 111606 10/17/01
Pay One thousand seven hundred and xx / 100 Dollars	TABLE AFTER 120 DAYS     Sheet: Annuality       ***\$1.700.00
To The NEW MEXICO- Order Of WATER MANAGEMENT QUALITY MANAGEMENT FUND C/O OIL CONSERVATION DIVISION	Dand L. Hanse
THIS DOCUMENT CONTAINS A TRUE WATERMARK	Authorized Signature

### Duke Energy Field Services, LP P O Box 5493 Denver, CO 80217



Check Date

Check Number

10/17/01

Invoice Number	Invoice Date	Net Amount	Description
1700	9/6/01	1,700.00	Accounts Payable Vouchers
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	Total Paid	<u>\$1,700.00</u>	

Please Detach and Retain for Your Records



A New Kind of Energy™

OIL CONSERVATION DIV. DI AUG 21 PM 12: 59 Duke Energy Field Services P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303/595-3331

August 15, 2001

### CERTIFIED MAIL RETURN RECEIPT

Mr. Jack Ford New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87504

SUBJECT: Lee Gas Plant (n.k.a. Snake Bite Booster Station) Discharge Plan No. GW-002 Lea County, New Mexico

Dear Mr. Ford:

This letter is to confirm our August 8, 2001 telephone conversation in which you indicated that NMOCD will be approving the facility's discharge plan based upon the facility operating as a *booster station opposed to a gas plant*. Per your instructions, DEFS will await the receipt of NMOCD approval of this booster station's discharge plan before submitting any discharge plan fees or taking further action.

If you have any questions regarding this matter, please call me at (303) 605-1717.

Sincerely, Duke Energy Field Services, LP

Karin Char Environmental Specialist



A New Kind of Energy™

Duke Energy Field Services P.O. Box 5493 Denver, Colorado 80217 OIL CONSERVATION DW 370 17th Street, Suite 900 Denver, Colorado 80202 01 JUL 18 PM 1: 30

July 13, 2001

### CERTIFIED MAIL RETURN RECEIPT

Mr. Jack Ford New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87504

SUBJECT: Lee Gas Plant (n.k.a. Snake Bite Booster Station) Discharge Plan No. GW-002 Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) respectfully submits the enclosed discharge plan renewal application for the remedial operations at Lee Gas Plant (GW-002), now known as Snake Bite Booster Station, located at SW/4 SE/4 T 17S, R 35E, Sec. 30. This application is in response to your January 25, 2001 and March 30, 2001 e-mail messages and supplements DEFS' November 15, 2000 and December 12, 2000 correspondence requesting renewal of the facility discharge plan.

As stated in DEFS' November 15, 2000 and December 12, 2000 letters of application to the NMOCD, there have been no modifications to the operations at the facility since the last discharge plan modification. However, since there have been several NMOCD-approved modifications throughout the duration of the remedial operations at the facility, DEFS has consolidated the remedial operations information into one document to aid in the review of the discharge plan renewal.

As you may know, the facility no longer is capable of operating as a gas processing plant; the equipment to process gas has either been removed or made inoperable. Current DEFS operations are limited to the remedial operations for the former gas plant and one compressor engine, which provides compression for the Linam Gathering System. Therefore, the enclosed discharge plan is limited to the remedial operations of the former gas plant.

If you have any questions regarding this discharge plan renewal application, please call me at (303) 605-1717.

Sincerely, Duke Energy Field Services, LP

Karin Char **Environmental Specialist** 

Enclosures

District I 1625 N. French Dr., Hobbs, NM 88240 District II	State of New Mexico Energy Minerals and Natural Resources	Revised January 24, 2001
811 South First, Artesia, NM 88210 <u>District III</u> 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87504	Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87504	Submit Original Plus 1 Copy to Santa Fe 1 Copy to Appropriate District Office
	NI ICATION FOR SERVICE COMPANI	

### 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)

☐ Modification

New X Renewal

- 1. Type: Lee Gas Plant (now known as Snake Bite Booster Station) Remedial Operations
- 2. Operator: See enclosed Discharge Plan. Address: Contact Person: Phone:
- 3. Location: See enclosed Discharge Plan.
- 4. Attach the name, telephone number and address of the landowner of the facility site. *See enclosed Discharge Plan.*
- 5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. *See enclosed Discharge Plan.*
- 6. Attach a description of all materials stored or used at the facility.

See enclosed Discharge Plan.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

See enclosed Discharge Plan.

- 8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. See enclosed Discharge Plan.
- 9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. *See enclosed Discharge Plan.*
- 10. Attach a routine inspection and maintenance plan to ensure permit compliance. *See enclosed Discharge Plan.*
- 11. Attach a contingency plan for reporting and clean-up of spills or releases. *See enclosed Discharge Plan.*
- 12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. *See enclosed Discharge Plan.*
- 13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

See enclosed Discharge Plan.

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

Name: Mark S. Nault

Signature: Mark & Mault

Title: Asset Manager

Date: <u>7-9-01</u>



A New Kind of Energy

## LEE GAS PLANT (n.k.a. SNAKE BITE BOOSTER STATION) DISCHARGE PLAN

JUNE 2001

### **DISCHARGE PLAN TABLE OF CONTENTS**

1	Type of Operation	1
2	Operator / Legally Responsible Party	2
3	Location of Discharge / Facility	2
4	Landowner	2
5	Facility Description	2
6	Materials Stored or Used	2
7	Sources and Quantities of Effluent and Waste Solids	3
8	Liquid and Solid Waste Collection / Storage / Disposal	4
9	Proposed Modifications	5
10	Inspection, Maintenance, and Reporting	6
11	Spill / Leak Prevention and Reporting (Contingency Plans)	
12	Site Characteristics	6
13	Additional Information	6

### **FIGURES**

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Figure 1	Site Location Map
Figure 2	Groundwater Remediation System Site Plan
Figure 3	Lee Gas Plant (n.k.a. Snake Bite Booster Station) Remedial Operations
	Simplified Process Flow Diagram

APPENDICES Appendix 1 Snake Bite Booster Station SPCC Plan

### Lee Gas Plant (n.k.a. Snake Bite Booster Station) SW/4 SE/4 T 17S, R 35E, Sec. 30

### **DISCHARGE PLAN**

This document constitutes a renewal application for a Groundwater Discharge Plan for the Lee Gas Plant (*n.k.a. Snake Bite Booster Station*) Remedial Operations. Although no modifications have been made to the remedial operations at Lee Gas Plant as previously approved by the New Mexico Oil Conservation Division (NMOCD) per discharge plan renewals and modifications, DEFS has consolidated this information into this renewal application to aid in the review of the renewal for this discharge plan. 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

Remedial operations include the operation of the groundwater monitoring and recovery wells. No changes have been made to the remedial operations as previously approved by the NMOCD. The last Recovery Well Work Plan modification was approved by the NMOCD on March 12, 1999. A brief description of the remedial operations currently in effect at the Lee Gas Plant is below.

Currently, there are five groundwater recovery wells (MW-6, RW-1, RW-2, RW-3, and RW-4) and nineteen monitoring wells (MW-3, MW-5, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, MW-18, MW-19, MW-20, MW-21, MW-22 and MW-23) that are used in remedial operations at Lee Gas Plant. Three monitoring wells (MW-1, MW-2, and MW-4) are currently dry wells.

### **Recovery Well Operations**

Fluid extraction is conducted at RW-2, RW-3, and RW-4. Fluid extraction is set to run continuously except for periodic maintenance and repair. The rate from these recovery wells is approximately 9 gallons/minute.

A soil vapor extraction well system is in place at RW-1. The soil vapor extraction system utilizes a Roots positive displacement blower (Model 24URAI – 2 horsepower).

A portable Xitech product recovery system is used to extract light non-aqueous phase liquids (LNAPL, condensate) from MW-6. This portable recovery system is periodically moved to other wells depending upon which well is generating more product.

#### **Monitoring Well Operations**

Passive bailers, absorbent socks, and hand bailers are used to remove product from MW-5, MW-8, and MW-15.

An air sparging system is in place at MW-23. Air sparging at this monitoring well is accomplished with the use of a 1-horsepower Gast Piston air compressor.

### 2 Operator / Legally Responsible Party

### Operator

Duke Energy Field Services, LP 11525 West Carlsbad Hwy. Hobbs, NM 88240 (505) 397-5701 Contact Person: Mark Nault – Asset Manager

### Legally Responsible Party

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

### 3 Location of Discharge / Facility

SW/4 SE/4 T 17S, R 35E, Sec. 30

See Figure 1 – Site Location Map.

### 4 Landowner

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

### 5 Facility Description

The facility is no longer capable of operating as a gas processing plant and currently operates only as a booster station. Current facility operations include remedial operations and the operation of one compressor engine, which provides compression for the Linam Gathering System; the equipment to process gas has either been removed or made inoperable. The last Recovery Well Work Plan modification was approved by the NMOCD on March 12, 1999.

See Figure 2 - Lee Gas Plant Groundwater Remediation System Site Plan.

### 6 Materials Stored or Used

Table 1 identifies materials and storage containers for substances used and stored at the facility related to the remedial operations at the facility.

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### Table 1 Materials Stored and Used

Name	Composition	Container	Capacity	Location	
Free Product	Condensate	AST	80 gal	N of CR 50 next to MW-6	
Slop Oil	Condensate	AST	210 bbl	NW of the Wastewater Tank	
Oil/Water	Condensate/	AST	250 bbl	NW of the Wastewater Tank	
Separator	water				
(Gun Barrel)					
Wastewater	Water,	AST	750 bbl	SE of the Slop Oil Tank and	
	condensate			Oil/Water Separator (Gun Barrel)	
Oil Sump	Condensate	Sump	1000 gal	N of the 210 Slop Oil Tank	

### 7 Sources and Quantities of Effluent and Waste Solids

Table 2 identifies sources and quantities, quality and disposition of effluent and waste solids generated at the facility related to the remedial operations at the facility.

## Table 2 Effluent and Solid Waste Sources, Quantity, Quality

Source	Waste/Quality	Quantity (gal/month unless otherwise specified)
Recovery Wells (RW-2, RW-3, RW-4)	Wastewater	Approx. 580,000
Recovery Well (MW-6)	Condensate	Approx. 60
Absorbent Socks	Condensate	Approx. 1
Absorbent Socks	Absorbent Socks	Approx. 2/mo.
Trash	Bailers, gloves, misc. trash	Negligible

### Separators/Scrubbers

A sump and oil/water (gun barrel) system is used for remedial operations when the passive bailers and absorbent socks are used to remove free product from monitoring wells.

### **Boilers and Cooling Towers/Fans**

There are no boilers or cooling towers/fans in operation at the facility.

### **Process and Storage Equipment Wash Down**

Wash down is not generated at the facility.

### Solvents/Degreasers

There are no solvent or degreasers used in the remedial operations at the facility.

### **Spent Acids/Caustics**

No spent acids or caustics are generated at the facility.

### **Used Engine Coolants**

No engine coolants are used in the remedial operations at the facility.

### Waste Lubrication and Motor Oils

Lubrication and motor oils are not used in the remedial operations at the facility.

### **Used Oil Filters**

Used oil filters are not generated from the remedial operations at the facility.

#### Solids and Sludges

No solids or sludges are generated at the facility.

### **Painting Wastes**

No painting wastes are generated at the facility.

### Sewage

No sewage is generated at the facility.

### Lab Wastes

The facility is not equipped with a laboratory.

#### Other Liquids and Solid Wastes

Bailers, gloves and other non-hazardous are generated from the remedial operations at the facility.

Absorbent socks used to remove free product from monitoring wells are generated by the remedial operations at the facility.

### 8 Liquid and Solid Waste Collection / Storage / Disposal

#### Collection/Storage

Free product (condensate) generated from MW-6 is collected in an 80-gallon fiberglass reinforced aboveground storage tank via unpressurized, aboveground piping.

Free product (condensate) removed from MW-5, MW-8, and MW-15 using passive bailers and absorbent socks is drained into a 1000 gal below grade Sump and 250 bbl aboveground Oil/Water Separator (Gun Barrel) System.

The 1000 gal fiberglass sump is below grade and has a concrete basin for secondary containment. The oil/water drained into the sump is routed via pressurized underground and aboveground steel piping to the 250 bbl aboveground Oil/Water Separator (Gun Barrel) where the oil and water are separated. The oil is then routed via steel unpressurized, aboveground piping to the 210 bbl aboveground Slop Oil Tank and the water is routed to the 750 bbl aboveground Wastewater Tank via steel unpressurized, aboveground Drisco and steel piping.

Wastewater generated from the RW-2, RW-3, and RW-4 is collected in a 750 bbl aboveground Wastewater Tank via pressurized, underground 1-inch PVC piping.

Wastewater from the 750 bbl Wastewater tank is routed to Rice Operating Company's Class II injection well via a gravity system of underground and aboveground Drisco and steel piping.

Absorbent socks used to remove free product from monitoring wells are drained into the 1000 gal Sump and 250 bbl aboveground Oil/Water Separator (Gun Barrel) system and then transported to the Linam Ranch Gas Plant for offsite recycling.

Bailers, gloves and other non-hazardous trash generated is transported offsite to the Linam Ranch Gas Plant for offsite disposal.

See Figure 3 – Lee Gas Plant Remedial Operations Process Flow Diagram.

### **Onsite Disposal**

No on-site disposal activities occur at the facility.

### **Offsite Disposal**

All effluent and waste generated from remedial operations at the facility are identified in Table 3.

### Table 3

#### **Offsite Disposal Contractors and Disposal Facilities**

Waste	Collection & Storage	Removal Contractor	Disposition	Disposal Facility
Wastewater	750 bbl AST	Rice Operating Co. 122 W. Taylor St. Hobbs, NM 88240 (505) 393-9174	Class II Injection Well	Rice Operating Co. 122 W. Taylor St. Hobbs, NM 88240 (505) 393-9174
Free Product (Condensate)	80 gal AST	Gandy Corporation 1109 East Broadway Tatum, NM 88267 (505) 398-4960	Waste Oil Treating Plant	Gandy Corporation 1109 East Broadway Tatum, NM 88267 (505) 398-4960
Oil/Water Separator (Gun Barrel)	250 bbl AST	NA	Water to the Wastewater Tank and Oil to the Slop Oil Tank	NA
Slop Oil	210 bbl AST	Gandy Corporation 1109 East Broadway Tatum, NM 88267 (505) 398-4960	Waste Oil Treating Plant	Gandy Corporation 1109 East Broadway Tatum, NM 88267 (505) 398-4960
Absorbent Socks	Filter Bin	Transported by DEFS personnel to Linam Ranch Gas Plant	Offsite recycling	E&E Environmental PO Box 683 Brownfield, TX 79316 (800) 658-2137
Trash	Trash bags, container, etc.	Transported by DEFS personnel/contractors to Linam Ranch Gas Plant for transport to landfill by Waste Management, Inc. 2608 N Lovington Hwy. Hobbs, NM 88240 (505) 392-6571	Offsite disposal	Eunice Landfill Operated by Camino Real Environmental 3219 E State Road 234 Eunice, NM 88240 (505) 394-9109

### 9 **Proposed Modifications**

No proposed modifications.

### 10 Inspection, Maintenance, and Reporting

The remedial system is inspected weekly by DEFS personnel. The following tanks will be inspected as specified in the facility's Spill Prevention, Control and Countermeasure (SPCC) Plan: 80-gallon Free Product Storage Tank, 750 Wastewater Tank, 210 bbl Slop Oil Tank, 250 bbl Oil/Water Separator (Gun Barrel). Operation and maintenance is provided by Trident Environmental (formerly TRW). Semi-annual sampling to monitor groundwater quality is conducted by Trident Environmental (formerly TRW). DEFS submits a report of the groundwater sampling analytical results, operational data, and recommendations for system improvement to the NMOCD on a semi-annual basis.

### 11 Spill / Leak Prevention and Reporting (Contingency Plans)

Since the facility is an unattended facility, the remedial system is inspected, at a minimum, on a weekly basis. DEFS will respond to spills as outlined in the facility's SPCC plan (Refer to Appendix 1) 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** 

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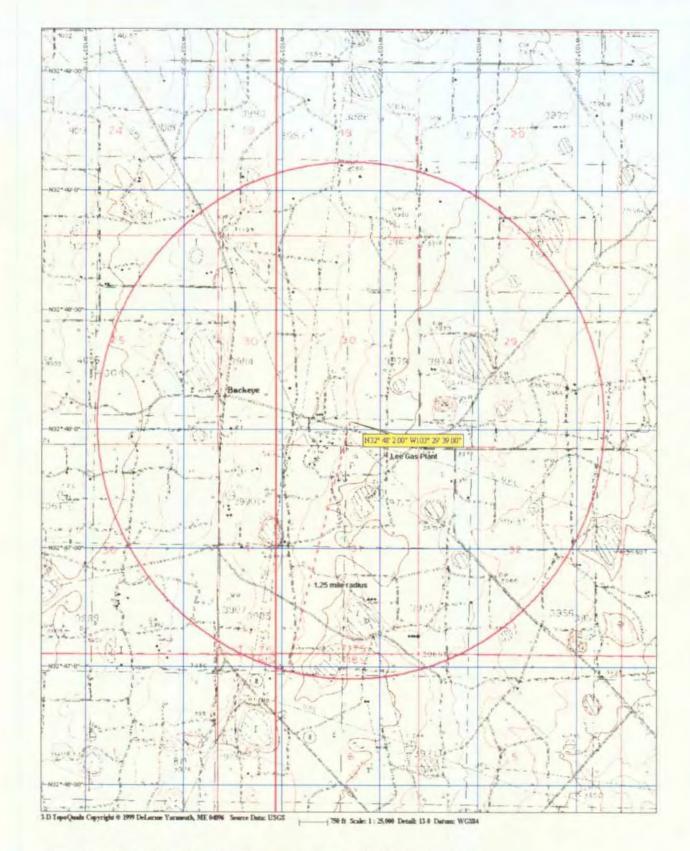


Figure 1. Site Location Map - Lee Gas Plant (n.k.a. Snake Bite Booster Station).

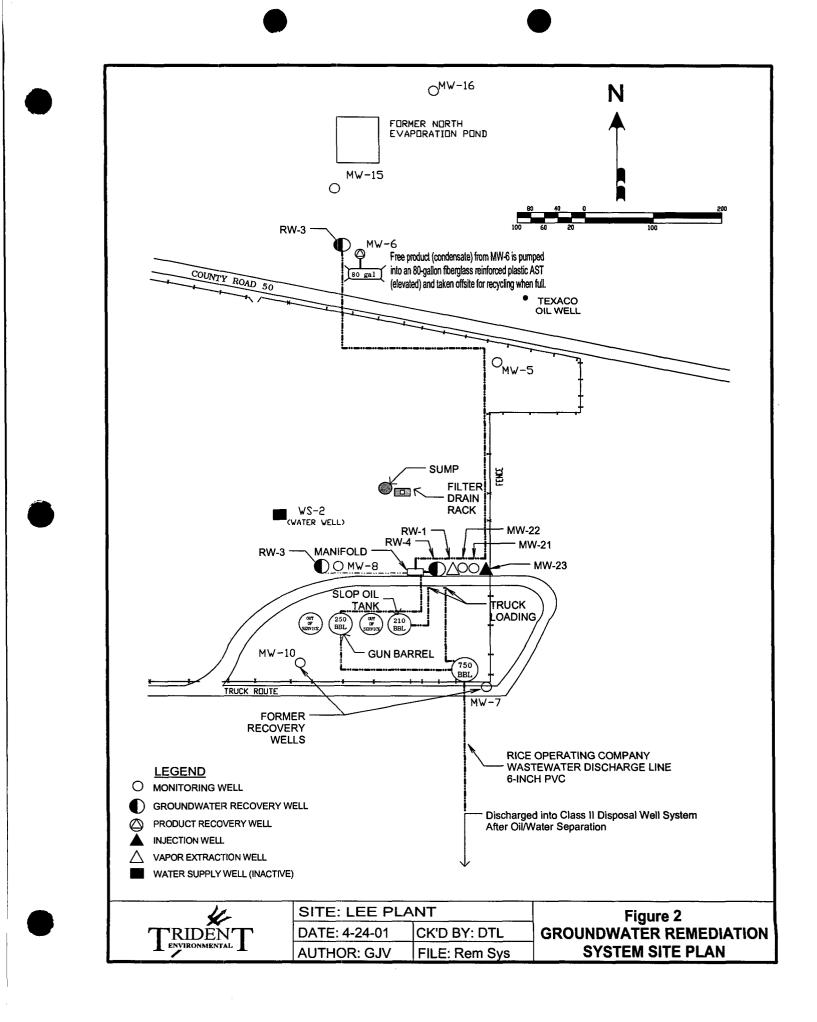
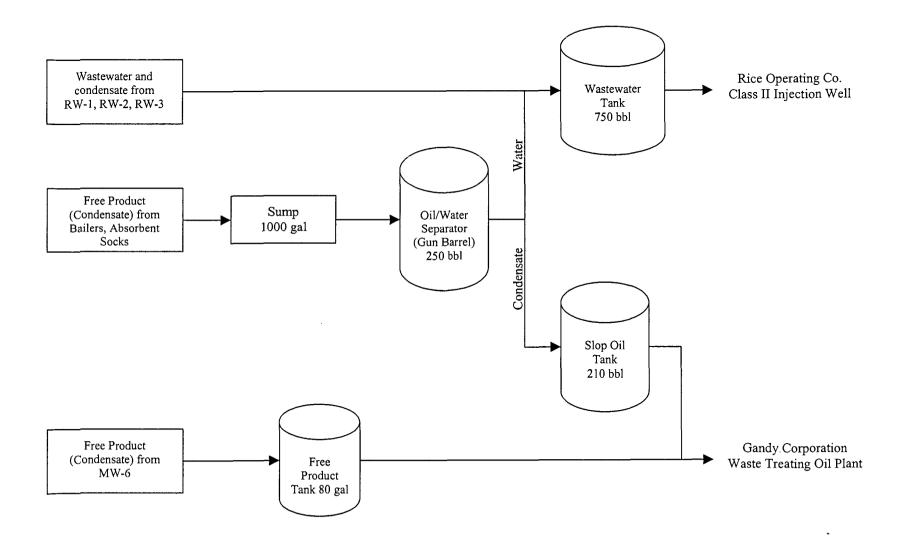


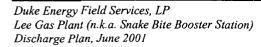
Figure 3 -- Lee Gas Plant (n.k.a. Snake Bite Booster Station) Remedial Operations Simplified Process Flow Diagram



Duke Energy Field Services, LP Lee Gas Plant (n.k.a. Snake Bite Booster Station) Discharge Plan, June 2001

### **APPENDIX 1**

Lee Gas Plant (n.k.a. Snake Bite Booster Station) SPCC Plan



### SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

### FIELD STATIONS IN THE LINAM SYSTEM

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December 2000

**Prepared for:** 

**Duke Energy Field Services, LP** 

Prepared by:

PENDERGAST SARNI ITELL Environmental Management, LLC 1809 Blake Street, Suite 210 Denver, Colorado 80202

### **COPY # 4**

File 2.1.2.1

### PENDERGAST SARNI ITELL Environmental Management, LLC

# Memo

<u> </u>	
Re:	SPCC Plan Calculations re: Secondary Containment Allowance For Precipitation
Date:	May 15, 2001
cc:	DUKE-021-01 C-1
From:	Michele F. Itell, P.E.
To:	Karin Char

In preparing SPCC Plans for Duke Energy Field Services, LP (DEFS), Pendergast Sarni Itell Environmental Management, LLC (PSI) performed secondary containment calculations using Microsoft Excel Spreadsheets created expressly for DEFS by a third party. The secondary containment calculations were provided to PSI by DEFS, and were not altered.

The spreadsheet formulas calculate the secondary containment volume as a percentage of the largest tank volume in the structure minus the volume of any obstructions. The target goal of a minimum available containment capacity 110% was used in preparation of the SPCC Plans to allow for both the largest tank volume in the structure minus the volume of any obstructions, as well as sufficient freeboard to account for precipitation.

December 2000 Page 1-1

#### 1.0 **GENERAL SYSTEM INFORMATION**

#### 1.1 Name and Address of Owner/Operator

**Owner:** 

Duke Energy Field Services, LP (DEFS) 370 17<sup>th</sup> Street Denver, CO 80202

### **Operator:**

Duke Energy Field Services, LP (DEFS) Linam Ranch Gas Plant 11525 W. Carlsbad Hwy. Hobbs, NM 88240

### Designated Person Accountable for Spill Prevention and Implementing this Plan:

Mr. Ronnie F. Gilchrest Gathering System Supervisor Duke Energy Field Services, LP (DEFS) Linam Ranch Gas Plant 11525 W. Carlsbad Hwy Hobbs, New Mexico 88240 Office Phone: (505) 397-5705 Mobile Phone: (391) 535-1330 (505) 410 4702

#### 1.2 **Description of Facilities**

The function of the Linam System field stations is natural gas compression. The SPCC regulated field stations in the Linam System include:

- Buckeye Booster
- Loco Hills Booster • Maljamar Booster
- Grayburg Booster
- Jackson Booster

- Shugart Booster
- Snake Bite Booster
- Square Lake Booster •
- Triple C Booster

Jay Booster

#### 1.3 **Management Approval**

Management approval has been extended at a level having authority to commit the necessary resources to implement this Spill Prevention, Control, and Countermeasure (SPCC) Plan. This SPCC Plan will be implemented as herein described.

Signature: Name: Title:

Comie Helchrect Ronnie F. Gilchrest Gathering System Supervisor

Date: 1--17-01



### **1.4 Professional Engineer Certification**

This SPCC Plan is based on fieldwork conducted by Pendergast Sarni Itell Environmental Management, LLC on October 10, 2000 and information provided by Duke Energy on or before November 9, 2000.

I hereby certify that I have supervised the evaluation of the sites listed below, and being familiar with the provisions of 40 CFR 112 attest that this SPCC plan has been prepared in accordance with the aforementioned regulations and good engineering practices.

- Buckeye Booster
- Grayburg Booster
- Jackson Booster
- Jay Booster

- Loco Hills BoosterMaljamar Booster
- Shugart Booster
- Snake Bite Booster
- Square Lake Booster
- Triple C Booster

Michele F. Itell, P.E. Name of Professional Engineer

License Number: State: Seal: 31582 Colorado



Michele J. Steel

Signature of Professional Engineer

12.29.00

Date

December 2000 Page 1-2

### Addendum to the Snake Bite Booster Spill Prevention, Control, and Countermeasure (SPCC) Plan

The following tanks were omitted from the Snake Bite Booster SPCC plan dated December 2000:

- 250 bbl Oil/Water Separator Tank
- 750 bbl Wastewater Tank
- 80 gal. Condensate Tank

The 250 bbl Oil/Water Separator Tank is located within an earthen berm and is used to separate condensate and water generated from facility operations.

The 750 bbl Wastewater Tank is located within an earthen berm and is used to collect wastewater generated from facility operations.

The 80 gal. Condensate Tank is used to collect free product condensate from the recovery wells at the facility.

This addendum is based on information provided by DEFS on or before May 2, 2001. A revised site plan (dated 06/13/01) illustrates modifications discussed in this addendum.

I hereby certify that I have examined this addendum to the Snake Bite Booster SPCC plan, and being familiar with the provisions of 40 CFR 112 attest that it has been prepared in accordance with the aforementioned regulations and good engineering practices.

John Admire, P.E. Name of Professional Engineer

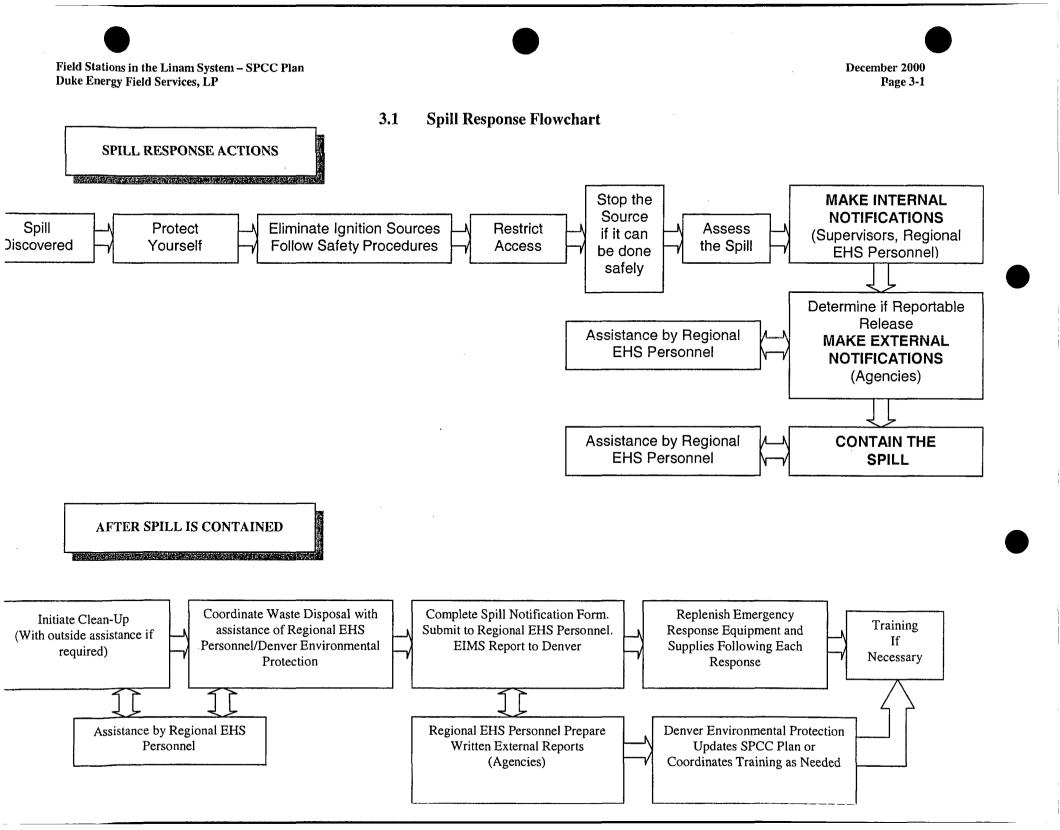
License Number: 80989 State: TEXAS Seal:

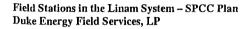
Signature of Professional Engineer



6/22/01

Date





December 2000 Page 3-3



'A major release is defined as (ref. NM OCD 116.B.1):

(a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;

- (b) an unauthorized release of any volume which:
- (i) results in a fire;
- (ii) will reach a water course;

(iii) may with reasonable probability endanger public health; or

(iv) results in substantial damage to property or the environment;

(c) an unauthorized release of natural gases in excess of 500 mcf; or

(d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A.19.B(1), B(2), or B(3). <sup>2</sup>A minor release is defined as (ref. NM OCD 116.B.2):

An unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels, or greater than 50 mcf but less than 500 mcf of natural gases.

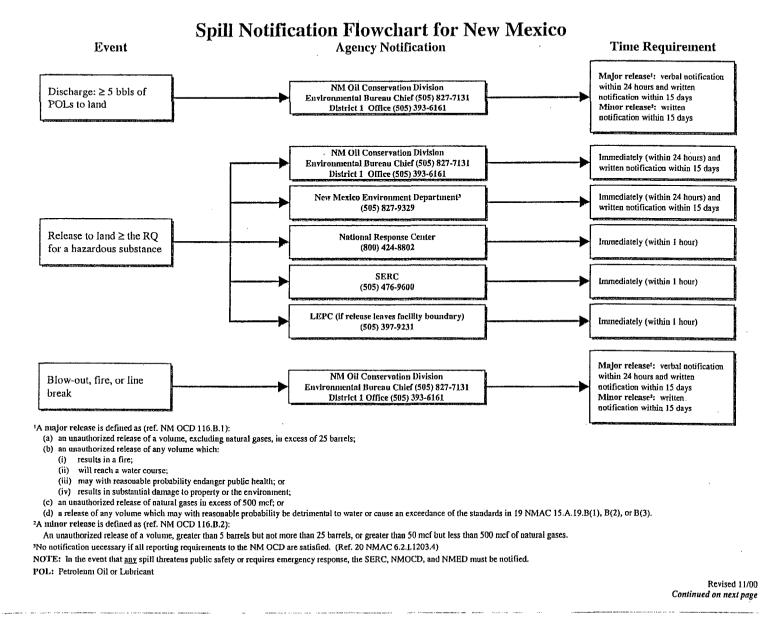
<sup>3</sup>No notification necessary if all reporting requirements to the NM OCD are satisfied. (Ref. 20 NMAC 6.2.1.1203.4)

\*No notification necessary if the National Response Center is notified.

NOTE: In the event that any spill threatens public safety or requires emergency response, the SERC, NMOCD, and NMED must be notified.

Revised 11/00

December 2000 Page 3-2



December 2000 Page 3-4

<b>Government Agency</b>	Location	Office Telephone	NOTIFICATIONS
National Response Center	Washington, DC	(800) 424-8802 (24-hour)	Notify immediately (within 1 hour) of a reportable release (any quantity that could cause a sheen on wate or reportable quantity of a hazardous substance).
US EPA Region 6	Dallas, TX	(800) 877-6063	No reporting necessary if the National Response Centers is notified.
New Mexico Oil Conservation Division (OCD) Environmental Bureau Chief	Santa Fe, New Mexico	(505) 827-7131 (24-hour)	<b>Major Release<sup>1</sup>:</b> Immediate verbal notification (withi 24 hours of release) and written notification within fifteen days.
New Mexico Oil Conservation Division (OCD) Districts 1 and 2	Buckeye, Jay, Maljamar, Snake Bite and Shugart Boosters (Lea County) Grayburg, Jackson, Loco Hills, Square Lake and Triple C Boosters (Eddy	(505) 393-6161 (505) 748-1283	Major Release <sup>1</sup> : Immediate verbal notification (withi 24 hours of release) and written notification within fifteen days. Minor Release <sup>2</sup> : Written notification within fifteen days.
New Mexico Environment Department	County) Santa Fe, New Mexico	(505) 827-9329 (24-hour)	Notify immediately (within 24 hours) of a reportable release (any quantity that could cause a sheen on wate or reportable quantity of a hazardous substance) and submit written notification within 15 days. No notification necessary if all reporting requirements to the OCD are satisfied. (ref. 20 NMAC 6.2.I.1203.4)
Local Emergency Planning Committee (LEPC) and Emergency Management Coordinator (EMC)	Carlsbad, New Mexico	(505) 397-9511	Notify immediately (within 1 hour) of any reportable release that leaves the facility boundary and/or if any emergency response is required.
State Emergency Response Commission (SERC)	Santa Fe, New Mexico	(505) 476-9600	Notify immediately (within 1 hour) of any reportable release and/or if any emergency response is required.

3.3 SPILL NOTIFICATION FOR NEW MEXICO, AGENCY NOTIFICATION

<sup>1</sup> A major release is defined as (ref. OCD 116.B.1):

(a) an unauthorized release of a volume, excluding natural gases, in excess of 25 barrels;

(b) an unauthorized release of any volume which:

(i) results in a fire;

(ii) will reach a water course;

(iii) may with reasonable probability endanger public health; or

(iv) results in substantial damage to property or the environment;

(c) an unauthorized release of natural gases in excess of 500 mcf; or

(d) a release of any volume which may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.A. 19.B(1), B(2), or B(3).

2

A minor release is defined as (ref. OCD 116.B.2): An unauthorized release of a volume, greater than 5 barrels but not more than 25 barrels; or greater than 50 mcf but less than 500 mcf of natural gases.

### Ford, Jack

From:	Gilbert J. Van Deventer[SMTP:Gilbert.Vandeventer@trw.com]
Sent:	Wednesday, January 31, 2001 8:35 AM
To:	Weathers, Steve; Ford, Jack; Olson, Bill; Williams, Donna
Cc:	Fergerson, John
Subject:	Groundwater Sampling Notification

TRW has scheduled groundwater sampling events for the following sites:

Feb. 5-6, 2001 DEFS-Lee Gas Plant Semi-annual groundwater sampling event BTEX: MW3,11,12,13,19,20,&21

Feb. 6-7, 2001 DEFS-Linam Ranch Gas Plant Semi-annual groundwater sampling event BTEX, SO4, NO3, DO: MW1,2,3,5,7,8,9,10,11,12,&13

Feb. 8-9, 2001 DEFS-Hobbs Booster Station First Quarter 2001 groundwater sampling event BTEX: MW1,2,3,5,6,7,14,15,16,&19 (also MW8,9,10,&18 if no product)

Feb. 12, 2001 DEFS-Monument Booster Station Semi-annual groundwater sampling event BTEX, SO4, NO3, DO: MW1d,2,3,4,6,&7

### Olson, William

From:Gilbert J. Van Deventer [SMTP:Gilbert.Vandeventer@trw.com]Sent:Wednesday, January 31, 2001 8:35 AMTo:Weathers, Steve; Ford, Jack; Olson, Bill; Williams, DonnaCc:Fergerson, JohnSubject:Groundwater Sampling Notification

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Feb. 12, 2001 DEFS-Monument Booster Station Semi-annual groundwater sampling event BTEX, SO4, NO3, DO: MW1d,2,3,4,6,&7



P.O. Box 5493 Denver, Colorado 80217 370 17th Street, Suite 900 Denver, Colorado 80202 303 595-3331 Fax: 303 595-0480

November 30, 2000

Mr. Bill Olsen New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division – Environmental Bureau 2040 South Pacheco Street Santa Fe, New Mexico 87505

# RE: 2000 Annual Groundwater Report for the Lee Gas Plant, Lea County New Mexico

Dear Mr. Olsen:

Duke Energy Field Services, LP (DEFS) is pleased to submit for your review, one copy of the 2000 Annual Groundwater Report for the Lee Gas Plant located in Lea County, New Mexico. The annual groundwater report incorporates the two semiannual sampling events that were completed this year.

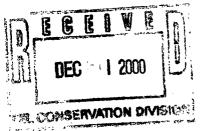
If you have any questions regarding the 2000 Annual Groundwater Report, please call me at 303-605-1718.

Sincerely Duke Energy Field Services, LP

Stephen Weathers Environmental Specialist

Enclosure

cc: Donna Williams, OCD Hobbs District Environmental Files



December 2000 Page 3-5

911 or (505) 392-5588

(505) 492-5000

(505) 492-2000

(888) 204-1781

or

### Spill Notification - Local Emergency Personnel and Duke Energy Management

### Fire, Police, and Ambulance

New Mexico State Police, Roswell, New Mexico dispatches emergency services to all areas of District 3. District 3 encompasses Lea County, Eddy County and Chavez County.

### Hospital

Lea Regional Medical Center, Hobbs, New Mexico

or

St. Mary's Hospital, Hobbs, New Mexico

### Duke Energy Gas Control (24-Hour Emergency Hotline) Beaumont, Texas

#### **Asset Engineer**

Mr. Mark Nault Office: (505) 397-5701 Mobile: (505) 370-3530

### **Gathering System Supervisor**

Mr. Ronnie Gilchrest Office: (505) 397-5705 Mobile: (505) 370-3572 Pager: (800) 586-4922

### **Regional Environmental Health and Safety**

Mr. Andy Price Office: (915) 620-4079 Mobile: (915) 349-5118

### **General Manager**

Mr. Stephen McNair Office: (915) 620-4021 Mobile: (915) 238-3266 Pager: (800) 458-3891

### **Corporate Environmental Protection Dpt.**

Office: (303) 595-3331 Administrative Assistant: (303) 605-1633 Environmental Fax: (303) 389-1957

December 2000 Page 3-6

### 3.4 Spill Notification - Contractors

In case of a release, the following contractors may be called to assist Duke Energy with the clean-up of a spill.

Contractor Name	Location	Office Telephone	Services Offered
B-H Construction	P.O Box 970, Eunice, NM 88231	505-394-2588	Backhoe
Smith and Son's	2705 N. West County Road, Hobbs, NM 88240	505-397-1852	Backhoe
Gandy's Oilfield Service	Weststar Route, Lovington, NM 88260	505-396-4948	Vacuum trucks/transports
Pool Company of Texas	P.O Box 2545, Hobbs, NM 88240	505-392-2577	Vacuum trucks/transports
Plains Marketing	3514 Lovington Highway, Hobbs, NM 88240	505-392-8212	Vacuum trucks/transports
McClaskey Oil Field Services	P.O. Box 580, Hobbs, NM 88241	505-393-1016	Vacuum trucks/transports
Smith and Son's	2705 N. West County Road, Hobbs, NM 88240	505-397-1852	Welders
Sullivan's Crane	P.O. Box 2247, Hobbs, NM 88241	505-393-7141	Crane operations
Sweatt Construction	P.O. Box 827, Artesia, NM 88211	505-397-4541	Dirt contractors
Rusty Forest	Hobbs, NM	505-397-7186	General contractor/roustabouts
Smith and Son's	2705 N. West County Road, Hobbs, NM 88240	505-397-1862	General contractor/roustabouts
Southwestern Public Service		800-750-2520	
Caprock Water	401 S. Bolton, Artesia, NM 88210	505-677-2221	Plant water system

December 2000 Page 3-7

Contractor Name	Location	Office Telephone	Services Offered
Triple T Field Service and Repair	2020 <sup>1</sup> / <sub>2</sub> W. Moreland Hobbs, NM 88240	505-393-0297	Vehicle repair
Artesia Fire Equipment	P.O. Box 1367, Artesia, NM 88211	505-420-7876, 505-396-3953, 505-746-6111	Safety supplies
Vallen Safety Supply		915-561-5419, 915-557-5751	Safety supplies
Callaway Safety	3229 Industrial Hobbs, NM 88240	505-392-2973	Safety supplies

3.5 Hazardous Substances (HS) and Extremely Hazardous Substances (EHS)

**Reporting Requirement**: The following is a list of EHS and HS that are commonly used in oil and gas operations, along with their release reportable quantities (RQ). However, this list is not inclusive of all EHS and HS. Contact Corporate Environmental Protection for assistance in reporting a release. Report a release (in any 24-hour period) to land, air, or water that equals or exceeds the following RQ:

Extremely Hazardous Substances (EHS)	Reportable Q	uantity (RQ)
	Pounds	Gallons
Acrolein (Magnacide B)	1	0.1
Allyl alcohol	100	14
Ammonia	100	15
Carbon disulfide	100	9
Chlorine	10	8
Chloroform	10	0.8
Formaldehyde	100	12
Hydrogen sulfide	100	7
Methylmercaptan	100	
Phenol	1000	111
Sulfur dioxide	500	
Sulfuric acid	1000	65
Hazardous Substances	Reportable Q	uantity (RQ)
	Pounds	Gallons
Acetic acid	5000	571
Acetone	5000	752
Allyl chloride	1000	127
Aluminum sulfate	5000	221
Amine - See Diemethylamine (DEA) or Triethylamine		
Ammonium bicarbonate	5000	1
Ammonium bifluoride	100	1
Ammonium bisulfite	5000	1 .
Ammonium chloride	5000	394
Ammonium hydroxide	1000	1
Aniline	5000	556 <sup>2</sup>
Antimony	5000	
Antimony compounds <sup>3</sup>		
Arsenic acid	1	1
Asbestos (friable)	1	

<sup>1</sup>Indicates compounds which are naturally solids but may be found in solution. To determine if RQ has been released, contact Environmental Affairs and report the volume released and the concentration of solution.

<sup>2</sup>Indicates RQ is a calculated number derived from the RQ (pounds), and specific gravity of the pure listed compound

Hazardous Substances, continued	Reportable Q	uantity (RQ)
	Pounds	Gallons
Barium cyanide	10	
Benzene	10	1
Benzenamine	5000	556 <sup>2</sup>
Biphenyl	100	1
1-Butanol	5000	703 <sup>2</sup>
2-Butanone	5000	703 <sup>2</sup>
n-Butyl alcohol	5000	703 <sup>2</sup>
Calcium hypochlorite	10	1
Carbonic dichloride (phosphene, carbonyl dichloride)	10	
Carbon tetrachloride	10	0.7
Carbonyl sulfide	100	
Chromium	5000	
Chromium compounds <sup>3</sup>		
Copper	5000	
Copper compounds <sup>3</sup>	100	
Cumene	5000	659 <sup>2</sup>
Cupric chloride	10	1
Diethanolamine	100	1
Diethylamine (DEA)	100	$16.1^2$
1,4 Dioxane (component of Tretolite KW-100)	100	11.0 <sup>2</sup>
Ethyl acrylate	1000	123 <sup>2</sup>
Ethylene diamine tetra acetic acid (EDTA)	5000	1
Ethylene glycol	5000	538
Ferrous chloride	100	3
Formic acid	5000	489
Glycol – See Ethylene glycol		
Hexane	5000	863 <sup>2</sup>
Hydrochloric acid	5000	1
Hydrofluoric acid	100	1
Hydrogen chloride	5000	1
Hydrogen fluoride	100	1
1,3-Isobenzofurandione	5000	1
Lead	10	
Lead acetate	10	1
Mercury	1	0.01

<sup>1</sup>Indicates compounds which are naturally solids but may be found in solution. To determine if RQ has been released, contact Environmental Affairs and report the volume released and the concentration of solution.

<sup>2</sup>Indicates RQ is a calculated number derived from the RQ (pounds), and specific gravity of the pure listed compound

Hazardous Substances, continued	Reportable Q	uantity (RO)
	Pounds	Gallons
Methane thiol	100	
Methanol	5000	758
Methyl ethyl ketone (MEK)	5000	703 <sup>2</sup>
Methyl isobutyl ketone (MIBK)	5000	712 <sup>2</sup>
Methyl methacrylate	1000	121 <sup>2</sup>
Methylene chloride	1000	85.6 <sup>2</sup>
4-Methyl-2-pentanone	5000	711 <sup>2</sup>
Naphthalene	100	10
Naphthenic acid	100	11.6 <sup>2</sup>
Nitric acid	1000	1
Oil	See Spill Notific	ation Flowchart
Paraformaldehyde	1000	
Pentachlorophenol (Dowcide G)	10	0.6
Phosphoric acid	5000	3371
Phthalic anhydride	5000	1
Polychlorinated biphenyls (PCB)	1	0.07 <sup>2</sup>
Polynuclear aromatic hydrocarbons (PAH's) <sup>3</sup>	1	0.1 <sup>2</sup>
Potassium chromate	10	1
Potassium hydroxide (potash)	1000	1
Potassium permanganate	100	1
Produced water	See Spill Notification Flowchart	
2-Propenoic acid, ethyl ester	1000	108 <sup>2</sup>
2-Propenoic acid, 2-methyl-, methyl ester	1000	121 <sup>2</sup>
Propionaldehyde	1000	141 <sup>2</sup>
Radionuclides	Contact Corporate Environmental Protection	
Silver nitrate	1	0.02
Sodium bichromate	10	1
Sodium bisulfite	5000	405
Sodium chromate	10	1
Sodium hydrosulfide	5000	1
Sodium hydroxide (caustic soda)	1000	1
Sodium dodecylbenzesulfonate	1000	1
Sodium hypochlorite	100	1
Sodium nitrite	100	5.5

<sup>1</sup>Indicates compounds which are naturally solids but may be found in solution. To determine if RQ has been released, contact Environmental Affairs and report the volume released and the concentration of solution.

<sup>2</sup>Indicates RQ is a calculated number derived from the RQ (pounds), and specific gravity of the pure listed compound

(Continued) Hazardous Substances, continued	Reportable Q	nantity (RO)
	Pounds	Gallons
Sodium phosphate, tribasic	5000	1
Sweet pipeline gas (methane/ethane)	See Spill Notification Flowchart for Pipelines in appropriate state Environmental Compliance Manual	
Thiomethanol	100	138
Toluene	1000	138
1,1,1, Trichloroethane (Chlorothane)	1000	80
Trichloroethylene (TCE)	100	8
Trichlorophenol	10	0.8
Triethylamine	5,000	
Vinyl acetate	5000	
Vinyl acetate monomer	5000	611 <sup>2</sup>
Xylene	100	13.8
Zinc bromide	1000	1
Zinc carbonate	1000	
Zinc chloride	1000	41
Unlisted hazardous waste (ignitable, corrosive, reactive)	Contact Corporate Protec	

**NOTE:** When a spill is discovered, check the Material Safety Data Sheet (MSDS) for the released substance to verify the chemical name and then check for the RQ. Many chemicals have similar names as well as several names, including trade names. Thus, all the names that a particular chemical has should be checked against the HS and EHS list for a RQ. Some of the chemicals used by DEFS do not have a RQ but are similar in name to other substances that do have a RQ. If the substance is not listed in this HS and EHS list or not included in the examples below, contact Regional Environmental or Corporate Environmental Protection to confirm that the substance does not have an RQ.

Some examples are listed in the table below:

Chemical Name	Reportable Quantity (pounds)
Dow Gas/Spec (R) CS-Plus Solvent	No RQ*
Ethylene glycol	5000
Triethylene glycol	No RQ*
Monoethanolamine	No RQ*
Monoethylamine	100
Diethanolamine	100
Diethylamine	100
Triethanolamine	No RQ*
Triethylamine	5000

\*Release of a substance with no RQ must still be cleaned up and reported internally within DEFS. Furthermore, depending upon the state in which the release occurred, the release may need to be reported to state regulatory agencies. Refer to the state specific Spill Response Notification Flowchart in this SPCC Plan or the appropriate state Environmental Compliance Manual.

<sup>1</sup>Indicates compounds which are naturally solids but may be found in solution. To determine if RQ has been released, contact Environmental Affairs and report the volume released and the concentration of solution.

<sup>2</sup>Indicates RQ is a calculated number derived from the RQ (pounds), and specific gravity of the pure listed compound

December 2000 Page 3-12

### 3.6 Spill Notification - Data Sheet

### **DUKE ENERGY FIELD SERVICES, LP - SPILL NOTIFICATION FORM**

Reporter's Last Name:	_ First:	M.I.	
Reporter's Daytime Phone Number:	)	_	
Evening Phone Number:	)	_	
Home Phone Number: (	)		
Reporter's Company:	·····	·	
Reporter's Department/Section:			
Reporter's Position:			
Owner's Address:			
Owner's City, State and Zip:			
Initial or Follow-up Notification: Were Materials Released? (Y/N)? Confidential (Y/N)? Reportable Quantity (Y/N)? Surface Waters Impacted (Y/N)? If yes, con Call Made to National Response Center (NRC) (800)	tact NRC immediately. ) 424-8802 (Y/N)? Time:		
Date of Incident:		······	
Incident Address/Location:			
Incident Location: Section, Township and Range:			
Facility Latitude (degrees, minutes, and seconds):		· ····································	
Facility Latitude (degrees, minutes, and seconds):			
Nearest City (also list the County, State and Zip Code			
	, <u> </u>		
Distance from the Nearest City (include units):			
Direction from the Nearest City:			
Container Type:			
Tank Capacity (include units):			
Facility Capacity (include units):			
MATERIAL			

CAS Number:	
Released Quantity (include units):	
Material Released in Water? If so, quantity (include units):	

December 2000 Page 3-13

### **RESPONSE ACTION**

Actions being taken on-site to correct, control, or mitigate incident:

#### WEATHER CONDITIONS:

(Current)

(Forecast)

### **IMPACT**

### **ADDITIONAL INFORMATION**

Any information about the incident not recorded elsewhere in the report?:

### **CALLER NOTIFICATIONS**

AGENCY/DUKE ENE	RGY NOTIFICATIO	N RECORD
	Contact Person	
	ETA	Time
	Contact Person	
	ETA	Time
	Contact Person	
	ETA	Time
	Contact Person	
	ETA	Time
	Contact Person	
	ETA	Time
	Contact Person	
	ETA	Time
	Contact Person	······
	ETA	Time

December 2000 Page 4-1

### 4.8.1 General Information – Snake Bite Booster Station

Start-Up Date:

Location: Lea County, NM, Latitude 32°48'2"N, Longitude –103°29'39".

**Driving Directions**: From State Road 238 and State Road 529, go 8 miles north to County Road 50 and turn right (east). Travel 0.5 miles to booster located on right (south) side of the road.

**Nearest Waterways Likely to Receive Runoff:** Depression located 0.25 miles south/southeast of the site.

Generalized Area Topography: The area around the site generally slopes toward the southeast.

Generalized Site Topography: Surface water flows east and south from the site.

Security: The site is surrounded by a wire mesh fence and the gate is kept locked when the site is unattended. Lighting is provided. Tank unloading valves are kept capped when not in use.

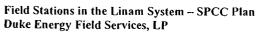
Spill History Within the Last 12 Months: No spills have been reported in last 12 months.

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#### Potential Spill Sources and Secondary Containment Information - Snake Bite Bo 4.8.2 Station

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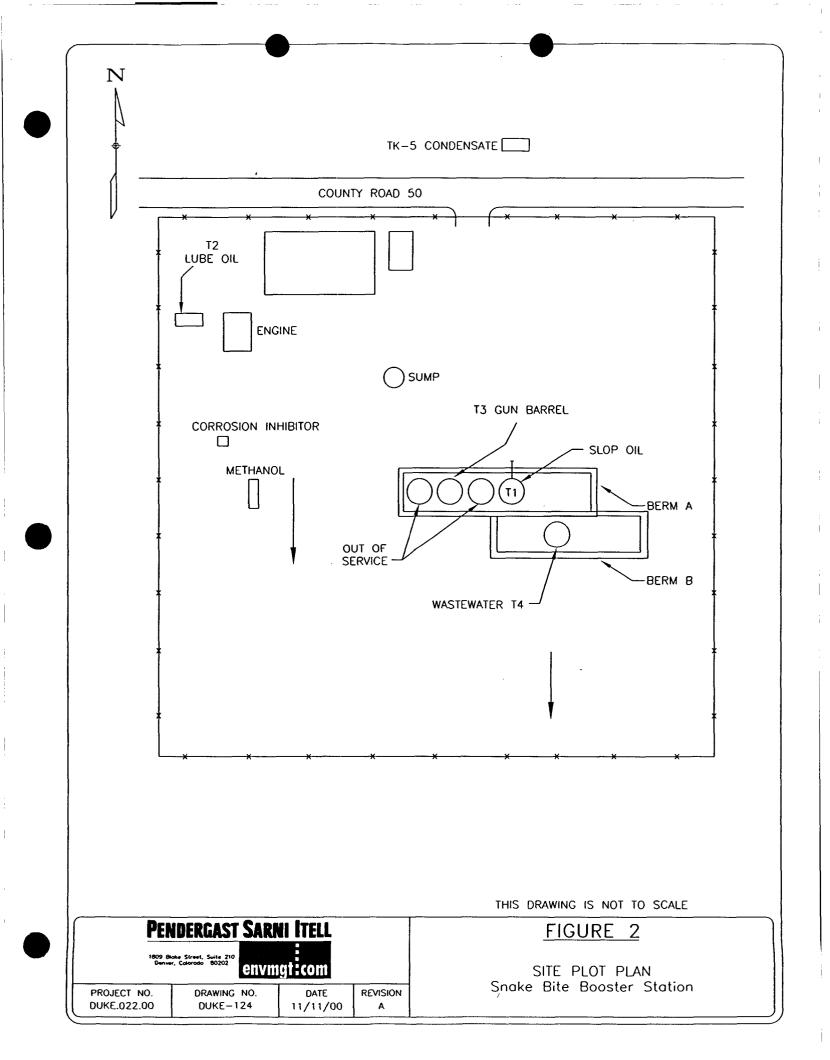
Source	Secondary Containment	Direction of Flow	Compatible with Material Stored?	Condition
Tank 1 210 bbl Slop Oil AST	Berm A, Earthen (1926 bbl, 770% of largest AST)	South toward the site boundary.	Yes	Good
Tank 2 24 bbl Lube Oil AST	No Secondary Containment	South toward the site boundary.		
Tank 3 250 bbl Oil/Water Separator	Berm A, Earthen (1926 bbl, 770% of largest AST)	South toward the site boundary.	Yes	Good
Tank 4 750 bbl Wastewater	Berm B, Earthen (2108 bbl, 281% of largest AST)	South toward the site boundary.	Yes	Good
Tank 5 80 gal Condensate	No Secondary Containment	South toward the site boundary.		
		Facility Truck Loadin	g Area(s)	
Slop Oil Loading Area	Yes	South toward the site	A release from the slop not likely mig	-
Lube Oil Loading Area	Yes	boundary	A release from the lube not likely min	*



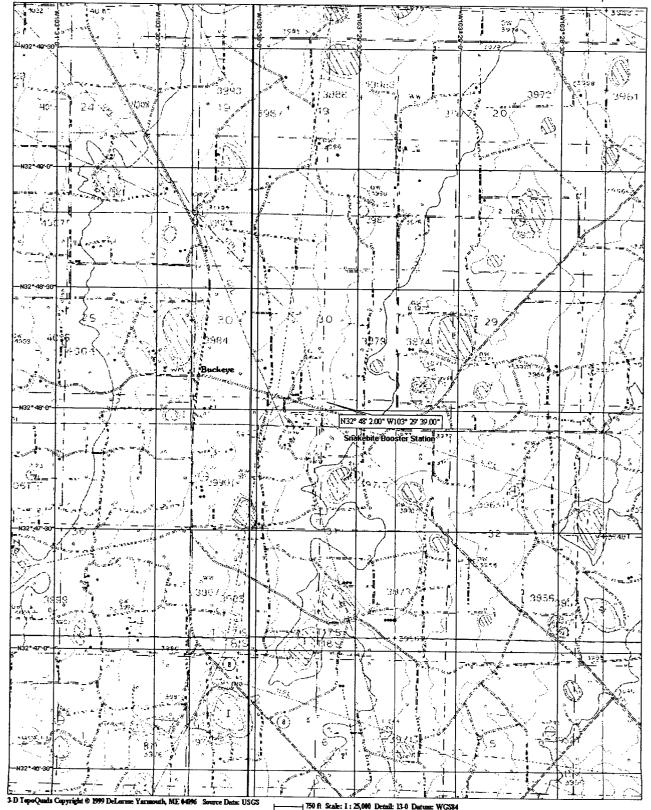
December 2000 Page 4-3

### 4.8.3 Site Plan -- Snake Bite Booster Station

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December 2000 Page 4-4



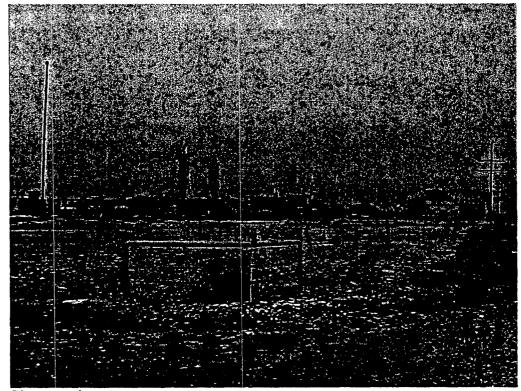
#### 4.8.4 Site Location - Snake Bite Booster Station

3-D TopoQuads Copyright @ 1999 DeLorme Yara ah, ME 640% Se urce Data: USGS

- 750 ft Scale: 1 : 25,000 Detail: 13-0 Datum: WGS84

December 2000 Page 4-5

### 4.8.5 Site Photographs – Snake Bite Booster Station



Site overview

### Secondary Containment (Berm) Volume Calculations Snake Bite Booster - Containment Area A

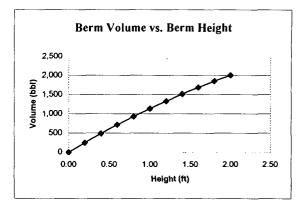


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### **Berm Volume Calculations**

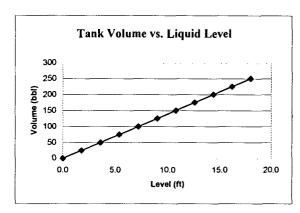
Berm Type	Rectangular, Tapered
Height (ft)	2.00
Width 1 (ft)	49.00
Width 2 (ft)	32.00
Length 1 (ft)	147.50
Length 2 (ft)	131.00
Berm Volume (bbl)	2010



### Largest Tank Volume Calculations

Tank ID	TK-2
Tank Orientation	Vertical
Diameter (ft)	10.00
Length (ft)	18.00
Calculated Volume (bbl)	251.79
Labeled Volume (bbl)*	250.00

\*Note: When available, the labeled tank volume is used in the calculations.



### **Additional Tank Volume Calculations**

Tank ID	Orientation	Diameter (ft)	Length (ft)	Volume (bbl)	Volume of Secondary Containment Displaced (bbl)
Tank I - Slop Oil	non-elevated, vertical	10.00	15.00	209.83	27.98
out of service	non-elevated, vertical	10.00	15.00	209.83	27.98
out of service	non-elevated, vertical	10.00	15.00	209.83	27.98

#### Summary

Berm Capacity (bbl)	2,010
Volume Displaced by Additional Tanks (bbl)	84
Berm Volume Less Tank Displacement (bbl)	1,926
Largest Tank Capacity (bbl)	250

Percentage of Berm/Largest Tank Volume 770

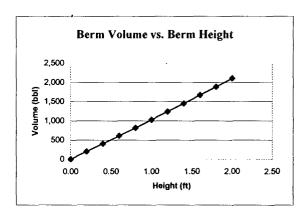
### Secondary Containment (Berm) Volume Calculations Snake Bite Booster - Containment Area B



Berm Type	Rectangular, Tapered
Height (ft)	2.00
Width 1 (ft)	43.00
Width 2 (ft)	50.00
Length 1 (ft)	130.00
Length 2 (ft)	125.00

2108

Berm Volume (bbl)

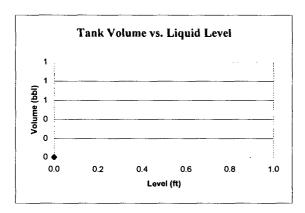


SECOR

### Largest Tank Volume Calculations

Tank ID	ТК-4
Tank Orientation	Vertical
Diameter (ft)	
Length (ft)	
Calculated Volume (bbl)	0.00
Labeled Volume (bbl)*	750.00

\*Note: When available, the labeled tank volume is used in the calculations.



### Additional Tank Volume Calculations

Tank ID	Orientation	Diameter (ft)	Length (ft)	Volume (bbl)	Volume of Secondary Containment Displaced (bbl)
· · · · · · · · · · · · · · · · · · ·	No Additional Tanks				· · · · · · · · · · · · · · · · · · ·

Summary

Berm Capacity (bbl)	2,108
Volume Displaced by Additional Tanks (bbl)	0
Berm Volume Less Tank Displacement (bbl)	2,108
Largest Tank Capacity (bbl)	750

Percentage of Berm/Largest Tank Volume 281

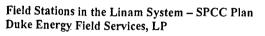
December 2000 Page 4-8

### 4.8.7 Professional Engineer Recommendations - Snake Bite Booster Station

The Snake Bite Compressor Station includes areas of oil product storage, handling, and usage where spill containment structures and other spill prevention devices are not in place, or are not adequate. It is Duke Energy's responsibility to implement quick and effective action to prevent adverse effects on human health and the environment from any spill event, and to install effective spill containment structures where feasible.

Action items (following page) are required to validate this SPCC plan and to meet current EPA SPCC compliance standards as specified in 40 CFR 112. As each deficiency is satisfied, the date of completion and any pertinent comments should be noted.





December 2000 Page 4-9

### Professional Engineer Recommendations – Snake Bite Booster Station

Action Item Description	Responsible Party	Action Taken	Com Date	pleted Signature
Install a secondary containment and/or diversionary structure at the loading areas equal to the volume of the largest compartment on a tank truck loading/unloading at the facility to prevent releases from leading accidents from impacting navigable waters of the U.S.				
Construct a secondary containment structure around the lube oil tank with minimum dimensions of 16 feet (length) x 7 feet (width) x 1.5 feet (height). A structure of this size will provide adequate spill containment plus additional freeboard for accumulated precipitation.				-
Construct a secondary containment structure around the 80 gallon condensate tank to contain a minimum of 90 gallons. Secondary containment of 90 gallons will provide adequate spill containment plus additional freeboard for accumulated precipitation.	· · ·			
Warning signs or interlocked warning lights or physical barrier systems should be provided in loading/unloading area to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines.				
Loadout valves must be locked when not in use.				······································

### Professional Engineer Recommendations – Snake Bite Booster Station

Action Item Description	Responsible	Action	Com	pleted
Paint tanks and piping, as needed, to reduce rust and corrosion.	Party	Taken	Date	Signature

Signature of Designated Person When all items are completed:	Date:

## 4.8.8 Certification of the Applicability of the Substantial Harm Criteria [ref. 40 CFR 112 Attachment C-II]

FACILITY NAME: Snake Bite Booster FACILITY ADDRESS: Lea County, NM

1. Does the facility transfer oil over water to or from vessels **and** does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes \_\_\_\_\_ No \_\_X \_\_\_\_

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons **and** does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes \_\_\_\_\_ No \_\_ X \_\_\_\_

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (calculated using the appropriate formula in Attachment C-III Appendix C, 40 CFR 112 or a comparable formula<sup>1</sup>) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans" (section 10, Appendix E, 40 CFR Part 112 for availability) and the applicable Area Contingency Plan.

Yes \_\_\_\_\_ No \_\_\_ X \_\_\_\_

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons **and** is the facility located at a distance (calculated using the appropriate formula (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula<sup>1</sup>) such that a discharge from the facility would shut down a public drinking water intake<sup>2</sup>?

Yes \_\_\_\_\_ No \_\_X\_\_\_

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes \_\_\_\_\_

No X

### **CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Ronnie Gilchrest Name (please type or print)

Konnie Alchrest Signature

Title Gathering System Supervisor

Date

<sup>1</sup> If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup> For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).



### 4.8.9 Tank and Berm Annual Inspection Checklist – Snake Bite Booster Station

Facility Name	Snake Bite Booster
Date	
Inspector	

Tank ID	
Contents	
Capacity (bbl)	
Working Capacity (bbl)	

TANK INSPECTION	Yes	No	NA	Comments/Description
Exterior surface shows signs of leakage.				
External coating is bubbled, cracked or damaged.				
Tank is corroded, pitted or damaged.				
Bolts, rivets or seams are damaged, cracked, or corroded.				
Tank foundation has eroded, settled or shows signs of leakage.				
Overfill protection system is not working.				
Tank bottoms have accumulated rust, scale, microorganisms, or foreign material.				
Vents and pressure release devices are obstructed.				
External stairways/walkways are unsound or obstructed.				
External stairways/walkways have low spots where water can accumulate.				
Level controls are inoperable.				
Tank roof drains are blocked, or damaged.				
Personnel are aware of emergency procedures applicable to the site.				
PIPING, VALVES, PUMPS, GAUGES	Yes	No	ŅA	Comments/Description
Equipment in good working condition.				
Equipment is leaking.				
Soil stained with product below equipment.				

BERM INSPECTION	Yes	No	NA	Comments/Description
Berm drainage valve is closed and locked.				
Berm shows indications of erosion or disrepair.				
Berm has holes, cracks, or other breaches that could result in leaks.				
Vegetation with large root systems (trees, bushes) is present in berm area.				
Ramps or other structures associated with spill control are damaged.				
Containment area has accumulated water.				
Sheen or oil on accumulated water.				
Pooled oil or stained soil.				
Drainage pipe or structures are clogged or have accumulated debris.				
Berm drainage outfall shows signs of erosion or disrepair.				
		•	••	· · · · · · · · · · · · · · · · · · ·

Additional Remarks:

## Ford, Jack

From:	Ford, Jack
Sent:	Friday, March 30, 2001 10:11 AM
To:	'kchar@duke-energy.com'
Subject:	Applications

Dear Ms. Char:

The OCD has not received a renewal application for the Lee Gas Plant (GW-002) nor the Pecos Diamond Gas Plant (GW-237). The last communication, dated November 29, 2000, indicated that Duke Energy was to renew these discharge plans.

The Pecos Diamond Gas Plant discharge plan (GW-237) expired March 29,2001 and Duke Energy Field Services, LP is now in violation of WQCC and OCD regulations.

The Lee Gas Plant discharge plan (GW-002) expired March 16, 2001 and Duke Energy Field Services, LP is now in violation of WQCC and OCD regulations.

Please respond at the earliest to prevent further compliance action by the OCD.

Sincerely,

Jack Ford OCD Environmental Bureau

## 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 application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-002) – Duke Energy Field Services, LP, Ms. Karin Char, Environmental Specialist, P.O. Box 5493, Denver, Colorado 80217, has submitted a discharge plan renewal application for their Lee Gas Plant located in the SW/4 SE/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Any effluent generated is collected in a closed containment prior to disposal at an OCD approved disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of 85 feet with a total dissolved solids concentrations ranging from 200 to 600 mg/l. The discharge plan addresses how spill, 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 thru 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. Request for public hearing shall set forth the reasons why a hearing shall be held.

A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 30th day of March, 2001.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

LORI WROTENBERY, Director

SEAL

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

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WRITER'S INTERNET ADDRESS: elewis@fulbright.com

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

January 15, 2001

FULBRIGHT & JAWORSKI L.L.P. A Registered Limited Liability Partnership 1301 McKinney, Suite 5100 Houston, Texas 77010-3095

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

#### 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,

Edward C. Lewis

ECL/jnr

Mr. Roger Anderson January 15, 2001 Page 2

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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	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 V
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

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## Ford, Jack

From:	Ford, Jack
Sent:	Thursday, January 25, 2001 10:15 AM
То:	'kchar@duke-energy.com'
Subject:	Lee Gas Plant _GW-002

Dear Karin:

Reference is made to your letters, dated November 15, 2000 and December 12, 2000, regarding the renewal of discharge plan GW-002 at the Lee Gas Plant. The submittal for renewal should follow the procedure as outlined in my e-mail to you yesterday, January 24, 2001, for the Pecos Diamond Gas Plant.

I will await your submittal before proceeding with the renewal review. If you have any questions please contact me at (505) 476-3489.

Sincerely,

Jack Ford Oil Conservation Division



P.O. Box 5493 Denver, Colorado 80217 370 17<sup>th</sup> Street, Suite 900 Denver, Colorado 80202 Direct: 303-595-3331 Fax: 303-389-1957

November 15, 2000

#### CERTIFIED MAIL RETURN RECEIPT 7099 3220 0001 5281 6371

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

RE: Duke Energy Field Services, LP Lee Gas Plant Discharge Plan Renewal GW-002, Lea County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) requests to renew the Lee Gas Plant Discharge Plan GW-002 which will expire on March 16, 2001. Enclosed is Check Number 61116497 in the amount of \$50.00 for the filing fee.

There have been no changes to the operations and sampling frequency of the monitoring wells located at Lee Gas Plant. GPM Gas Services Company submitted a letter on November 6, 1995 to renew the Lee Gas Plant discharge plan, which stated that the gas plant was idle. The Lee Gas Plant remains idle except for the operation of one engine, which provides natural gas compression for the Linam Gathering System.

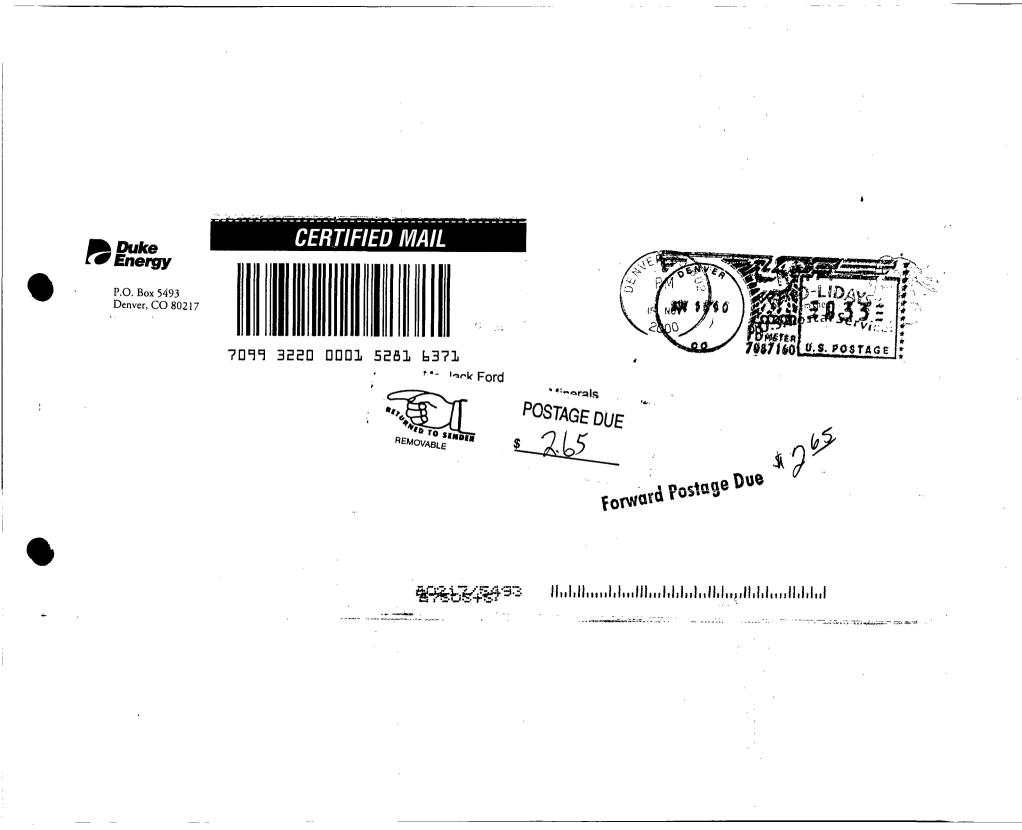
DEFS will be developing and implementing best management practices as outlined in our previously submitted Environmental Compliance and Management Plan for DEFS booster stations. Following completion of the development of the ECAMP for the Lee Gas Plant, DEFS will submit a copy to NM OCD.

If you have any questions regarding this Discharge Plan renewal application, please call me at (303) 605-1717.

Sincerely, Duke Energy Field Services, LP

Karin Char Environmental Specialist

cc: Mark Nault Ronnie Gilchrest Andy Price Stephen McNair Jack Braun Corp. Env. File 2.2.3.1 Reg. Env. File 2.2.3.1 Facility Env. File 2.2.3.1







P.O. Box 5493 Denver, Colorado 80217 370 17<sup>th</sup> Street, Suite 900 Denver, Colorado 80202 Direct: 303-595-3331 Fax: 303-389-1957

December 12, 2000

#### CERTIFIED MAIL RETURN RECEIPT 7099 3220 0001 5281 6524

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

RE: Duke Energy Field Services, LP Lee Gas Plant Discharge Plan Renewal GW-002, Lea County, New Mexico

Dear Mr. Ford:

As discussed in our telephone conversation today, Duke Energy Field Services, LP (DEFS) had submitted via Certified USPS Mail on November 15, 2000 a request to renew the Lee Gas Plant Discharge Plan GW-002 that will expire on March 16, 2001. Also enclosed in the November 15, 2000 correspondence was Check Number 61116497 in the amount of \$50.00 for the filing fee.

Due to DEFS mailroom error, the November 15, 2000 submittal was not stamped with enough postage. Thus, the Lee Gas Plant November 15, 2000 request for renewal of the discharge plan was returned to DEFS due to insufficient postage.

Per your instructions, I am re-sending the November 15, 2000 request for renewal of the Lee Gas Plant Discharge Plan (GW-002) along with the \$50.00 filing fee. Also enclosed is a copy of the envelope in which the November 15, 2000 submittal was originally mailed and returned due to insufficient postage. We apologized for this administrative error.

If you have any questions regarding this Discharge Plan renewal application, please call me at (303) 605-1717.

Sincerely, Duke Energy Field Services, LP

Karin Char Environmental Specialist

cc: Mark Nault Ronnie Gilchrest Andy Price Jack Braun Corp. Env. File 2.2.3.1 Reg. Env. File 2.2.3.1 Facility Env. File 2.2.3.1

## Olson, William

From:	Gilbert J. Van Deventer [SMTP:Gilbert.Vandeventer@trw.com]
Sent:	Tuesday, August 08, 2000 9:46 AM
To: Cc:	Olson, William; Williams, Donna
Cc:	Weathers, Steve; Driver, Mel; Canfield, Tony; Gunter, Vicki F; Gilchrest, Ronnie;
4	Nault, Mark S; Hyde, Greg A; Fergerson, John
Subject:	Sceduled groundwater sampling events in Lea County

TRW has scheduled groundwater sampling events for the following facilities:

Lee Gas Plant near Buckeye in Lea County on August 15<sup>th</sup>-16<sup>th</sup>. Sample MWs 2, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, & 22 Analytes: BTEX (Annual sampling event)

Linam Ranch Plant west of Hobbs in Lea County on August 17<sup>th</sup>.

Sample MWs: 1, 2, 3, 5, 7, 8, 9, 10, 10d, 11, 12, & 13

Analytes: BTEX, NO3, SO4, CI, TDS, Ag, Al, As, Ba, Cd, Cr, Fe, & Mn (Annual sampling event) Hobbs Booster Station in Hobbs on August 18<sup>th</sup> Sample MWs: 1, 2, 3, 5, 6, 7, & 9 Analytes: BTEX (Third Quarter sampling event)

Monument Booster Station near Monument on August 22<sup>nd</sup>.

Sample MWs: 1d, 2, 3, 4, 6, & 7

Analytes: BTEX, NO3, SO4, CI, TDS, AI, As, B, Cr, F, Fe, & Mn (Annual sampling event) Work will consist of measuring depth to groundwater and product thickness (if present) in all monitoring wells on site, sampling monitoring wells, and performing operation & maintenance of the groundwater remediation systems in accordance with work plan requirements.

Sample dates for latter sites may vary somewhat dependent on weather conditions and scheduling. The OCD will be notified of schedule changes during the course of field work.

Feel free to call me at (915) 682-0008 if you have any questions or would like to schedule sample splitting or witnessing. While in the field, John Fergerson or I can be reached on our cellular phone at (915) 661-6870.

Gilbert J. Van Deventer, REM Project Manager / Environmental Engineer TRW Inc. - Energy & Environmental Integration Services 415 West Wall Street, Suite 1818 Midland, Texas 79701

# Olson, William

From:	Gilbert J. Van Deventer [SMTP:Gilbert.Vandeventer@trw.com]
Sent:	Monday, February 07, 2000 12:08 PM
To:	Olson, William; Williams, Donna
Cc:	Driver, Mel; Fergerson, John
Subject:	GPM - Lee Plant

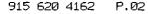
RE: Notification of sampling activities at GPM - Lee Gas Plant

TRW has scheduled to conduct semi-annual sampling operations at the GPM Lee Gas Plant the morning of February 15, 2000. All monitoring wells (MW-1 through MW-23) will be gauged for depth to groundwater and product thickness (if any). In accordance with the work plan, groundwater samples will be collected and analyzed (BTEX) for monitoring wells MW-2, MW-11, MW-12, MW-13, MW-19, MW-20, and MW-21. Routine maintenance of groundwater remediation equipment (submersible pumps, xitech product recovery system, and passive bailers) will also be conducted. Bailing of sand from the wellbore of recovery well RW-4 and replacement of the submersible pump is also planned. Work is anticipated to last 2 days (Feb 15-16, 2000). Please feel free to call me at the office (915-682-0008) or my cellular (915-661-8760) if you have any questions or would like to meet on site.

Gil Van Deventer TRW Inc. 415 West Wall, Suite 1818 Midland, Texas 79701 (915) 682-0008 (office) (915) 682-0028 (Fax)

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i.





PHONE (915) 673-7001 . 2111 BEECHWOOD . ABILENE, TX 79603

PHONE (505) 393-2326 . 101 E. MARLAND . HOBBS, NM 86240

ANALYTICAL RESULTS FOR GPM GAS CORP. ATTN: MEL DRIVER P.O. BOX 50020 MIDLAND, TX 7910-0020 FAX TO: (915) 620-4162

Receiving Date: 09/22/99 Reporting Date: 09/25/99 Project Owner: ENVIRONMENTAL Project Name: SOIL SAMPLES Project Location: LEE PLANT Analysis Date: 09/22/99 Sampling Date: 09/22/99 Sample Type: SOIL Sample Condition: COOL & INTACT Sample Received By: GP Analyzed By: BC

#### LAB NUMBER SAMPLE ID

TPH (mg/Kg)

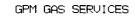
H4346-1	LEE SOIL #1	1690
H4346-2	LEE SOIL #2	2210
Quality Contr		221
True Value Q	C	240
% Recovery		92.0
	ent Difference	5.0

METHOD: EPA 600/4-79-020 418.1

2 achi reff

#### H4346.XLS

PLEASE NOTE: Liability and Demoges. Cardinal's liability and client's exclusive remedy for any claim shaing, whether based in contract or tort, shall be fimiled to the amount paid by client for anxityses. All claims, including trace for negligence and any other cause whatsoever shall be deemed waved unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal's liability and client's exclusive ramady, without limbation, hudiness interruptions, loss of use, or loss of profils incurred by client, its subsidiaries, atfiliates or successors writing out of or related to the performance of services hareunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. 3



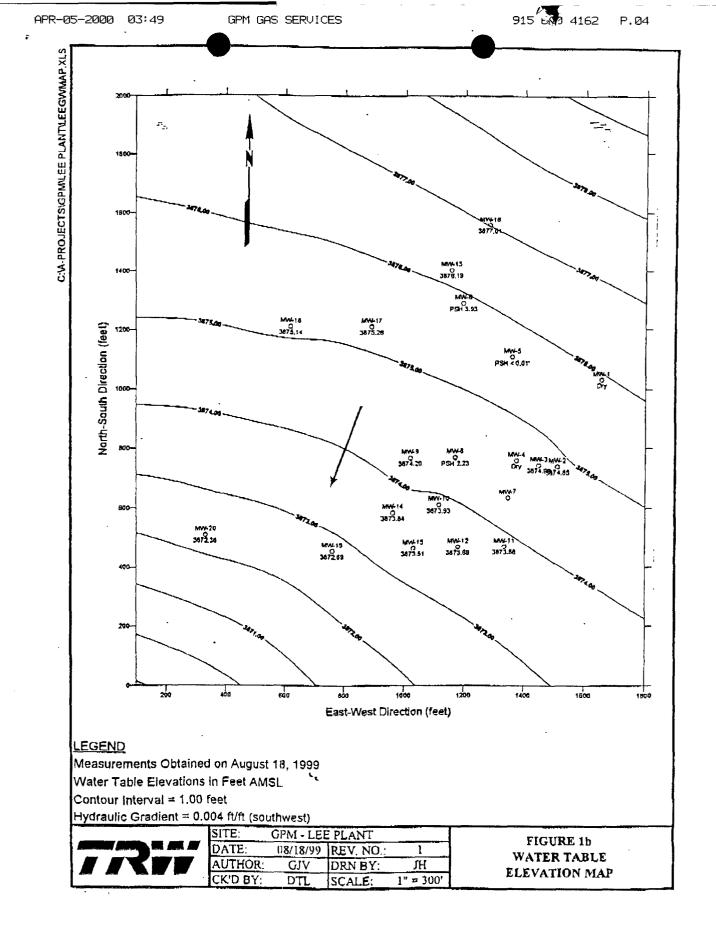
- -7

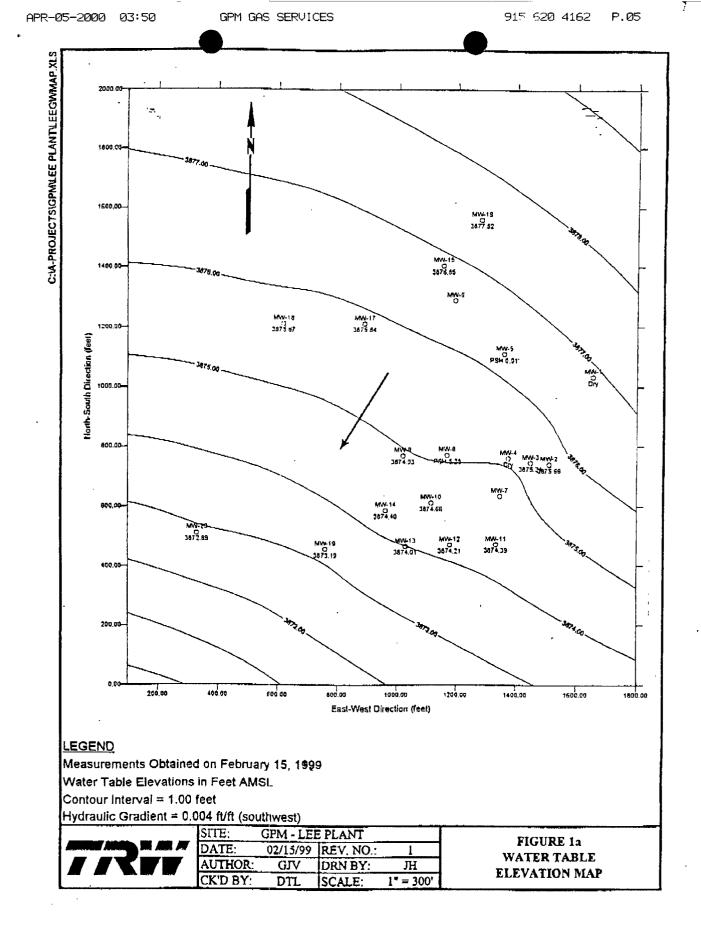
1999 Annual Sample and Monit

and Monitoring Report GPM - Lee Gas Plant

	- <u>"-</u> -,	4000 0	Table 2		
			ndwater Elevatio	ns	
			A - Lee Plant		
		Relative	Depth to	Relative	Phase-Separated
Monitoring	Date	Top of Casing	Groundwater	Groundwater	Hydrocarbon
Well	Gauged	Elevation	Below Top of	Elevation	Thickness
		(feet)*	Casing (feet)	(feet)**	(feet)
MW-I	02/15/99	3979.25	Dry	Dry	0.00
	08/18/99	3979.25	Dry	Dry	0.00
MW-2	02/15/99	3980.50	104.84	3875.66	0.00
	08/18/99	3980_50	105.65	3874.85	0.00
MW-3	02/15/99	3980.27	105.03	3875.24	0.00
	08/18/99	3980.27	105.61	3874.66	0.00
MW-4	02/15/99	3980,16	Dry	Dry	0.00
	08/18/99	3980.16	Dry	Dry	0.00
MW-5	02/15/99	3979.82	103.58	3876.25	0.01
	08/18/99	3979.82	104.04	3875.78	0.00
MW-6	08/13/99	3981.79	109.10	3875.91	3.93
MW-7	08/18/99	3978 45	104.56	3873.89	0.00
MW-8	02/15/99	3979.96	109.13	3875.16	5.28
	08/18/99	3979.96	108.59	3873.20	2.23
MW-9	02/15/99	3980.17	105.24	3874.93	0.00
	08/18/99	3980.17	105.97	3874.20	0.00
MW-10	02/15/99	3979.66	105.00	3874.66	0.00
	08/18/99	3979.66	105.73	3873.93	0.00
MW-II	02/15/99	3978.50	[04.1]	3874.39	0.00
	08/18/99	3978.50	104.62	3873.88	0.00
MW-12	02/15/99	3978.82	104.61	3874.21	0.00
	08/18/99	3978.82	105.13	3873.69	0.00
MW-13	02/15/99	3980.52	106.51	3874.01	0.00
	08/18/99	3980.52	107.01	3873.51	0.00
MW-14	02/15/99	3982.23	107.83	3874.40	0.00
-	08/18/99	3982.23	108.39	3873.84	0.00
MW-15	02/16/99	3981.70	104.93	3876.85	0.10
	08/18/99	3981.70	105.53	3876.19	0.02
MW-16	02/15/99	3980.80	103.28	3877.52	0.00
	08/18/99	3980,80	103.79	3877.01	0.00
MW-17	02/15/99	3981.80	105.96	3875.84	0.00
	08/18/99	3981.80	106.54	3875.26	0,00
MW-18	02/15/99	3983.10	107.43	3875.67	0.00
	08/18/99	3983.10	107.96	3875.14	0.00
MW-19	02/15/99	3980.80	107.61	3873.19	0.00
	08/18/99	3980.80	108.11	3872.69	0.00
MW-20	02/13/99	3983.30	110.41	3872.89	0.00
	08/18/99	3983,30	110.92	3872.38	0.00

Page 10 of 30





#### Olson, William

From:	Gilbert J. Van Deventer [SMTP:Gilbert.Vandeventer@trw.com]	
Sent:	Tuesday, August 08, 2000 9:46 AM	
To:	Olson, William; Williams, Donna	
From: Sent: To: Cc:	Weathers, Steve; Driver, Mel; Canfield, Tony; Gunter, Vicki F; Gilchrest, Ronnie;	
	Nault, Mark S; Hyde, Greg A; Fergerson, John	
Subject:	Sceduled groundwater sampling events in Lea County	

TRW has scheduled groundwater sampling events for the following facilities:

Lee Gas Plant near Buckeye in Lea County on August 15<sup>th</sup>-16<sup>th</sup>. Sample MWs 2, 7, 9, 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, & 22 Analytes: BTEX (Annual sampling event)

Linam Ranch Plant west of Hobbs in Lea County on August 17th.

Sample MWs: 1, 2, 3, 5, 7, 8, 9, 10, 10d, 11, 12, & 13

Analytes: BTEX, NO3, SO4, CI, TDS, Ag, Al, As, Ba, Cd, Cr, Fe, & Mn (Annual sampling event) Hobbs Booster Station in Hobbs on August 18<sup>th</sup> Sample MWs: 1, 2, 3, 5, 6, 7, & 9 Analytes: BTEX (Third Quarter sampling event)

Monument Booster Station near Monument on August 22<sup>nd</sup>.

Sample MWs: 1d, 2, 3, 4, 6, & 7

Analytes: BTEX, NO3, SO4, CI, TDS, AI, As, B, Cr, F, Fe, & Mn (Annual sampling event) Work will consist of measuring depth to groundwater and product thickness (if present) in all monitoring wells on site, sampling monitoring wells, and performing operation & maintenance of the groundwater remediation systems in accordance with work plan requirements.

Sample dates for latter sites may vary somewhat dependent on weather conditions and scheduling. The OCD will be notified of schedule changes during the course of field work.

Feel free to call me at (915) 682-0008 if you have any questions or would like to schedule sample splitting or witnessing. While in the field, John Fergerson or I can be reached on our cellular phone at (915) 661-6870.

Gilbert J. Van Deventer, REM Project Manager / Environmental Engineer TRW Inc. - Energy & Environmental Integration Services 415 West Wall Street, Suite 1818 Midland, Texas 79701

	-2000 03:58	GPM GAS SER	VICLJ ~ -		915 620 41	
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		ANALYTICAL	RESULTS FO	R		
		GPM GAS C	ORP.			
		ATTN: MEL I				
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	•	ODESSA, TX				
Beceiving Dr	ate: 06/30/98	FAX TO: (91	5) 300-1103	Sampling Date	· 06/30/98	
•	ate: 07/01/98			Sample Type:		
• •					ion: COOL & INT/	ACT
Project Num	ber: NOT GIVEN					MU
	ber: NOT GIVEN e: LEE LAND FARM					
Project Nam	ber: NOT GIVEN e: LEE LAND FARM tion: NOT GIVEN			Sample Conuc Sample Receiv Analyzed By: E	ved By: BC	
Project Nam	e: LEE LAND FARM			Sample Receiv	ved By: BC 3C	
Project Nam Project Loca	e: LEE LAND FARM tion: NOT GIVEN	<b>11</b> 1231.1	DENZENE	Sample Receiv Analyzed By: E	ved By: BC 3C ETHYL	TOTAL
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Project Nam Project Loca LAB NO. ANALYSIS I H3707-1 H3707-2 H3707-3 Guality Cont True Value 0 % Recovery	e: LEE LAND FARM tion: NOT GIVEN SAMPLE ID DATE: RIGHT SIDE CENTER LEFT CENTER	(mg/kg) 06/30/98 13100 11300 19600 246	(mg/kg) 06/30/98 <0.002 <0.002 <0.002	Sample Receiv Analyzed By: E TOLUENE (mg/kg) 06/30/98 0.003 <0.002 <0.002	ved By: BC 3C ETHYL BENZENE (mg/kg) 06/30/98 0.008 <0.002 <0.002	TOTAL XYLENES (mg/kg) 06/30/98 0.042 <0.006 0.014 0.014

METHODS: TRPHC - EPA 600/7-79-020, 418.1; BTEX - EPA SW846-8020, 8260

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PLEASE NOYE: Liability and Damages. Cerdinat's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cerdinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be lighte for incidental or consequential damages. Including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

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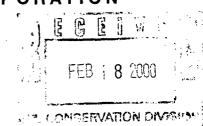
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## GPM GAS CORPORATION

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

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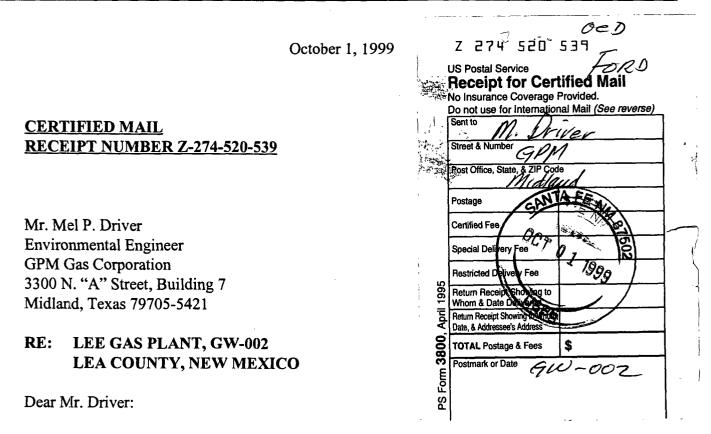
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OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 57505 (505) \$27-7131



OCD is in receipt of your letter, dated September 30, 1999, and attached laboratory analysis report for cooling tower wood and associated debris samples collected during the dismantling of the tower at the above referenced site. Based upon laboratory results of the collected samples OCD **approves the burial on-site** of the cooling tower wood and associated debris <u>within</u> the boundaries of the plant. Under no circumstances will this material be removed from the plant site without OCD approval.

Note that OCD approval does not relieve GPM Gas Corporation of liability should GPM Gas Corporation's operations result in contamination of surface waters, ground waters or the environment.

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

Sincerely,

W. Jack Ford, C.P.G. Water Resources Engineering Specialist Oil Conservation Division

cc: Hobbs OCD District Office





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

15RP/ATION F

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

November 5, 1999

Mr. William C. Olson New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division Environmental Bureau 2040 S. Pacheco Santa Fe, New Mexico 87505

Dear Mr. Olson:

Attached is the 1999 Annual Groundwater Monitoring and Sampling Report for GPM Gas Corporation's Lee Gas Plant. The report contains the following recommendations:

- 1. Continue groundwater recovery operations since the present system has been effective in limiting the downgradient migration of the dissolved-phase hydrocarbon plume.
- 2. Implement free product recovery at monitoring well MW-6 with the Xitech system currently in use at MW-15.
- 3. Continue free product recovery from monitoring well MW-5 and MW-15 using passive bailers and/or hydrophobic adsorbent socks, and from MW-8 using hand bailing methods.
- 4. Continue the sampling and monitoring program on a semi-annual basis.

The next sampling event for Lee Gas Plant is scheduled for January 2000. The OCD will be notified at least one week in advance of any scheduled activity at the site. If you have any questions or concerns with our recommendations, please advise. I can be reached at (915) 620-4142.

Sincerely,

Mel Driver Environmental Engineer New Mexico Region

Attachments

xc: Donna Williams, OCD-Hobbs District Mark Nault, GPM-Linam Ranch Plant Gilbert Van Deventer, TRW-Midland

	17:01	TRW-MIDLAND		915 682 0028	P.Ø1/
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DA	TE:	08/02/1999			
т	O: Bill Ols	on	FAX:	(505) 827-8177	
	NY: NMOCD	,	- Phone:	(505) 827-7154	
			-		
FRO	M: <u> </u>	Van Deventer	FAX:	(915) 682-0028	·
COMPA	NY: TRW Inc.	(Energy & Environmental S	Systems) Phone: _	(915) 682-0008	-
		_	4		
Nur	nber of Pages (	(including cover page):			
Do: Noti	Testion of Sobe	udulad Compling & Manitadr			
RE. NUL	ication of Sche	duled Sampling & Monitorir	iy Activities		
TRW has	scheduled the	dates for Groundwater San	npling Events at the t	facilities listed below.	
	Nevela	Site Site		Estimated Sampling Date Aug. 16, 1999	
	11987910 - L	ea Refinery near Lovington		<b>.</b>	
			1/	400. 17-10. 1999	
	GPM - Le	e Plant near Buckeye, NM nam Ranch Plant near Hobb		Aug. 17-18, 1999 Aug. 19, 1999	

CONFIDENTIALITY NOTICE The documents accompanying this facsimile transmission contain confidential information belonging to the sender which is legally privileged. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this facsimile is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone to arrange for the return of the original documents to us.

September 30, 1999

OCT

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



GPM GAS CORPORATION

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

## FAXED

Mr. W. Jack Ford, G.P.G. New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

## RE: Request for On-site Disposal Of Cooling Tower Wood Under Discharge Plan GW-044 and/or GW-002

Dear Mr. Ford:

GPM Gas Corporation (GPM), New Mexico Region is requesting permission to dispose of cooling tower wood and debris generated at its Lee Natural Gas Processing Plant (Discharge Plan GW-002). GPM proposes to dispose of the cooling tower wood and associated debris at either its Lee Gas Plant (GW-002) located in Lea County, NM approximately 0.5 miles south-southeast of Buckeye or its Hobbs Booster (GW-044) located in Hobbs, NM. GPM believes that burial of the wood and associated debris on site is an appropriate disposal option based on the analytical results. Please find attached for your review the analytical results of the cooling tower wood.

If you have any questions concerning this request, please call me at (915) 368-1142.

Sincerely,

Mel P. Driver

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

Attachment





PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR GPM GAS CORP. ATTN: JAY MILLER 11525 W. CARLSBAD HWY. HOBBS, NM 88240 FAX TO: (505) 397-5781

Receiving Date: 07/01/99 Reporting Date: 07/13/99 Project Owner: GPM Project Name: LEE PLANT COOLING TOWER Project Location: BUCKEYE

Sampling Date: 07/01/99 Sample Type: SOLID Sample Condition: INTACT Sample Received By: BC Analyzed By: AH/GP

#### TCLP METALS

LAB NO.	SAMPLE ID	As ppm	Ag ppm	Ba ppm	Cd ppm	Cr ppm	Pb ppm	Hg ppm	Se _ppm
ANALYSIS D	DATE:	07/12/99	07/12/99	07/12/99	07/12/99	07/12/99	07/12/99	07/13/99	07/12/99
EPA LIMITS:		5	5	100	1	5	5	0.2	· 1
H4221-1	BOARD #1	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
H4221-2	BOARD #2	<1	<1	<5	<0.1	<1	<1	<0.02	<0.1
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Quality Cont	rol	0.054	0.937	50.73	1.027	4.623	3.051	0.0048	0.045
True Value C	20	0.050	1.000	50.00		5.000		0.0050	0.050
% Recovery		108	93.7	102	103	92.5	102	96.0	90.0
Relative Standard Deviation		9.5	0.2	0.7	0.2	0.9	0.9	4.4	1.3
METHODS:	EPA 1311, 600/4-91	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

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07/12/99

H4221A.XLS

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remarks for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed walved unless made in writing and received by Cardinal within thiny (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries. affliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.

915 620 4162 P.01

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# GPM GAS CORPORATION

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'AX		Date: 9/3( Number of pa	)/99 ges including cover sheet: 3
Го:	W. Jack Ford Oil Conservation Division 2040 S. Pacheco Street Santa Fe, NM 87505	From:	Mel P. Driver P.O. Box 50020 Midland, TX 79710 email: mpdrive@gpm.com
Phone:	505-827-7156	Phone:	915-620-4142
Fax phone: CC:	505-827-8177	Fax phone:	915-620-4162
Fax phone: CC: REMARKS:		review $\boxtimes$ Reply $\land$ S/ se of the cooling tower	AP [] Please comment wood generated at its Lee Pla
Fax phone: CC: REMARKS:	Urgent Dryour 1	review $\boxtimes$ Reply $\land$ S/ se of the cooling tower	AP Dease comment
Fax phone: CC: REMARKS:	Urgent Dryour 1	review $\boxtimes$ Reply $\land$ S/ se of the cooling tower	AP [] Please comment wood generated at its Lee Pla



September 30, 1999

#### GPM GAS CORPORATION

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

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

#### FAXED

Mr. W. Jack Ford, G.P.G. New Mexico Oil Conservation Division 2040 South Pacheco Street Santa Fe, New Mexico 87505

## RE: Request for On-site Disposal Of Cooling Tower Wood Under Discharge Plan GW-044 and/or GW-002

Dear Mr. Ford:

GPM Gas Corporation (GPM), New Mexico Region is requesting permission to dispose of cooling tower wood and debris generated at its Lee Natural Gas Processing Plant (Discharge Plan GW-002). GPM proposes to dispose of the cooling tower wood and associated debris at either its Lee Gas Plant (GW-002) located in Lea County, NM approximately 0.5 miles south-southeast of Buckeye or its Hobbs Booster (GW-044) located in Hobbs, NM. GPM believes that burial of the wood and associated debris on site is an appropriate disposal option based on the analytical results. Please find attached for your review the analytical results of the cooling tower wood.

If you have any questions concerning this request, please call me at (915) 368-1142.

Sincerely,

Mel P. Driver

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

Attachment

SEP-29-1999 22:32

GPM GAS SERVICES



PHONE (915) 673-7001 . 2111 BEECHWOOD . ABILENE, TX 79603

PHONE (505) 393-2328 . 101 E. MARLAND . HOBBS, NM 88240

ANALYTICAL RESULTS FOR GPM GAS CORP. ATTN: JAY MILLER 11525 W. CARLSBAD HWY. HOBBS, NM 88240 FAX TO: (505) 397-5781

Receiving Date: 07/01/99 Reporting Date: 07/13/99 Project Owner: GPIM Project Name: LEE PLANT COOLING TOWER Project Location: BUCKEYE Sampling Date: 07/01/99 Sample Type: SOLID Sample Condition; INTACT Sample Received By: BC Analyzed By: AH/GP

#### TCLP METALS

LAB NO.	SAMPLE ID	As	Ag	Ba	Cd	Cr	Pb	Hg	Se
		ppm	ppm						
ANALYSIS	DATE:	07/12/99	07/12/99	07/12/99	07/12/99	07/12/99	07/12/99	07/13/99	07/12/09
EPA LIMITS	S:	5	5	100	1	5	5	0.2	1
H4221-1	BOARD #1	<1	<1	<5	<0.1	<1	<1	<0.02	<0,1
H4221-2	BOARD #2	<1	<1	<5	<0,1	<1	<1	<0.02	<0.1
		• •							
		·····							
					h .				
Quality Cor	ntrol	0.054	0.937	50.73	1.027	4.623	3.051	0.0048	0.045
True Value	QC	0.050	1.000	50.00	1.000	5.000	3.000	0.0050	0.050
% Recovery		108	93.7	102	103	92.5	102	96.0	the second state of the se
Relative Standard Deviation		9.5	0.2					the second se	Contractory of the local division of the loc
METHODS	EPA 1311, 600/4-01/	206.2	272.1	208.1	213.1	218.1	239.1	245.1	270.2

Gavle Potter, Chemist

07/12/99 Date

H4221A.XLS

PLEASE NOTE: Labbility and Demogras. Cardiant's liability and client's analysis remody for any clean arking, whether based in contract or left, shell be limited to the amount paid by client for analyses. All claims, including those (or negligence and any other cause whethere there descend we'red unless make in writing and received by Cardinal within thiry (30) days after completion of the applicable service. In no event shall be liable for incidental or consequential demoges, including, who we have the tables interruptions, loss of uses of use of the applicable service. In no event shall be liable for incidental or consequential demoges, including, who arkites interruptions, loss of uses, or loss of uses of the applicable services arkites are always of or related to the performance of services herewhole by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



#### STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE. NEW MEXICO 87505 (505) 827-7131

March 12, 1999

## CERTIFIED MAIL RETURN RECEIPT NO. Z-274-529-632

Mr. Mel Driver GPM Gas Corporation P.O. Box 50020 Midland, Texas 79705-0020

## RE: RECOVERY WELL WORK PLAN LEE GAS PLANT

Dear Mr. Driver:

The New Mexico Oil Conservation Division has reviewed GPM Gas Corporation's (GPM) February 9, 1999 "REPLACEMENT OF THREE RECOVERY WELLS AT LEE GAS PLANT, LEA COUNTY, NEW MEXICO" which was submitted on behalf of GPM by their consultant TRW Systems & Information Technology Group. This document contains GPM's work plan for replacement of inoperable recovery wells used for remediation of contaminated ground water at GPM's Lee Gas Plant.

The above referenced work plan is approved with the following conditions:

- 1. The recovery wells will be developed upon completion of monitor well construction activities using EPA approved procedures.
- 2. Any new below grade piping used to convey fluids from the recovery wells will be hydrostatically tested prior to operation. The tests will be conducted at a minimum of 3 psi above maximum operating pressure and will hold that pressure for a minimum of 30 minutes.

Please be advised that OCD approval does not relieve GPM of liability if the recovery well system fails to adequately remediate contamination related to GPM's activities. In addition, OCD approval does not relieve GPM of responsibility for compliance with any other federal, state or local laws and regulations Mr. Mel Driver March 12, 1999 Page 2 of 2

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson Hydrologist Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office Gilbert Van Deventer, TRW

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PS Form 3800, April 1995	Postmark or Date								

TRW Systems & Information415 West Wall Street, Suite 1818Technology GroupMidland, TX 79701

TRW/MID-GJV-LTR05-99

February 9, 1999

Mr. William C. Olson State of New Mexico; Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Re: Replacement of Three Recovery Wells at Lee Gas Plant Lea County, New Mexico

ENVIRONMENTAL BUREAU OIL CONSERVATION DIVISION

RECEIVED

FEB 1 2 1998 9

Dear Mr. Olson:

TRW Inc. (TRW) has been retained by GPM Gas Corporation (GPM) to submit this work plan to replace three recovery wells at GPM's Lee Gas Plant in Lea County, New Mexico as requested in your letter to Mr. Mel Driver, GPM Environmental Engineer, dated February 3, 1999.

#### Status of Remediation System

Currently, the groundwater recovery system at the Lee Gas Plant consists of three groundwater recovery wells (RW-1, MW-6, and MW-7). Each of these recovery wells is equipped with a ½-horsepower (HP) submersible pump. Recovery well, RW-1 is also equipped with a 2 HP vacuum unit for vapor extraction of residual hydrocarbons from the vadose zone and for extraction of hydrocarbons induced from the air sparge system. Air sparging is accomplished by a 2 HP compressor that pumps air into monitoring well MW-23, which is located approximately 60 feet east of RW-1. Two recovery wells, MW-8 and MW-10, are out of service due to plugged well screens. For the past 8 years, the extraction of groundwater from the recovery wells has aided in keeping the dissolved hydrocarbon plume from migrating offsite. However, groundwater recovery rates have diminished from an approximate average of 5,900 gallons per day (gpd) in 1995 to a current rate of 568 gpd as of November 25, 1998 as depicted in the attached graph. The decline in groundwater recovery rates is due primarily to the two factors listed below:

- There is significantly less available drawdown and correspondingly less yield for groundwater extraction because of the declining water table (approximately 1 foot per year).
- Build up of scale and biofouling in the wells has likely resulted in plugging the metal well screen.

-



Mr. William C. Olson February 9, 1999 Page 2 of 2

#### Scope of Work

In order to re-establish groundwater recovery rates to optimal levels, the replacement of three recovery wells at the locations noted in the attached map (Figure 1) is recommended. The wells will be installed to a depth of at least 135 feet below ground surface to provide sufficient yields for the next 10 to 20 years if necessary. Replacement of MW-8 is recommended because it has indicated the presence of free product (condensate) and it is located approximately 125 feet from an inactive water supply well (WS-2). A second and third recovery well should be installed to replace RW-1 and MW-6 because of the limited available drawdown, decreased groundwater yields, and presence of free product in and near these recovery wells. Replacement of recovery wells MW-7 and MW-10 is not necessary because groundwater recovery from the three recommended replacement recovery wells should be sufficient to limit the downgradient migration of the free phase and dissolved phase hydrocarbon plume. According to the well permit (L-3875-S) on file at the New Mexico State Engineer Office, the state has appropriated 45.0 acre-feet of groundwater per year for the purpose of pollution control at Lee Plant. This amount is equivalent to three wells pumping approximately 28 gallons per minute (9.3 gpm each) continuously.

Prior to recovery well completion, TRW will submit an *Application for Permit to Change Location of Well* to install the three groundwater recovery wells for approval by the New Mexico State Engineer Office in Roswell, New Mexico. After the application is approved, a notice of the intent to complete the recovery wells will be published in the local newspaper as required. Well installation operations will begin after the above-referenced State requirements have been met.

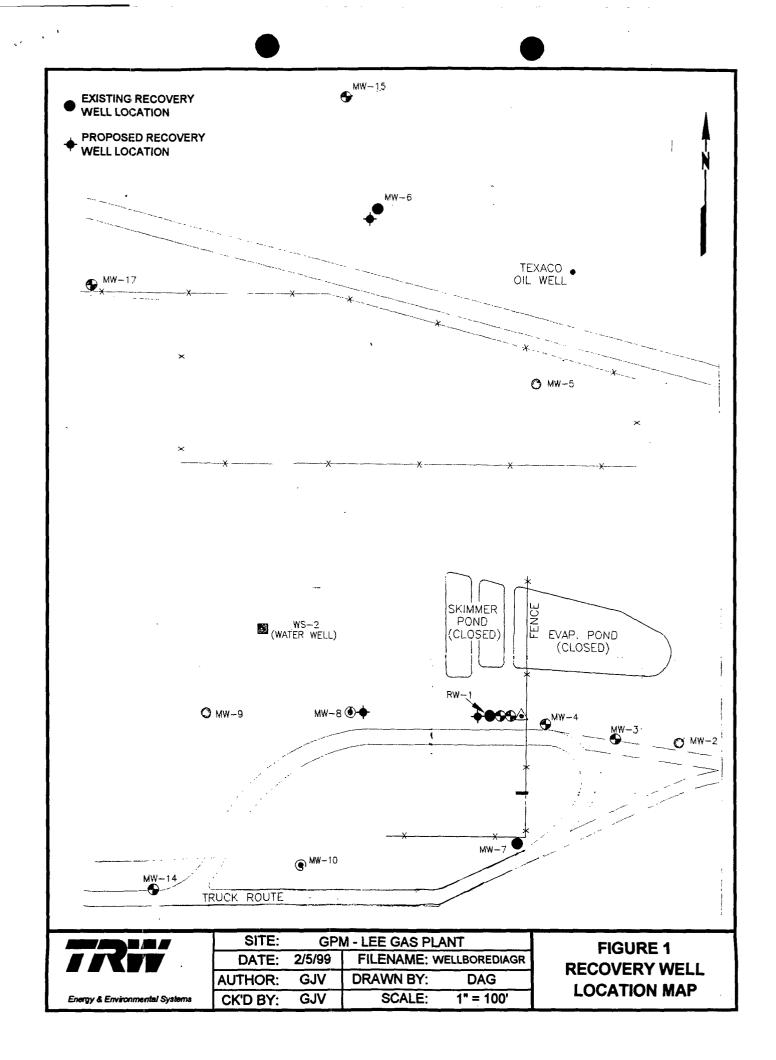
Each recovery well will completed to a depth of at least 135 feet below ground surface or to the base of the Ogallala aquifer, whichever is shallower. The borings will be a minimum diameter of 8 inches. Drilling will require a mud rotary rig. A guar gum polymer, Baroid Quickfoam, or other biodegradable mud additive will be necessary for borehole stability. The well casing (95 feet) and screen (40 feet) will consist of either 5- or 6-inch diameter PVC. The annular space will be filled with gravel pack to a point above the well screen. A minimum 3-foot thick bentonite seal will be placed above the gravel pack. The remainder of the annular space will be grouted to the surface with a cement slurry containing 5% bentonite. The  $\frac{1}{2}$  horsepower Grundfos submersible pumps will be removed from the existing recovery wells and installed in the new replacement wells. New discharge pipe (1  $\frac{1}{4}$ -inch dia. PVC) and electrical cable (jacketed 4-conductor 12/3 gauge) will be installed in the new recovery wells. A recovery well construction diagram is attached.

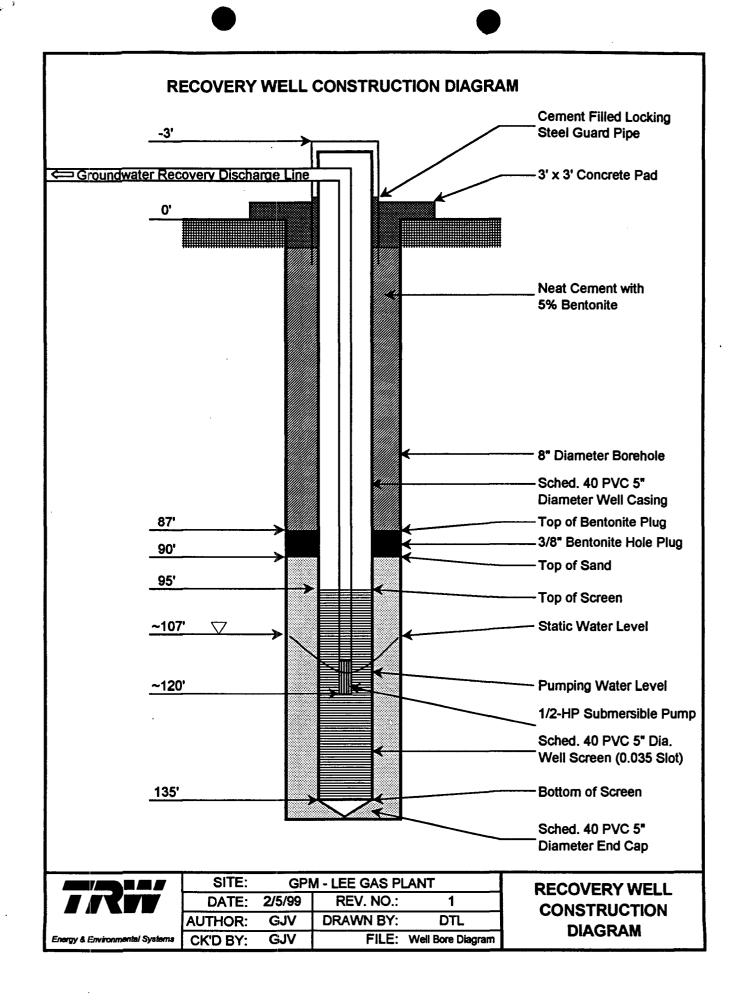
Upon completion of the recovery wells, TRW will complete and submit the *Proof of Completion of Well* forms to the State Engineer Office. If requested, TRW will also submit records of the amounts of groundwater recovered (*Totalizing Meter Reports*) to the State Engineer Office on a quarterly basis as required by the permit.

Sincerely,

Gilbert J. Van Deventer, REM Project Manager

GPM/LEE/LEE-RWs.DOC





STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

February 3, 1999

## <u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. Z-274-520-614</u> --

Z-274-520-614 - receipt fibel with Liham Runch

Mr. Mel Driver GPM Gas Corporation P.O. Box 50020 Midland, Texas 79705-0020

## RE: ANNUAL REPORT LEE GAS PLANT

Dear Mr. Driver:

The New Mexico Oil Conservation Division has reviewed GPM Gas Services Company's (GPM) December 4, 1998 correspondence and November 16, 1998 "1998 ANNUAL GROUNDWATER MONITORING AND SAMPLING REPORT, GPM - LEE GAS PLANT, LEA COUNTY, NEW MEXICO". These documents contain the results of GPM's ground water remediation and monitoring program for 1998. The documents also recommend installation of additional ground water recovery wells for remediation of contaminated ground water.

Prior to the OCD approving of the above referenced recommendation, the OCD requests that GPM submit to the OCD a work plan for installation of the additional recovery wells. Please submit the work plan to the OCD Santa Fe Office by April 1, 1999 with a copy provided to the OCD Hobbs District Office.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson Hydrologist Environmental Bureau

xc: Chris Williams, OCD Hobbs District Office Gilbert Van Deventer, TRW

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OIL CONSERVE UN DThe Santa Fe New Mexican Since 1849. We Read You.

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NEW MEXICO OIL CONSERVA	TION DIV.	AD NUMBER: 440098	ACCOUNT: 56689
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## AFFIDAVIT OF PUBLICATION

#### NOTICE OF PUBLICATION from the Oil Conservation Di-STATE OF NEW MEXICO vision and may submit writ-Energy, Minerals and Natural Resources Department Oil Conservation Division

Notice is hereby given that application may be viewed at pursuant to New Mexico Wa- the above address between ter Quality Control Commis- 8:00 a.m. and 4:00 p.m., Monsion Regulations, the follow- day through Friday. Prior to ing discharge plan renewal ruling on any proposed disapplication has been submit- charge plans or its modificated to the Director of the Oil tion, the Director of the Oil Conservation Division, 2040 Conservation Division shall S. Pacheco, Santa Fe, New allow at least thirty (30) days Mexico, 87505, Telephone after the date of publication (505) 827-7131:

cated in the SW/4 SE/4, Sec- be held if the director detertion 30, Township 17 South, mines that there is signifi-

likely to be affected by a spill, the hearing. leak, or accidental discharge GIVEN under the Seal of tration of approximately 600 November, 1995. mg/L. The discharge plan STATE OF NEW MEXICO and other accidental dis-SION

charges to the surface will be WILLIAM J. LEMAY, Direcmanaged.

ten comments to the Director of the Oit Conservation Division at the address given above. The discharge plan of this notice during which (GW-002) · GPM Gas Ser- comments may be submitted vices Company, Mr. Vince to him and public hearing Bernard, (915)-368-1085, 4044 may be requested by any in-Penbrook, Odessa, TX, 79762 terested person. Request for has submitted a Discharge public hearing shall set forth Plan Renewal Application the reasons why a hearing for their Lee Gas Plant lo- shall be held. A hearing will

County, New Mexico. The If no public interest. Plant is currently not in oper- the Director will approve or ation, but should operations disapprove the proposed resume approximately plan based on the informa-47,000 gallons per day of pro- tion available. If a public cess wastewater with a Total hearing is held, the director Dissolved Solids content of will approve or disapprove 5,300 mg/l would be disposed the proposed plan based on of offsite at an approved OCD the information in the plan facility; Groundwater most and information presented at

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addresses how spills, leaks, OIL CONSERVATION DIVI-

tor

Any interested person may Legal #58572

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper 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 gualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 58572 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 17thday of NOVMEBER 1995 and that the undersigned has personal

knowledge of the matter and things set forth in-this affida---vit. /S/

ISEMENT ADVERZ REPRESENTATIVE

Subscribed and sworn to before me on this day of NOVEMBER A.D., 1995. 1/th

OFFICIAL SEAL LAURA E. HARDING

Laura & Harding

NOTARY PUBLIC -- STATE OF NEW MEXIUM MY COMMISSION EXPIRES \_\_\_\_\_\_

202 East Marcy Street • P.O. Box 2048 • Santa Fe. New Mexico 87501

### Affidavit of Publication

) ) ss.

)

STATE OF NEW MEXICO

#### 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

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COUNTY, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
entire issue of THE LOVINGTON DAILY LEADER and
not in any supplement thereof, oneaxeexixxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx
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Notary Public, Lea County, New Mexi	со
My Commission Expires Sept. 28 19 98	; 

#### 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 have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505)827-7131:

(GW-002) - GPM Gas Services Company, Mr. Vince Bernard, (915)-368-1085, 4044 Penbrook, Odessa, TX, 79762 has submitted a Discharge Plan Renewal Application for their Lee Gas Plant located in the SW/4 SE/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. The Plant is currently not in operation, but should operations resume approximately 47,000 gallons per day of process wastewater with a Total Dissolved Solids content of 5,300 mg/l would be disposed of offsite at an approved OCD facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 85 feet with a total dissolved solids concentration of approximately 600 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 the State of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of November, 1995.

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

SEAL

Published in the Lovington Daily Leader November 16, 1995.

Okay to Pay PWG

#### NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of November, 1995.

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

SEAL



#### MEMORANDUM OF MEETING OR CONVERSATION

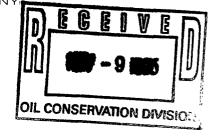
11/13/95 10:30 A Date Time Personal Telephone Other Parties Originating Party Pat Sunchez -NMOCD Subject GW-002 Dischware Review cf Plan File. Discussion will need to Letter state Denemal of the Reneurals other Modifications Said 6W-002) Perm. RENEWED March 16,1986 \* RL. Stamets 2. 18, 1991 W.J. LIMM Renewed March 3 W.J. Le May May 18, 199] Modified Modified 26,1993 W. J. LIMAY t( April Submitted Renenal application 1995 puls 12-19-95 J.D. Romey Approved March 16,1981 First bч Conclusions or Agreements dated Nov. 6,1995 W/ Vince 1, 440 Sce GPM. Rivnard of Posting U.S. **Distribution** Signed



GPM GAS SERVICES COMPANY A DIVISION OF PHILLIPS PETROLEUM COMPAN

4044 PENBROOK ODESSA, TX 79762

November 6, 1995



#### **REGISTERED MAIL RETURN RECEIPT REQUESTED**

Mr. Patricio W. Sanchez Petroleum Engineer State of New Mexico **Oil Conservation Division** 2040 South Pacheco Santa Fe. New Mexico 87505

#### RE: Discharge Plan GW-002 Renewal Lee Gas Processing Plant Lea County, New Mexico

Dear Mr. Sanchez:

On March 16, 1996, discharge plan GW-002 for GPM Gas Corporation's Lee Plant, located in Section 30, Township 17S, Range 35E, NMPM, Lea County, New Mexico, will expire. As per the Oil Conservation Division (OCD) letter to GPM dated October 17, 1995, please consider this notification that GPM wishes to renew the Lee Plant discharge plan.

As we discussed on October 26, 1995, Lee Plant is currently idle. However, in consideration of any possible future change in disposition of the plant, as well as the current site restoration project requirements being rolled into the present discharge plan, we agreed it would be best at this time to simply renew the discharge plan as it stands today.

In accordance with WQCC Regulation 3-114 (discharge plan fee), attached is the filing fee of fifty (50) dollars, plus the flat fee of \$1,667.50 for gas processing plants, representing a total of \$1,717.50 payable to NMED-Water Quality Management.

If you have any questions or if I can be of further assistance, please contact me at (915) 368-1085.



NOV 1 3 1995

Environmental Bureau **Oil Conservation Division**  Sincerely,

Vince Bernard Safety & Environmental Director New Mexico Region

VBB Maureen Gannon - GCL Albuquerque

cc:

NEW MEXICO ENERGY, MICERALS AND NATURAL RECOURCES DEPARTMENT

#### OIL CONSERVATION DIVISION

October 17, 1995

#### CERTIFIED MAIL RETURN RECEIPT NO. 2-765-963-076

Mr. Vincent B. Bernard Safety & Environmental Supervisor GPM Gas Corp. 4044 Penbrook Odessa, Texas 79762

#### RE: Discharge Plan GW-002 Renewal Lee Gas Processing Plant Lea County, New Mexico

Dear Mr. Bernard:

On March 21, 1995, GPM Gas Corp. was notified by the NMOCD that the groundwater discharge plan, GW-002, for the Lee Gas Processing Plant located in the SW/4 SE/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico, will expire on March 16, 1996. The plan was approved by the Director of the New Mexico 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.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. If GPM Gas Corp. submits an application for renewal at least 120 days before the discharge plan expires ( on or before November 16, 1995), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

The discharge plan renewal application for the LEE Gas Processing Plant is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat fee of \$1,667.50 for gas processing plants.

The (50) dollar filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan - with the first payment due the at Mr. Vincent B. Bernard October 17, 1995 Page 2

the time of approval. Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. 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 a discharge plan is not need, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Patricio W. Sanchez at (505) 827-7156.

Sincerely,

Roger C. Anderson Environmental Bureau Chief

RCA/pws

xc: Mr. Wayne Price and Mr. Jerry Sexton

Z 765 963 076 **Receipt** for **Certified Mail** No Insurance Coverage Provided Do not use for International Mail UNITED STATES (See Reverse) Sent to Month Street and No. GW-0 P.O., State and ZIP Code Postage \$ **Certified Fee** Special Delivery Fee **Restricted Delivery Fee** 1993 Return Receipt Showing to Whom & Date Delivered March Return Receipt Showing to Whom, Date, and Addressee's Address TOTAL Postage Form **3800.** Ś & Fees Postmark or Date R

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<ul> <li>Submit Scapies to Appropriate District Office <u>DISTRICT I</u></li> <li>P.O.Box 1980, Hobbs, NM 88241-1980</li> <li><u>DISTRICT II</u></li> <li>P.O. Drawer DD, Artesia, NM 88211-0719</li> <li><u>DISTRICT III</u></li> <li>1000 Rio Brazos Rd, Azzec, NM 87410</li> </ul>	State of New Mex E y, Minerals and Natural Res OIL CONSERVATION P.O. Box 2088 Santa Fe, New Mexico 8	sources Departm	PERMIT NO	Form C-117 A Revised 4-1-91
TANK CLEANING, SEDIMENT OIL RI	EMOVAL, TRANSPORTATION OF MIS	CELLANEOUS HYDRO	CARBONS AND	DISPOSAL PERMIT
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Tide		Signature <u>C</u>	Roy B	lythe
Date	~ 	Tide FIELD SU	PERVISOR	_Date
OIL CONSERVATION DIVISION				
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#### STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

March 21, 1995

#### CERTIFIED MAIL RETURN RECEIPT NO. 2-765-962-650

Mr. Vincent B. Bernard Safety & Environmental Supervisor GPM Gas Corp. 4044 Penbrook Odessa, Texas 79762

RE: Discharge Plan GW-002 Renewal Lee Gas Processing Plant Lea County, New Mexico

Dear Mr. Bernard:

On March 16, 1986, the groundwater discharge plan, GW-002, for the Lee Gas Processing Plant located in the SW/4 SE/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). The plan was subsequently renewed on March 18, 1991. This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was renewed for a period of five years. The renewal will expire on March 16, 1996.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, 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 system, and if so, please include these modifications in your application for renewal.

To assist you in preparation of your application, I have enclosed an application form and a copy of the OCD's Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Plants and a copy of the WQCC regulations. Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. Mr. Vincent B. Bernard March 21, 1995 Page 2

The discharge plan renewal application for the Lee Gas Processing Plant is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat fee of \$1667.50 for gas processing plants.

The (50) dollar filing fee is to be submitted with discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

If you no longer have any actual or potential discharges a discharge plan is not needed, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Patricio Sanchez at (505) 827-7156.

Sincerely,

Roger C. Anderson Environmental Bureau Chief

xc: OCD Hobbs Office

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

May 31, 1995

CERTIFIED MAIL RETURN RECEIPT NO. P-667-242-218

Mr. Vince Bernard GPM Gas Services Company 4044 Penbrook Odessa, TX 79762

RE: MONITOR WELL SAMPLING LEE GAS PROCESSING PLANT BUCKEYE, NEW MEXICO

Dear Mr. Bernard:

On March 16, 1995, the New Mexico Oil Conservation Division (OCD) split samples of ground water from monitor wells with GPM during a quarterly ground water monitoring event at the Lee Gas Plant. Enclosed you will find copies of the analytical results for these samples.

If you have any questions please contact me at 827-7154.

Sincerely,

William C. Olson Hydrogeologist Environmental Bure'au

xc w/enclosures:

Jerry Sexton, OCD Hobbs District Supervisor Wayne Price, OCD Hobbs District Office Maureen Gannon, GCL



CLIENT	:NM OIL CONSERVATION DIV.	DATE RECEIVED	:03/17/95
PROJECT #	: (NONE)		
PROJECT NAME	: PHILLIPS LEE GAS PLANT	REPORT DATE	:04/10/95

ATI ID:	503354
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ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	CLAVE JONES WINDMILL	AQUEOUS	03/15/95
02	MW-12	AQUEOUS	03/16/95
03	MW-11	AQUEOUS	03/16/95
04	Ma-13	AQUEOUS	03/16/95
05	MW-15	AQUEOUS	03/16/95
06	MW-6	AQUEOUS	03/16/95
07	MW-19	AQUEOUS	03/16/95
08	MW-17	AQUEOUS	03/16/95

---TOTALS----

<u>MATRIX</u> AQUEOUS <u>#SAMPLES</u> 8

#### ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

31



#### GAS CHROMATOGRAPHY RESULTS

TEST	: BTEX (EPA 8020)	
CLIENT	: NM OIL CONSERVATION DIV.	ATI I.D.: 503354

PROJECT # : (NONE)

PROJECT NAME : PHILLIPS LEE GAS PLANT

SAMPI ID. #	LE # CILENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTEC	DATE ANALYZED	DIL. FACTOR
02	MW-12	AQUEOUS	03/16/95	NA	03/20/95	1
03	MW-11	AQUEOUS	03/16/95	NA	03/20/95	1
04	MW-13	AQUEOUS	03/16/95	NA	03/20/95	1
PARA	METER		UNITS	02	03	04
BENZI	ENE		UG/L	0.6	<0.5	0.6
TOLUI	ENE		UG/L	2.0	1.6	1.4
ETHYI	LBENZENE		UG/L	<0.5	<0.5	<0.5
TOTAL	L XYLENES		UG/L	2.7	2.2	2.2
SURRO	DGATE:					

89

100

93

BROMOFLUOROBENZENE (%)

Analytical **Technologies,** Inc.

#### GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : NM OIL CONSERVATION DIV. ATI I.D.: 503354

PROJECT # : (NONE)

PROJECT NAME : PHILLIPS LEE GAS PLANT

SAMPI		NA DD TV	DATE	DATE	DATE	DIL.
ID. #	# CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
05	MW-15	AQUEOUS	03/16/95	NA	03/20/95	100
06	MW-6	AQUEOUS	03/16/95	NA	03/20/95	100
07	MW-19	AQUEOUS	03/16/95	NA	03/20/95	1
PARA	METER		UNITS	05	06	07
BENZI	ENE		UG/L	4700	15000	59
TOLUI	ENE		UG/L	720	14000	21
ETHYI	LBENZENE		UG/L	76	1500	3.8
TOTAI	L XYLENES .		UG/L	120	2400	8.4
SORR	DGATE:					

95

89

96

BROMOFLUOROBENZENE (%)

Analytical **Technologies,** Inc.

#### GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : NM OIL CONSERVATION DIV. ATI I.D.: 503354

PROJECT # : (NONE)

PROJECT NAME : PHILLIPS LEE GAS PLANT

SAMPLE ID. # CLIENT I.D.	MATRTX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
08 MW-17	AQUEOUS	03/16/95	NA	03/20/95	1
PARAMETER		UNITS	08		
BENZENE		UG/L	48		
TOLUENE		UG/L	16		
ETHYLBENZENE		UG/L	3.2		
TOTAL XYLENES		UG/L	7.6		

#### SURROGATE:

BROMOFLUOROBENZENE (%)

98



#### GAS CHROMATOGRAPHY RESULTS

#### REAGENT BLANK

TEST	: BTEX (EPA 8020)	ATI I.D.	: 503354
BLANK I.D.	: 032095	MATRIX	: AQUEOUS
CLIENT	: NM OIL CONSERVATION DIV.	DATE EXTRACTED	: NA
PROJECT #	: (NONE)	DATE ANALYZED	: 03/20/95
PROJECT NAME	: PHILLIPS LEE GAS PLANT	DILUTION FACTOR	:1
PARAMETER	UNITS		
BENZENE	UG/L	<0.5	
TOLUENE	UG/L	<0.5	•
TOLUENE ETHYLBENZENE	UG/L UG/L	<0.5 <0.5	
	•		

#### SURROGATE:

BROMOFLUOROBENZENE (%)

96



#### GAS CHROMATOGRAPHY - QUALITY CONTROL

#### MSMSD

TEST	: BTEX (EPA	8020)						
MSMSD #	: 50335404			ATI I.D.		:	503354	
CLIENT	: NM OIL CON	SERVATION	DIV.	DATE EXT	RACTED	:	NA	
PROJECT #	: (NONE)			DATE ANA	LYZED	:	03/20/9	95
PROJECI <sup>.</sup> NAME	: PHILLIPS L	EE GAS PLA	ANT	SAMPLE M	ATRIX	:	AQUEOU	S
REF. I.D.	: 50335404			UNITS		:	UG/L	
PARAMETER		SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	ہ REC	DUP SPIKE	DUP % REC	RPD
BENZENE		0.6	10	9.6	90	9.1	85	5
TOLUENE		1.4	10	11	96	10	86	10
ETHYLBENZENE		<0.5	10	9.7	97	9.5	95	2
								-

(Spike Sample Result - Sample Result)
% Recovery = ----- X 100
Spike Concentration

(Sample Result - Duplicate Result) RPD (Relative Percent Difference) = ------ X 100 Average Result STATE OF NEW MEXICO

SOURCES DEPARTMENT

**OIL CONSERVATION DIVISION** 

ATI# 503354

-	LABORATO	RY SAMPL	E RE	CORI	)			
PROJ. NO. PROJECT NAME	Lee Gas Mant	NO. OF CON- TAINERS	4					REMARKS
	<i></i>	84	2	$\frac{7}{1}$	<u>' Y</u>	-{	-	
950315 1300 950316 0845	Clave Jones Windmill	<u> </u>			-7	╉		Al Antimony As Ba Be
11 0970	$\frac{Mh/-11}{Mh/-11}$	2	┟╼╼┼╸		2			Mag Man Ha Mirk se st An
" 1030	MW - 13	2	┟──┼		2			La. TI, V. PR
11 /300	MW-15	2			2	-		
1 1310	MW-6	2			2			FI, Br, AIK, CI, SUY, TDS,
" 1400	<u>MW-19</u>	2		_	2			pH,EC
<u> </u>	MW-17	2			2			
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			<u> </u>	, <b></b>				
Relinquished by: 15.00 stures	Date / Time Received by: (Signature)	-		S	EALS	ÍŇ	ТАСТ	: (Signature)
Relinquiched by: /Signeture/	Date / Time Received by: (Signature)							: (Signature)
Rolinguished by: (Signolurol	Date / Time Received for Laboratory 	y by:	1	) Date /	Time		Remail	
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# **Chain of Custody**

	<b>Chai</b>	n of	Custod	ANALYSIS REQUEST	DATE 3 17 95 PAGE_	OF
NETWORK PROJECT MANAGER: LETITIA KRAKOWSKI COMPANY: Analytical Technologies, Inc. ADDRESS: 2709-D Pan American Freeway, NE Albuquerque, NM 87107		D C (MBAS)	היומיות היותיות היותים איניין היותים איניין איני איני איניאי א	PE, Mg, Mn, 146, 111 ZHE UN, 771, VN, 277 BTXE/MTBEL (MOD 8015/6020) GCMS (624/8240) 5/C4, S04, 7775, pt1/4	30D FOTAL COLIFORM FECAL COLIFORM GROSS ALPHA/BETA GROSS ALPHA/BETA ARDIUM 226/228 ARDIUM 226/228 ARDIUM 226/228 ARDIUM 226/228 ARDIUM 226/228	Sound black (MUU BUIS) BUIS
CLIENT PROJECT MANAGER: SAMPLE ID DATE TIME MATRIX LAB ID 50 3354 -01 3/15 1300 AQ 1		ORGANIC LEAD SULFIDE SULFIDE	632/632 MOD 619/619 MOD 610/8310	XCDJ ( U, FP) 8240 (TCLP 131 8240 (TCLP 131) NI, Diesel/Gasoline/ Diesel/Gasoline/ Volatile Organics ASBESTOS ASBESTOS	BOD       TOTAL COLIFORM       FECAL COLIFORM       FECAL COLIFORM       GROSS ALPHA/BET       RADIUM 226/228       AIR/Discell/Casoline	
PROJECT INFORMATION       SAMPLE RECI         PROJECT NUMBER:       50/33544       TOTAL NUMBER OF CONTAIN         PROJECT NAME:       F       MN14       CHAIN OF CUSTODY SEALS         QC_LEVEL:       SID:       IV       INTACT?         QC_REQUIRED       MSD_BLANK       RECEIVED GOOD COND.COL	NERS	2 NA Y	SAMPLES SENT TO. SAN DIEGO FT. COLLINS RENTON PENSACOLA PORTLAND	RELINCUISHED BY:     1.       Stgnature:     Time:       WHD     Time:       Printed Name:     Date       WHMLHAR     Date       WHMLHAR     Time:       Analytical Technologies, Inc.     Time:	Signature: Time:	<u>2.</u>
TAT: (STANDARD) RUSHI LAB NUMBER DUE DATE:			PHOENIX X	RECEIVED BY: (LAB) 1. Signature: Time: Printed Name: Date: Company:	RECEIVED BY: (LAB) Signature: Time: I Mulaui fia Printed Name: Date: Melanie Giange Company: ATI-Phoen'iX	2/18/2

ATI Labs: San Diego (619) 458-9141 • Phoenix (602) 496-4400 • Seattle (206) 228 8335

	ENERGY, MINERALS AN	ND NATURAL RESOURCES DEPARTMENT
1013.0	ANALY	SIS REQUEST FORM
Contract Lab April	yfical Technology	Contract No. <u>95-521.07-040</u>
OCD Sample No. 93	0316 0845	
Collection Date Collection Time	e Collected by —Person/Agency	
3 16 95 0845	Olson	/OCD
	Phillips Lee Gas	Plant
Sample location	MW-12	
Collection Site Description		
		Township, Range, Section, Tract:
SEND ENVIRONMENT	AL BUREAU RVATION DIVISION	SAMPLE FIELD TREATMENT — Check proper boxes
REPORT PO Box 2088		
Santa Fe, NM 87	504-2006	
SAMPLING CONDITIONS	Waterievel	<b>NF:</b> Whole sample (Non-filtered) <b>F:</b> Filtered in field with 0.45 <i>//</i> membrane filter
Bailed X Pump	Discharge	PF: Pre-filtered w/45 Amembrane filter
	Sample type 9 mb	NA: No acid added A: 5ml conc. HNO, added
pH(00400) 6.8.5	Conductivity (Uncorrected)	A: HCL A: 4ml fuming HNO, added
Water Temp. (00010) 67.5°F	Conductivity at 25° C	FIELD COMMENTS:
<u> </u>	mh mh	
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LAB ANALYSIS REQUES	TED:	
ITEM DESC	METHOD ITEM	DESC METHOD ITEM DESC METHOD

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VOA	8020	013	PHENOL	604	□ 026	Cd	7130
VOA	602	<b>D</b> 14	VOC	8240	027	Pb	7421
VOH	8010	015	VOC	624		Hg(L)	7470
VOH	601	016	SVOC	8250	031	Se	7740
SUITE	8010-8020	□017	SVOC	625	□ 032	ICAP	6010
SUITE	601-602	018	VOC	8260	□ 033	CATIONS/ANIONS	· )
HEADSPACE		019	SVOC	8270	034	N SUITE	
РАН	8100	□ 020	O&G	9070	035	NITRATE	,
PAH	610	□022	AS	7060	🗖 036	NITRITE	
PCB	8080	023	Ba	7080	037	AMMONIA	
PCB	608	□ 024	Cr	7190	🗖 038	TKN	-
PHENOL	8040	□025	Cr6	7198		OTHER	
	VOA VOA VOH SUITE SUITE HEADSPACE PAH PAH PCB PCB	VOA         8020           VOA         602           VOH         8010           VOH         601           SUITE         8010-8020           SUITE         601-802           HEADSPACE         PAH           PAH         610           PCB         8080           PCB         608	VOA         8020         013           VOA         602         014           VOH         8010         015           VOH         601         016           SUITE         8010-8020         017           SUITE         601-502         018           HEADSPACE         019         020           PAH         610         0222           PCB         8080         023           PCB         608         024	VOA       8020       I013       PHENOL         VOA       602       I014       VOC         VOH       8010       I015       VOC         VOH       601       I016       SVOC         VOH       601       I017       SVOC         SUITE       8010-8020       I017       SVOC         SUITE       601-602       I018       VOC         HEADSPACE       I019       SVOC         PAH       8100       I020       O&G         PAH       610       I022       AS         PCB       8080       I023       Ba         PCB       608       I024       Cr	VOA       8020       013       PHENOL       604         VOA       602       014       VOC       8240         VOH       8010       015       VOC       624         VOH       601       016       SVOC       8250         SUITE       8010-8020       017       SVOC       625         SUITE       601-602       018       VOC       8260         HEADSPACE       019       SVOC       8270         PAH       8100       0220       O&G       9070         PAH       610       0222       AS       7060         PCB       8080       023       Ba       7080	VOA       8020       IO13       PHENOL       604       IO26         VOA       602       IO14       VOC       8240       IO27         VOH       8010       IO15       VOC       624       IO28         VOH       601       IO16       SVOC       8250       IO31         SUITE       8010-8020       IO17       SVOC       625       IO32         SUITE       601-602       IO18       VOC       8260       IO33         HEADSPACE       IO19       SVOC       8270       IO34         PAH       8100       IO22       AS       7060       IO35         PAH       610       IO22       AS       7060       IO36         PCB       8080       IO23       Ba       7080       IO37         PCB       608       IO24       Cr       7190       IO38	VOA       8020       IO13       PHENOL       604       IO26       Cd         VOA       602       IO14       VOC       8240       IO27       Pb         VOH       8010       IO15       VOC       624       IO28       Hg(L)         VOH       601       IO16       SVOC       8250       IO31       Se         SUITE       8010-8020       IO17       SVOC       625       IO32       ICAP         SUITE       601-502       IO18       VOC       8260       IO33       CATIONS/ANIONS         HEADISPACE       IO19       SVOC       8270       IO34       N SUITE         PAH       8100       IO22       AS       7060       IO35       NITRATE         PAH       610       IO22       AS       7080       IO37       AMMONIA         PCB       608       IO24       Cr       7190       IO38       TKN

		ENERGY, I				TMENT		
A PARTY OF THE PAR				ONSERVATION D				1
Contract Lab_	Analy	tical Techn	1		Contract No	8-52	1.07 - 04	10
OCD Sample N	No. 95	93160930						
Collection Date	Collection Time	Collected by —Perso	n/Agency					·
316195	0930	Olson						IOCD -
SITE INFORMA Sample location		Phillips Le MW-11	re Ges	Plant				i
Collection Site Det	scription			· · · · · · · · · · · · · · · · · · ·				
					Townsh	ip, Range, Sect	ion, Tract:	
		AL BUREAU			, <u>}</u>	·		
REPORT PO B	ox 2088	RVATION DIVISION				— Checkp	roper boxes	<u></u>
Santa	a Fe, NM 87	2504-20 <b>88</b>		No. of sample		•		
	Pump	Water level Discharge		NF:	Whole sample (Non-fi Filtered in field with 0. Pre-filtered w/45 Ar	45 µmembra		
рН(00400)	1 Tap . 78	Sample type 9546 Conductivity (Uncorrected	210		No acid added HCL 2mi H,SO,/L added			dded added
Water Temp. (000	10) F.8°F	Conductivity at 25° C		FIELD COMM		X	JIGU	
	.01	l	mh	0				
		<u> </u>						' <u> </u>
					· · · · · · · · · · · · · · · · · · ·			
LAB ANALYSI	S REQUES	TED:						
ITEM	DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOD
001 002 003 004 005 006 007 008 009 010 011 011	VOA VOH VOH SUITE SUITE HEALISPACE PAH PCB PCB PHENOL	8020 602 8010 601 8010-8020 601-602 5 8100 610 8080 608 8040	013 014 015 016 017 018 019 020 022 022 022 022 022	PHENOL VOC SVOC SVOC VOC SVOC O&G AS Ba Cr Cr Cr6	604 8240 624 8250 625 8260 8270 9070 7060 7080 7190 7198	026         027         028         031         032         033         034         035         036         037         038         039         038         038         038	Cd Pb Hg(L) Se ICAP CATIONS/ANIONS N SUITE NITRATE NITRATE NITRITE AMMONIA TKN OTHER	7130 7421 7470 7740 6010

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OCD Sample No.     9503/6/030       Collection Date     Collected by -Person/Agency       3 //6 951 /030     0/30N       SITE INFORMATION       MIN - 13       Collection Site Description         Township, Range, Section, Tract:       Imal       ENVIRONIMENTAL BUREAU       Imal       ENVIRONIMENTAL BUREAU       Sample Field TREATMENT - Check proper boxes			D NATURAL R	ESOURCES DEPARTMENT
$\begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} $			INSERVATION D	DIVISION
OCD Sample No.       95 03 / 6 / 03 0         Collection Date       Collected by -Person/Agency         3 / 6 / 95 / 03 0       0 / 3 p n         Sample location       M/1 / 13         Sample location       M/1 / 13         Collection Site Description       M/1 / 13         Collection Site Description       Township, Range, Section, Tract:         Image: Section Site Description       Township, Range, Section, Tract:         Image: Section Site Description       Township, Range, Section, Tract:         Image: Section Site Description       Sample Isocation         Sample Iocation       M/1 / 13         Image: Section Site Description       Sample Section, Tract:         Image: Section Site Description       Image: Section, Tract:         Image: Section Site Description       Sample State File D TREATMENT - Check proper boxes         PO Box 2088       Image: Section, Tract:         Image: Section Site Section       Image: Section, Tract:         Image: Section Site Section       Image: Section, Tract:         Sample Section Site Section       Image: Section, Tract:         Image: Section Site Description       Image: Section, Tract:         Section Site Description       Image: Section, Tract:         Image: Section Site Description       Image: Section, Tract:	1911	ANALYS	IS REQUES	ST FORM
Collection Date Collected byPerson/Agency Collection Date Collected byPerson/Agency Collection Date Collection Time Collection Collection Date Collection	Contract Lab Analy	ical Technology		Contract No. 95-521.07-040
3 1/6 95 /030       0/20n       OCD         SITE INFORMATION         Millips       Lea       6cs       Plant         Sample location       MIJ - 13       Collection Site Description         Township, Range, Section, Tract:         Imal       +       +       +         Image Section, Tract:         Imal       NM OIL CONSERVATION DIVISION         SAMPLE FIELD TREATMENT - Check proper baxes         PO Box 2088       No. of samples submitted:       2         SAMPLING CONDITIONS         Water level       Image:       Image:         Image:       Discharge       Image:       Image:         Image:       Sample type       1/2       Image:       Amendated         Image:       Conductivity (Uncorrected)       Image:       Amendated       At: Smil conc. HNO, added         Image:       Image:       Image:       Image:       Image:       Image:       Image:         Image:       Image:       Image:       Image:       Image:       Image:       Image:         Constructivity (Uncorrected)         Image:       Image:       Image:       Image:       Image:         Image:	OCD Sample No. 95	0316 1030		
SITE INFORMATION       Millips Lee Gas Plant         Sample location       Millips Lee Gas Plant         Sample location       Millips Lee Gas Plant         Collection Site Description       Township, Range, Section, Tract:         Imal       Imal         INAL       ENVIRONMENTAL BUREAU         INAL       NM OIL CONSERVATION DIVISION         PO Box 2088       Santa Fe, NM 87504-2088         Sample torget       Imal         Bailed       XPump         Discharge       Discharge         PH(00400)       G.65         Conductivity (Uncorrected)       Imal         At:       HCL         Water Temp. (00010)       Conductivity (Uncorrected)         Gastree       FELD COMMENTS:	Collection Date Collection Time	Collected byPerson/Agency		
Sample location       MIN - 13         Collection Site Description       Township, Range, Section, Tract:         Image: Section, Tract:       Image: Section, Tract:         Sample: PORT       PO Box 2088         Sample: Sample: Section, Tract:       Image: Section, Tract:         Image: Section, Tract:	3 16 95 1030	Olson		/OCD
Collection Site Description         Township, Range, Section, Tract:         Invalue         Invalue         NM OIL CONSERVATION DIVISION         SAMPLE FIELD TREATMENT - Check proper boxes         O Box 2088         O Box 2088         SAMPLING CONDITIONS         Water level         Discharge         Discharge         Discharge         Discharge         PH(00400)         6.65         Conductivity (Uncorrected)         Water Temp. (00010)         (Conductivity at 25° C         FIELD COMMENTS:		Phillips Lee Gas 0	0/ant	
Township, Range, Section, Tract:         INAL       NM OIL CONSERVATION DIVISION         INAL       NM OIL CONSERVATION DIVISION         IEPORT       PO Box 2088         O •       Samples submitted:         Z       X         SAMPLING CONDITIONS       Water level         Bailed       Pump         Discharge       Discharge         PH(00400)       6.65         Conductivity (Uncorrected)       NA:         No. of sample type       A:         Sample type       Sample type         PH(00400)       6.65         Conductivity (Uncorrected)         Water Temp. (00010)       Conductivity at 25° C         FIELD COMMENTS:		MW - 13		
ENVIRONMENTAL BUREAU         INAL         PO Box 2088         Santa Fe, NM 87504-2088         No. of samples submitted:         INAL         ING CONDITIONS         Water level         Image         Imap				
END INAL REPORT       ENVIRONIMENTAL BUREAU NM OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088       SAMPLE FIELD TREATMENT - Check proper boxes         SAMPLING CONDITIONS       Sample submitted:       2         SAMPLING CONDITIONS       Water level       Image: State Field of the sample (Non-filtered)         Bailed       A Pump       Discharge         Dipped       Tap       Sample type         pH(00400)       6.65       Conductivity (Uncorrected)         Water Temp. (00010)       Conductivity (Uncorrected)       A:         Mater Temp. (00010)       Conductivity at 25°C       FIELD COMMENTS;				
INAL IEPORT       NM OIL CONSERVATION DIVISION       SAMPLE FIELD TREATMENT — Check proper boxes         PO Box 2088 Santa Fe, NM 87504-2088       No. of samples submitted:       2         SAMPLING CONDITIONS       Water level       XIF: Whole sample (Non-filtered)         Bailed       Pump       Discharge       F: Filtered in field with 0.45 µmembrane filter         Dipped       Tap       Sample type       Grad       A: Smi conc. HNO, added         PH(00400)       6.65       Conductivity (Uncorrected)       A: HCL       A: 4mi fuming HNO, added         Water Temp. (00010)       Conductivity at 25° C       FIELD COMMENTS:       FIELD COMMENTS:				
Santa Fe, NM 87504-2088       No. of samples submitted: 2	FINAL NM OIL CONSEF		SAMPLE F	IELD TREATMENT — Check proper boxes
Image: Sample type       Image: Sa		504-2088	No. of sample	is submitted: 2
Sample type $g \nota b$ $\Box$ NA: No acid added $\Box$ A: 5ml conc. HNO, added         pH(00400) $6 \cdot 65$ Conductivity (Uncorrected) $\Box$ A: HCL $\Box$ A: 4ml fuming HNO, added         Water Temp. (00010) $6 \cdot 7 \cdot 9$ $G$ Conductivity at 25° C       FIELD COMMENTS:	🗆 Bailed 🖄 Pump		<b>F</b> :	Filtered in field with 0.45 gmembrane filter
G 7 9 / Conductivity at 25° C FIELD COMMENTS:	ph(00400) 6.65	J 9!~b		HCL A: 4ml fuming HNO <sub>3</sub> added
	$(\neg a)$	Conductivity at 25° C	FIELD COMM	ENTS:
			<u></u>	
	L			·

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ITEM	DESC	METHOD	ITEM	DESC	METHOD	ITEM.	DESC	METHO
<b>001</b>	NOA	8020	013	PHENOL	604	□ 026	Cd	713(
X 002	VOA	602	□014	VOC	8240	027	Pb	742
003	VOH	8010	015	VOC	624	028	Hg(L)	747
004	VOH	601	016	SVOC	8250		Se	774
005	SUITE	8010-8020	017	SVOC	625	032	ICAP	601
006	SUITE	601-602	018	VOC	8260	<u> </u>	CATIONS/ANIONS	·
007	HEADSPACE		019	SVOC	8270	034	N SUITE	Į
008	PAH	8100	□ 020	O&G	9070	035	NITRATE	1
009	PAH	610	<b>[]</b> 022	AS	7060	036	NITRITE	
010	PCB	8080	023	Ba	7080	037	AMMONIA	
011	PCB	608	024	Gr	7190	038	TKN	
012	PHENOL	8040	025	Cr6	7198		OTHER	

TOT TOT		S REQUEST FORM
ontract Lab Ancly	N 1 1 1	Contract No. 95-521.07-040
OCD Sample No. 950	3161300	
Collection Date Colkection Time	Collected byPerson/Agency	
3 16 95 1300	Obon	/OCD
SITE INFORMATION Sample location	Phillips Lee Gas	Plant
Collection Site Description	<u></u>	
END ENVIRONMENTA NAL NM OIL CONSER EPORT PO Box 2088 O Santa Fe, NM 87	VATION DIVISION	Township, Range, Section, Tract:         Image: Sectin, Tract, Tract:         Imag
SAMPLING CONDITIONS	Water level Discharge	ix NF: Whole sample (Non-filtered) □ F: Filtered in field with 0.45 µmembrane filter □ PF: Pre-filtered w/45 µmembrane filter
pH(00400) 6.81 Water Temp. (00010)	Sample type 5/26 Conductivity (Uncorrected) 800 A(mho	Image: NA: No acid added       Image: A: 5ml conc. HNO, added         Image: A: HCL       Image: A: 4ml furning HNO, added         Image: A: 2ml H_SO/L added       Image: A: 4ml furning HNO, added
68.9%	Conductivity at 25° C	FIELD COMMENTS:
AB ANALYSIS REQUES	IED:	

ITEM	DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOL
_ <b></b> 001	VOA	8020	□013	PHENOL	604	□ 026	Cđ	713C
002	VOA	602	014	VOC	8240	027	Pb	7421
∕□`003	VOH	8010	<b>D</b> 015	VOC	624	028	Hg(L)	747C
004	VOH	601	016	SVOC	8250	031	Se	7740
🗖 005	SUITE	8010-8020	017	SVOC	625	□ 032	ICAP	601C
006	SUITE	601-602	018	VOC	8260	<u> </u>	CATIONS/ANIONS	· · ]
D 007	HEADSPACE		019	SVOC	8270	034	N SUITE	1
008	PAH	8100	020	O&G	9070	<b>D</b> 035	NITRATE	
009	PAH	610	□022	AS	7060	036	NITRITE	
010	PCB	8080	023	Ba	7080	037	AMMONIA	
011	PCB	608	024	Cr	7190	038	TKN	i.
012	PHENOL	8040	□ 025	C76	7198		OTHER	

	ENERGY, MINERALS AND	NATURAL RESOURCES D	EPARTMENT
P. Intr. Co.	ANALYS	REQUEST FORM	
ontract Lab <u>Ahaly</u>	itical Technology	Contract N	vo. 95-521.07-040
DCD Sample No. 95	03/6/3/0		
Collection Date Collection Tim	e Collected by —Person/Agency		
3116195 1310	Obon		JOO/
SITE INFORMATION Sample location	Phillips Lee Gas	Plant	
Collection Site Description	UU		
······································			
		T	Fownship, Range, Section, Tract:
END ENVIRONMENT NAL NM OIL CONSE EPORT PO Box 2088	AL BUREAU RVATION DIVISION	SAMPLE FIELD TREAT	MENT — Check proper boxes
Santa Fe, NM 8	7504-2088	No. of samples submitted:	2 .
	Water level Discharge		(Non-filtered) I with 0.45 Amembrane filter /45 Amembrane filter
Dipped Tap	Sample type SAL Conductivity(Uncorrected)	NA: No acid added A: HCL A: 2ml H,SO/L ad	, , A: , 4ml fuming HNO, added
Water Temp. (00010)	Conductivity at 25° C	FIELD COMMENTS:	dded X Hs Cl
	/ mho	<del>بر</del> اور این این این بان بر این این این این این ا	

ITEM	DESC	METHOD	ITEM	DESC	METHOD	ПЕМ	DESC	METHO
,□_001	VOA	8020	□013	PHENOL	604	026	Cd	713(
X 002	VOA	602	014	VOC	8240	027	Pb	742:
1⊡003	VOH	8010	015	VOC	624	028	Hg(L)	747
004	VOH	601	016	SVOC	8250	031	Se	774
🗖 005	SUITE	8010-8020	017	SVOC	625	<b>D</b> 032	ICAP	601C
006	SUITE	601-602	018	VOC	8260	🗖 033	CATIONS/ANIONS	•
007	HEADSPACE		019	SVOC	8270	034	N SUITE	
008	PAH	8100	□ 020	O&G	9070	035	NITRATE	
009	PAH	610	□022	AS	7060	036	NITRITE	
010	PCB	8080	023	Ba	7080	037	AMMONIA	
011	PCB	608	□ 024	Cr	7190	038	TKN	
012	PHENOL	8040	□ 025	Cif6	7198		OTHER	

		NATURAL RE		ENT		
THE THE T						
Contract Lab_Anely	tical Technology	(	Contract No. 75	-521.0	7-040	
OCD Sample No. 95	03/6/400					
Collection Date Collection Time	Collected by —Person/Agency	<u> </u>				
3116195 1400	Olson				/OCD	
SITE INFORMATICIN Sample location	Phillips Lee Ga MW-19	s Plent	<u> </u>			
Collection Site Description						
Primping Cocover	y well		Township, ł	Range, Section, Tra	ct: +-   +-	
REPORT PO Boy 2088	AL BUREAU RVATION DIVISION	SAMPLE FI	ELD TREATMENT -	- Check proper l	boxes	
Santa Fe, NM 87	7504-2088	No. of samples	submitted: 2	•		
		NF: Whole sample (Non-filtered)				
Bailed X Pump	Discharge	🗆 PF:	Pre-filtered w/45 <u>A</u> men	ndrane niver		
pH(00400) 6.43	Sample type 37-5 Conductivity (Uncorrected)		No acid added HCL	_ Α: 4π	nl conc. HNO, added	
Water Temp. (00010)	Conductivity at 25° C	FIELD COMME	2ml H <sub>2</sub> SO <sub>2</sub> /L added NTS:	X Ha	l'	
		L				
LAB ANALYSIS REQUES	TED:					

ITEM	DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHO
001	VOA	8020	013	PHENOL	604	□ 026	Cd	713
X 002	VOA	602	014	VOC	8240	027	Pb	742
☐ 003	VOH	8010	015	VOC	624	028	Hg(L)	747、
004	VOH	601	016	SVOC	8250	031	Se	774
🗖 005	SUITE	8010-8020	017	SVOC	625	C 032	ICAP	601
006	SUITE	601-602	018	VOC	8260	<u> </u>	CATIONS/ANIONS	·
D 007	HEADSPACE		019	SVOC	8270	034	N SUITE	
008	PAH	8100	□ 020	O&G	9070	<b>D</b> 035	NITRATE	I
009	PAH	610	□ 022	AS	7060	036	NITRITE	-
010	PCB	8080	023	Ba	7080	037	AMMONIA	
011	PCB	608	024	Cr	7190	D 038	TKN	
012	PHENOL	8040	025	C76	7198		OTHER	

	ENERĠY, M				TMENT				
			ONSERVATION	-					
		ANALY	SIS REQUE	ST FORM					
Contract Lab Aha	lytical Terhno	loy_		Contract No.	95-57	21.07-	040		
OCD Sample No. 9	503161440								
Collection Date Collection T	ime Collected by Person/	Agency			<u> </u>				
3,16,95 1440	) Olson		<u>.                                    </u>				/OCD		
SITE INFORMATION		2 625	Plant						
Sample location	MW-17			······································					
Collection Site Description	<u> </u>	<u> </u>	·· <u>····</u>	<u></u>		<u> </u>			
	· · · · · · · · · · · · · · · · · · ·			Townsh	ip, Range, Sec	tion, Tract:			
SEND ENVIRONMEN	ITAL BUREAU					·····	<u> </u>		
	ERVATION DIVISION		SAMPLE	FIELD TREATMENT	Г— Checkµ	oroper boxes	·		
то ы FO Box 2008 Santa Fe, NM	87504-2088		No. of sampl	es submitted: 2	•				
SAMPLING CONDITION	IS Waterlevel		□ F:						
Bailed XPump	Discharge								
pH(00400)	Sample type			: No acid added			HNO, added		
Water Temp. (00010)	Conductivity (Uncorrected)	Иm		HCL 2mi H <sub>s</sub> SO <i>,</i> /L added		A: 4ml furning $H_5 CL$	g HNO, added		
	Conductivity at 25° C	ml ہم	FIELD COM	MENTS:					
	<u> </u>		~	······					
			<u> </u>				'ــــــــــــــــــــــــــــــــــــ		
LAB ANALYSIS REQUI	ESTED:								
TEM DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOD		
	8020	□013	PHENOL	604	026	Cd	7130		
002 VOA	602 8010	□014 □015	VOC VOC	8240 624	□ 027 □ 028	Pb Hg(L)	<b>742</b> 1 <b>74</b> 70		
□ 004 VOH	601	016	SVOC	8250	🗖 031	Se	7740		

SVOC

VOC

SVOC

O&G

AS

Ba

Cr

Cr6

017

018

019

020

□022

□023

□024

□ 025

625

8260

8270

9070

7060

7080

7190

7198

ICAP

N SUITE

NITRATE

NITRITE

TKN

OTHER

AMMONIA

CATIONS/ANIONS

032

🗆 035

036

037

038

6010

SUITE

SUITE

PAH

PAH

PCB

PCB

PHENOL

HEADSPACE

□ 005

006

□ 008

009

010

011

012

8010-8020

601-602

8100

610

8080

608

8040

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL	<b>RESOURCES DEPARTMENT</b>
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**OIL CONSERVATION DIVISION** 

ATI# 503354

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			LABORATOR	Y SAMPL	E RI	ECOR	D							
PROJ. NO. PROJECT NAME	Læ	64	, Plant	NO.							/	•		
SAMPLERS: Isignaliure)				OF		Ň	Y.	V»	∛∕∕			· REMARI	KS	
O/son	r			CON- TAINERS		$\langle g \rangle$	X	/ J	$\bigvee$					
DATE TIME	ļ	STATIC	DN LOCATION			£/c	Ž	Ž	//				•	······
950315 1300	Clav	e Joi	nes Windmill	\$4	2	]	1			ALA	1/1mo	my.A	3, BG, BE	5 
950316 0845	M	W-	12	2				2		cdica	- CK	$(o_1 u)$	, Fe, to	<u>'</u>
11 0930	M	W -	$\overline{n}$	2				2		May!	hpyl	9 Ni	Kiseis	a.Ag
11 1030	M	1W-	13	2				2		Ha,-	$\overline{1}, V_{t}$	n, to	!	
11 1200	1	1W-	15	2				2						
11 12/0	M	111-	6	2				2		FLB	- Alk	J.C.	204,TLS	·
1 1/00	/	1W -	-19	2				2		pH,E	í j			
11		<u>4W-</u>	17	2				2						
								_+						
		<del></del>		· · · ·									<del>و الحالة (</del> بربوره مربع <sub>ا</sub> لمربوع الم	
			·											
				<u> </u>	ļ					I		·······	: (Signature)	
Relinquished by: foreverures	Date		Acceived by: ISignature	-					NTACT		5 🗆 NO		•	
1 ja Joon -	5/17/95	1450	P. Ulla	<u>×</u>	ļ		SEA	L2 I	NIACI				: (Signature)	
Relinquished by: Isopherurel	Date	/Time	Received by: (Signatura)	)										
Relinguished by: (Signature)	Date	/ Time	Received for Laborator	γ bγ:	<u>از ا</u>	Date	/Tin	18	Aemar	k	_ <b>i</b>	<u></u>		
			(Signalura)											
Distribution: Or	Igenal Acces	mpanias 8	hipment; Copy to Casidina	ar field file	•			-						

	STATI	e of New Mexi NATURAL RE	
		NSERVATION D	IVISION
101.101	ANALYSI	S REQUES	T FORM
Contract Lab	itical Technology		Contract No. <u>95-521.07-040</u>
OCD Sample No. 95	0316 0845		
Collection Date Collection Time 3   16   95 0845	Collected by —Person/Agency		/OCD
SITE INFORMATION Sample location	Phillips Lee Gas MW-12	Plant	
Collection Site Description			
			Township, Range, Section, Tract:
REPORT DO Boy 2088	AL BUREAU RVATION DIVISION	SAMPLEF	ELD TREATMENT — Check proper boxes
Santa Fe, NM 87	504-2088	No. of samples	s submitted: 2.
SAMPLING CONDITIONS	Waterlevel Discharge	⊠ NF: □ F: □ PF:	Whole sample (Non-filtered) Filtered in field with 0.45 //(membrane filter Pre-filtered w/45 //(membrane filter
pH(00400) 6.8.5 Water Temp. (00010)	Sample type grab Conductivity (Uncorrected) 1730 Amho		No acid added $\Box$ A:5ml conc. HNO, addedHCL $\Box$ A:4ml fuming HNO, added2ml H <sub>2</sub> SO /L added $A$ $H_{G}$ C
67.5°F	Conductivity at 25° C M mho	FIELD COMM	

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ПЕМ	DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOD	
<b>001</b>	VOA	8020	013	PHENOL	604	026	Cd	7130	
002	VOA	602	<b>014</b>	VOC	8240	D 027	Pb	7421	
003	VOH	8010	015	VOC	624	028	Hg(L)	7470	
004	VOH	601	016	SVOC	8250	031	Se	7740	
005	SUITE	8010-8020	017	SVOC	625	032	ICAP	6010	
006	SUITE	601-602	018	VOC	8260		CATIONS/ANIONS		
007	HEADSPACE		019	SVOC	8270	034	N SUITE		
□ 008	PAH	8100	□ 020	O&G	9070	035	NITRATE		
009	PAH	610	022	AS	7060		NITRITE		
010	PCB	8080	023	Ba	7080		AMMONIA		
011	PCB	608	024	Cr	7190	038	TKN		
012	PHENOL	8040	025	C76	7198		OTHER		

1011-01	•	NSERVATION D				
		s reques	SI FORM			
ntract Lab_An <ly< th=""><th>cal Technolosy</th><th></th><th>Contract No. 95-521.07-040</th></ly<>	cal Technolosy		Contract No. 95-521.07-040			
OCD Sample No. 95C	2316 1030					
Dilection Date Collection Time	Collected byPerson/Agency		· · · · · · · · · · · · · · · · · · ·			
5/16/95 1030	Olson		/OCD			
SITE INFORMATION	Millips Lee Gas A	Plant				
Collection Site Description	11/- 13					
			Township, Range, Section, Tract:			
······································						
ND ENVIRONMENTAL						
PORT PO Box 2088		SAMPLE FIELD TREATMENT — Check proper boxes				
Santa Fe, NM 875	04-2088	No. of sample	es submitted: 2			
	later level	⊠(NF: □ F: □ PF:	Filtered in field with 0.45 <i>(membrane filter</i>			
Bailed X Pump [ Dipped Tap	Discharge	L Pr:	Pre-filtered w/45 Amembrane filter			
pH(00400)	Sample type grab	□ NA: □ A:				
Water Temp. (00010)	Conductivity (Uncorrected)		HCL $\Box$ A: 4ml fuming HNO, added 2ml H <sub>2</sub> SO /L added $\Delta$ $H_{\odot}$			
	Conductivity at 25° C	FIELD COMM				
	,					
	<u></u>					

#### ITEM DESC METHOD TEM DESC METHOD ITEM DESC METHOD □ 001 × 002 □ 003 VOA 8020 □013 PHENOL 604 026 Cđ 7130 VOA 602 VOC 014 8240 027 Pb 7421 VOH 8010 015 VOC 624 7470 028 Hg(L) 004 VOH 601 016 SVOC 8250 7740 031 Se 005 SUITE 8010-8020 SVOC 017 625 ICAP 032 6010 006 SUITE 601-602 VOC 8260 018 🗆 033 CATIONS/ANIONS 007 HEADSPACE SVOC 8270 019 034 N SUITE □ 008 PAH 8100 □ 020 O&G 9070 035 NITRATE 009 PAH 610 □022 AS 7060 NITRITE 036 010 PCB 8080 023 7080 Ba AMMONIA 037 PCB 608 011 □024 Cr 7190 038 TKN PHENOL 025 012 8040 **C16** 7198 OTHER

A THE FTANK	STAT	E OF NEW MEXICO
100.000		NSERVATION DIVISION
	ANALYS	IS REQUEST FORM
Contract Lab <u>Ancl</u>	itical Technology	Contract No. 95-521.07-040
OCD Sample No. 95	03161300	
Collection Date Collection Tim	e Collected by —Person/Agency	
3 16 95 1300	Obon	/OCD
SITE INFORMATION Sample location	Phillips Lee Gas MW-15	Plant
Collection Site Description	<u> </u>	
		Township, Range, Section, Tract:
END ENVIRONMENT	AL BUREAU	SAMPLE FIELD TREATMENT — Check proper boxes
PO Box 20B8 Santa Fe, NM 8	7504-2088	No. of samples submitted: 2
SAMPLING CONDITIONS	Water level Discharge	KF: Whole sample (Non-filtered)     F: Filtered in field with 0.45 µmembrane filter     PF: Pre-filtered w/45 µmembrane filter
pH(00400) 6.81 Water Temp. (00010)	Sample type 51%6 Conductivity (Uncorrected) 800 A(mho	$\square A: HCL \square A: 5ml conc. HNO, added  \square A: HCL \square A: 4ml furning HNO, added  \square A: 2ml H_SO_L added  \square A: 2ml H_SO_L added  \square A: 4ml furning HNO_1 added  \square A: 4ml furning HNO_2 added  \square A: 4ml furning HNO_2 added $
68.9°F	Conductivity at 25° C	FIELD COMMENTS:

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### LAB ANALYSIS REQUESTED:

ITEM	DESC	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOD
001	VOA	8020	□013	PHENOL	604	□ 026	Cd	7130
002	VOA	602	014	VOC	8240	027	Pb	7421
<b>^</b> □ 003	VOH	8010	015	VOC	624	028	Hg(L)	7470
004	VOH	601	016	SVOC	8250	031	Se	7740
🗖 005	SUITE	8010-8020	<b>[</b> ]017	SVOC	625	032	ICAP	6010
006	SUITE	601-602	018	VOC	8260		CATIONS/ANIONS	
007	HEADSPACE		019	SVOC	8270	034	N SUITE	
D 008	PAH	8100	□ 020	O&G	9070	035	NITRATE	1
009	PAH	610	□ 022	AS	7060	036	NITRITE	
010	PCB	8080	023	Ba	7080		AMMONIA	
011	PCB	608	□ 024	Cr	7190	038	TKN	
012	PHENCIL	8040	025	Cr6	7198		OTHER	ter in state of the state of th

	ENERGY, MINERALS AND	e of new mex NATURAL R NSERVATION D	ESOURCES DEPARTMENT			
1011-022	ANALYSI	s reques	ST FORM			
Contract Lab Analy	tical Technology		Contract No. <u>95-521.07-040</u>			
OCD Sample No. 95	03/6/3/0					
Collection Date Collection Time	Collected by —Person/Agency		/OCD			
SITE INFORMATION Sample location	Phillips Lee Gas MII-6	Plant				
Collection Site Description						
			Township, Range, Section, Tract:			
ENVIRONMENT	AL BUREAU RVATION DIVISION	SAMPLEF	IELD TREATMENT — Check proper boxes			
Santa Fe, NM 87	/504-2088	No. of samples submitted: 2				
SAMPLING CONDITIONS	Water level Discharge	∑ NF: □ F: □ PF:	Whole sample (Non-fillered) Filtered in field with 0.45 Amembrane filter Pre-filtered w/45 Amembrane filter			
pH(00400) Water Temp. (00010)	Sample type S/S/D Conductivity(Uncorrected)	□ NA: □ A: □ A:	No acid added $\Box$ A: 5ml conc. HNO, added HCL $\Box$ , A: 4ml fuming HNO, added 2ml H <sub>2</sub> SO <sub>2</sub> L added $H_5$ CL			
	Conductivity at 25° C	FIELD COMM				

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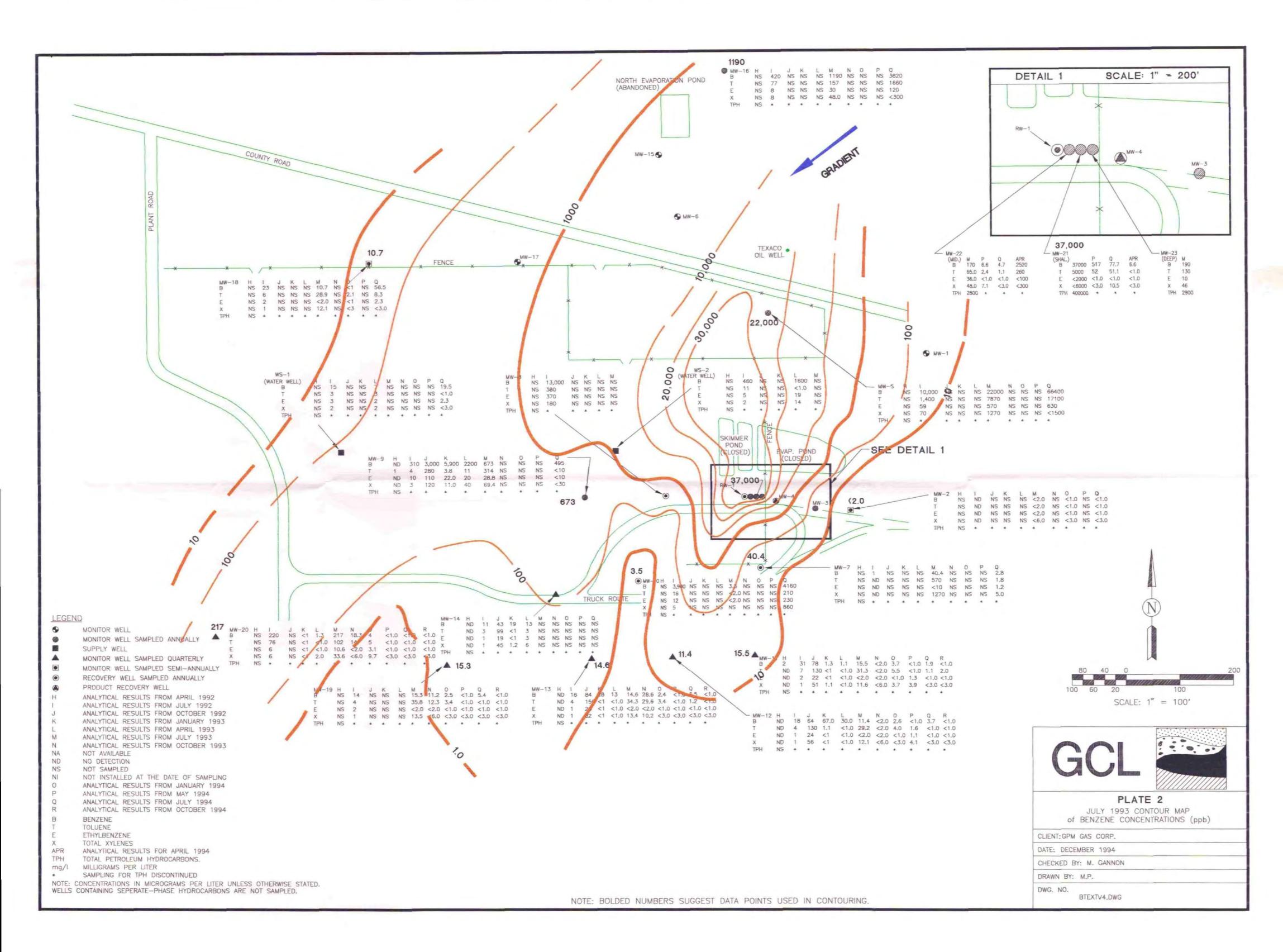
ITEM	DESC:	METHOD	ITEM	DESC	METHOD	ITEM	DESC	METHOD
.□_001	VOA	8020	□013	PHENOL	604	□ 026	Cd	7130
002	VOA	602	014	VOC	8240	027	Pb	7421
1003	VOH	8010	□015	VOC	624	028	Hg(L)	7470
004	VOH	601	<b>D</b> 016	SVOC	8250	<b>1</b> 031	Se	7740
🗖 005	SUITE	8010-8020	<b>D</b> 017	SVOC	625	032	ICAP	6010
006	SUITE	601-602	018	VOC	8260	033	CATIONS/ANIONS	
🗖 007	HEADSPACE		019	SVOC	8270	034	N SUITE	
008	PAH	8100	□ 020	O&G	9070	□ 035	NITRATE	
009	PAH	610	□ 022	AS	7060	036	NITRITE	
010	PCB	8080	<b>[</b> ] 023	Ba	7080	037	AMMONIA	
011	PCB	608	024	Cr	7190	038	TKN	
012	PHENOL	8040	025	Cr6	7198		OTHER	and and a second second second second

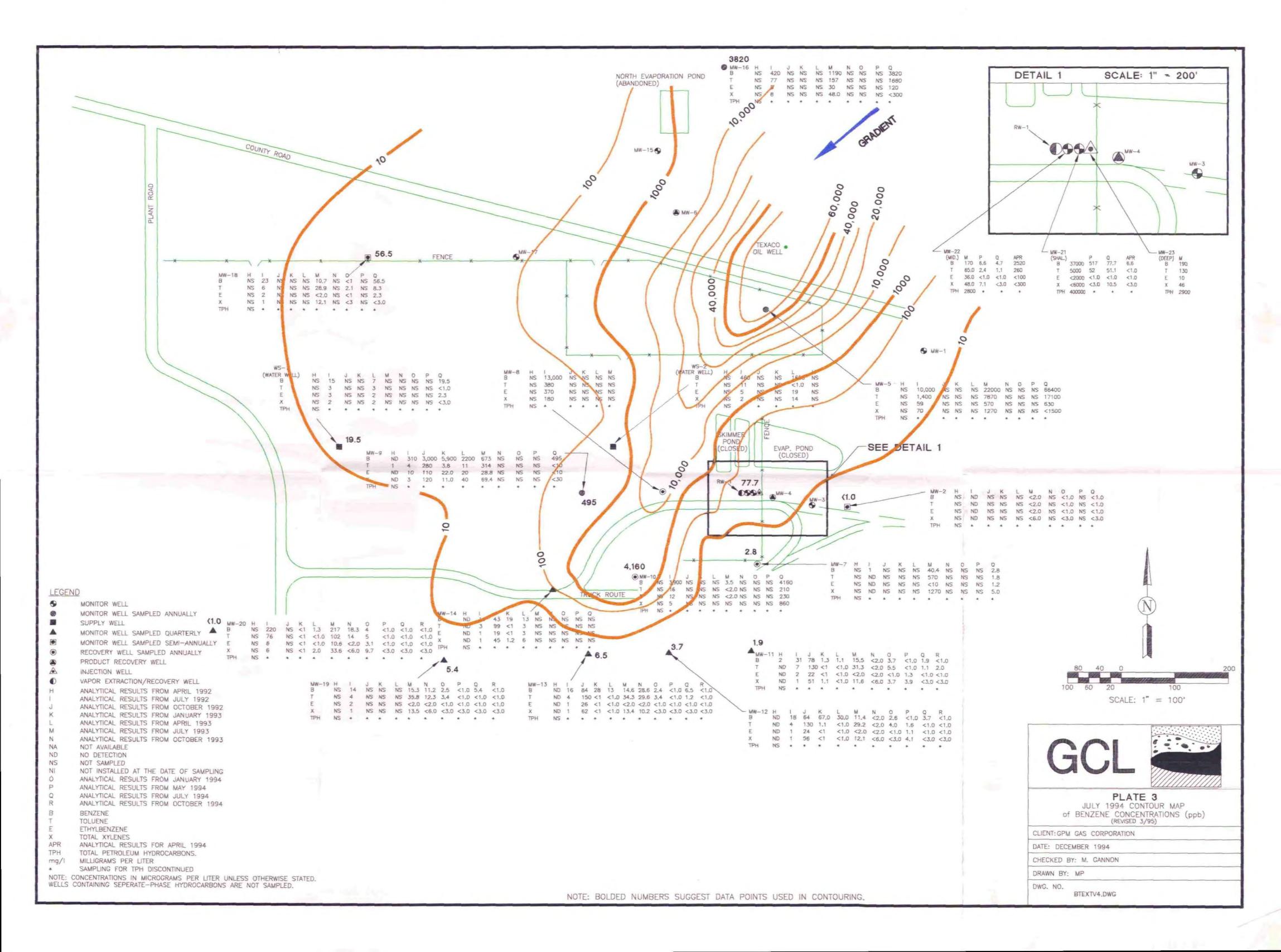
STATE OF NEW MEXICO ENERGY. MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION ANALYSIS REQUEST FORM Contract Lab <u>Analytical Technology</u> Contract No. <u>95-521.07-040</u> OCD Sample No. <u>9.5-03/6/400</u> Collection Date Collected by -Person/Agency										
OIL CONSERVATION DIVISION ANALYSIS REQUEST FORM Contract Lab <u>Analytical Technology</u> Contract No. <u>95-521.07-040</u> OCD Sample No. <u>9.5-03/6/400</u>										
ANALYSIS REQUEST FORM Contract Lab <u>Analytical Technology</u> Contract No. <u>75-521.07-040</u> OCD Sample No. <u>9.5-03/6/400</u>										
Contract Lab <u>Analytical Technology</u> Contract No. <u>95-521.07-040</u> OCD Sample No. <u>9.5-03/6/400</u>										
OCD Sample No. 9.5-03/6/400										
Collection Date Collection Time Collected by —Person/Agency	OCD Sample No. 9.5-03/6/400									
Collection Date Collection Time Collected by —Person/Agency										
3/16/95 1400 Olson	20									
	$\neg$									
SITE INFORMATION Phillips Lee Gas Ment										
Sample location NW-19										
Collection Site Description										
pinping recovery well Township, Range, Section, Tract:										
SEND ENVIRONMENTAL BUREAU										
FINAL NM OIL CONSERVATION DIVISION SAMPLE FIELD TREATMENT — Check proper boxes PO Box 2088	SAMPLE FIELD TREATMENT — Check proper boxes									
Santa Fe, NM 87504-2088 No. of samples submitted: 2										
SAMPLING CONDITIONS Waterlevel										
F: Filtered in field with 0.45 Amembrane filter										
Bailed Pump Discharge Discharge										
Dipped Tap Sample type /										
pH(00400) / (13 $3755$ $100$ NA: No acid added $100$ A: 5ml conc. HNO <sub>3</sub> added	,									
Water Temp. (00010) Conductivity (Cincorrected) A: HCL A: 4ml fuming HNO, added										
67.7 °F Conductivity at 25°C FIELD COMMENTS:										
	-									

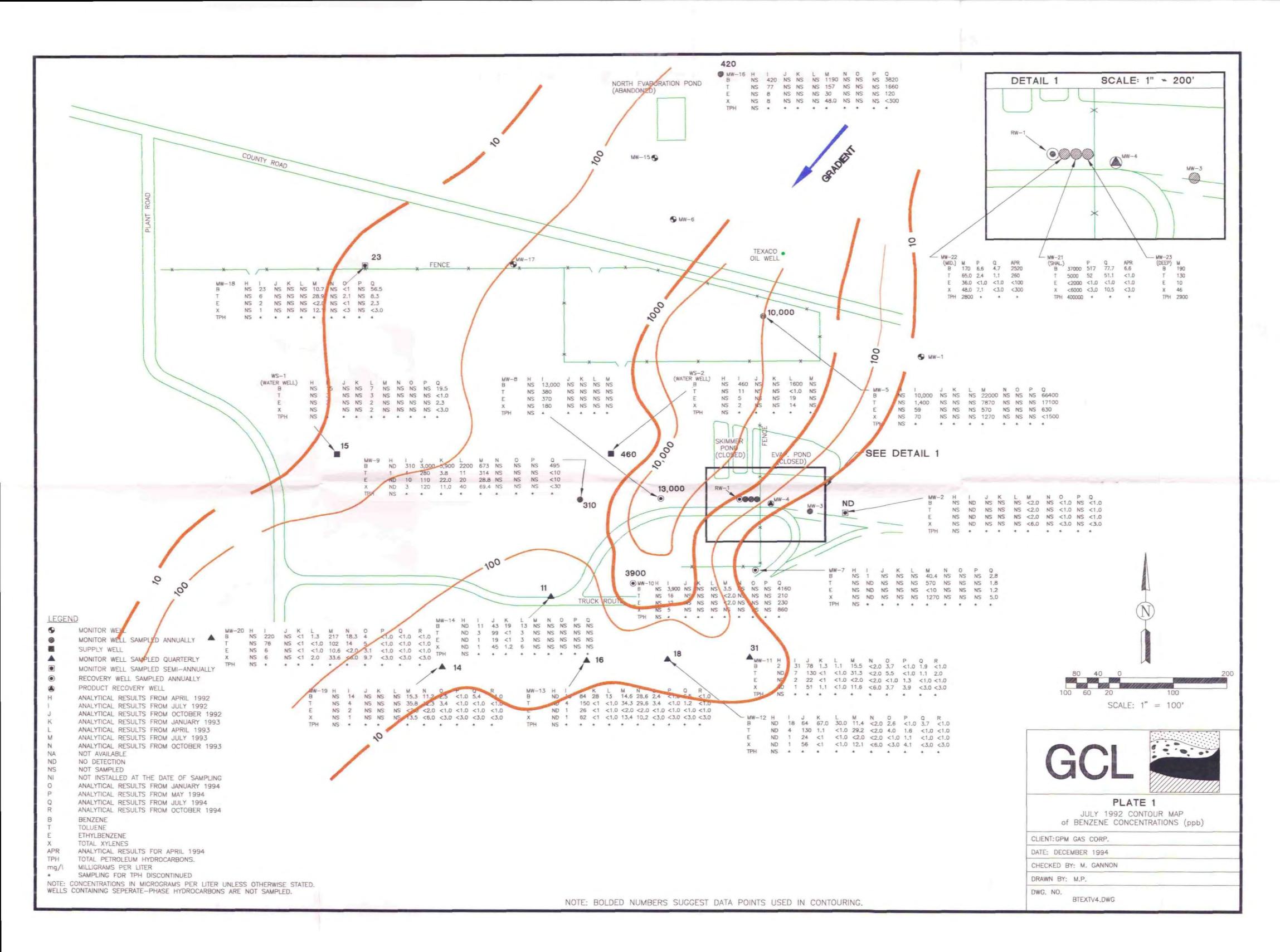
ITEM	DESC	METHOD	<u>ITEM</u>	DESC	METHOD	ITEM	DESC	METHOD	:
001	VOA	8020	□013	PHENOL	604	□ 026	Cd	7130	
<b>X</b> 002	VOA	602	□014	VOC	8240	027	Pb	7421	
∕□ 003	VOH	8010	015	VOC	624	028	Hg(L)	7470	
004	VOH	601	016	SVOC	8250	031	Se	7740	
<b>D</b> 005	SUITE	8010-8020	<b>017</b>	SVOC	625	032	ICAP	6010	
006	SUITE	601-602	018	VOC	8260	033	CATIONS/ANIONS		
007	HEADSPACE		019	SVOC	8270	034	N SUITE		
<b>□</b> 008	PAH	8100	□ 020	O&G	9070		NITRATE		
009	PAH	610	022	AS	7060		NITRITE		
010	PCB	8080	023	Ba	7080		AMMONIA		
011	PCB	608	024	Cr	7190		TKN		i
012	PHENOL	8040	025	Cr6	7198		OTHER		

THEFTAN	STAT	E OF NEW MEX	ICO					
	ENERGY, MINERALS AND	D NATURAL RESOURCES DEPARTMENT						
		CONSERVATION DIVISION						
1013	ANALYS	S REQUES	T FORM					
Contract Lab Ana	lyfical Technology		Contract No. 25-521.07-040					
OCD Sample No. 93	503161440							
Collection Date Collection Ti	me Collected by —Person/Agency							
3 16 95 1440	Clisim		/OCD					
SITE INFORMATION Sample location	Phillips Lee Gas 1	Plant						
Collection Site Description	<u>MW - 11</u>							
			Township, Range, Section, Tract:					
SEND ENVIRONMEN								
FINAL NM OIL CONS	ERVATION DIVISION	SAMPLE FIELD TREATMENT — Check proper boxes						
TO DO Box 2088 Santa Fe, NM 8	87504-2088	No. of samples submitted: 2						
SAMPLING CONDITION	S Waterlevel	NF: Whole sample (Non-filtered) F: Filtered in field with 0.45 <i>(</i> , membrane filter						
Bailed Drump	Discharge	🗆 PF:	Pre-filtered w/45 Amembrane filter					
pH(00400)	Sample type		No acid added A: 5ml conc. HNO, added					
Water Temp. (00010)	Conductivity (Uncorrected)	□ A: □ A:	HCL $\square$ A: 4ml furning HNO, added 2ml H, SO, /L added $H_5$ CL					
	Conductivity at 25° C	FIELD COMMENTS:						
L								

<u>ITEM</u>	DESC:	METHOD	<b>TEM</b>	DESC	METHOD	ITEM	DESC	METHOD
001	VOA	8020	□013	PHENOL	604	□ 026	Cd	7130
¥ 002	VOA	602	□014	VOC	8240	027	Pb	7421
003	VOH	8010	□015	VOC	624	028	Hg(L)	7470
004	VOH	601	016	SVOC	8250	031	Se	7740
005	SUITE	8010-8020	017	SVOC	625		ICAP	6010
□ 006	SUITE	601-602	018	VOC	8260	033	CATIONS/ANIONS	
007	HEADSPACE		019	SVOC	8270	034	N SUITE	
008	PAH	8100	□ 020	O&G	9070	□ 035	NITRATE	
🗖 009	PAH	610	022	AS	7060	□ 036	NITRITE	
010	PCB	8080	023	Ba	7080	037	AMMONIA	
011	PCB	608	024	Cr	7190	038	TKN	
012	PHENOL	8040	□ 025	C76	7198		OTHER	







DISCHARGE PLAN STATUS AS OF 04/13/94

DISCHARGE PLAN NO: GWOOZ Philips Lee GP

EXPIRES:03/16/96

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OWNER: PHILLIPS 66 NAT GAS CO FACILITY: LEE(BUCKEYE) TYPE: GAS PLANT STATUS: ACTIVE

#### SW4SE4 SECTION 30 TWP 17S RGE 35E LEA COUNTY, NEW MEXICO LAND STATUS: STATE

DP STATUS: RENEWED DEPTH TO GROUNDWATER: 85 ft GROUNDWATER QUALITY: 600 TDS FIRST APPROVAL: 03/16/81 DATE REQUESTED: 07/26/90 DATE RECEIVED: 12/17/90 EXTENSION TO: 1 1 DATE RENEWED: 03/18/91 MODIFIED: 1 1 Y **REMEDIATION?** 

DISCHARGE	VOLUME	:	47000	gal
DISCHARGE	QUALIT	יY:	5300	TDS
DISCHARGE	то:	CLAS	S II '	WELL
FI	ROM:	ON-G	RADE	TANKS
FI	ROM:			
ALBUQUERQU	JE NOTI			
LOCAL NOT	[CE:		01/18	/91

LAST INSPECTION: 02/05/91

#### DISCHARGE PLAN STATUS AS OF 04/13/94

	MONITORING REQUIREMENTS	
MONTHLY	1. MONITOR WELL WATER LEVELS	
MONTHLY	2. MONITOR WELL PRODUCT THICKNESS	
	3 GROUND WATER ANALYSIS FOR MW-9	
QUARTERLY	MW-11,MW-12,MW-13,AND MW-14	
	4. GROUND WATER ANALYSIS FOR WS-1,	
II-ANNUALLY	AND WS-2 SEM	
	5. GROUND WATER FROM WELLS W/O	
ANNUALLY	FREE PHASE PETROLEUM	

GW002

REPORTING REQUIREMENTS

1. GROUND WATER ANALYSES

2. DP MODIFICATION FOR DISPOSAL OF FLUIDS GENERATED FROM RECOVERY WELLS. QUARTERLY

START-UP

#### DISCHARGE PLAN STATUS AS OF 04/13/94

08/19/85	OCD LETTER TO PHILLIPS REMINDING THEM TO
	SEND APPLICATION FOR DP RENEWAL PRIOR TO EXPIRATION DATE
02/20/86	PHILLIPS SUBMITS DP RENEWAL APPLICATION
02/21/86	OCD INSPECTS FACILITY
02/26/86	OCD LETTER TO PHILLIPS OUTLINING DEFICIENCIES AND REQUESTING
	COMMITMENT TO CORRECT
02/12/06	PHILLIPS LETTER REQUESTING EXTENSION TO
03/12/86	
	6/1/86 TO DISCHARGE W/O A DP WHILE
00/17/06	EVALUATING DEFICIENCIES
03/17/86	OCD LETTER GRANTING EXTENSION TO 6/1/86
03/31/86	LETTER FROM US DOI NOT CONTESTING
	RENEWAL
04/14/86	PHILLIPS COMMITS TO CORRECT DEFIEIENCIES
	WITH TIMETABLE
05/08/86	PHILLIPS SUBMITS MONITOR WELL SAMPLE
	RESULTS
02/05/87	PHILLIPS REQUESTS 90 DAY EXTENSION TO
	INSTALL DRAIN SYS
02/11/87	OCD APPROVES EXTENSION
02/23/87	PHILLIPS SUBMITS DESIGNS OF ENGINE ROOM
-	DRAIN SYSTEM
06/05/87	PHILLIPS NOTIFICATION PAD DRAIN SYS IN
	OPERATION
07/26/90	OCD REQUESTS DP RENEWAL APPLICATION
12/17/90	OCD RECEIVES RENEWAL APPLICATION
02/05/91	OCD INSPECTS FACILITY (ANDERSON, OLSON,
, ,	BROWN)
02/25/91	OCD LETTER REQUESTING ADDITIONAL
	INFORMATION
03/01/91	PHILLIPS RESPONDS TO OCD 2/25/91
00/01/21	REQUESTS
03/18/91	OCD APPROVES DP RENEWAL

GW002

REMARKS





August 13, 1993

Mr. Bill Derick Phillips Petroleum 1411 W. Second St. Odessa, Texas 79762

Dear Mr. Derrick:

As a follow-up to our phone conversation earlier today, the following facility is currently permitted to accept sand trap waste from car washes and similar operations:

> E.E. Taylor, Owner Lea County Septic Tank Service P.O. Box 703 Hobbs, New Mexico 88240 (505)397-2382

The Lovington Wastewater Treatment Plant is not permitted to accept sand or grease trap waste.

The Ground Water Section appreciates your response to the Lovington Septic Service illegal dumping incident and your assurance that wastes generated at your wash racks will be sent to a permitted facility. If you need additional information, feel free to call me at (505)827-2945.

0111

Bruce King Governor

Judith M. Espinosa Secretary

Ron Curry Deputy Secretary

. . . . . . . . . . .

(arold Runnels Building 1.190 St. Francis Drive P.O. Box 26110 Santa Fe. NM 87502 (505) 827-2850 FAX (505) 827-2836



Sincerely,

the att

Marcy Leavitt Program Manager, Groundwater Section Groundwater Protection and Remediation Bureau

cc: Bridget Jacober, State Land Office

June 10, 1993 Page 2

GPM has now revised the sampling schedule to comply with the Discharge Plan GW-2 Modification approved on April 26, 1993. The new quarterly, semi-annual and annual sampling schedules are provided below.

#### Quarterly

- MW-11, MW-12, MW-13, MW-19 and MW-20 for dissolved aromatics (BTEX) using EPA method 602
- Depth to groundwater and product thickness measurements from all monitor wells

#### Semi-annually

• MW-2 and MW-18 for dissolved aromatics (BTEX) using EPA method 602

#### Annually

 MW-5, MW-7, MW-9, MW-10 and MW-16 for dissolved aromatics (BTEX) using EPA method 602

This new schedule will be adopted during our next quarterly sampling event set for July. We will conduct semi-annual and annual sampling during this time as well. If you have any questions or comments regarding the contents of this letter, please call me at (915) 368-1085.

Sincerely,

Vince Bernard Safety & Environmental Supervisor New Mexico Region

cc: Maureen Gannon - H+GCL Albuquerque S.J. Seeby M.S. Nault



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State of New Mexico

OFFICE OF THE

#### Commissioner of Public Lands

RAY B. POWELL COMMISSIONER

Santa Fe

P.O. BOX 1148 SANTA FE, NEW MEXICO 87504-1148

BY FAX AND MAIL

August 3, 1993

Marcy Leavitt Groundwater Section Environment Department 1190 St. Francis Drive Santa Fe, NM 87503

RE: Waste Water Discharge onto State Trust Lands

Dear Ms. Leavitt:

Following on the fax machine is a copy of a report by Leon Anderson, a Land Use Specialist with the State Land Office. Mr. Anderson's telephone number is 392-8796 if you need additional information.

Would you please review the report and call me at 827-5856 concerning your recommendations as to the action that should be taken. In particular, we are considering whether to file a complaint with ED for Lovington Septic Tank Service's illegal dumping and possible groundwater contamination.

I have provided a copy of this same report to Roger Anderson of OCD because fluids under their jurisdiction may also be involved. I would like to set up a meeting with you, Roger and State Land Office employees at your earliest convenience to discuss a course of action. Please let me know what time might work for you.

Thank you for your assistance in this matter.

Sincerely yours,

Bridget Jacober Associate Counsel

cc: Roger Anderson OCD

> Dennis Garcia Leon Anderson Janet Whitte SLO Field Division

June 18, 1993

LA-SA-029

TO: Ray B. Powell, Commissioner of Public Lands Santa Fe. New Mexico

FROM: Leon Anderson, Land Use Specialist Hobbs, New Mexico Leon Anderson

SUBJECT: Illegal Dumping on State Trust Land Lovington Septic Tank Service

#### SYNDPSIS

On June 15, 1993 while conducting a field inspection, Mr. D. H. Roberson, employee of Lovington Septic Tank, was seen discharging waste water into a caliche pit located in Section 1, T18S, R34E.

I requested Mr. Roberson to cease operation immediately and questioned the contents of water being discharged illegally. Mr. Roberson informed me he had gotten the water from the Buckeye Phillips Plant. The water was from a sand trap at the facility.

I informed Mr. Roberson he was trespassing on state trust land and the dumping of any liquids was illegal. He then informed me he would take the remaining contents to the Lovington disposal.

Once Mr. Roberson left the site, a Texaco pumper came up and informed me this company had been discharging fluids on surface properties throughout the Buckeye area for quite some time.

Upon returning to the office, I telephoned Phillips Petroleum in reference to the fluid contents from the sand trap. Mr. Bill Derick with Phillips said that the fluid was from a wash rack at the Buckeye Garage. The washing material was bio-degradable soap and non-hazardous or toxic.

I told Mr. Derrick that I was concerned about the possibility of other material in the tank truck prior to arriving at the Phillips facility.

Mr. Derick informed me that he would personally get in touch with Lovington Septic Service and make sure they disposed of future water picked up at the Phillips facility as contracted or they would cease doing business with the contractor. The water is contracted to be disposed of in the Lovington disposal facility.

I made Mr. Derick aware of the memo to my supervisor advising him of this trespass.

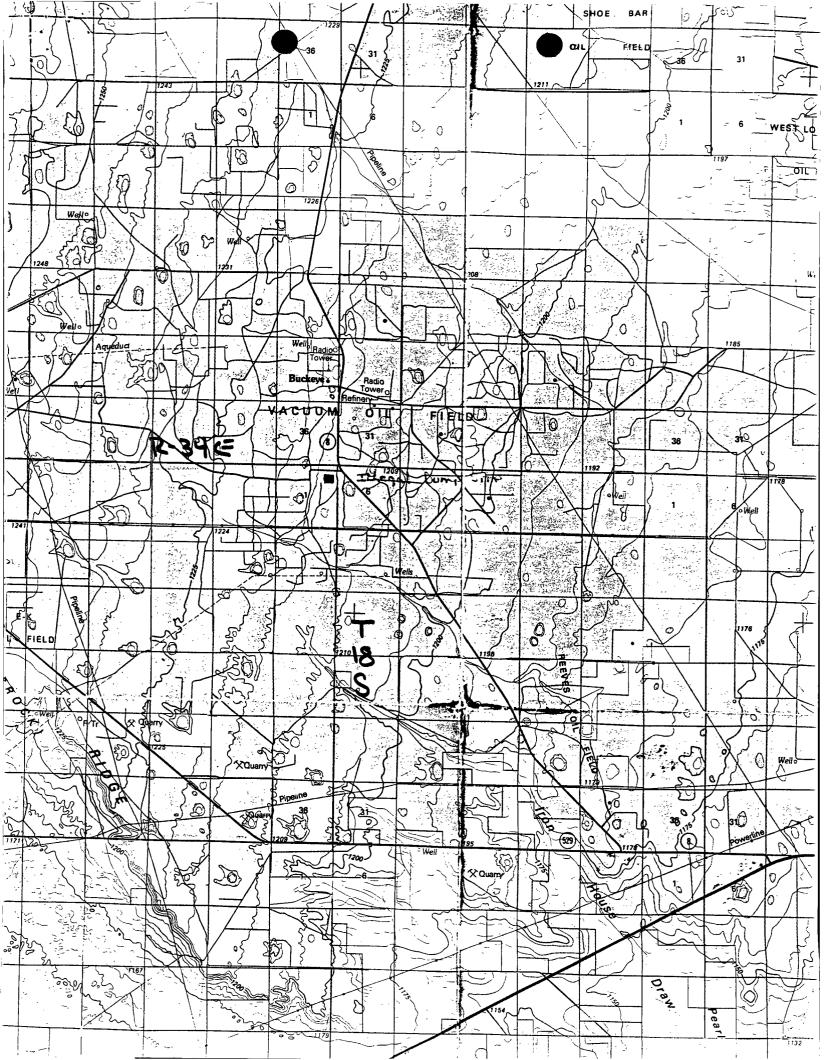
No samples of the water were taken due to the lack of proper safety equipment needed for sampling unknown fluids.

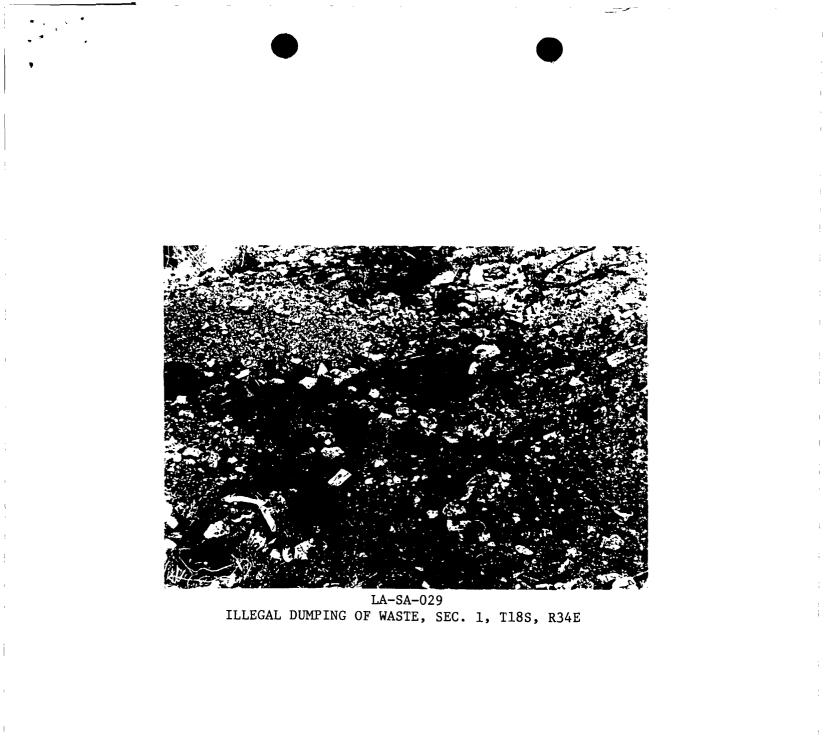
If further information is necessary, please do not hesitate to contact me.

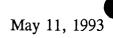
June 18, 1993

The address for Lovington Septic Tank is as follows:

Lovington Septic Tank and Waste Service Bel Dente Pis-368-1340 Bel Dent Thomportution Grand Supply 916 South 3rd









GPM GAS SERVICES COMPANY

A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK ODESSA, TX 79762

Discharge Plan GW-2 Modification Filing Fee - Lee Gas Plant

William J. LeMay, Director
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Dear Mr. LeMay:

Pursuant to New Mexico Water Quality Control Commission (WQCC) Regulation 3-114, discharge plan fees, GPM Gas Corporation submits to the Oil Conservation Division the filing fee for the modification of the Lee Gas Processing Plant Discharge Plan (GW-2), as approved by your letter of April 26, 1993.

Please find enclosed a check payable to NMED-Water Quality Management in the amount of fifty (50) dollars. Also, pursuant to Section 3-114.B.5, the flat fee of one-thousand six-hundred and sixty-seven dollars and fifty cents (\$1667.50) for gas processing plants is waived, as this modification request resulted in little or no investigative or issuance costs to the Oil Conservation Division.

Please contact me at (915) 368-1085 should you have any question regarding this issue. Thank you.

Sincerely,

Vincent B. Bernard Safety & Environmental Supervisor New Mexico Region

/sm

cc: Jerry Sexton, OCD Hobbs Office



OIL CONSERVENON DIVISION RECEIPT

'92 F.J : 11 fat 10 15

INTER-OFFICE CORRESPONDENCE / SUBJECT:

July 27, 1992\*

Lee Gasoline Plant <u>H2S Contingency Plan</u>

William J. Lemay, Director New Mexico Oil Conservation Commission State Land Office Building P. O. Box 2088 Hobbs, New Mexico 87504-2088

Dear Mr. Lemay:

In connection with GPM Gas Corporation's (formerly Phillips 66 Natural Gas Company) Lee Gasoline Plant, you will find the following:

Revised H2S Contingency Plan for this facility; and Revised H2S Reporting Form for Division Rule 118.

The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2) mile to the plant. The legal description being as Unit letter 0, Section 30, T17S, R35E, Lea County, New Mexico.

In the event of a hazardous H2S release, you will be notified immediately.

If you have any questions regarding this Plan or H2S Reporting Form, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm Enclosure nmocd \*Supersedes letter dated October 4, 1991

## HYDROGEN SULFIDE (H<sub>2</sub>S) OPERATIONS

# CONTINGENCY PLAN FOR LEE GASOLINE PLANT

AS SPECIFIED BY OCD OF NEW MEXICO RULE 118



GPM GAS CORPORATION NEW MEXICO REGION

#### GPM GAS CORPORATION

A.

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#### NEW MEXICO REGION

#### H2S CONTINGENCY PLAN

#### IN COMPLIANCE WITH NEW MEXICO OIL CONSERVATION COMMISSION

#### **RULE 118**

FOR

LEE GASOLINE PLANT

#### TABLE OF CONTENTS

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Section							
PURPOSE							
SCOPE							
PROCEDURES							
CERTIFICATE OF COMPLIANCE (H2S REPORTING FORM) IV							
PUBLIC NOTIFICATION							
NOTIFICATION TO AUTHORITIES							
NOTIFICATION TO AUTHORITIES							
MOBILE UNIT NUMBERS							
PLAT OF RADIUS OF EXPOSURE							
PLAT OF PLANT							

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#### DISTRIBUTION LIST FOR LEE GASOLINE PLANT CONTINGENCY PLAN

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NEW MEXICO OIL CONSERVATION COMMISSION - SANTA FE NEW MEXICO OIL CONSERVATION COMMISSION - HOBBS NEW MEXICO ENVIRONMENTAL IMPROVEMENT BOARD NEW MEXICO STATE POLICE LEA COUNTY SHERIFF DEPARTMENT - LOVINGTON OFFICE LEA REGIONAL HOSPITAL NORTE VISTA MEDICAL CENTER LTD. NOR-LEA GENERAL HOSPITAL DR. T. G. MCCORMICK HOBBS AMBULANCE SERVICE LOVINGTON AMBULANCE SERVICE LOVINGTON FIRE DEPARTMENT HOBBS FIRE DEPARTMENT BUCKEYE STORE & SERVICE STATION MR. MIKE CHRISMER, WEST STAR ROUTE **GPM GAS CORPORATION - SAFETY** GPM GAS CORPORATION - R. DUNHAM, AREA MANAGER GPM GAS CORPORATION - M. S. NAULT, PLANT SUPT. GPM GAS CORPORATION - W. A. SCOTT, FIELD SUPV. GPM GAS CORPORATION - R. G. GILCHREST, MAINT. SUPV. GPM GAS CORPORATION - R. A. MEAUX, OPER. SUPV. GPM GAS CORPORATION - CONTROL ROOM, LEE PLANT GPM GAS CORPORATION - CENTRAL FILES GPM GAS CORPORATION - ENGINEERING SECTION

## RECORD OF REVISIONS

REV. NO.		DATE INSERTED	BY	REV. NO.	REVISION DATE	DATE INSERTED	BY
1	8-30-90	8-30-90	B. DILLARD				
2	10-4-91						
3	17-31-92	7-31-92	V. MCARTY V. MCCARTY				
		-					
						<u> </u>	
	-						

### EMERGENCY LOG

-				
DATE	TIME	PERSON CONTACTED	ACTION TAKEN OR REMARKS	SIGNATURE
			· · · · · · · · · · · · · · · · · · ·	
			· · · · · · · · · · · · · · · · · · ·	
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#### I. PURPOSE

The purpose of the Contingency Plan is to provide an organized plan of action for alerting and protecting the public following the release of a potentially hazardous volume of hydrogen sulfide. This Plan prescribes mandatory safety procedures to be followed in case of a release of H2S into the atmosphere from exploration, production, and gas gathering operations included in the scope of this Plan. The extent of action taken will be determined by the supervisor and will depend on the severity and extent of H2S release. All significant releases of H2S must be reported and the emergency log sheet maintained.

#### II. SCOPE

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This Contingency Plan shall cover the Lee Gasoline Plant which processes gas with the specified H2S content and could result in the listed maximum radius of exposure. Radius of exposure is defined as the maximum distance from the source of release that a specified calculated average concentration of H2S could exist under specific weather conditions.

#### III. PROCEDURES

A. ALL personnel involved in the operation of these properties will become familiar with this Contingency Plan.

The first employee on the scene should carefully survey the situation, note the wind direction, ensure his own safety, and proceed with the following:

#### 1. REQUEST ASSISTANCE IF AND AS NEEDED.

Notify your immediate supervisor of your work location, the nature of the emergency, and of the assistance needed. The supervisor should request any necessary assistance from company personnel or outside agencies and obtain any safety equipment which might be required for company personnel, area residents, or the general public.

#### 2. ALERT AND/OR EVACUATE PEOPLE WITHIN THE EXPOSURE AREA

If the escape of gas could result in a hazard to area residents, the general public, or employees, the person first notified or observing the leak should take immediate steps to notify any nearby residents as listed under Section V in this plan. The avoidance of injury or loss of life should be of prime consideration and given top priority in all cases. Location of residents, public areas, roads, etc., in relation to H2S-containing facilities are attached to this plan (see Section X) and should be consulted to determine possible hazardous areas in relation to the leak source. In all situations, consideration should be given to wind direction and weather conditions. H2S is heavier than air and can settle in low spots. Shifts in wind direction can also change the location of possible hazardous areas.

## 3. ESTABLISH ROADBLOCKS TO PREVENT ENTRY TO THE EXPOSURE AREA

Upon arrival at the scene, the supervisor or superintendent will assume the role of Incident Commander and be responsible for this Contingency Plan; and establish the staging area, barricades and/or warning signs at or beyond the calculated 100 ppm H2S exposure radius. If barricades are manned, the personnel must be equipped with hydrogen sulfide measuring devices or personnel monitors and two-way radios. A staging area should be established at a safe distance upwind of the gas escape area and should be used for storage of safety equipment, communications, briefings, first aid, and evacuation. Mobile unit numbers are listed in Section IX. Locations of road blocks and the staging area are shown on the radius of exposure drawing in Section X.

#### 4. STOP THE ESCAPE OF H2S

Plug the leak or shut off the sources of gas to the rupture. In some cases, clamps can be used to temporarily stop the smaller leaks. For large or inconveniently located leaks, isolate the leak by closing the most readily accessible valves upstream and downstream. A decision to ignite the escaping gas to reduce the toxicity hazard should be made only as a last resort. It must be determined if the gas can be safely ignited (i.e., is there a possibility of a widespread flammable atmosphere).

#### 5. COMPLETE NOTIFICATIONS AS REQUIRED

Notify the New Mexico Oil Conversation Division, New Mexico Environmental Improvement Board, local public officials and other company personnel as provided for in Section VIII.

#### 6. RETURN THE SITUATION TO NORMAL

When the total absence of hydrogen sulfide and combustible gas is confirmed throughout the evacuated area, allow and/or assist the evacuees in returning to the area. Remove all barricades and warning signs. Advise all parties previously notified that the emergency has ended.

#### 7. POST EMERGENCY ACTIONS

Review the factors that caused or allowed the emergency to happen, and if the need is indicated, modify operating, maintenance, and/or surveillance procedures.

Replace emergency equipment and return to proper place.

Evaluate all actions. Train or retrain employees in emergency procedures, if necessary.

Refer media to public relations specialists (local or Bartlesville)

DO NOT DISCUSS OR SPECULATE about the cause, amount of damage, impact of the incident on the community, company, employees or the environment.

#### DO NOT DISCLOSE NAMES OF INJURED OR DEAD

B. A listing of safety equipment available at the Lee Gasoline Plant is provided in Section VII. Safety equipment applicable for use in H2S service is also available at the following locations:

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Equipment	<b>Location</b>	<u>Tel. No.</u>
2 - 30 min. Scott Air-Pak 5 - 30 min. MSA Air-Pak	Hobbs Booster Eunice Plant	(505) 397-5576 (505) 397-5591
(All paks are Scott II a or Scott 2.2 with modifications)		
1 trailer-mounted cascade cylinder breathing air system, containing two 300 cu. ft. air cylinders.	Eunice Plant	(505) 397-5591
5 30-minute Scott Air-Pak units		
4 Scott SKA-Pak hose-line work units.		
1 trailer-mounted cascade cylinder breathing air system, containing 5 300 cu. ft. air cylinders.	Hobbs Maint.	(505) 397-5547
1 30-minute Scott Air-Pak unit		
4 Scott SKA-Pak hose-line work units.		
1 trailer-mounted cascade breathing air system, con- taining 8 - 300 cu. ft. air cylinders.	Safety Training Trailer	(915) 368-1381
2 Scott 5 min. SKA-PAK hose- line work units.		
6 30 min. Scott Air-Paks		



July 27, 1992\*

Lee Gasoline Plant <u>H2S Contingency Plan</u>

William J. Lemay, Director New Mexico Oil Conservation Commission State Land Office Building P. O. Box 2088 Hobbs, New Mexico 87504-2088

Dear Mr. Lemay:

In connection with GPM Gas Corporation's (formerly Phillips 66 Natural Gas Company) Lee Gasoline Plant, you will find the following:

Revised H2S Contingency Plan for this facility; and Revised H2S Reporting Form for Division Rule 118.

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In the event of a hazardous H2S release, you will be notified immediately.

If you have any questions regarding this Plan or H2S Reporting Form, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm Enclosure nmocd \*Supersedes letter dated October 4, 1991



July 27, 1992\*

#### Lee Gasoline Plant <u>H2S Contingency Plan</u>

Mr. J. T. Sexton New Mexico Oil Conservation Division 1000 W. Broadway P. O. Box 1980 Hobbs, New Mexico 88240

Dear Mr. Sexton:

In connection with GPM Gas Corporation's (formerly Phillips 66 Natural Gas Company) Lee Gasoline Plant, you will find the following:

Revised H2S Contingency Plan for this facility; and Revised H2S Reporting Form for Division Rule 118.

The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2) mile to the plant. The legal description being as Unit letter 0, Section 30, T17S, R35E, Lea County, New Mexico.

In the event of a hazardous H2S release, you will be notified immediately.

If you have any questions regarding this Plan or H2S Reporting Form, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm Enclosure nmocd.2 \*Supersedes letter dated October 4, 1991



#### July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

New Mexico Environmental Improvement Board 1190 St. Francis Drive Santa Fe, New Mexico 87504

Gentlemen:

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) turn left and travel approximatley one-half (1/2) mile to the plant. The legal description being as Unit letter O, Section 30, T17S, R35E, Lea County, New Mexico.

In the event of a hazardous H2S emission you shall be notified of the situation as soon as possible.

This Plan will provide you with the location of the Lee Gasoline Plant and other necessary information (see Section XI). If you have any questions regarding this Plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

2 Arahl

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm nmeib Attachments \*Supersedes letter dated October 4, 1991 Submit 1 copy to Appropriate District Office DISTRICT I P.O. Box 1980, Hobbs, NM 88241-1980 DISTRICT II P.O. Drawer DD, Artesia, NM 88211-0719 DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

#### State of New Mexico Energy, Minerals and Natural Resources Department OIL CONSERVATION DIVISION P.O. Box 2088

Santa Fe, New Mexico 87504-2088

H<sub>S</sub> REPORTING FORM Lee Gasoline Plant OPERATOR GPM Gas Corporation (formerly Phillips 66 Natural Gas) (Pool. Plant, or Facility Name) ADDRESS 4044 Penbrook, Room GB-160 Odessa, TX 79762 **H.S Concentration** Sampling Point Report in PPM Lease, Plant Test Test Location Name of (Tank, Separator, etc.) or Facility Well No. Method Volume il Available **UL-S-T-R** Tester Date 7/92 5,825 PPM Tutweiler 30–17s–35e R. Meaux Plant MS #9286 Signature Rabit AMM R. G. Stubbs REMARKS: Printed Name and Title Engineering Director, New Mexico Region

Date July 31, 1992elephone No. (915) 368-1058

Form Adopted 1987•

Form Revised 1990

File in Accordance

With Rule 118

#### V. PUBLIC NOTIFICATION

The following resident(s) or public areas are in the possible hazardous areas covered by this Contingency Plan. (See plat). If the incident is of such magnitude or at such location so as to create a hazardous situation, they should be requested to evacuate until the situation can be returned to normal. If such evacuation procedure is implemented or public roads require blockage, the applicable New Mexico Oil Conservation Commission office and the New Mexico Environmental Improvement Board should be notified immediately.

Regulatory Agencies	<u>Telepł</u>	none No.
New Mexico Oil Conservation Commission District I P. O. Box 1980 Hobbs, New Mexico 88241-1980	(505)	393-6161
New Mexico Oil Conservation Commission District II Attn: Mike Williams P. O. Drawer DD Artesia, NM 88210	(505)	748-1283
New Mexico Oil Conservation Division Attn: Mr. Dave Boyer P. O. Box 2088 Santa Fe, NM 87504-2088	(505)	827-5800
New Mexico Environmental Improvement Board 1190 St. Francis Drive Santa Fe, NM 87504	(505)	827-0042
New Mexico Environmental Improvement Board 414 West Taylor Hobbs, NM 88240	(505)	393-2333
National Response Center	1-800-	-424-8802
Residence or Public Facility		
Buckeye Store & Service Station West Star Route	(505)	676-9441
Mr. Mike Chrismer West Star Route	(505)	396-2457





July 27, 1992

New Mexico Oil Conservation Division Hydrogen Sulfide (H2S) <u>Contingency Plan Lee Gasoline Plant</u>

Mr. Mike Chrismer West Star Route Lovington, New Mexico 88260

Dear Mr. Chrismer:

In compliance with the New Mexico Oil Conservation Division Rule 118 and GPM Gas Corporation's (formerly Phillips 66 Natural Gas Company) regard for your safety, this is a notice of a Contingency Plan in the event of a release of Hydrogen Sulfide (H2S) gas from or near GPM Gas Corporation's, Lee Gasoline Plant.

- 1. The possible sources of hydrogen sulfide within the radius of exposure in which you reside would come from the plant proper or an incoming gas line from the field.
- 2. Hydrogen sulfide has the following characteristics.
  - A. Deadly--extremely toxic gas.
  - B. Colorless.
  - C. Odor of rotten eggs at low concentrations: rapidly deadens your sense of smell; gas may still be present in the air, so you cannot depend on smell to detect it.
  - D. Highly flammable (keep sources of ignition away!); burns with a blue flame, producing sulfur dioxide which is also a toxic gas.
  - E. Heavier than air; tends to settle in low lying areas.
  - F. Readily dispersed by wind movement or air currents.
  - G. Water soluble.
- 3. If you detect a leak in a pipeline, stay upwind of the leak. Call the following personnel and report the location of the leak:

W. A. Scott, Field Supvr. Home: (915) 297-1003 Office: (505) 397-5704 H2S Contingency Plan July 27, 1992 Page 2

R. F. Gilchrest, Maint. Supvr.			393-0780 397-5705
R. A. Meaux, Plant Operations Supervisor			392-2607 397-5703
M. S. Nault, Plant Supt.			392-2635 397-5701
GPM Gas Corporation 24 Hour Emergency Telephone Numbe	er	1-800	-367-1266

- You will be notified by phone and/or personal contact in the event of a significant release of H2S gas. If your address or phone number changes, please notify W. A. Scott, Field Supervisor.
- 5. In the event of an emergency, leave the area as soon as possible, staying upwind of the gas release. **DO NOT PANIC.**

If you need additional information or have any questions, call the Lee Gasoline Plant Office at (505) 397-5700.

Yours truly,

R. G. Stubbs

New Mexico Region Engineering Director

RGS:vgm pub.2

attachments



July 27, 1992 New Mexico Oil Conservation Division Hydrogen Sulfide (H2S) Contingency Plan Lee Gasoline Plant

Mr. Charles Ginn c/o Buckeye Store & Service Station West Star Route, Box 430 Lovington, New Mexico 88260

Dear Mr. Ginn:

In compliance with the New Mexico Oil Conservation Division Rule 118 and GPM Gas Corporation's (formerly Phillips 66 Natural Gas Company) regard for your safety, this is a notice of a Contingency Plan in the event of a release of Hydrogen Sulfide (H2S) gas from or near GPM Gas Corporation's Lee Gasoline Plant.

- 1. The possible sources of hydrogen sulfide within the radius of exposure in which you reside would come from the plant proper or an incoming gas line from the field.
- 2. Hydrogen sulfide has the following characteristics.
  - A. Deadly--extremely toxic gas.
  - B. Colorless.
  - C. Odor of rotten eggs at low concentrations: rapidly deadens your sense of smell; gas may still be present in the air, so you cannot depend on smell to detect it.
  - D. Highly flammable (keep sources of ignition away!); burns with a blue flame, producing sulfur dioxide which is also a toxic gas.
  - E. Heavier than air; tends to settle in low lying areas.
  - F. Readily dispersed by wind movement or air currents.

G. Water soluble.

3. If you detect a leak in a pipeline, stay upwind of the leak. Call the following personnel and report the location of the leak:

W. A. Scott, Field Supvr. Home: (915) 297-1003 Office: (505) 397-5704

H2S Contingency Plan July 27, 1992 Page 2		·	
R. F. Gilchrest, Maint. Supvr.			393-0780 397-5705
R. A. Meaux, Plant Operations Supervisor		· · ·	392-2607 397-5703
M. S. Nault, Plant Supt.			392-2635 397-5701
GPM Gas Corporation 24 Hour Emergency Telephone Numb	ber	1-800-	-367-1266

- 4. You will be notified by phone and/or personal contact in the event of a significant release of H2S gas. If your address or phone number changes, please notify W. A. Scott, Field Supervisor.
- 5. In the event of an emergency, leave the area as soon as possible, staying upwind of the gas release. DO NOT PANIC.

If you need additional information or have any questions, call the Lee Gasoline Plant Office at (505) 397-5700.

Yours truly,

Ital / aluts

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm pub.1

attachments



#### July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S <u>Contingency Plan Lee Gasoline Plant</u>

Sheriff Bill Lane Lea County Sheriff Department 215 N. Central Lovington, New Mexico 88260

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to assist GPM Gas Corporation in the following duties:

- 1. Secure the area and blockade the highways at designated points (See Section XI).
- Notify and evacuate the residents within the radius of exposure. (See Section V and Section X).

If GPM Gas Corporation personnel arrive on the scene first, they will set up temporary road blocks at the designated areas. Assemble your personnel at the staging area as designated in Section X. At that time, you will be given further instructions by the supervisor in charge of emergency procedures.

If your personnel arrive on the scene first, proceed to blockade the roads at the designated areas as outlined in Sections X. If your assistance is needed to perform additional duties, you will be directed by the supervisor in charge of the emergency procedures.

GPM Gas Corporation vehicles will be identified by emergency blinking lights. Company vehicles equipped with radios and walkie-talkies will be utilized by company personnel during the emergency procedures. Note the list of mobile unit radios in Section IX. Lea County Sheriff Department Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant Page 2

This Plan will provide you with the necessary information needed to perform the above services. However, if your personnel need additional H2S training, contact the GPM Safety Director at (915) 368-1085.

If you have any questions regarding this Plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs

New Mexico Region Engineering Director

RGS:vgm

sheriff attachments

\*Supersedes letter dated October 4, 1991



July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

Lt. Jim Woods New Mexico State Police P. O. Box 1069 Hobbs, New Mexico 88241

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to assist GPM Gas Corporation in the following duties:

- 1. Secure the area and blockade the highways at designated points (See Section X).
- 2. Notify and evacuate the residents within the radius of exposure. (See Section V and Section X).

If GPM Gas Corporation personnel arrive on the scene first, they will set up temporary road blocks at the designated areas. Assemble your personnel at the staging area as designated in Section X. At that time, you will be given further instructions by the supervisor in charge of emergency procedures.

If your personnel arrive on the scene first, proceed to blockade the roads at the designated areas as outlined in Sections X. If your assistance is needed to perform additional duties, you will be directed by the supervisor in charge of the emergency procedures.



New Mexico State Police Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant Page 2

GPM Gas Corporation vehicles will be identified by emergency blinking lights. Company vehicles equipped with radios and walkie-talkies will be utilized by company personnel during the emergency procedures. Note the list of mobile unit radios in Section IX.

This Plan will provide you with the necessary information needed to perform the above services. However, if your personnel need additional H2S training, contact the GPM Safety Director at (915) 368-1085.

If you have any questions regarding this Plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm

nmsp attachments

\*Supersedes letter dated October 4, 1991



July 23, 1992 New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan - Lee Plant

Hobbs Fire Department Mike Gray, Fire Chief 301 E. White Street Hobbs, New Mexico 88240

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (at Buckeye) turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to assist GPM Gas Corporation in the following duties:

1. Assist in controlling a fire (See Section VII).

2. Assist in providing emergency medical services.

If you are notified that your assistance is needed during an emergency situation, proceed immediately to the staging area as designated in Section X. Wait at the staging area for further instructions from the supervisor in charge of emergency procedures.

This Plan will provide you with the necessary information needed to perform the above services; however, if your personnel need additional H2S training, contact the GPM Safety Director at (915) 368-1058.

If you have any questions regarding this plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly ur H Arah

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm fire2 Attachments



July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S <u>Contingency Plan Lee Gasoline Plant</u>

Lovington Fire Department Jack Davis, Fire Chief 213 S. Love Street Lovington, New Mexico 88260

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (at Buckeye) turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to assist GPM Gas Corporation in the following duties:

- 1. Assist in controlling a fire (See Section VII).
- 2. Assist in providing emergency medical services.

If you are notified that your assistance is needed during an emergency situation, proceed immediately to the staging area as designated in Section X. Wait at the staging area for further instructions from the supervisor in charge of emergency procedures.

This Plan will provide you with the necessary information needed to perform the above services; however, if your personnel need additional H2S training, contact the GPM Safety Director at (915) 368-1085.

Lovington Fire Dept. Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant Page 2

If you have any questions regarding this plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm fire Attachments

\*Supersedes letter dated October 4, 1991



July 23, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S <u>Contingency Plan Lee Gasoline Plant</u>

Hobbs EMS Ambulance Service 301 East White St. Hobbs, New Mexico 88240

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corp. (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release, you may be requested to assist GPM Gas Corporation in the following duties:

- 1. Provide emergency medical services.
- 2. Provide ambulance service from the area to local medical facilities.

If you are notified that your assistance is needed, report to the staging area as designated in Section X and wait for further instructions from the supervisor in charge of emergency procedures. This Plan will provide you with the necessary information if your assistance is requested; however, if your personnel need additional H2S training, contact the GPM Safety Director at (915) 368-1085.

If you have any questions regarding this Plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm ambulance Attachments \*Supersedes letter dated October 4, 1991



July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

Lovington Emergency Medical Service P. O. Box 1269 Lovington, New Mexico 88260

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to assist GPM Gas Corporation in the following duties:

- 1. Provide emergency medical services.
- 2. Provide ambulance service from the area to local medical facilities.

If you are notified that your assistance is needed, report to the staging area as designated in Section X and wait for further instructions from the supervisor in charge of emergency procedures. This Plan will provide you with the necessary information, if your assistance is requested. If your personnel need additional H2S training, contact the GPM Safety Director at (915) 368-1085.

If you have any questions regarding this plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty at (915) 368-1048.

Yours truly, Robert A Arubien

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm amb.lov Attachments \*Supersedes letter dated October 4, 1992



July 23, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

Dr. T. G. McCormick 1801 North Dal Paso Hobbs, New Mexico 88240

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to provide medical services for person(s) being transported to the Lea Regional Hospital or other facilities by the Lovington EMS Ambulance Service.

If you have any questions regarding this Plan call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm doctor Attachments

\*Supersedes letter dated October 4, 1991



#### July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

Lea Regional Hospital Lovington Highway Hobbs, New Mexico 88240

Attention: Head Nurse

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to provide medical facilities and services. You will be notified if the Lovington EMS Ambulance Service is transporting injured persons to your facility.

If you have any questions regarding this Plan, call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm hosp Attachments \*Supersedes letter dated October 4, 1991



July 23, 1992\* New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

Norte Vista Medical Center Ltd. 2410 N. Fowler Hobbs, New Mexico 88240

Attention: Industrial Relations Dir.

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) then turn left and travel one-half (1/2) mile to the plant.

In the event of a hazardous H2S release you may be requested to provide medical facilities and services. You will be notified if the Hobbs EMS Ambulance Service is transporting injured persons to your facility.

If you have any questions regarding this Plan call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm hosp1

Attachments \*Supersedes letter dated October 4, 1991



July 27, 1992\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S Contingency Plan Lee Gasoline Plant

Nor-Lea General Hospital 1600 N. Main Lovington, New Mexico 88260 Attention: Head Nurse

In compliance with New Mexico Oil Conservation Commission Rule 118, GPM Gas Corporation (formerly Phillips 66 Natural Gas Company) is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway #238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H2S release, you may be requested to provide medical facilities and services. You will be notified if the Lovington EMS Ambulance Service is transporting injured persons to your facility.

If you have any questions regarding this Plan call GPM Gas Corporation, Engineering Section, Vickie McCarty (915) 368-1048.

Yours truly,

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R. G. Stubbs New Mexico Region Engineering Director

RGS:vgm hosp2 Attachments \* Supersedes letter dated October 4, 1991

#### VII. EQUIPMENT AND MAINTENANCE

- A. All materials used for repairs of original installations for service in systems with H2S concentrations in excess of 100 ppm should be of suitable use in H2S service. In general, carbon steels having low-yield strengths and a hardness below RC-22 are suitable. The engineering staff should be consulted if any doubt exists on material specifications.
- B. Appropriate signs should be maintained in good condition at lease entrances, wells, surface facilities, plants, road locations, and other locations specified in NMOCD Rule 118. See Section XI.
- C. All notification lists should be kept current with changes in names, telephone numbers, etc. Area personnel will document the results of visits to public officials and other companies involved in operations in this area of exposure on an annual basis. Records of these visits will be filed in Section VI.
- D. All shutdown devices, alarms, monitors, etc., should be maintained and checked at regular intervals to ensure that they are in proper working order.
- E. All personnel working in H2S areas shall have attended safety meetings and received training on procedures and safety equipment applicable for use in H2S areas. A record will be kept of the H2S safety meeting dates and all personnel attending. Invitations will be extended to all public agencies to attend area safety meetings on H2S safety presentations.

Emergency Equipment Suppliers

Leek Fire & Equipment Company,		(915) 332-4961 (915) 362-1207 (915) 332-7645
Thompson Specialties, Odessa	Day/Night:	(915) 337-3891
Standby Monitoring System, Inc	., Odessa	(915) 563-3974
Callaway Safety Equipment, Inc	., Hobbs	(505) 392-2973
American Oxygen Co.		(505) 623-2995 : (505) 623-1774

#### Fire Protection

Available for use in fighting fires at various locations covered by this plan, are approximately 600 employees who have been trained in fire-fighting techniques common to the industry. These employees may be called for duty from maintenance and plant groups throughout the entire Permian Basin Region.

Personnel of the plant or booster experiencing the fire emergency will man the fire equipment in the capacity in which they have been trained. The only exception to this rule would be when a fire truck or pumping unit is dispatched to the scene and the driver or operator of this equipment will remain the operator of same under direction of the GPM supervisor.

#### Fresh Air Breathing Equipment Available at Lee Gasoline Plant

Control Room

East of HDG 30-40 Tank

Old Refining Cooling Tower

Process Cooling Tower & Trtr.

Sulphur Recovery Unit

Lee Portable Booster

Plant Firehouse

1 30-min Scott Air-Pak

- 1 30-min Scott Air-Pak
- 1 30-min Scott Air-Pak
- 1 30-min Scott Air-Pak
- 1 30-min Scott Air-Pak
- 5 Spare cylinders for 5-min SKA-PAK
- 6 Spare cylinders for 5-min SKA-PAK
- 1 7 cylinder 300 cu. ft. Cascade breathing air system refill station

#### Fixed H2S Monitors

- 1- "Rexnard" fixed monitor
   with 10 sensor heads located at:
  - 5 Sulphur plant
  - 4 Treaters (North, South, East & West)
  - 1 Process Control Room

# VIII. EMERGENCY CALL LIST

Local Supervisory Personnel	Telephon	<u>e No.</u>
W. A. Scott, Field Supervisor		(915) 297-1003 (505) 397-5704
R. A. Meaux, Plant Oper. Superv.		(505) 392-2607 (505) 397-5703
R. F. Gilchrest, Maint. Supvr.		(505) 393-0780 (505) 397-5705
M. S. Nault, Plant Supt.		(505) 392-2635 (505) 397-5701
If unable to notify above personnel,	call the	following:
GPM Gas Corporation 24 Hour Emergency Telephone Number	Odessa:	1-800-367-1266
R. D. Dunham, Area Manager		(505) 393-7541 (505) 397-5541
V. Bernard, Safety Director		(915) 686-7911 (915) 368-1085
R. G. Stubbs, Enigneering Director		(915) 520-7713 (915) 368-1058
J. L. Bowles, Region Manager	Home: Office:	(915) 520-4413 (915) 368-1075
G. J. Koiro, Media Representative	Home: Office:	(915) 683-9122 (915) 368-1080
<u>New Mexico Oil Conservation Comm.</u> District I P. O. Box 1980		
Hobbs, New Mexico 88241-1980	Office:	(505) 393-6161
<u>New Mexico Environmental Improvement</u> 414 West Taylor		
Hobbs, New Mexico 88240	Office:	(505) 393-2333
National Response Center		1-800-424-8802
Local Emergency Calls: 911		

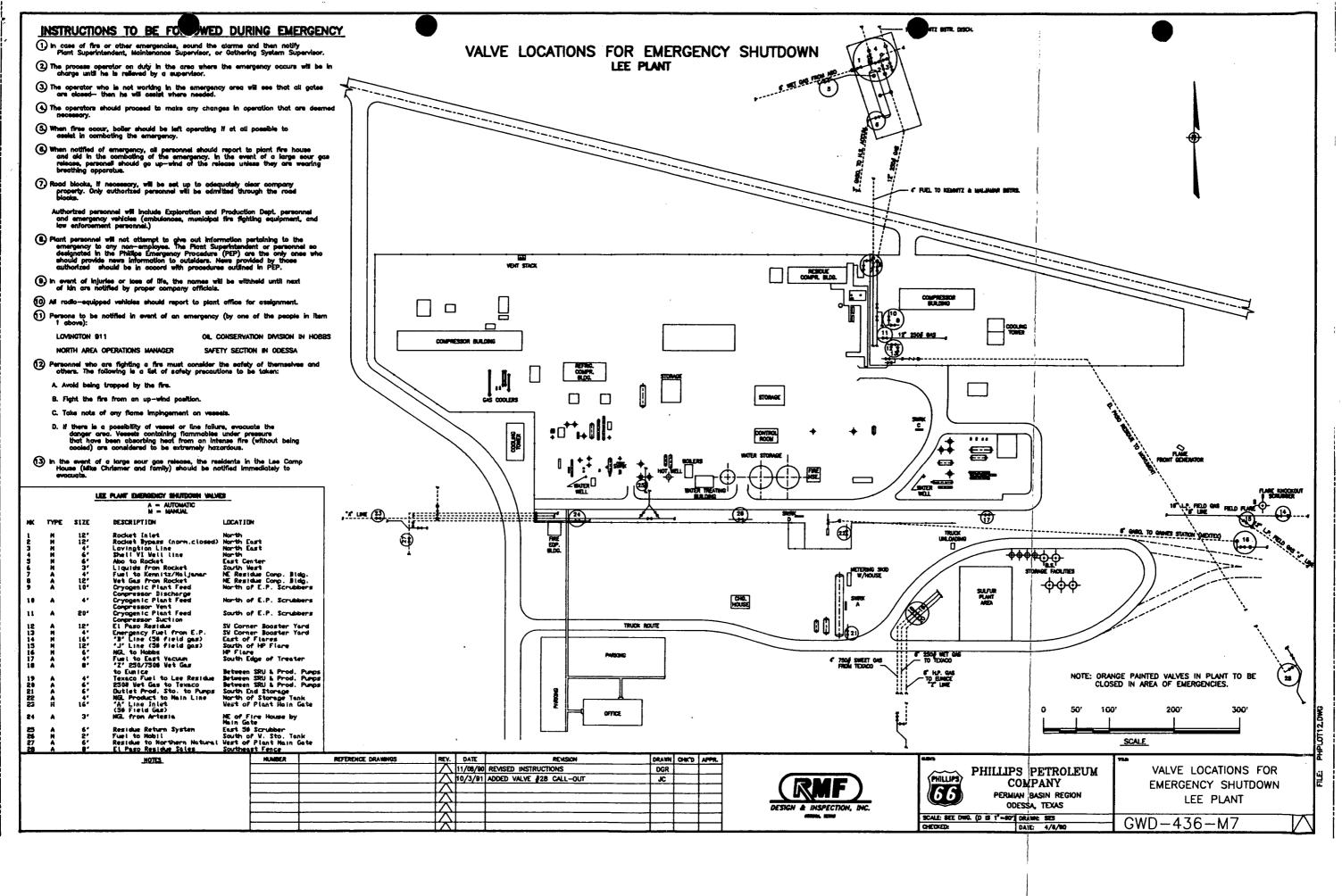
# Fire Department

Jack Davis, Fire Chief Mike Gray, Fire Chief	Lovington: Hobbs:		396-2359 397-9308
Law Enforcement Agencies			
New Mexico State Police Lt. Jim Woods	Hobbs:	(505)	392-5588
New Mexico State Police	Lovington:	(505)	396-3611
Lea County Sheriff Bill Lane	Lovington:	(505)	396-3611
Chavez County Sheriff	Roswell:	(505)	624-6500
Eddy County Sheriff	Carlsbad:	(505)	887-7551
Ambulance Service			
Lovington EMS Hobbs EMS	Office: Office:		396-2359 397-9308
Physicians/Hospitals			
T. G. McCormick, MD	Office: Residence:		393-0511 393-3637
Lea Regional Hospital	Hobbs:	(505)	392-6581
Norte Vista Medical Center	Hobbs:	(505)	392-5571
Nor-Lea General Hospital	Lovington:	(505)	396-6611

# IX. MOBILE UNIT NUMBERS

To reach personnel by mobile radios, first dial 1-505-397-5789 or 1-505-397-5599. At the tone, dial radio number listed below:

	<u>Radio #</u>
W. A. Scott	1-343
R. G. Gilchrest	1-332
R. A. Meaux	1-208
M. S. Nault	1-322
Eldon Hetrick	1-362
B. A. Ivy	1-358
D. A. Payne, Jr.	1-357
Ben Molina	1-359
Stan Gregory	1-354
Rich Watkins	1-240
Ron Kelley	1-237
Luther Thompson	1-212
R. Dunham	1-213



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				<u>U</u> 2	S RADIUS OF E		
INSTRUCTIO	ONS TO BE FOLLOW	ED DURING EME	RGENCY			, <del>,</del>	
					71	Y	
(1) In case of Superinter	fire or other emergencies, so ndent, Maintenance Supervisor	ound the alarms and t , or Gathering System	hen notify Plant Supervisor.		//		
2) The operato until he i	or on duty in the area where s relieved by a supervisor.	the emergency occurs	s will be in charge				
3.) The operato are closed	r who is not working in the d— then he will assist where	emergency area will so needed.	ee that all gates			/	
(4) The operato necessary	rs should proceed to make o	ony changes in operation	on that are deemed				
5.) When fires assist in	occur, boilers should be left combating the emergency.	operating if at all pos	sible to		Л		
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7 Road blocks property. blocks.	s, if necessary, will be set up Only authorized personnel will	o to adequately clear a be admitted through	company the road	BC.	88 88 80	COUNTY ROA	D 50
and emer	personnel will include Explora gency vehicles (ambulances, cement personnel.)	tion and Production De municipal fire fighting (	ept. personnel equipment, and		НІБНИАҮ		
emergency designated should pro	nnel will not attempt to give y to any non-employee. The d in the Phillips Emergency P ovide news information to out should be in accord with	Plant Superintendent o rocedure (PEP) are the tsiders. News provided	r personnel so e only ones who by those				
9. In event of of kin are	injuries or loss of life, the r notified by proper company	names will be withheld officials.	until next		6		LEE PLANT
10 All radio-e	quipped vehicles should report	t to plant office for a	ssignment.		NS8		
(11) Persons to	be notified in event of an a	emergency:			Ę		
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A. Avoid b	being trapped by the fire.						
B. Fight t	he fire from an up-wind pos	iition.	•				
C. Take n	ote of any flame impingemer	t on vessels.				$\mathbf{i}$	
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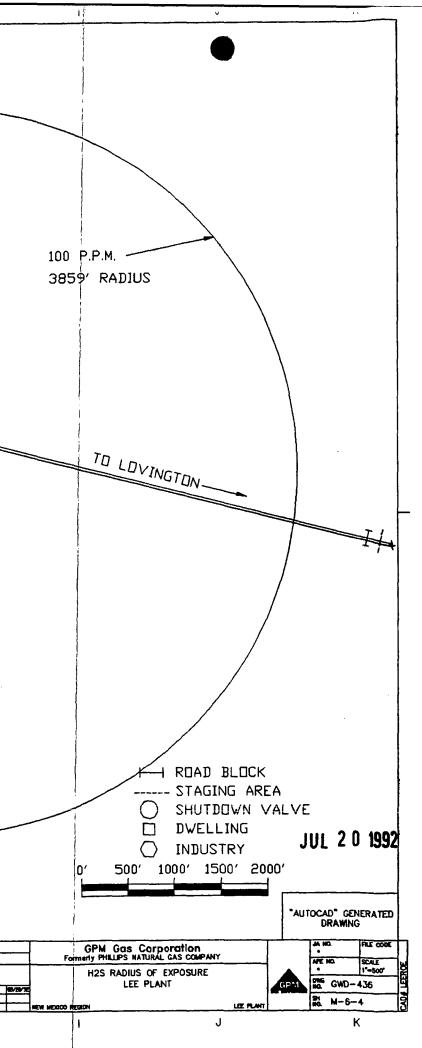
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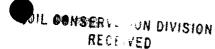
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# GPM GAS CORPORATION

4044 PENBROOK ODESSA, TEXAS 79762

May 5, 1992

Discharge Plan GW-2 Lee Gasoline Plant Underground Skimmer Tank <u>Completion Notification</u>

#### CERTIFIED MAIL NO. P-512-092-849 RETURN RECEIPT REQUESTED

Mr. William J. LeMay, Director New Mexico Oil Conservation Division Land Office building P.O. Box 2088 Santa Fe, NM 87504-2088

Dear Mr. LeMay,

In your letter of February 21, 1992 to Mr. Ralph McCord of this office, you approved a design revision and also granted an extension (from March 1, 1992 to June 1, 1992) of the completion schedule for the installation of the underground skimmer tank at Lee Plant.

This letter will serve as notification that this project is complete. Installation and start up of the OCD approved underground skimmer tank with secondary spill containment was completed April 17, 1992. The tank that was replaced has been isolated from the plant drain system and is targeted for removal. All residual oily water has been removed from the tank to prevent any possibility of ground water contamination.

Please contact me at (915) 368-1085 should any questions arise concerning the underground skimmer tank at Lee Plant. Thank you for your consideration and cooperation on this project.

Sincerely,

Vincent B. Bernard Safety & Environmental Supervisor New Mexico Region

VBB:smm

cc: Chris Eustice OCD Hobbs Office

c:vbb06

192 0C 5 PM 9 58



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 <u>Description</u>	Permit <u>Number</u>
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

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICD 87504

(505) 827-5800

BRUCE KING GOVEFINOR

ANITA LOCKWOOD CABINET SECRETARY

April 22, 1992

CERTIFIED MAIL RETURN RECEIPT NO. P-690-155-060

Vince Bernard GPM Gas Corporation 4044 Penbrook Odessa, TX 79762

### RE: FINAL PHASE INVESTIGATION REPORT LEE GAS PROCESSING PLANT BUCKEYE, NEW MEXICO

Dear Mr. Bernard:

The New Mexico Oil Conservation Division (OCD) has completed a review of GPM's February 24, 1992 "Final Phase Investigation Report, Lee Gas Plant, Buckeye, New Mexico" and GPM's accompanying February 28, 1992 correspondence.

The report details the results of the recent ground water investigation into the extent of petroleum contamination related to the Lee Gas Processing Plant. While the report appears to have adequately defined the extent of petroleum contaminants related to GPM's past disposal practices at the "North Evaporation Pond", benzene in excess of New Mexico Water Quality Control Commission water quality standards was documented in monitor well MW-20 downgradient of the gas plant.

In addition, the accompanying GPM February 28, 1992 correspondence states that GPM "will further evaluate remediation system designs and technologies in an effort to conceive a multi-technology remediation system which is effective and economical in eliminating the groundwater contamination and which will eliminate any passive sources of groundwater contamination at the site". However, GPM provides no commitment to supply OCD with such information. Mr. Vince Bernard April 22, 1992 Page 2

The OCD requests that GPM provide OCD with a work plan containing the following items:

- 1. The remediation system design as referenced in GPM's February 28, 1992 correspondence.
- 2. A proposal to investigate the extent of the petroleum contaminants found in downgradient monitor well MW-20.

The OCD would like to thank GPM for their cooperation and initiative in this matter.

.....

If you have any questions please contact me at (505) 827-5885.

Sincerely

William C. Olson Hydrogeologist Environmental Bureau

xc: Chris Eustice, OCD Hobbs District Office Martin Nee, Geoscience Consultants, Ltd STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

POST OFFICE BOX 2098

STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87504

(505) 827-5800

BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

May 14, 1992

## CERTIFIED MAIL RETURN RECEIPT NO. P-690-155-065

Vince Bernard GPM Gas Corporation 4044 Penbrook Odessa, TX 79762

## RE: QUARTERLY MONITORING MODIFICATION LEE GAS PROCESSING PLANT BUCKEYE, NEW MEXICO

Dear Mr. Bernard:

The New Mexico Oil Conservation Division (OCD) has completed a review of GPM's April 29, 1992 correspondence requesting modification of GPM's quarterly sampling requirements for contaminated ground water at the Lee Gas Processing Plant.

The OCD approves of GPM's request to discontinue sampling for total petroleum hydrocarbons and major cations and anions, and that depth to ground water measurements be made on a quarterly basis as opposed to monthly.

If you have any questions please contact me at (505) 827-5885.

Sincerely

William C. Olson Hydrogeologist Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor Chris Eustice, OCD Hobbs District Office Martin Nee, Geoscience Consultants, Ltd





GPM GAS CORPORATION formerly PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4044 PENBROOK

February 28, 1992

Final Phase Investigation Report Work Plan for Site Investigation Lee Gas Processing Plant

CERTIFIED MAIL NO. P 574818238 <u>RETURN RECEIPT REQUESTED</u> Roger C. Anderson, Acting Director Environmental Bureau, Oil Conservation Division Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87504-2088

RECEIVED

MAR 0 3 1992

OIL CONSERVATION DIV. SANTA FE

Dear Mr. Anderson:

PHILLIPS

GPM Gas Corporation, formerly Phillips 66 Natural Gas Company, submits to the Environmental Bureau of the New Mexico Oil Conservation Division, the *Final Phase Investigation Report* for the Site Investigation for the Lee Gas Processing Plant as specified in the approved <u>Work Plan for Final Phase of the Site Investigation at Phillips (GPM)</u> Lee Gas Plant.

This report details the installation of six (6) additional monitoring wells and includes analytical results for the sampling of Monitor Well Nos. MW-9, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, MW-18, MW-19 and MW-20 in fulfillment of quarterly and initial sampling requirements.

GPM Gas Corporation and its consultant, H<sup>+</sup>GCL, have reviewed several different remediation technologies as these technologies could be utilized in remediating the contaminated groundwater and the residual groundwater contamination source of hydrocarbon tainted soils. This detailed review leads GPM to believe that only a multi-technology approach can effectively remediate the site contamination. As such, GPM Gas Corporation proposes, at this time, that the existing pump and recovery of free phase hydrocarbons and the groundwater pump, recovery and treat systems, which are currently in place, be continued in conjunction with the existing monitoring program. GPM Gas Corporation will further evaluate remediation system designs and technologies in an effort to conceive a multi-technology remediation system which is effective and economical in eliminating the groundwater contamination and which will eliminate any passive sources of groundwater contamination which remain at the site.

Please contact me at 915-368-1142 to discuss any portion of the <u>Final Phase Investigation Report</u> or the decision to continue with the existing hydrocarbon and groundwater recovery systems as a means to hydraulically control the site groundwater contamination. This submittal completes the work as outlined in the <u>Work Plan for Final Phase of the Sire Investigation at Phillips (GPM) Lee Gas Plant</u>. Thank you for your cooperation in this matter.

Sincerely,

Raph 4. Mard

Ralph Y. McCord Environmental Specialist

RYM:2070 Enclosures (3)

cc:

OIL CONSER. UN DIVISION RECERCED



PHILLIPS 66 NATURAL GAS COMPANY92 FEB 17 AM 9 38

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266

February 11, 1992

Discharge Plan GW-2 Lee Gasoline Plant Schedule Extension Request

Mr. William J. Lemay, Director New Mexico Oil Conservation Division Land Office Building P. O. Box 2088 Santa Fe, NM 87504-2088

Dear Mr. Lemay:

Phillips 66 Natural Gas Company requests an extension for the OCD approved schedule for installing a concrete vault around the underground skimmer tank at its Lee Gasoline Plant. This underground skimmer tank was initially discussed in your Feb. 25, 1991 letter to Phillips. Phillips responded that by March 1, 1992, a concrete vault would be installed around a new skimmer tank and its pumps. This response letter was incorporated into *Discharge Plan GW-2* which was approved on March 18, 1991.

Phillips requests an extension of this completion date from March 1, 1992 to June 1, 1992. An evaluation of the vault and vessel design has been conducted and it has been determined that a more economical alternative is available (one which has the same leak detection capabilities as the original design). This alternate design places a fiberglass tank and pump within a carbon steel stock tank ( ${}^{3}/{}_{16}$  inch shell,  ${}^{1}/{}_{4}$  inch bottom) which is coated externally with black tar mastic and internally coated with a polymer coating. The top of the stock tank will be covered to prevent rainwater from accumulating and to prevent wildlife from entering the tank. A sketch of the proposed installation is enclosed for your information.

Please contact me at 915-368-1142 should any questions arise concerning this requested revision and schedule extension. Phillips wishes to thank the Oil Conservation Division for their consideration and cooperation in this request for the revision of *Discharge Plan GW-2*.

Sincerely,

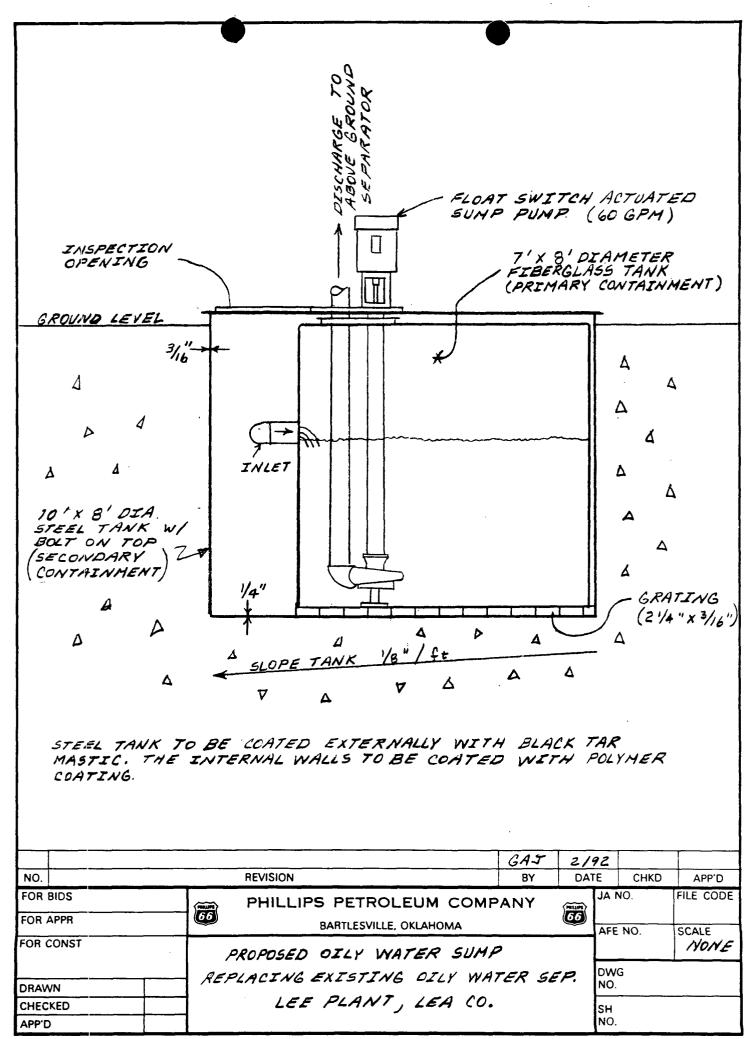
Raph 4. M. Cord

Ralph Y. McCord Environmental Specialist

RYM:2052 Enclosure (1)

> Chris Eustice OCD Hobbs Office

cc:



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PHILLIPS PETROLEUM COMPANY BARTLESVILLE, OKLAHOMA 74004 918 661-6600

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JAN 3 1 1992 Oil Conservation div. Santa Fe

RECEIVED

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-4	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

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STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING GOVERNOR POST OFFICE BOX 2088 STATE LAND OFFICE BUILOING SANTA FE, NEW MEXICO 87504 (505) 827-5800

January 23, 1992

## <u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. P-756-903-837</u>

Ralph Y. McCord Phillips 66 Natural Gas Company 4001 Penbrook Odessa, TX 79762

# RE: GROUND WATER INVESTIGATION WORK PLAN PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT BUCKEYE, NEW MEXICO

Dear Mr. McCord:

The New Mexico Oil Conservation Division (OCD) has received Phillip's January 13, 1992 request for an extension of the submittal deadline for developing a comprehensive ground water remedial stategy for the Phillip's Lee Gas Processing Plant in Buckeye, New Mexico.

The OCD approves of an extension of the deadline for submission of the remedial strategy from January 20, 1992 to February 29, 1992.

If you have any questions please contact me at (505) 827-5885.

Sincerely, C. Im-

William C. Olson Hydrogeologist

xc: Chris Eustice, OCD Hobbs District Office Martin Nee,



HILLIPS

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# PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266

January 13, 1992

Groundwater Investigation Work Plan - Lee Gas Processing Plant

Roger C. Anderson, Acting Director Environmental Bureau, Oil Conservation Division Energy, Minerals & Natural Resources Department Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87504-2088

Dear Mr. Anderson:

Phillips 66 Natural Gas Company is progressing with the groundwater investigation for our Lee Gas Processing Plant as outlined in the <u>Work Plan for Final Phase of the Site Investigation</u> at <u>Phillips Lee Gas Plant</u>. The work has progressed as scheduled. However, the development of the remedial strategy, Step 3.4 of the Work Plan, is requiring more time than anticipated.

It is anticipated that the remedial strategy can be completed and submitted to your office for approval with a 40 day extension of the submittal deadline. Phillips respectfully requests an extension of the remedial strategy submittal deadline from January 20, 1992 to February 29, 1992.

We appreciate your consideration of this request and look forward towards receiving your approval of the requested extension. Thank you for your cooperation in this matter.

Sincerely,

Ralph H. McCord

Ralph Y. McCord

RYM:2027

cc: William C. Olson, OCD, Santa Fe, NM Martin J. Nee, H<sup>+</sup>GCL, Albuquerque, NM

Geoscience Consum	an	ts, l	.td	•	GCL
500 Copper Avenue NW, Sui Albuquerque, New Mexico 87 (505) 842-0001 FAX (505) 84 ' 31 00 -					

September 24, 1991

Mr. Bill Olson New Mexico Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail, Room 206 Santa Fe, NM 87501

# RE: SUBMISSION OF ADDENDUM TO PHASE IV SUBSURFACE INVESTIGATION, PHILLIPS 66 NATURAL GAS COMPANY, LEE GAS PLANT

Dear Mr. Olson:

Geoscience Consultants Ltd. is pleased to submit Phillips' "Addendum to Phase IV Report of Subsurface Investigation, Phillips 66 Natural Gas Company, Lee Gas Plant. This addendum contains field data for the June 26 and 27, 1991 monitor and supply well sampling event. Specifically, this addendum includes all of the monitor and supply well purge data collected prior to ground-water sampling.

Sincerely,

GEOSCIENCE CONSULTANTS, LTD.

Martin J. Nee Project Hydrogeologist

MJN/lc/0528/OLSON05.LTR

Enclosure

cc: Ralph McCord, Phillips, Odessa, TX (w/encl.) Mike Selke, GCL



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

**OIL CONSERVATION DIVISION** 

BRUCE KING GOVERNOR POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICD 87504 (505) 827-5800

September 16, 1991

## CERTIFIED MAIL RETURN RECEIPT NO. P-106-675-365

Ralph Y. McCord Phillips 66 Natural Gas Company 4001 Penbrook Odessa, TX 79762

## RE: PHASE IV REPORT OF SUBSURFACE INVESTIGATION PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT BUCKEYE, NEW MEXICO

Dear Mr. McCord:

The New Mexico Oil Conservation Division (OCD) has completed review of the September 5, 1991 "PHASE IV REPORT OF SUBSURFACE INVESTIGATION, PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT" for the Phillips Lee Gas Plant in Buckeye, New Mexico.

On September 13, 1991, the OCD discussed, with you, OCD's review of this document and Phillip's recommendations. During this conversation, several agreements were made between the OCD and Phillips regarding investigation activities at the site.

The OCD approves of the recommendations in the above Phillips report conditioned upon the following agreements:

- 1. All ground water quality monitoring samples, except monitor wells containing floating product, will be analyzed for benzene, toluene, ethylbenzene, xylene, total petroleum hydrocarbons and major cations and anions using approved EPA methods.
- 2. Phillips will include field measurements such as specific conductivity, temperature and pH in future reports and will supply OCD the field measurements from the June 1991 sampling.

Mr. Ralph Y. McCord September 16, 1991 Page 2

Please contact the OCD prior to monitor well installation and water quality sampling so that the OCD may have the opportunity to have a representative present.

Please be advised that OCD approval does not limit you to the work performed if the investigation fails to fully delineate the extent of contamination related to Phillip's activities. In addition, OCD approval does not relieve you of liability which may be actionable under any other laws and/or regulations.

If you have any questions please contact me at (505) 827-5885.

Sincerely,

William C. Olson Hydrogeologist

xc: Jerry Sexton, OCD Hobbs District Office Martin Nee, Geoscience Consultants, Ltd.

OIL CONSERVE ON DIVISION RECY (ED



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANDI SEP 9 AM 9 24

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266

September 6, 1991

Report of Subsurface Investigation Phillips Lee Gas Plant

#### CERTIFIED MAIL NO. P-34928187

**RETURN RECEIPT REQUESTED** Bill Olson Environmental Bureau Oil Conservation Division State of New Mexico P. O. Box 2088 Santa Fe, New Mexico 87504

Dear Mr. Olson:

Enclosed are two (2) copies of the <u>Phase IV - Report of Subsurface</u> <u>Investigation</u> for the Phillips Lee Gas Plant. This report is being submitted to the Oil Conservation Division's (OCD) Environmental Bureau in accordance with our <u>Work Plan for Final Phase of the</u> <u>Groundwater Investigation</u> as submitted to your office on July 10, 1991.

Phillips looks forward towards receiving your comments on this report and the proposed installation of six (6) additional groundwater monitoring wells. These additional wells will allow Phillips to assess groundwater quality for the whole facility. We anticipate receiving your response by September 25th.

Please fell free to contact me at 915-368-1142 should you or other OCD staff wish to discuss any portion of this report.

Sincerely, Ealph Y. Mc Cord

Ralph Y. McCord, P.E. Environmental Specialist

RYM:1091

cc: Eddie Seay, NMOCD, Hobbs, NM w/encl. E. C. Thompson, Phillips, Buckeye, NM w/encl.





PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266 DIL CONSERVATION DIV.

July 10, 1991

GROUNDWATER INVESTIGATION WORK PLAN - LEE PLANT

#### OVERNIGHT DELIVERY

Mr. Bill Olson Oil Conservation Division State Land Office Bldg. 310 Old Santa Fe Trail Santa Fe, New Mexico 87504

# RECEIVED

JUL 1 1 1991

OIL CONSERVATION DIV. SANTA FE

Dear Mr. Olson:

Phillips 66 Natural Gas Company submits the <u>Work Plan for the Final</u> <u>Phase of the Site Investigation at Phillips Lee Gas Plant.</u> This plan details the investigative approach as presented to OCD during our meeting on May 22, 1991.

The quarterly, semi-annual and annual groundwater sampling requirements were completed during the comprehensive groundwater sampling event as described in the work plan which was conducted on June 26th and 27th. The results of the sampling event will be presented with Phillips' proposed additional monitoring wells. It is anticipated this will be submitted to your office no later than September 9, 1991.

Please feel free to contact me at 915-368-1142 should you wish to discuss any portion of the work plan.

Sincerely,

Raph y. McCord

Ralph Y. McCord, P.E. Environmental Specialist

RYM:sdj:1052 Enclosures (2)

cc: Eddie Seay, NMOCO, Hobbs, NM w/encl. E.C. Thompson, Phillips, Buckeye, NM w/encl.



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK OIL CONSERVING ON DIVISION

'91 MAY 28 AM 10 50

May 23, 1991

Bill Olson Oil Conservation Division State of New Mexico P. O. Box 2088 Santa Fe, NM 87504-2088

Dear Mr. Olson;

Mr. Ford and I wish to thank Kathy Brown, Roger Anderson and you for meeting with us yesterday. We appreciated the opportunity to discuss the groundwater investigation at Phillips' Lee Gas Plant.

We feel that the discussions were very beneficial in helping Phillips determine an appropriate approach for continuing this groundwater investigation. Thank you for your comments and insight. We look forward to working with you and other OCD staff with this investigation.

Sincerely,

P. y. Mcad

R. Y. McCord Environmental Specialist

RYM/bkh:1027

cc: M. D. Ford

STATE OF NEW MEXICO OC CONSERVIATION DIVISION	MEMORANDUM OF MEETING	G OR CONVERSAT	ION
Telephone	Personal Time 09/3	5 Dat	e 5/8/91
·	Originating Party	   	Other Parties
Mike For	-d - Phillips Petro. Co.	<i>B</i> , 11 <i>C</i>	1/son - OCD Shute Fe
Subject		└	
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<u>Conclusions or</u> OK	Agreements		· · · · · · · · · · · · · · · · · · ·
Distribution Phillips L	ee Renediction File	gned VA	Ødlan

PANE PETROLEUM COMPANY

OIL CON

ARTLESVILLE, OKLAHOMA 74004

'91 MEY 6 APPALS Y, 36 VIRONMENT AND SAFETY

May 1, 1991

Discharge Plan Amendment Lee Gasoline Plant <u>Discharge Plan No. GW-2</u>

REGISTERED MAIL RETURN RECEIPT NO. P-06

Mr. William C. Olson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Olson:

We will complete installation of a submersible pump in monitor/recovery well MW-10 by May 15, 1991. Attached are a revised process description, wastewater flow sheet and plot plan reflecting this change.

We request that Discharge Plan No. GW-2 be amended to reflect disposal of the pumped fluids from monitor/recovery well MW-10 into the Lee Plant wastewater treatment system.

If you should have any questions regarding this information, please call me collect at (918) 661-0478.

Very truly yours,

Michael D. Ford

Michael D. Ford Environmental Scientist

MD:F

Attachments

cc: Mr. Jerry Sexton, OCD Hobbs District Office Mr. Martin Nee, Geoscience Consultants, Ltd.

## Amendment to

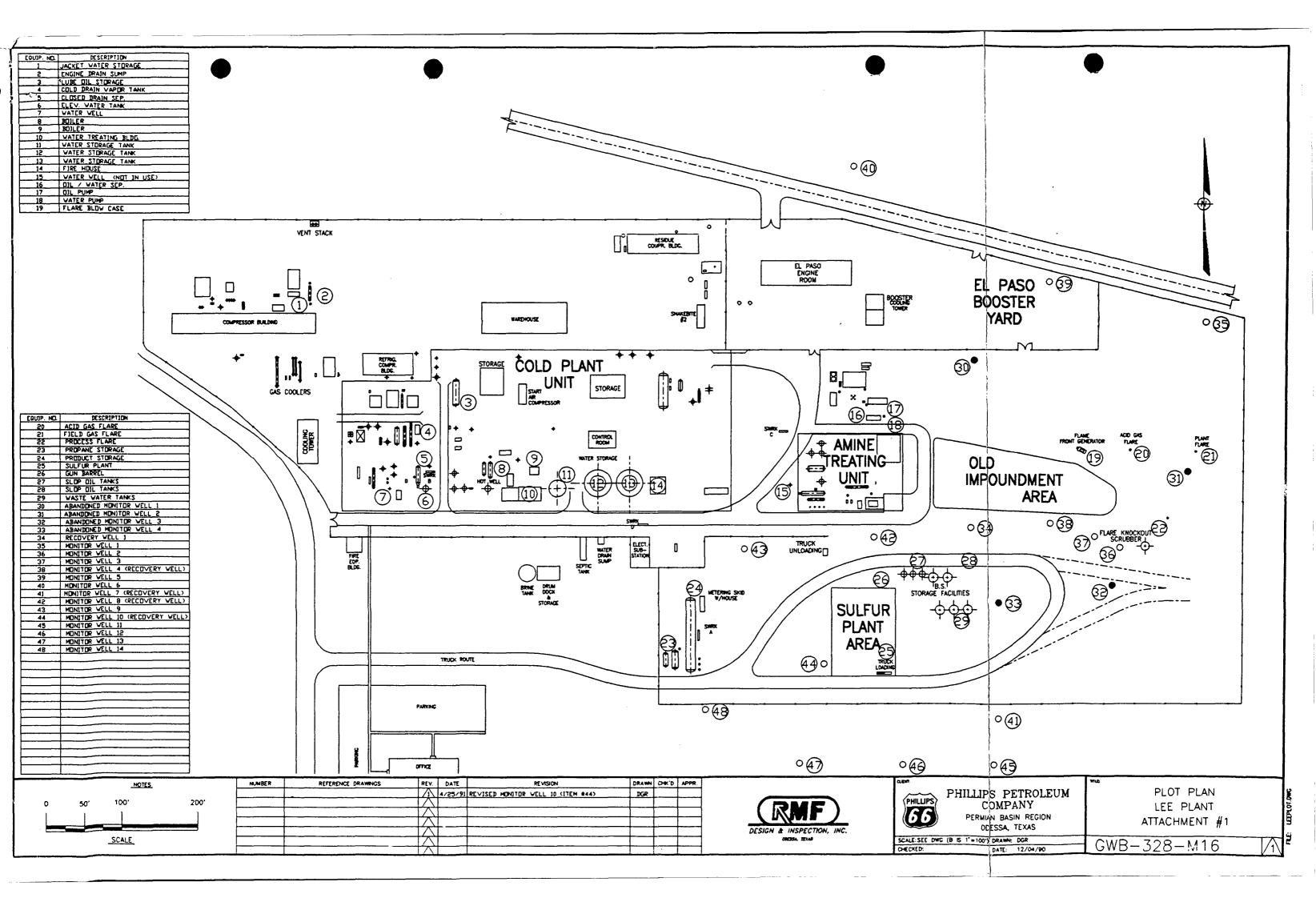
## Discharge Plan GW-2, Phillips Lee Gas Plant

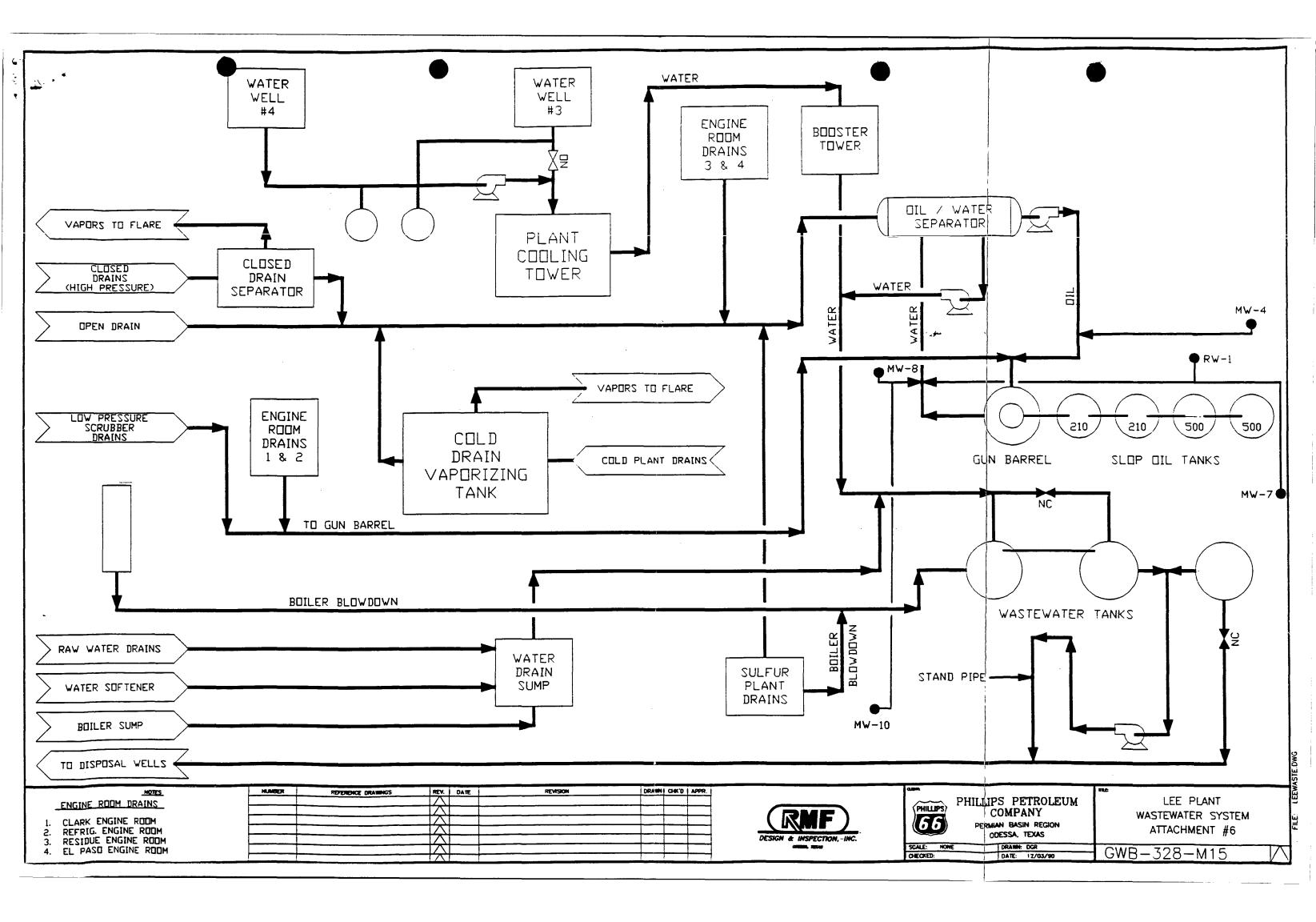
May 1, 1991

The April 1988, April 1990, October 1990 and January 1991 subsurface investigations at Lee Plant have resulted in the installation of fourteen monitor wells and one recovery well.

Four existing monitor wells have been converted into ground water/hydrocarbon recovery wells. Submersible pumps have been installed in monitor wells MW-7, MW-8 and MW-10 to enhance recovery operations. All monitor and recovery well locations are shown on amended Attachment 1. Due to the presence of free-phase hydrocarbon in MW-4, a product recovery pump (designed to pump only product) has been installed at this location.

Recovered groundwater will be pumped at approximately three gallons per minute from each of the recovery wells RW-1, MW-7, MW-8 and MW-10 into the plant wastewater treatment system. This water will flow into the oil/water separator. The separated oil will then be pumped to the slop oil tanks and the water will flow to the wastewater tanks. Product recovered from MW-4 is pumped to the slop oil tanks. Points of entry into the wastewater disposal system of recovered groundwater and product are schematically shown on revised Attachment 6.





STATE OF NEW MEXICO ON CONSERVATION DIVISION MEMORANDUM OF MEETING OR CONVERSATION			
Telephone Personal Time //00	Date 4/2/91.		
Originating Party	Other Parties		
Milke Ford - Phillips Petco.	Bill Olson OCP		
Subject Phillips Lee Plant Remediction	l		
environntal activitius Conclusions or Agreements			
He agreed with above. New Ph	Phillips 66 Natural Gas Co. 4001 Penbrook		
Distribution Phillips D.P. file 1 Remediation file	gned Marchan		

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING

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

April 2, 1991

CERTIFIED MAIL RETURN RECEIPT NO. P-106-675-345

Michael D. Ford Phillips Petroleum Company 12 B2 Phillips Building Bartlesville, Oklahoma 74004

RE: REPORT OF SUBSURFACE INVESTIGATION PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT BUCKEYE, NEW MEXICO

Dear Mr. Ford:

The New Mexico Oil Conservation Division (OCD) has completed review of the March 11, 1991 "PHASE III REPORT OF SUBSURFACE INVESTIGATION, PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT" for the Phillips Lee Gas Plant in Buckeye, New Mexico.

On April 2, 1991, the OCD discussed, with you, our review of this document and Phillip's recommendations. During this conversation, several agreements were made between the OCD and Phillips regarding remedial activities at the site.

The OCD approves of the recommendations in the above Phillips report conditioned upon the following agreements:

- 1. All ground water quality monitoring samples will be analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons using approved EPA methods.
- 2. Ground water from monitor wells MW-9, MW-11, MW-12, MW-13 and MW-14 will be sampled quarterly.
- 3. Ground water from water supply wells WS-1 and WS-2 will be sampled semi-annually.
- 4. Ground water from all recovery wells which do not contain free phase petroleum will be sampled annually.

- 5. Monitor well MW-10 will be converted to a recovery well. Pumps will be installed in these wells within approximately 60 days. Phillips will submit a discharge plan modification for disposal of pumped fluids prior to initiation of pumping.
- 6. Phillips will submit a proposal to investigate the source and extent of the floating product and dissolved phase petroleum contaminated ground water discovered in monitor well MW-6 within 60 days of receipt of this letter.
- Please contact the OCD prior to water quality sampling so that the OCD may have the opportunity to have a representative present.

Please be advised that OCD approval does not relieve you of liability which may be actionable under any other laws and/or regulations. If you have any questions please contact me at (505) 827-5885.

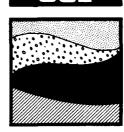
Sincerely,

William C. Olson Hydrogeologist

xc: Jerry Sexton, OCD Hobbs District Office Ralph McCord, Phillips 66 Natural Gas Co. Martin Nee, Geoscience Consultants, Ltd.

## **Geoscience Consultants, Ltd.**

500 Copper Avenue N.W. Suite 200 Albuquerque, New Mexico 87102 (505) 842-0001 FAX (505) 842-0595



GCI

March 11, 1991

## RECEIVED

Mr. Bill Olson New Mexico Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail, Room 206 Santa Fe, NM 87501

MAR 1 2 1991

**OIL CONSERVATION DIV.** SANTA FE

#### RE: SUBMISSION OF PHASE III SUBSURFACE INVESTIGATION REPORT

Dear Mr. Olson:

Geoscience Consultants Ltd. is pleased to submit Phillips' "Phase III Report on Subsurface Investigation, Phillips 66 Natural Gas Company, Lee Gas Plant". If you have any questions or comments, please call me in Albuquerque at 842-0001.

Sincerely, GEOSCIENCE, CONSULTANTS, LTD.

Martin J. Nee

Project Hydrogeologist

MJN/lc/0439/OLSON03.LTR

Enclosures

cc (w/o Enclosures): Mr. M. Ford, Bartlesville Mr. D. Jelmini, Odessa Mr. E.C. Thompson, Hobbs cc (w/Enclosures): Mr. E. W. Seay, Hobbs

OIL CONSERVE FON DIVISION RECEIVED



PHILLIPS PETROLEUM COMPANY

BARTLESVILLE, OKLAHOMA 74004

'91 MAR 8 AM 9 17

QUALITY, ENVIRONMENT AND SAFETY

March 1, 1991

Discharge Plan Amendment Lee Gasoline Plant <u>Discharge Plan No. GW-2</u>

CERTIFIED MAIL RETURN RECEIPT NO. P-06

Mr. William C. Olson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Olson:

We recently completed installation of pumps in monitor/recovery wells MW-4, MW-7 and MW-8 per your letter dated November 16, 1990. Attached are a revised process description, wastewater flow sheet and plot plan reflecting these changes.

We request that Discharge Plan No. GW-2 be amended to reflect disposal of the pumped fluids from monitor/recovery wells MW-4, MW-7 and MW-8 into the Lee Plant wastewater treatment system.

If you should have any questions regarding this request, please call me collect at (918) 661-0478.

Very truly yours,

Michael D. Ford

Michael D. Ford Environmental Scientist

MDF

Attachments

cc: Mr. Jerry Sexton, OCD Hobbs District Office Mr. Martin Nee, Geoscience Consultants, Ltd.

## Amendment to

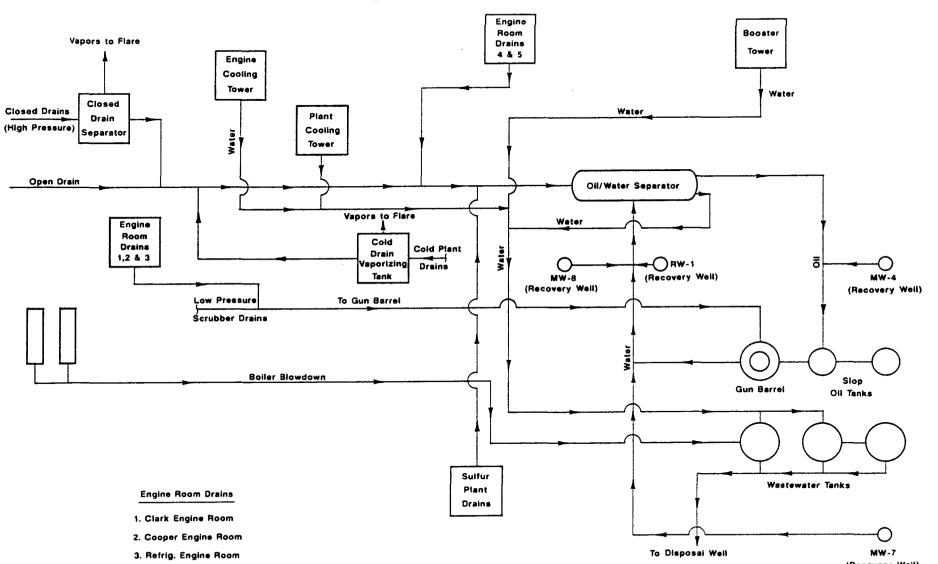
## Discharge Plan GW-2, Phillips Lee Gas Plant February 12, 1991

The April 1988, April 1990, and October 1990 subsurface investigations at the Lee Gas Plant have resulted in the installation of twelve monitor wells and one recovery well. Two additional ground-water monitoring wells were installed in January 1991.

Three existing monitor wells have been converted into ground-water/hydrocarbon recovery wells. Submersible pumps have been installed in monitor wells MW-7 and MW-8 to enhance the existing recovery operations. All monitor and recovery well locations are shown on amended attachment 1. Due to the presence of free-phase hydrocarbon in MW-4, a product recovery pump (designed to pump only product) has been installed at this location.

Recovered ground water will be pumped at approximately 3 gallons per minute from each of the recovery wells RW-1, MW-7, and MW-8 into the plant wastewater treatment system. This water will flow into the oil/water separator. The separated oil will then be pumped to the slop oil tanks and the water will flow to the wastewater tanks. Product recovered from MW-4 will be pumped to the slop oil tank. Points of entry into the wastewater disposal system of recovered ground water and product are schematically shown on revised attachment 6.

## 0439/MONWELL.DOC

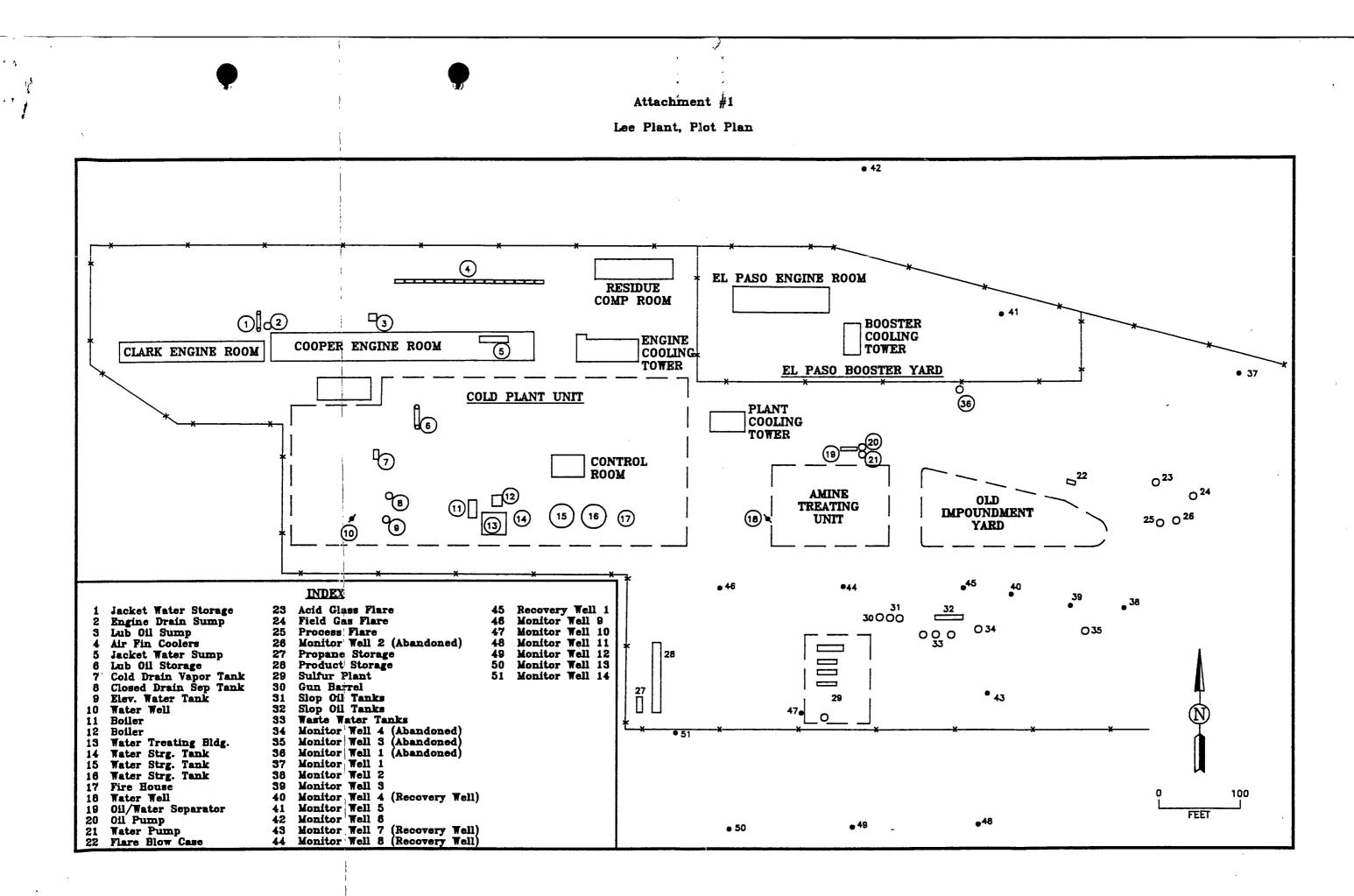


Attachment #6 Lee Wastewater Schematic

4. Residue Engine Room

5. El Paso Engine Room

(Recovery Weil)



NOTICE OF PUBLICATION

## STATE OF NEW MEXICO

## ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

## OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications and 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-32) - Giant Refining Company, Claud Rosendale, Environmental Manager, Route 3, Box 7, Gallup, New Mexico 87301, has submitted a renewal application for its previously approved discharge plan for its Ciniza Refinery located 17 miles east of Gallup, New Mexico on Interstate Highway 40. The refinery and associated waste-management facilities are located in the S/4 of Section 28 and the N 3/4 of Section 33 of Township 15 North, Range 15 West, NMPM, McKinley County, New Mexico. The refinery discharges approximately 161,000 gallons per day of process and non-process wastewater. The wastewater, with an approximate concentration of 2000 to 3000 mg/l total dissolved solids, is discharged to 11 unlined evaporation ponds with a total of 117 acres of capacity. These ponds are constructed in and of the shales of the upper Chinle Formation, which have a permeability of less than six inches per year. The uppermost ground water likely to be affected by refinery discharges is in thin localized sand lenses at depths of 30 to 65 feet, with a total dissolved solids concentration of approximately 1100 mg/l. The uppermost ground water at the site known to be areally extensive is the Sonsela Sandstone at depths from 20 to 140 feet, with a total dissolved solids concentration of approximately 800 mg/l. Ground water in localized sands and the Sonsela is confined under artesian conditions. The discharge plan application in addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-55) - Thriftway Marketing Corporation, F. L. Stark, Vice President, 710 East 20th Street, Farmington, New Mexico 87401, has submitted a discharge plan application for its Bloomfield Refinery located in the SE/4, Section 32, and SW/2 SW/4, Section 33, Township 29 North, Range 11 West, and the NE/4 NE/4, Section 9, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1225 gallons per day of wastewater is disposed of in a synthetically double-lined evaporation pond equipped with leak detection. The wastewater has a total dissolved solids concentration of 1670 mg/l. Groundwater most likely to be affected by an discharge to the surface is at a depth of from 5 to 30 feet with a total dissolved solids concentration of approximately 4300 mg/l The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed and also covers remediation of contaminated groundwater. (GW-2) - Phillip 6 Natural Gas Company, David Joini, Environmental Specialist, 4001 Penbrook, Odessa, Texas 79762, has submitted an application for renewal of its previously approved discharge plan for its Lee Plant located in SW/4 SE/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Approximately 47,000 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5300 mg/l is disposed of in an OCD approval offsite commercial Class II disposal well. Groundwater most likely to be affected by a spill, leak and other accidental discharge to the surface is at a depth of 85 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan application addresses how spills, leaks and other accidental discharges to the surface will be managed and also covers remediation of contaminated groundwater.

(GW-60) - Williams Field Services, H. Spencer George, Manager, Processing Engineering, P. O. Box 10368, Salt Lake City, Utah, 84158-0900, has submitted a discharge plan application for its Milagro Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1500 gallons per day of process wastewater will be disposed of in synthetically double-lined evaporation basins equipped with leak detection. The total dissolved solids concentration of the wastewater will not be known until the plant begins operation. Groundwater most likely to be affected by a spill, leak and other accidental discharge to the surface is at a depth in excess of 60 feet with a total dissolved solids concentration of approximately 5800 mg/l. The discharge plan application 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. 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 <u>7th</u> day of January, 1991. To be published on or before January 18, 1991.

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

SEAL



## PHILLIPS PETROLEUM COMPANY



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 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 <u>Description</u>	Permit <u>Number</u>
Artesia Gas Plant	Discharge	GW-23
Eunice Gas Plant	Discharge	GW-16
Hobbs Booster	Discharge	GW-44
Lee Gas Plant	Discharge	GW-2

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING

May 8, 1991

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

## CERTIFIED MAIL RETURN RECEIPT NO. P-106-675-349

Michael D. Ford Environmental Services Phillips 66 Petroleum Company Bartlesville, OK 74004

## RE: DISCHARGE PLAN GW-2 MODIFICATION PHILLIPS LEE GAS PLANT LEA COUNTY, NEW MEXICO

Dear Mr. Ford:

The New Mexico Oil Conservation Division (OCD) has received your request, dated May 1, 1991, to modify the above referenced, previously approved, discharge plan. The modification consists of the addition of ground water pumped from monitor/recovery well MW-10 into the OCD approved Lee Plant wastewater treatment and disposal system.

The May 1, 1991 requested modification of the previously approved ground water discharge plan, GW-2, for the Phillips Lee Gas Plant located in the SW/4 SE/4, Section 30, Township 17 South, Range 35 East (NMPM), Lea County, New Mexico is hereby approved with the monitoring conditions contained in OCD's April 2, 1991 approval of the ground water remedial activities. The discharge plan (GW-2) was approved on March 18, 1991. The modification does not significantly alter the discharge streams, therefore, public notice was not issued.

The application for modification was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3-107.C and is approved pursuant to WQCC Regulation 3-109.

Please note that Section 3-104 of the WQCC regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C, you are required to notify the Director of any facility Mr. Michael D. Ford May 8, 1991 Page 2

expansion, production increase or process modification that would result in a significant modification in the discharge of potential ground water contaminants.

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

If you have any questions please, contact William Olson of my staff at (505)827-5885.

Sincerely, William J. Leplay Director

WJL/WCO

xc : OCD Hobbs District Office

PANLE PETROLEUM COMPANY

ARTLESVILLE, OKLAHOMA 74004

91 MAY 6 APPLAGY, 36 VIRONMENT AND SAFETY

May 1, 1991

Discharge Plan Amendment Lee Gasoline Plant <u>Discharge Plan No. GW-2</u>

REGISTERED MAIL RETURN RECEIPT NO. P-06

Mr. William C. Olson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Olson:

OIL CONS

We will complete installation of a submersible pump in monitor/recovery well MW-10 by May 15, 1991. Attached are a revised process description, wastewater flow sheet and plot plan reflecting this change.

We request that Discharge Plan No. GW-2 be amended to reflect disposal of the pumped fluids from monitor/recovery well MW-10 into the Lee Plant wastewater treatment system.

If you should have any questions regarding this information, please call me collect at (918) 661-0478.

Very truly yours,

Michael D. Ford

Michael D. Ford Environmental Scientist

MDF

Attachments

cc: Mr. Jerry Sexton, OCD Hobbs District Office Mr. Martin Nee, Geoscience Consultants, Ltd.

See remediation file for attachment

O'L CONSERV IN DIVISION RE: VED

AII 8 35



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

April 4, 1991

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266

Discharge Plan No. GW-2 Lee Gasoline Plant

'91 APR 🧃

Mr. William Olsen New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Olson:

You were recently sent a letter from Michael Ford, dated March 1, 1991, concerning revised wastewater and process layout drawings for Lee Plant. After reviewing these drawings with the Lee Plant operations personnel, it was determined that they were not totally accurate. Therefore, attached is a revised set of drawings (2) which should be used to amend our discharge plan, GW-2, which was recently renewed by your department.

I apologize for any inconvenience this may have caused. Please call me at (915) 368-1316 if you should have any questions.

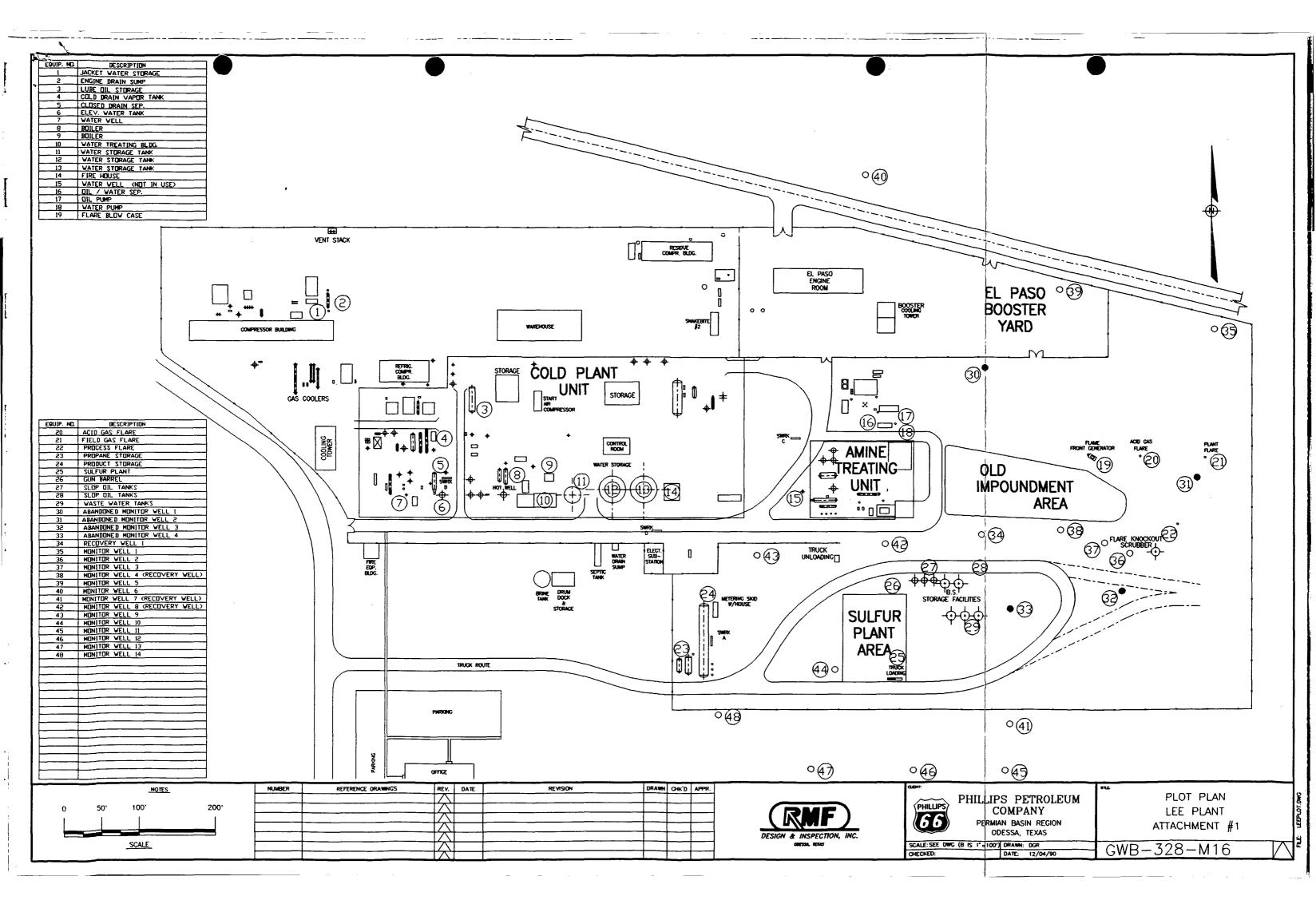
Yours truly,

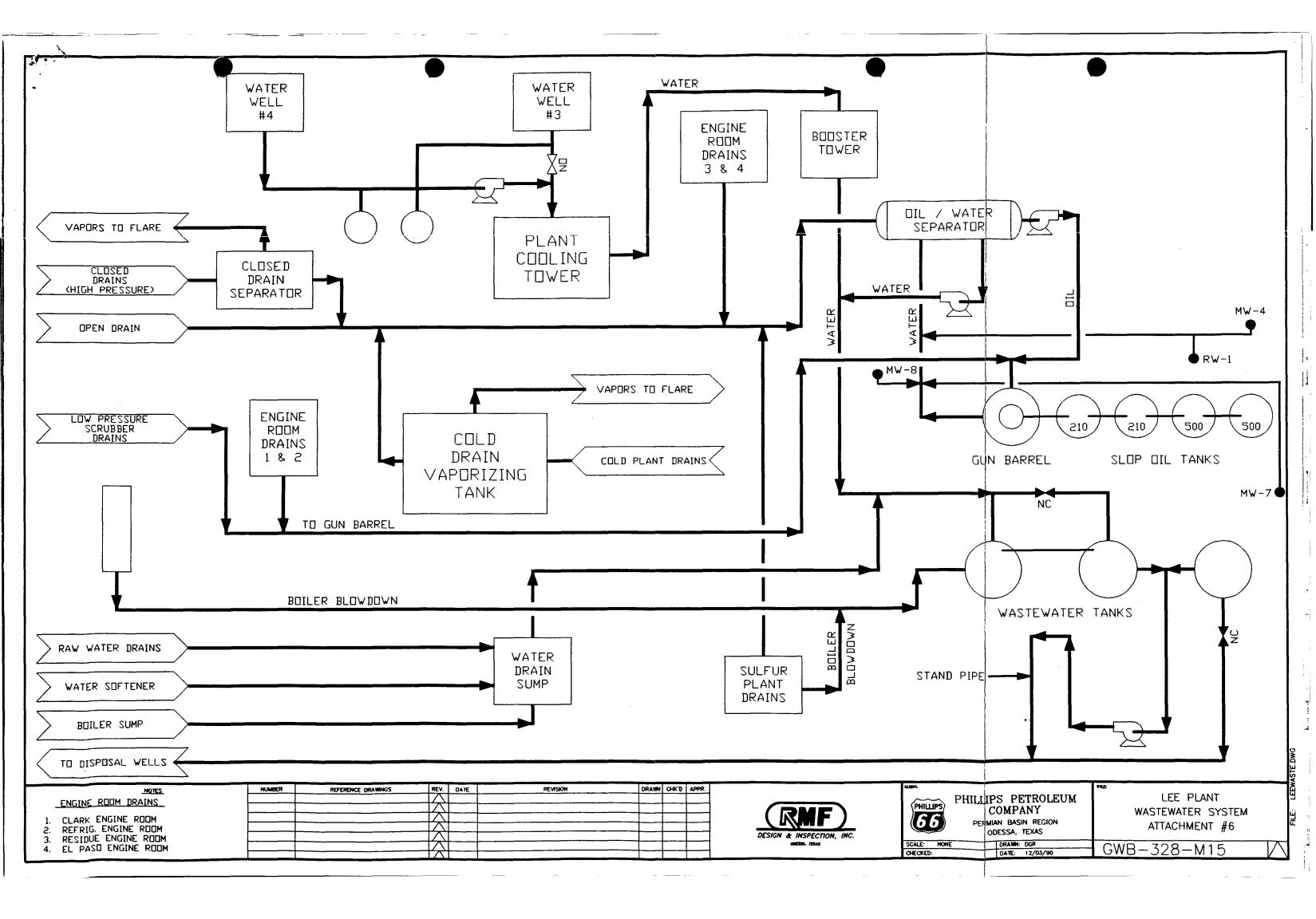
David Jelmini Environmental Specialist

DJJ:leedisc

Attachments

cc: Mr. Martin Nee, Geoscience Consultants, Ltd.









PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

'91 MAR 5 AM 8 54

OIL CONSERVE JON DIVISION RECEIVED

L

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266

March 1, 1991

Discharge Plan GW-2 Lee Plant

CERTIFIED MAIL RETURN RECEIPT Nr. P-512 089 814

Mr. Roger Anderson Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87504

Dear Mr. Anderson:

I have received your letter of 2/25/91 concerning our discharge plan renewal, and have the following responses for your consideration.

- 1. Curbing and paving is required at process and storage areas where leaks or spills can occur. The following areas require containment:
  - a. The cooling tower treatment chemical and acid tanks west of the tower.
     <u>Response</u>: The treatment chemical has been placed on an elevated skid which was in construction during your inspection; any leakage from this tank will drain into the cooling tower basin. A concrete slab/containment will be built around the sulfuric acid tank.
     9/30/91
  - b. The "Magnus 150" oil saddle tank. <u>Response</u>: This tank will be removed and replaced with a single barrel of oil which will be mounted on expander skid which has containment and a drain. 7/1/91
  - c. The valve and piping area of the engine oil tank east of the west engine building. <u>Response</u>: A concrete slab/containment will be built around this area. 9/30/91
  - d. The drum storage off the east warehouse. <u>Response</u>: A concrete slab/containment will be built along the north fence to accomodate various drum and tank storage. It will be large enough to contain the largest tank plus one-third extra capacity. These drums will be moved to this site. 9/30/91
  - e. The 650 gallon solvent saddle tank at the west end of the 3rd engine bld. <u>Response</u>: This tank will be moved to the new containment area referenced in 1.d. 9/30/91

- f. The glycol tanks northeast of the east engine building. <u>Response</u>: These tanks will be moved to the new containment area referenced in 1.d. 9/30/91
- g. The sulfuric acid tanks near the wastewater tanks.
- <u>Response</u>: A concrete slab/containment will be built around the sulfuric acid tank. 9/30/91
- h. The KG-49 pipeline treatment saddle tank.

<u>Response</u>: An elevated platform will be built which will support this tank with containment piped to process drain system at the SRU. 6/30/91

- i. The solvent saddle tank on north end of south service shop. <u>Response</u>: This tank will be removed from service. 4/30/91
- 2. Above grade tanks that contain materials that could be harmful to fresh water and the environment if a catastrophic spill were to occur must be contained with berming. The containment must hold the contents of the largest tank plus one-third or the entire contents of all interconnected vessels plus onethird. The following areas require berming:
  - a. The lube oil tank along the north fence line.
     <u>Response</u>: A concrete slab/containment will be built under this tank as referenced in 1.d.
     9/30/91
  - b. The wastewater tanks adjacent to the slop oil tanks.
    - <u>Response</u>: A berm will be built around these tanks on three sides to hold the contents of the largest tank plus one-third extra capacity. The fourth side is adjacent to the slop oil tanks which has a berm. 6/30/91
  - c. The vertical glycol storage tanks are impractical to berm, and should therefore have curbing installed instead. <u>Response</u>: A 6" angle iron curb will be fastened around the slab with a rubber gasket seal to prevent leakage. 9/30/91
- 3. There was evidence that the containment system around the engine building pads are not containing spills and leaks. This containment must be modified or replaced to prevent leakage.

<u>Response</u>: The concrete surface and angle iron curbing will be sandblasted and sealed. Additional bolts will be installed in the curbing as needed. Plastic cement will be used to seal and prevent seapage. This action will only be taken on the west engine room since the other buildings have no leakage off their slabs. 6/30/91

- 4. The underground skimmer tank is not equipped with leak detection. Submit a procedure for annual integrity testing of this vessel. <u>Response</u>: A concrete vault will be built to house the vessel and pumps. Any leakage from the vessel will be contained in the concrete vault and subsequently repaired. The existing tank and pumps will be removed after the new system has been installed. 3/1/92
- 5. Section III A, Engine OII Drain System, describes the system to collect spent lube oil. Supply the final disposition of the lube oil.
  - <u>Response</u>: Please refer to page 3 of the discharge plan application. The first paragraph of section A states "The spent lube oil (#3, Attachment 1) is then pumped to the plant's slop oil storage tanks." The contents of the slop oil tanks are trucked to our Hobbs booster where it is placed into a crude oil pipeline, which eventually ends up at a refinery for processing.

I hope these responses are to your satisfaction. Please contact me at (915) 368-1316 if I can provide any further clarification. I look forward to your issuance of a discharge plan renewal.

Yours truly,

Varid Jelmini

David Jelmini Environmental Specialist

DJJ:leedis1

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING GOVERNOR February 25, 1991

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

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. P-327-278-079</u>

Mr. David Jelmini Phillips 66 Natural Gas Company 4001 Penbrook Odessa, Texas 79762

RE: Discharge Plan GW-2 Lee Plant Lea County, New Mexico

Dear Mr. Jelmini:

The Oil Conservation Division (OCD) has received and is in the process of reviewing the above referenced discharge plan renewal application, dated December 13, 1990. The following comments and requests for additional information are based on review of the application and observations from the OCD site inspection on February 5, 1991:

- 1. The OCD requires the paving and curbing of process and storage areas where leaks or spills can occur. The purpose of this requirement is to contain and prevent migration and infiltration of any spilled or leaked materials that may contaminate the environment. The following is a list of those areas observed during the site inspection that require containment:
  - a. The cooling tower treatment chemical and acid tanks west of the tower.
  - b. The "Mangus 150" oil saddle tank.
  - c. The valve and piping area of the engine oil tank east of the west engine building.
  - d. The drum storage off the east warehouse.
  - e. The 650 gallon solvent saddle tank at the west end of the third engine building.

Mr. David Jelmini February 25, 1991 Page -2-

-

- f. The glycol tanks northeast of the east engine building.
- g. The sulfuric acid tanks near the wastewater tanks.
- h. The KG-49 pipeline treatment saddle tank.
- i. The solvent saddle tank on north end of south service shop.

Submit a completion schedule for paving and curbing the above areas and any other areas where leaks or spills can occur. This schedule must include all drum storage area.

## 2. Berming of Tanks

The OCD is requiring that above grade tanks that contain materials with constutuents 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 contraminants. All tanks that contain these types of materials must be bermed to prevent migration of 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. The following areas were identified as needing berming:

- a. The lube oil tank along the north fence line.
- b. The wastewater tanks adjacent to the slop oil tanks.
- c. The vertical glycol storage tanks are presently on concrete pads and, due to location, would be impractical to berm. At this time, the installation of a curb on these pads would be acceptable. If repositioning of these tanks becomes necessary in the future, berming will be required.

Mr. David Jelmini February 25, 1991 Page -3-

- 3. There was evidence that the containment system around the engine building pads, installed pursuant to discharge plan renewal requirements approved on May 5, 1986, is not containing spills and leaks. Submit a plan and completion schedule for modifying or replacing the engine room pad containment.
- 4. The underground skimmer tank is not equipped with leak detection. Submit a procedure for annual integrity testing of this vessel. Please be aware, if repair or replacement of this tank becomes necessary in the future, leak detection is required to be incorporated in the design.
- 5. Section III A, Engine Oil Drain Systems, describes the system to collect spent lube oil. Supply the final disposition of the lube oil.

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

# 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 Aav. 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
consecutive weeks, beginning with the issue of
January 18 1991
and ending with the issue of
January 18 , 1991

And that the cost of publishing said notice is the sum of .48.08

which sum has been (Paid) (Assessed) as Court Costs
Cipi Cimens
Subscribed and sworn to before me this 21st
day of January 19 91
Mrs Jean Llenier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 24 19 94

## NOTICE OF FUBLICATION STOP OF NEW MEXICO ENERGY, MINERAL AN ONATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications and renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P. 0. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

LEGAL NUTICE

(GW-32) - Giant Refining Company, Claud Rosendale, Emrironmental Manager, Route 3, Box 7 Gallup, New Mexico 87301, has submitted a renewal application for its previously approved discharge plan for its Ciniza Refinery located 17 miles east of Ga]hup, New Mexico on Interstate Highway 40. The refinery and associated waste-management facilities are located in the S/4 of Section 28 and the N 3/4 of Section 33 of Township 15 North, Range 15 West, NMPM, McKinley County, New Mexico. The refinery discharges approximately 161,000 gallons per day of process and non-process wastewater. The wastewater, with an approximate concentration of 2000 to 3000 mg/l total dissolved solids, is discharged to 11 unlined evaporation ponds with a total of 117 acres of capacity. These ponds are constructed in and of the shales of the upper Chinle Formation, which have a permeability of less than six inches per year. The uppermost ground water likely to be affected by refinery discharges is in thin localized sand lenses at depths of 30 to 65 feet, with a total dissolved solids concentration of approximately 1100 mg/L. The uppermost ground water at the site known to be areally extensive is the Sonsela Sandstone at depths from 20 to 140 feet, with a total dissolved solids concentration of approximate]y 800 mg/i. Ground water in localized sands and the Sonsela is confined under artesian conditions. The discharge plan application in addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-55) - Thriftway Marketing Corporation, F. L Stark, Vice President, 710 East 20th Street, Famington, New Mexico 87401, has submitted a discharge plan application for its Bloomfield Refinery located in the SE/4, Section 32, and SW/2 SW/4, Section 33, Township 29 North, Range 11 West, and the NE/4 NE/4, Section 9, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximnately 1225 gallons per day of wastewater is disposed of in a synthetically double-lined evaporation pond equipped with leak detection. The wastewater has a total dissolved solids concentration of 1670 mg/l. Groundwater most likely to be affected by an discharge to the surface is at a depth of from 5 to 30 feet with a total dissolved solids concentration of approximnately 4300 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed and also covers remediation of contammated groundwater.

(GW-2) - Phillips 66 Natural Gas Company, David Jehmini, Environmental Specialist, 4001 Penbrook, Odessa, Texas 79762, has submitted an application for renewal of its previously approved discharge plan for its Lee Plant located in SW/4 SE/4 Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico. Approximately 47,000 gallom per day of process waitdwater with a total dissolved solids concentration of approximately 5300 mg/l is disposed of in an OCD approval offsite commercial Class II disposal well. Groundwater most likely to be affected by a spill, leak and other accidental discharge to the surface is at a depth of 85 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan application addresses how spills, leaks and other accidental discharges to the surface will be managed and also covers remediation of contaminated groundwater.

(GW-6O) - Williams Field Services, H. Spencer George, Manager, Processing Engineering, P. 0. Box 10368, Salt Lake City, Utah, 84158-0900, has submitted a discharge plan application for its Milagro Plant located in the SW/4 SE/4, Section 12, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Appromnately 1500 gallons per day of process wastewater will be disposed of in synthetically double-lined evaporation basins equipped with leak detection. The total dissolved solids concentration of the wastewater will not be known until the plant begins operation. Groundwater most likeky to be affected by a spill, leaks and other accidental discharge to the surface is at a depth in excess of 60 feet with a total dissolved solids concentration of apprximately 5800 mg/l. The discharge plan application addresses how spi]ls, 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. 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 7th day of January, 1991. To be published on or before January 18, 1991.

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

SEAL

Published in the Lovington Daily Leader January 18, 1991.

## STATE OF NEW MEXICO

County of Bernalillo

SS

PRICE....

Thomas J. Smithson 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, Chaper 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,

1991, and the subsequent consecutive

publications on.....

ADDITUE APITEL

-18-9

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of.....

CLA-22-A (R-12/91)

Statement to come at end of month.

C 81184 ACCOUNT NUMBER.....

(GW-2) - Philips 66 Natural Gas Company, David Jelmini, Environmental Specialist, 4001 Penbrook, Odessa, Texas 79762, has submitted an application for renewal of its previously approved discharge plan for its Les Plant located in SW/4 SE/4, Section 30, Township TSouth, Range 35 East, NMPM, Les County, New Mexico. Approximately 47,000 gallons per day of process wastewater with a total disolved solids concentration of approximately 5300 mg/l is disposed of in an OCD approval offsite commercial Class II disposal well. Groundwater most likely to be affected by a spil, lesk and other solids concentration of approximately 600 mg/l. The discharge plan application adtresses how spill, a leaks and other socidential discharges to the surface will be managed and also covers remediation of contaminated groundwater. (GW-60) - Williams Field Ser-

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day of January, 1991. STATE OF NEW MEXICO, on UNIS / 2016 STATE OF NEW MEXICO OIL CONSERVATION DIVISION SWilliam J. LeMay

Director

Journal: January 21, 1991

#### NOTICE OF PUBLICATICIN STATE OF NEW MEXICO ENERGY, MINERALS ANID NATURAL

RESOURCES DEPARTMENT OIL CONSERVATION DIVISION Notice is hereby given that pur

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the tollowing discharge plan applications and 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:

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(GW-55) - Thriftway Marketing Corporation, F.L. Stark, Vice Presi-dent, 710 East 20thStreet, Farmı. keting New Mexico 87401, has ington, submitted a discharge plan application for its Bloomfield Refinery located in the SE/4, Section 32, and SW/2 SW/4, Section 23, Township 29 North, Range 11 West, and the NE/4 NE/4, Section 9, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 1225 gallons per day of wastervater is posed of in a synthetically dcubie-lined evaporation pond aquipped with leak detection. The wastewater has a tota dissolved solids concentration of 1670 mg/l. Groundwater most likely to be affected by an discharge to the surface is at a depth of from 5 to 30 feet with a totla dissolved solids concentration of approximately 4300 mg/l. The discharge plan add addresses how spills, leiks and other accidental discharges to the e will be managed and also ediation of contaminated grounwater.

Affidavit of Pu	ublication
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STATE OF NEW MEXICO,

) ss COUNTY OF McKINLEY

### Barbara Garrett

Legal Clerk

\_\_\_\_\_being duly sworn upon

oath, deposes and says:

As

\_of the Gallup

Independent, a newspaper published in and having a general circulation in McKinley County, New Mexico, and in the City of Gallup, therein: that this affiant makes this affidavit based upon personal knowledge of the facts herein sworn to. That the publication, a copy of which is hereto attached was published in said newspaper during the period and time of publication and said notice was published in the newspaper proper, and not in a supplement thereof,

for	One (1) Time	, the fi	rst publication being on the
	<u>15th</u> day of	_January_	, 199] the
second p	ublication being on the		day of
		, 19	
on the _		.day of	, 19
<u></u>			
and the I	ast publication being on th	e	day of
		, 19	

That such newspaper, in which such notice or advertisement was published, is now and has been at all times material hereto, duly qualified for such purpose, and to publish legal notices and advertisements within the meaning of Chapter 12, of the statutes of the State of New Mexico, 1941 compilation

	_1Mam	MMMA
	V	Affiant.
Sworn and subscribed to be	fore me this	<i>]</i> day of
	, A.D., 19	+ /haze
0	1 ( 4	Notary Public.
		$\mathcal{C}$

My commission expires 6.00-93

LEGAL NOTICE STATE OF NEW MEXICO

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications and renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2008, Santa Fe, New Mexico 87504-2068, Telephone (505) 827-5800:

(GW-32) - Giant Refining Company, Claud Rosendale, Environmental Mana-'ger, Route 3, Box 7, Gallup, New Mexico 87301, has submitted a renewal application for its previously approved discharge plan for its previously approved discharge plan for its cliniza Refinery located 17 miles east of Gallup, New Mexico on Interstate Highway 40. The refinery and associated waste-management facilities are located in the S/4 of Section 28 and the N 3/4 of Secion 33 of Township 15 North, Range 15 West, NMPM, McKinley County, New Mexico. The refinery discharges approximately 161,000 gallons per day of , "cess and non-process wastewater. The wastewater, with an approximate concentration of 2000 to 3000 mg/t total dissolved solids, is discharged to 11 unlined? evaporation ponds with a total of 117. acres of capacity. These ponds are constructed in and of the shales of the upper Chinle Formation, which have a permeability of less than six inches per year. The uppermost ground water likely to be affected by refinery discharges is in thin localized sand lenses at depths of 30 to 65 feet, with a total dissolved solids concentration of approximately 1100 mg/l. Theuppermost ground water at the site known to be areally extensive is the Sonsela Sandstone at depths from 20 to 140 feet, with a total dissolved solids concentration of approximately 900 mg/l.

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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 shuld be held. A hearing will be head 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 7th day of January, 1991. To be published on or before January 18, 1991.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

WILLIAM J. LEMAY, Director

Legal #6450 published in the Independent January 15, 1991.

STATE OF NEW MEXICO, County of San Juan:

CHRISTINE HILL being duly sworn, says: "That she is the NATIONAL AD MANAGER of

No.

27090

The Farmington Daily Times, a daily newspaper of general circulation published in English in Farmington , said county and state, and that the hereto attached LEGAL NOTICE

was published in a regular and entire issue of the said Farmington Daily Times, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for ONE consecutive (days) (////) on the same day as follows:

First Publication SUNDAY, JANUARY 13, 1991

Second Publication

Third Publication

Fourth Publication

and that payment therefore in the amount of \$<u>81.66</u> has been made.

tino -

Subscribed and sworn to before me this 14THday of 1991

JANUARY

mu nau Notary Public, San Juan County,

New Mexico

My Comm expires: JULY 3, 1993

COPY OF PUBLICATI

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT OL CONSERVATION DIVISION Notice is herby given that pursuant to New Mexico Water Quality Control Commission Regulation, the Iolioving discharge plan applications and renewal ap-plications have been submitted to the Director of the Di Conservation Division, State Land Office Building. P. O. Box 2088, Santa Fe. New Mexico 87504-2088, Telephone (505) 827-5800: (GW-32)-Giant Refining Company, Claud Rosendale, Environmental Manager, Route 3, Box 7, Gallup, New Mexico 87301, has sub-mitted a renewal application for its previously approved discharge plan for its Criniza Refinery located 17 miles east of Gallup, New Mexico on Interstate Highway 40. The refinery and as-sociated waste-management facilities are located in the 5/4 of Section 28 and the N 3/4 of Section 33 of Township 15 North, Range 15 West, NMPM, McKinley County, New Mexico. The refinery discharges approximately 161.000 gallons per day of process and non-process wastewater. The wastewater, with an approx-imate concentration of 2000 to 3000 mgl total dissolved solids, is discharged to 11 unlined evaporation ponds with a total of 117 acres of capacity. These ponds are constructed in and of the shales of the upper Chinle formation. which have a permeability of less than six inches per year. The uppermost ground water likely to be affected by refinery discharges is in thin localized sand lenses at depths of 30 to 65 feet, with a total dissolved solids concentration of approximately 1100 mgl. The uppermost ground water in localized sands and the Sonsela is confined under artesian conditions. The discharge plan application in address how spills, leaks and other accidential discharges to the surface will be managed. (GW-55)-Thriftway Marketing Corporation, F L. Stark, Vice President, 710 East 20th Street, Farmington, New Mexico 87401, has submitted a discharge plan papication in the Bloomfield Refinery located in the SE/4, Section 32, and SW/2 SW/4, Section 33, Townshi

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NEW MEXICO ON CONSERVATION DIVISION MEMORANDUM OF MEETING OR CONVERSATION					
Telephone	Personal	Time /500	) Date	1/3/91	
	Originating Party	· ·	<u> </u>	Other Parties	
Mile For	-d - Phillips	Petcoleum	Bill Olson	11 Olson - OCD	
Subject Subject Phillips Lee Burkleye @ Gas Plant Discussion Willing and precovery physes installation to begin week at Janney 21, 1991					
<u>Conclusions or</u>	· · · · · · · · · · · · · · · · · · ·	To do a	mtivity	5/3 on recovery	
Told him slug tests not required by OCP, he can get conductivity intermation from literature and recent were by Texaco & OCD in the area Told him to make sure physics can handle any phymping rate Distribution Phillips Lee D.P. file					

File.

2005

AL DIVISION



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK, PHONE: 915 367-1266 м сомрану December 13, 1990

Discharge Plan Renewal Lee Plant <u>Discharge Plan No. GW-2</u>

CERTIFIED MAIL RETURN RECEIPT NO. P-512 089 830

Mr. David Boyer Environmental Bureau Chief New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87504

Dear Mr. Boyer:

In accordance with New Mexico Water Quality Control Commission regulations, Phillips 66 Natural Gas Company submits the attached Groundwater Discharge Plan for Lee Gas Processing Plant, located in Lea County, New Mexico. The current Groundwater Discharge Plan expires on March 16, 1991. There have been several minor changes from the previous plan, including a newly revised drain system and numerous groundwater monitoring/recovery wells. Three copies of the revised plan, along with a signed affirmation, are enclosed as requested.

If you should have any questions regarding this information, please contact me at (915) 368-1316.

Yours very truly, elmin

David Je#mini Environmental Specialist

DJJ:leedispl

Attachments

## **AFFIRMATION**

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true and accurate and complete to the best of my knowledge and belief.

alm (signature)

ee 1990 (date)

<u>David Jelmini</u> (printed name)

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Environmental Specialist

(title)

## DISCHARGE PLAN PHILLIPS 66 NATURAL GAS COMPANY LEE GASOLINE PLANT SECTION 30, TOWNSHIP 17 SOUTH, RANGE 35 EAST, LEA COUNTY

## I. <u>GENERAL PROCESS DESCRIPTION</u>

Lee Plant's basic function is to remove the ethane and heavier hydrocarbon fractions from casinghead and gas well gas. The plant receives sour hydrocarbon gas streams from 5 and 250 psig gathering systems. The gas from the 5 psig system is compressed to 250 psig so that the total gas stream entering the plant's amine contactor (first stage of processing) is at 250 psig. The amine contactor uses Ucarsol CR-304 (a proprietary blend) to remove the hydrogen sulfide and carbon dioxide from the inlet gas stream. The hydrogen sulfide and carbon dioxide removed in the sweetening process are sent to the plant's sulfur recovery unit. The sweet gas from the amine contactor is split into two streams. One stream is sent to our processing plant located near Eunice, New Mexico. The second stream is compressed from 250 to 750 psig and is then routed to a molecular sieve dehydrator where the gas is dehydrated to a water content of less than 1 ppmv. From the dehydrator 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 80 percent of the ethane and all of the propane and heavier hydrocarbons that entered the plant. The liquid hydrocarbon stream has a vapor pressure of appropriately 350 psig and is sent to a 10' I.D. x 108' S/S, 550 psig MWP vessel for temporary storage before being delivered to a pipeline for sale. The second hydrocarbon stream produced from the turboexpander is comprised primarily of methane gas. This gas is compressed to 750 psig before being sold to El Paso Natural Gas Company or Northern Natural Gas Company.

Attachments 1 and 2 are a plot plan and process flow sheet of the plant.

## II. <u>PLANT WATER SYSTEMS</u>

### A. Raw Water

Lee Plant receives its water from a total of three wells (#1, 3 & 4) located in Sections 30 and 31, Township 17 South, Range 35 East, Lea County. The wells are completed at a depth of approximately 230 feet and supply an average of 1770 bbl/day of water to the plant. Wells #1 & 4 are used for process make-up water. Attachment 3 is an analysis of this water.

## B. Potable Water

A Small fraction of the raw water is chlorinated and used as potable water for the plant's office and control room. This water is taken from Well #3.

## C. Cooling Tower System

The cooling tower system is comprised of two open recirculating cooling towers referred to as the Booster and Process cooling towers. The Booster cooling tower has a recirculation rate of 1080 gpm with an approximate water make-up rate of 50 gpm from the Process cooling tower. The Process cooling tower has a recirculation rate of 3500 gpm with an approximate raw water make-up rate of 63 gpm. The water in these towers is recirculated until the impurities in the water are concentrated to four times their inlet concentrations, producing approximately 670 bbl/day of wastewater. This wastewater is piped directly to the plant's wastewater holding tanks. The following chemicals, with their specific feed rates, are being added to the cooling tower waters for scale, corrosion, and biological treatment:

Chemical	Feed Rate (gal/day)
Betz 26K	2.5
Inhibitor 562 C	1.00
Betz 409	.3
Slimicide C-31	.42

Material safety data sheets for these chemicals are found in Attachment 4.

## D. Boiler Water System

The boiler water system is comprised of a zeolite water softener, three boilers (one process and two waste heat boilers in the sulfur plant) which produce 250 psig steam, and one sulfur plant condenser which produces 50 psig steam used in the various plant processes. The raw make-up water to this system passes through the zeolite softener which removes calcium and magnesium in the make-up water. The treated water from the softener flows to a holding tank before being pumped into the boilers and sulfur plant condensers. All condensate produced from the use of the 50 and 250 psig steam is returned to the boiler feed-water tank for reuse. Approximately 450 bbl/day of boiler blowdown wastewater is produced and piped directly to the plant's wastewater holding tanks. The following chemicals, with their specific feed rates, are being added to the boiler waters for scale and corrosion treatment:

Chemical	Feed Rate (gal/day)
Balance Polymer 6400	4 Davidoa
Corrogen Magni - Form 305	Dry Powder 0.5
Optimeen	2.3
Ferrosperse	0.25

Material safety data sheets for these chemicals are found in Attachment 5.

#### E. Engine Cooling Systems

Water and antifreeze (50% Mix) is used as coolant in the jacket water systems of all engines at the plant. The plant has four engine rooms referred to as the Clark, Refrigeration, Residue, and El Paso engine rooms. Engines in the engine rooms have individual, self-contained cooling systems.

Coolant from engines in the Clark engine room 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. Coolant in engines equipped with self-contained cooling systems is drained into a common supply storage header before an engine is worked on. Coolant is placed back in the engine when the work is completed.

#### III. PLANT DRAIN SYSTEMS

#### A. Engine Oil Drain Systems

Lube oil in all of the plant engines is changed by draining the "spent" oil charge from an engine into Engine drain sumps and then replacing with a "fresh" charge of lube oil. The spent lube oil (#3, Attachment 1) is then pumped to the plant's slop oil storage tanks.

Atmospheric drains, designed to catch leaking oil from the engines, are in place around the plant's engine rooms. Drains from the Clark, and Refrigeration engine rooms flow to the below ground engine drain sump (#2, Attachment 1) constructed of externally coated steel. Liquids from the sump are pumped into the low pressure scrubber drain system. Drains from the Residue and El Paso engine rooms are tied into the plant's open drain system. Attachment 6 is a process flowsheet of this system.

#### B. Closed (High Pressure) Drain System

The closed drain system is a pressure drain system constructed of buried, externally coated, schedule 40 steel pipe. The drain system is tied into an above ground separator (#5, Attachment 1) where liquids with low specific gravities vapor off. Vapors from the separator are burned in the plant flare. Liquids which do not vapor off in the separator flow into a blowcase for transfer to the 5th inlet scrubber. Attachment 6 is a process flow sheet of this system.

#### C. Cold Drain System

The cold drain system is Low Pressure drain system constructed of buried, stainless steel pipe connected to an above ground cold drain vaporizing tank (#4, Attachment 1). Drain liquids from the turboexpander (cold plant) flow to the vaporizing tank where they are heated. Vapors produced from heating the drain liquids in the tank are burned in the plant flare. Liquids which do not vapor off flow into the open drain system. Attachment 6 is a process flow sheet of this system.

#### D. Low Pressure Scrubber Drain System

The low pressure scrubber drain system receives waste liquids from the plant's low pressure (5 psig) inlet gas scrubbers. The drain lines are constructed of buried, externally coated, schedule 40 steel pipe. The waste liquids are piped to an above ground "gun barrel" (#26, Attachment 1) where oil and water are separated. Oil from the "gun barrel" flows directly to the plant's slop oil storage tanks. Water from the "gun barrel" is piped directly to the open drain system's oil/water separator. Attachment 6 is a process flow sheet of this system.

#### E. 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, internally coated steel oil/water separator (#16, Attachment 1). Oil from the separator flows into a below grade steel sump (#17, Attachment 1) from which it is pumped to the plant's slop oil storage tanks. Water from the separator flows into a second below grade steel sump (#18, Attachment 1) and is then pumped to the plant's wastewater holding tanks. Attachment 6 is a process flow sheet of this system.

#### F. Water Drain System

Drains that are primarily water (e.g. water softener, boiler drains) are collected in a water drain sump and them pumped to the Waste Water Storage Facilities. This Sump is a concrete basin with an internal fiberglass tank to give a primary and secondary means for leak prevention.

#### G. Final Wastewater Disposal System

Wastewater from the open drain oil/water separator, boiler blowdown, and cooling tower blowdown enter the #1 wastewater tank where they are commingled (#29, Attachment 1). Any solids in the wastewater will settle out in this tank. Wastewater from the #1 tank then overflows into the #2 tank where it is treated with acid to maintain a pH of 6.0 to 6.5. Wastewater from the #2 tank flows through a sock filter, used to remove any remaining solid particles, into the final wastewater standpipe. Wastewater in the standpipe is treated with Visco 950 (Attachment 7) for scale inhibition before it gravity feeds into Rice Engineering's flow line. The wastewater is disposed of in Rice Engineering's Vacuum Salt Water Disposal System (Class II injection well). Attachment 7A is a detailed chemical analysis of the final wastewater stream. All three of the wastewater tanks are 750 barrel capacity and have been internally coated. If a leak or failure is detected, the system will be shut in and the wastewater trucked to a nearby permitted disposal facility.

#### IV. SOLID WASTE DISPOSAL

#### A. General Waste

All solid waste is picked up by Waste Management for disposal in a Hobbs landfill. This includes paper, pipe, concrete and other nonhazardous refuse.

#### B. Spent Molecular Sieve

Approximately every 3 to 4 years the molecular sieve dehydrators at the plant are recharged. The spent molecular sieve (Attachment 8) is disposed of by Waste Management at a Hobbs landfill. Approximately 28,000 pounds of this material are disposed of each time the beds are recharged.

#### C. Spent Sulfur Catalyst

Approximately once every five years the catalyst in the sulfur recovery unit converter beds are recharged. The spent catalyst (Attachment 9) is disposed of by Waste Management at a Hobbs landfill. Approximately 29,000 pounds of this material are disposed of each time the beds are recharged.

#### V. <u>SPILL/LEAK PREVENTION AND HOUSEKEEPING PROCEDURES</u>

The plant's underground vessels and piping are visually inspected and/or pressure tested prior to being put in service. The vessels and lines are externally and/or internally coated to ensure against corrosion. This equipment is checked continuously by operators who are on duty 24 hours per day. Any leaks would be detected by the operators and corrected. Operators are required to notify the plant superintendent of any leak. If the leak is significant, the plant superintendent will notify the Oil Conservation Division in accordance with Rule 116. <u>All drain lines</u> <u>installed prior to 1981 were replaced during the summer of 1990.</u>

#### VI. MISCELLANEOUS INFORMATION

#### A. Sanitary Wastes

Sanitary wastes from the plant and office are handled by a septic tank and leach field.

#### B. Plant Topography

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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

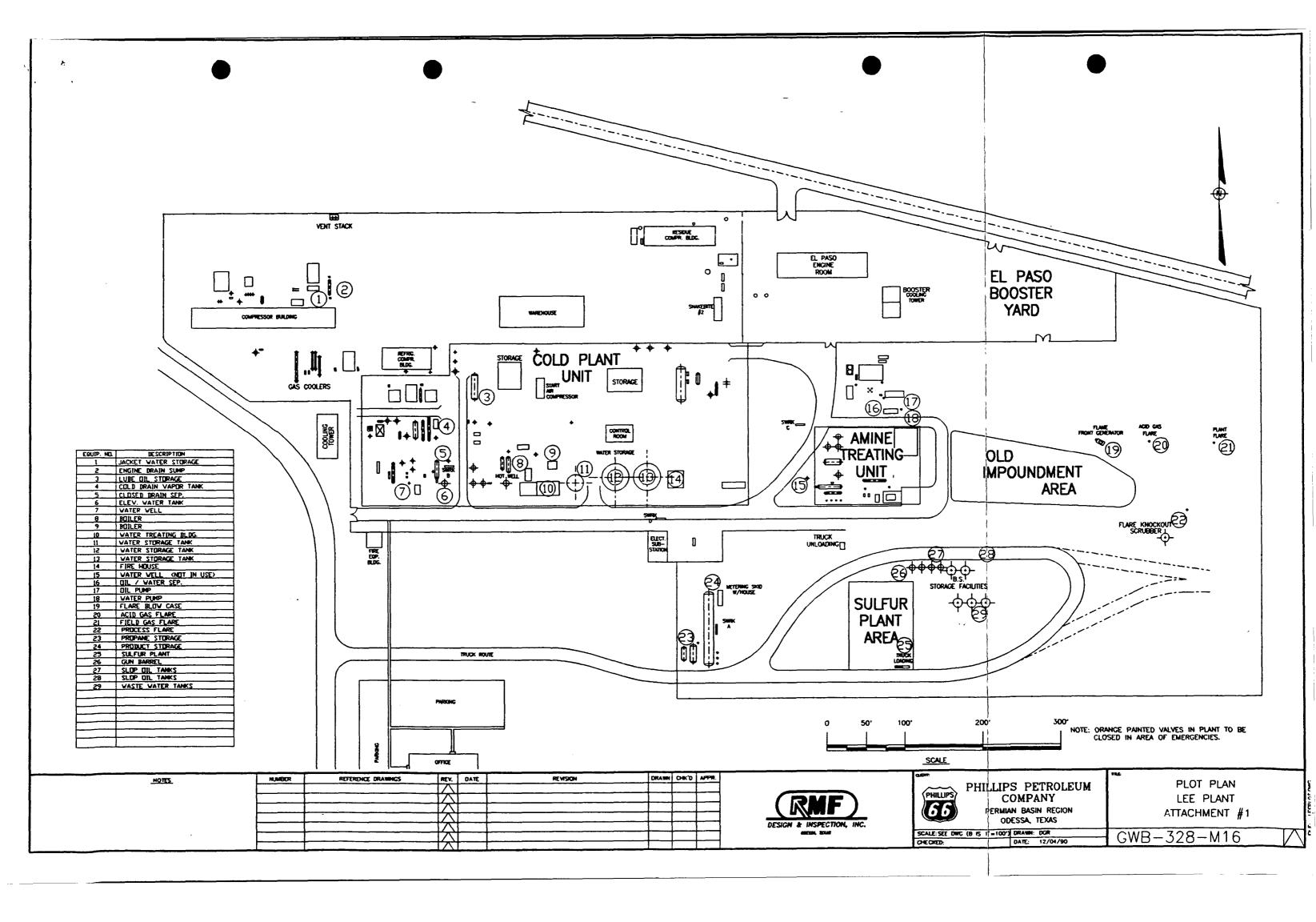
None

#### D. Ground Water Contamination

In 1988, four ground-water monitoring wells were installed around an abandoned wastewater evaporation pond. Samples from these wells indicated both free-phase and dissolved-phase hydrocarbons were present in the saturated zone, approximately 100 feet below the surface.

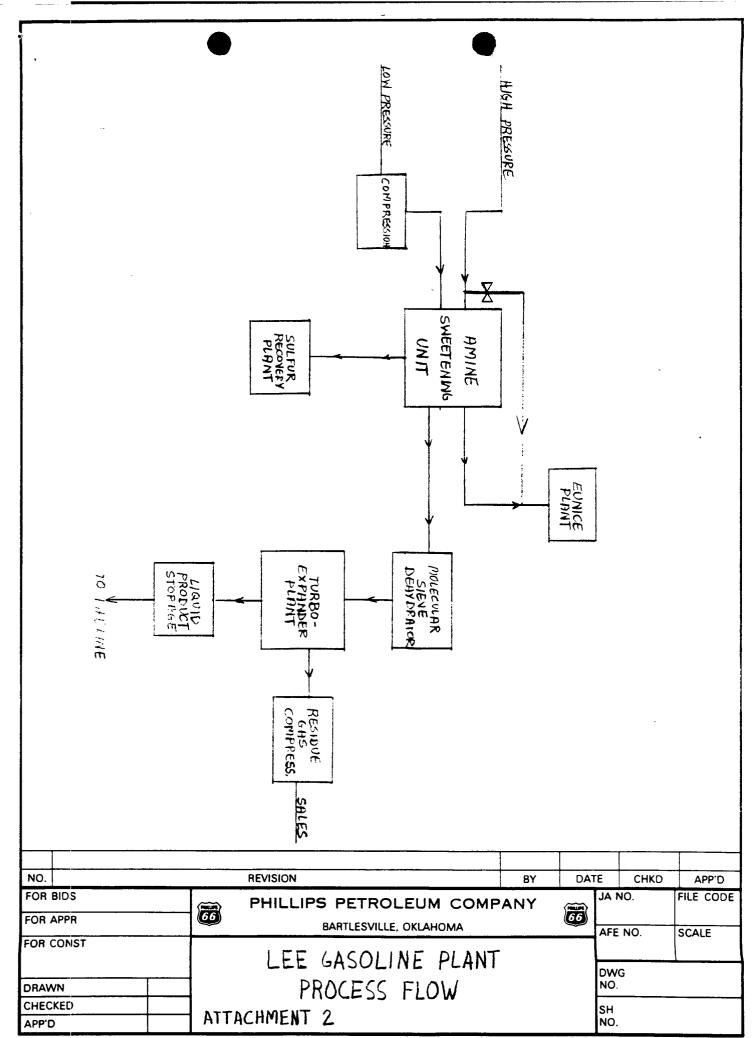
A total of 12 monitoring wells and 1 recovery well have been installed as the result of a hydrogeological study conducted by a third party consultant (Attachment 11). The recovery well is currently being pumped in an effort to remediate the hydrocarbon contamination. The pumped effluent is sent to the oil/water separator (#16, Attachment 1) for further processing. Two additional monitoring wells will be installed in early 1991. Three of the existing monitoring wells (MW-4, 7 & 8) will also be converted to recovery wells during this same period; the effluent will be processed through the same oil/water separator as recovery well 1.

Detailed investigative and analytical reports have been previously supplied to the NMOCD, and should be referred to for further information of this subject.





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### ATTACHMENT 3 OUTHWESTERN LEBORATORIES

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. <u>C-1950-W</u> Customer No. 3355796 Report No. <u>35059</u>

> > Report Date \_\_\_\_\_\_\_\_\_\_

Date Received <u>1-10-84</u>

mg/L

Report of tests on:

<u>\_</u> Sw[

Water

Client:

Phillips Petroleum

identification:

Lee Plant, Raw Water

AluminumLess		2
ArsenicLess		0.05
BariumLess		1
BoronLess		0.1
CadmiumLess	Than	0.01
ChromiumLess	Than 🗠 👘	0.05
CobaltLess	Than	0.1
CopperLess	Than	0.1
IronLess		0.2
LeadLess	Than -	0.05
ManganeseLess	Than	0.05
MercuryLess		0.002
MolybdenumLess		1
NickelLess		0.5
SeleniumLess		0.01
SilverLess		0.05
ZincLess		0.05
2005		0.05
Sulfate		33
Chloride		156
Fluoride		- 0.6
Nitrate		13.3
CyanideLess		0.001
PhenolsLess		- 0.001
LUGUOT2	T 11CT 19	0.001
Total Dissolved Solids @ 180° C		592

Technician: KLH, PCB, GMB

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

BORATORIES

Our letters and reports are for the exclusive use of the client to whom they are addressed. The use of our name must receive our prior written approval. Our letters and reports apply only to the sample tested and/or inspected, and are not necessarily indicative of the quantities of apparently identical or similar products.

#### BETZ INDUSTRIAL 4636 SOMERTON ROAD, TREVOSE, PA. 19047

#### BETZ MATERIAL SAFETY DATA SHEET

24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : BETZ 26K SERIES 26087

EFFECTIVE DATE 05-18-89 PRINTED: 10/30/89 REV: SEC. 3

ATTACH. 4

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/TLV:2, OMG/M3(CEILING).

PHOSPHONIC ACID, (1-HYDROXYETHYLIDINE)BIS-+++HEDP; CAS#2809-21-4; EYE IRRITANT; PEL: NONE; TLV: NONE.

1-H-BENZOTRIAZOLE, METHYL\*\*\*(TOLYLTRIAZOLE; TTA); CAS#29385-43-1; IRRITANT(EYE); PEL: NONE; TLV: NONE.

----SECTION 2-----TYPICAL PHYSICAL DATA-----

PH: AS IS (APPROX.) 12.3 ODOR: SLIGHT FL.PT.(DEG.F): >200 P-M(CC) SP.GR.(70F)OR DENSITY: 1.436 VAPOR PRESSURE(mmHG): 18 VISC cps70F: 56 EVAP.RATE: ND WATER=1 PHYSICAL STATE: LIQUID

VAPOR DENSITY(AIR=1): (1 %SOLUBILITY(WATER): 100 APPEARANCE: YELLOW FREEZE POINT(DEG.F): 2

----SECTION 3-----REACTIVITY DATA------

STABLE.MAY REACT WITH STRONG OXIDIZERS.DO NOT CONTAMINATE.BETZ TANK CLEAN-OUT CATEGORY 'B'

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

### MATERIAL SAFETY DATA SHEET (PAGE 2 OF 3) ATTACH. 4 Cont.

PRODUCT: BETZ 26K SERIES EFFECTIVE DATE 05-18-89 26087 ----SECTION 4-----HEALTH HAZARD EFFECTS-----ACUTE SKIN EFFECTS \*\*\* PRIMARY ROUTE OF EXPOSURE IVERE 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 IN' LATION EXPOSURE\*\*\* .. EMOVE 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. 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

MATERIAL SAFETY DATA SHEET (PAGE 3 OF 3)

ATTACH. 4 Cont.

PROPUCT: BETZ 26K SERIES 26087 EFFECTIVE DATE 05-18-89 --- 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. DO NOT FREEZE. IF FROZEN, THAW AND MIX COMPLETELY PRIOR TO USE HANDLING INSTRUCTIONS\*\*\* IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE ALKALINE.CORROSIVE(EYES).DO NOT MIX WITH ACIDIC MATERIAL. TH' MSDS COMPLIES WITH THE OSHA HAZARD COMMUNICATION STANDARD HARGED M. HERSH (ENVIRONMENTAL 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: 1,229 GALLONS DUE TO POTASSIUM 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: 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 + 3 ; FIRE - 1 ; REACTIVITY - 0 ; SPECIAL - ALK ; PE - B

BETZ INDUSTRIAL, INC. 4636 MERTON ROAD, TREVOSE, PA. 047

ATTACH. 4 Cont.

#### BETZ MATERIAL SAFETY DATA SHEET

24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : INHIBITOR 5620

EFFECTIVE DATE 02-05-87 LATEST VERSION

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. OMG/M3; TLV: 2. OMG/M3(CEILING).

1-H-BENZOTRIAZOLE,METHYL\*\*\*(TOLTLTRIAZOLE;TTA);CAS#29385-43-1; IRRITANT(EYE); PEL: NONE; TLV: NONE.

-----BECTION 2-----TYPICAL PHYSICAL DATA-----

(APPROX.) 12.8 ODOR: NONE PH' AS IS FL.FT (DEG.F) 200 SETA(CC) SP.GR.(70F)OR DENSITY: 1.077 VAPOR PRESSURE(mmHG): ND VISC cps70F: 5.6 EVAP, RATE: ND WATER=1 PHYSICAL STATE: LIQUID

VAPOR DENSITY(AIR=1): ND ZSOLUBILITY(WATER): 100 APPEARANCE: LIGHT AMBER FREEZE POINT(DEG.F): 13

-----SECTION 3-----REACTIVITY DATA-----

STABLE

1

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

MATERIAL SAFETY DATA SHEET (PAGE 2 OF 3) ATTACH. 4 Cont. PRODUCT INHIBITOR 562C ----SECTION 4-----HEALTH HAZARD EFFECTS-----' "UTE 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 S-----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 S-----SPILL, DISPOSAL AND FIRE INSTRUCTIONS------SPILL INSTRUCTIONS\*\*\* VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT. CONTAIN AND ABSORD 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 SEVER TREATMENT FACILITY, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A PERHITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS)-INCINERATE OR FURY 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

MATERIAL SAFETY DATA SHEET (PAGE 3 OF 3)

ATTACH. 4 Cont.

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 FILTERS. RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EVE PROTECTION\*\*\* SPLASH PROOF CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* KEEP DRUMS & PAILS CLOSED WHEN NOT IN USE 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------OURA(29CFR)-USE PROTECTIVE EQUIPMENT IN ACCORDANCE WITH 29CFR SECTIONS 1910.132-1910.134. USE RESPIRATORS WITHIN USE LIMITATIONS OR ELSE USE SUPPLIED AIR RESPIRATORS. 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 NFPAZHMIS HEALTH - 1 : FIRE - 0 ; REACTIVITY - 0 ; SPECIAL - ALK ; PE- B 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



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ATTACHMENT 4 CONT.

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Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

(		
MATERIAL	SAFETY DATA SHEET	
FRODUCT : BETZ 409	LEFHONE NUMBER 215/353-3300 EFFECTIVE DATE 1/84	* NFFA
BECTION 1HAZARD	DUS INGREDIENTS	* REACTIVITY-0
OSHA INGREDIENT PERMISSIBLE EXP Sonium Hydroxide+2mg/M3 Acgih ingredient tLV-tWA: Sonium Hydroxide+2mg/M3(cfil)	DSURE LIMIT: ING),ETHYLENE GLYCOL-10MG/M3()	* SPECIAL - ALK ************************************
		5122-2010/1137
*** GENER A WATER SOLUTION OF AN ALKYLFHE ETHYLENE OXIDE-FROFYLENE OXIDE SILICONE EMULSION AND SODIUM HY SECTION 2TYFICA	COPOLYMER, ALKYLENE GLYCOL, DROXIDE.	
FH: AS IS (APPROX.) 12.4		
FL.FT.(DEG.F): >200 SETA(CC)	SF.GR.(70/700F)OR DENSITY: VAFOR DENSITY(AIR=1): ND ZVOLATILES: ND ZSOLUBILITY(WATER): 100	1.020
SECTION 3REACTI	UTTY DATA	
THERMAL DECOMPOSITION YIELDS OX: Stable	IDES OF C,N,S,OR F IF FRESENT	•
BECTION 4HEALTH ACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS*** MODERATELY IRRITATING TO THE EYN ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION CHRONIC EFFECTS*** CHRUNIC EFFECTS OF THIS FORMULA	ES TO UPPER RESPIRATORY TRACT	EVALUATED
SECTION 5FIRST	AID INSTRUCTIONS	· · ·
SKIN CONTACT*** REMOVE CONTAMINATED CLOTHING.WAS SDAF SOLUTION OR WATER FOR 15 M EYE CONTACT*** IMMEDIATELY FLUSH EYES WITH WATS FHYSICIAN FOR ADDITIONAL TREATM INHALATION EXFOSURE*** REMOVE VICTIM FROM CONTAMINATED FYRST AID TREATMENT AS NECESSAR INGESTION*** GENERAL-DO NOT FEED ANYTHING BY SFECIFIC- DO NOT INDUCE VOMITING STOMACH USING 3-4 GLAS	INUTES ER FOR 15 MINUTES.IMMEDIATELY ENT AREA TO FRESH AIR.AFFLY AFFR Y MOUTH TO AN UNCONSCIOUS OR C G.IMMED.CONTACT FHYSICIAN.DIL	CONTACT A DFRIATE DAVULSIVE VICTIM
		OVER
COR 2018A 8201		Printed in 11 S

-----SECTION 6-------SFILL, DISFOSAL AND FIRE INSERUCTIONS------SFILL INSTRUCTIONS\*\*\* GENERAL-VENTILATE AREA, USE SPECIFIED FROTECTIVE EQUIPMENT. CONTAIN ATTACH. 4 Cont. AND ABSORD ON ABSORDENT 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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SD, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES FERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING AFFARATUS(FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER. FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT -----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 AND DUST/MIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REFLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SFLASH FROOF CHENICAL GOGGLES -----SECTION 8------STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING HANDLING INSTRUCTIONS\*\*\* GENERAL-INMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- ALKALINE.DO NOT HIX WITH ACIDIC MATERIAL. FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH . APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR AFPARATUS. CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) 94,177GAL (SODIUN HYDROXIDE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND POULTRY FLANTS- AUTHORIZATION: SEC.G5,G7 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM.WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDINATOR

#### ATTACH. 4 Cont.

#### BETZ LABORATORIES, INC. 4636 SCMERTCN ROAD, TREVOSE, PA. 19047

#### BETZ MATERIAL SAFETY DATA SHEET

24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

#### PRODUCT: SLIMICIDE C31

(PAGE 1 OF 3) EFFECTIVE DATE 1-85

PRODUCT APPLICATION : SOLVENT-BASED MICROBIAL CONTROL AGENT.

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.

DODECYL GUANIDINE HYDROCHLORIDE\*\*\*(DGH);CAS#13590-97-1;CORROSIVE;PEL:NONE; TLV:NGNE.

METHYLENE BIS(THIOCYANATE)\*\*\*CAS#6317-18-6;POTENTIAL REPRODUCTIVE TOXIN; PEL:NCNE;TLV:NCNE.

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(APPRGX.)3.2CDOR: NONEFL.PT.(DEG.F):120SETA(CC)SP.GR.(70FJOR DENSITY: 1.095VAPOR PRESSURE(MMHG):24VAPOR DENSITY(AIR=1): NDVISC CPS70F:64%SDLUBILITY(WATER): 100EVAP.RATE:ND WATER=1APPEARANCE: YELLOWPHYSICAL STATE:LIQUIDFREEZE POINT(DEG.F): <-30</td>

-----SECTION 3-----REACTIVITY DATA-----

STABLE

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

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BETZ MATERIAL SAFETY DATA SHEET (PASE 2 OF 3) ATTACH. 4 Cont.

PRODUCT: SLIMICIDE C31

SECTION 4HEALTH HAZARD EFFECTS	
- TE 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	
VAPOR S, GASES, MISTS AND/OR AEROSOLS CAUSE IRRITATION TO UPPER	
RESPIRATORY TRACT	
CHRONIC EFFECTS OF OVEREXPOSURE***	
PROLONGED OR REPEATED EXPOSURES MAY CAUSE REPRODUCTIVE SYSTEM TO:	VICITY
MEDICAL CONDITIONS AGGRAVATED ***	ALCIIT.
NOT KNCWN	
SWADTONS OF EVROSURE +++	
SYMPTOMS OF EXPOSURE *** INHALATION MAY CAUSE IRRITATION OF MUCOUS MEMBRANES AND RESPIRAT	DOV TRACT.
SKIN CONTACT CAUSES SEVERE IRRITATION OF HOCOOS MEMORANES AND RESPIRATE	GRT INACT,
SKIN CONTACT CAUSES SEVERE IRRITATION OR BURNS.	
PRECAUTIONARY STATEMENT BASED ON TESTING RESULTS ***	
MAY BE TEXIC IF ORALLY INGESTED.	
SECTION 5FIRST AID INSTRUCTIONS	
SKIN CONTACT***	
REMOVE CLOTHING WASH AREA WITH LARGE AMOUNTS OF SOAP SOLUTION OR	WAIEK
FOR 15 MIN.IMMEDIATELY CONTACT PHYSICIAN	
EYE CONTACT***	<b>T</b> 4 6 <b>T</b> 4
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY CON	TACTA
PHYSICIAN FOR ADDITIONAL TREATMENT	
INALATION EXPOSURE***	
REMOVE VICTIM FROM CONTAMINATED AREA.APPLY NECESSARY FIRST AID	
TREATMENT.IMMEDIATELY CONTACT A PHYSICIAN.	
INGESTION***	C <b>T I</b> 11
DU NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VIC	
DILUTE CONTENTS OF STOMACH. INDUCE VOMITING BY ONE OF THE STANDARD	J
METHODS.IMMEDIATELY CONTACT A PHYSICIAN	
SECTION FRANK STRUCTIONS	
SECTION 6SPILL, DISPOSAL AND FIRE INSTRUCTIONS SPILL INSTRUCTIONS***	
VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND Absorb on absorbant material.place in waste disposal container.t	ыс
CONTAMINATED ABSORBANT SHOULD BE CONSIDERED A PESTICIDE AND	nc
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,	^
PERMITTED WASTE TREATMENT FACILITY OR DISCHARGED UNDER A NPDES P	
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 BREATH	ING
APPARATUS(FULL FACE-PIECE TYPE).	
DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER.FOAM OR WATER CREATE A	SITPPERY
CONDITION.SPREAD SAND CR GRIT	
CUNUITIUNSTREAD SAND UN UNTI	

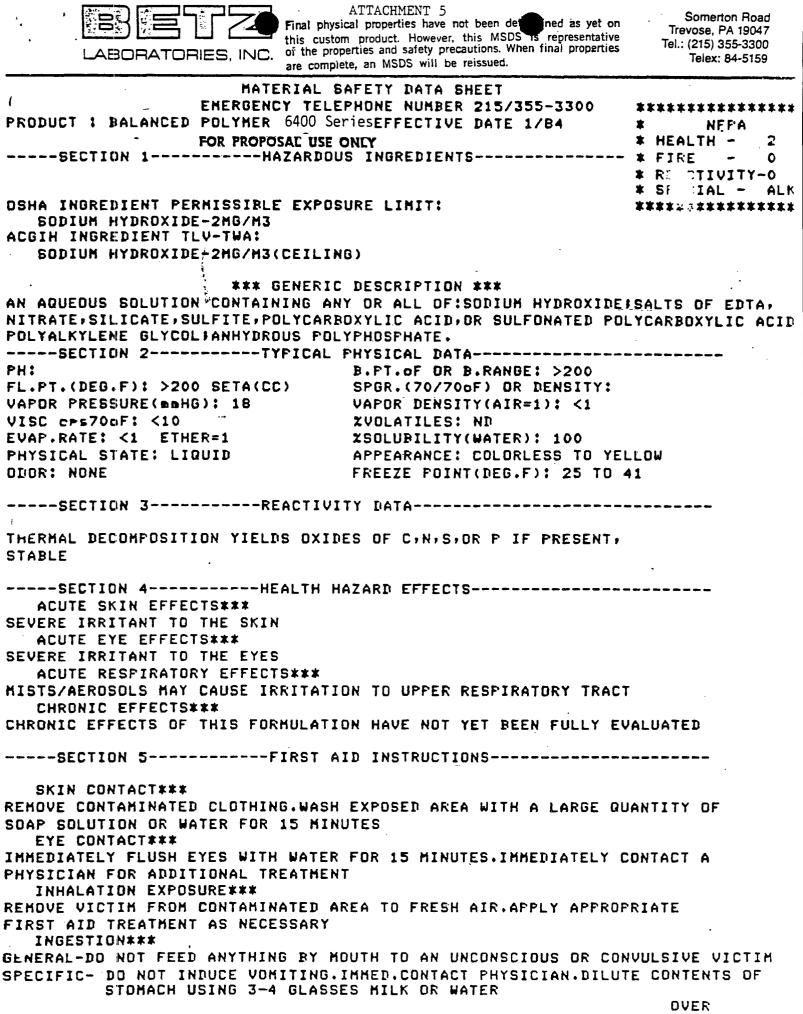
ATTACH. 4 Cont.

#### BETZ MATERIAL SAFETY DATA SHEET (PAGE 3 CF 3)

PRODUCT: SLIMICIDE C31

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 ERGANIC 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-----STCRAGE AND HANDLING PRECAUTIONS------STURAGE 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. 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. CWA(40CFR)REPORTABLE GUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# DOO1 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, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

> HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR



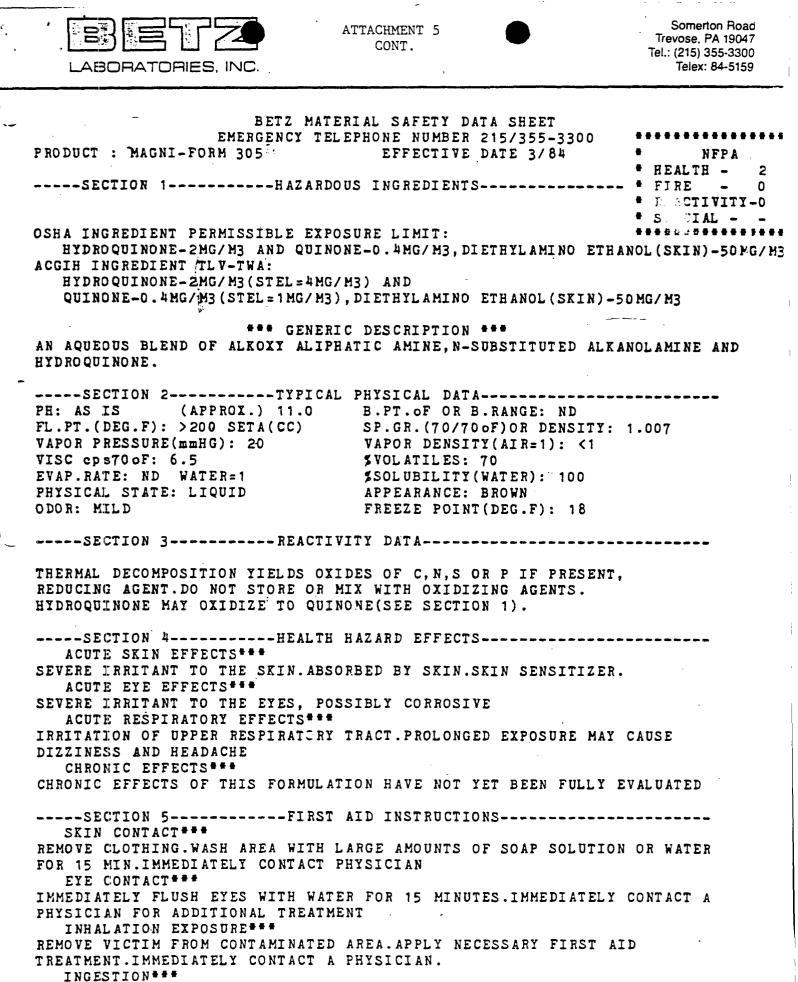
SPILL INSTRUCTIONS\*\*\* ATTACH. 5 Cont. BENERAL-VENTILATE AREA, USE BPECIFIED PROTECTIVE EQUIPMENT.CONTAIN AND ABBORB ON ABBORBENT NATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABBORBED MATERIAL, DR ANY CONTAMINATED BOIL, BHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS. SPECIFIC- FLÜBH AREA WITH WATER, WET AREA MAY BE SLIPPERY, IF SD, SPREAD SAND DR GRIT. DIBPOBAL INSTRUCTIONS\*\*\* BENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE BENT TO A BANITARY BEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE). DRY CHENICAL, CARBON DIDXIDE, FOAN OR WATER, FOAM OR WATER CREATE A SLIPPERY CONDITION. SPREAD SAND OR GRIT ----BECTION 7-----SPECIAL PROTECTIVE EQUIPMENT-----VENTILATION PROTECTION\*\*\* ADEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS RECOMMENDED RESPIRATORY PROTECTION\*\*\* IF VENTILATION IS INADEQUATE OR SIGNIFICANT FRODUCT EXPOSURE IS LIKELY. USE A RESPIRATOR WITH DUST/MIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SFLASH PRODE CHEMICAL GOGGLES -----SECTION 8------STORAGE AND HANDLING FRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING.IF FROZEN, THAW COMPLETELY AND HIX THOROUGHLY PRIDE TO USE HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- ALKALINE.DO NOT HIX WITH ACIDIC HATERIAL. FIFRA(40CFR) #EFA REG.ND. NOT APPLICABLE DSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIDSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS. OTHERWISE, USE SUPPLIED AIR APPARATUS. FDA(21CFR) INGREDIENTS AUTHORIZED UNDER: CONTACT BETZ CHA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS- AUTHORIZATION: CONTACT BETZ THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDIN, 1

· ·	ATTACHMENT 5 CONT.	Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159
	MATERIAL SAFETY DATA SHEET EMERGENCY TELEPHONE NUMBER 215/355-3300 PRODUCT : CORROGEN EFFECTIVE DATE 1/84 SECTION 1HAZARDOUS INGREDIENTS	<ul> <li>NFPA</li> <li>HEALTH - 2</li> <li>FIRE</li> </ul>
	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: NUISANCE PARTICULATE-TOTAL DUST-15MG/M3, RESPIRABLE DUST-5M ACGIH INGREDIENT TLV-TWA: NUISANCE PARTICULATE-TOTAL DUST-10MG/M3, RESPIRABLE DUST-5M	<pre>* REACTIVITY-0 * SPECIAL **********************************</pre>
	A POWDER MIXTURE OF A SULFITE SALT AND A COBALT SALT.	
	SECTION 2TYPICALPHYSICAL DATAPH: 5\$ SOL.(APPROX.) 10.0B.PT.OF OR B.RANGE: NAFL.PT.(DEG.F): NASP.GR.(70/700F)OR DENSITY:VAPOR PRESSURE(mmHG): NAVAPOR DENSITY(AIR=1): NAVISC cps700F: ND\$VOLATILES: NAEVAP.RATE: NA WATER=1\$SOLUBILITY(WATER): 50PHYSICAL STATE: SOLIDAPPEARANCE: WHITE POWDERODOR: SLIGHT SULFURFREEZE POINT(DEG.F): NA	90LBS/CU.FT.
-	THERMAL DECOMPOSITION YIELDS OXIDES OF C, N, S, OR P IF PRESENT, REDUCING AGENT.DO NOT STORE OR MIX WITH OXIDIZING AGENTS	
	SECTION 4HEALTH HAZARD EFFECTS ACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS*** MODERATELY IRRITATING TO THE EYES ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT CHRONIC EFFECTS***	
	CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY E	
	SKIN CONTACT *** REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE Q SOAP SOLUTION OR WATER FOR 15 MINUTES EYE CONTACT *** IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY PHYSICIAN FOR ADDITIONAL TREATMENT INHALATION EXPOSURE***	
	REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPRO FIRST AID TREATMENT AS NECESSARY INGESTION### GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OF CO	
	SPECIFIC- DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE O METHODS.IMMEDIATELY CONTACT A PHYSICIAN	· · · · · · · · · · · · · · · · · · ·

SPILL, DISPOSAL AND FIRE INTRUCTIONS \_\_\_ AJJACH. 5 Cont. SPILL INSTRUCTIONS GENERAL-VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT.SWEEP UP AND PLACE IN WASTE DISPOSAL CONTAINER. SPECIFIC- SPILL RESIDUE MAY BE NEUTRALIZED WITH 3\$ HYDROGEN PEROXIDE SOLUTION DISPOSAL INSTRUCTIONS \*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER.IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS)- INCINERATE OF BURY IN AFPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION \*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* AIRTIGHT CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- KEEP DRY HANDLING INSTRUCTIONS \*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- NORMAL CHEMICAL HANDLING ----SECTION 9-----FEDERAL REGULATIONS------FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. FDA(21CFR) INGREDIENTS AUTHORIZED UNDER: SECTION 173.310 CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# NOT APPLICABLE DOT(49CFR)CLASSIFICATION: NOT APPLICABLE THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

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GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM SPECIFIC- DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN PRODUCT: MAGNI-FORM 30

ATTACH. 5 Cont. -----SECTION 6------SPILL, DISPOSAL AND FIRE INSTRUCTIONS------SPILL INSTRUCTIONS\*\*\* GENERAL-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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IP SO.SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT (AS IS) - INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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 AND DUST/MIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* GAUNTLET TYPE RUBBER GLOVES, CHEMICAL RESISTANT APRON. REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SPLASE PROOF CHEMICAL GOGGLES.FACE SHIELD ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING.IF FROZEN, THAW COMPLETELY AND MIX THOROUGHLY PRIOR TO USE HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFOIE 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. CWA(40CFR) REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40 CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# NOT APPLICABLE DOT(49CFR)CLASSIFICATION: NOT APPLICABLE THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDINAT

#### ATTACH. 5 Cont.

# 4636 MERTON ROAD, TREVOSE, PA. 9047

#### BETZ MATERIAL SAFETY DATA SHEET

24 HOUR EMERGENCY TELEPHONE (HEALTH OR ACCIDENT) 215/355-3300

PRODUCT : OPTI-MEEN

, **..** 

80240

EFFECTIVE DATE 05-18-89 PRINTED: 9/13/89 REV:SEC.3

`**-**-

PRODUCT APPLICATION : NEUTRALIZING AMINE. -----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.

CYCLOHEXYLAMINE\*\*\*CAS#108-91-8;FLAMMABLE;CORROSIVE;REPRODUCTIVE TOXIN; TOXIC;PEL/TLV:10PPM.

DIMETHYLISOPROPANOLAMINE\*\*\*(DMA-2-P);CAS#108-16-7;FLAMMABLE;CORROSIVE; PEL:NONE;TLV:NONE.

----SECTION 2-----TYPICAL PHYSICAL DATA-----

PH: AS IS (APPROX.) 12.7	ODOR: AMINE
FL.PT.(DEG.F): 120 P-M(CC)	SP.GR.(70F)OR DENSITY: 0.944
VAPOR PRESSURE(mmHG): 18	VAPOR DENSITY(AIR=1): <1
VISC cps70F: 20	XSOLUBILITY(WATER): 100
EVAP.RATE: ND WATER=1	APPEARANCE: COLORLESS TO YELLOW
PHYSICAL STATE: LIQUID	FREEZE POINT(DEG.F): 19

-----SECTION 3-----REACTIVITY DATA-------

STABLE.MAY REACT WITH ACIDS.DO NOT CONTAMINATE. BETZ TANK CLEAN-OUT CATEGORY 'C'

THERMAL DECOMPOSITION (DESTRUCTIVE FIRES) YIELDS ELEMENTAL OXIDES.

MATERIAL SAFETY DATA SHEET (PAR 2 OF 3) ATTACH. 5 Cont.

PRODUCT: OPTI-MEEN		EFFECTIVE DATE 05-18-89
ACUTE SKIN EFFECTS *** PR )RROSIVE TO SKIN.ABSO	-HEALTH HAZARD EFFECTS Rimary Route of Exposure Drbed by Skin.Potential Skin	
ACUTE EYE EFFECTS *** CORROSIVE TO THE EYES		<b>DC</b>
VAPORS, GASES, MISTS AND	S *** PRIMARY ROUTE OF EXPOSU )/OR AEROSOLS CAUSE IRRITATIO SURE MAY CAUSE DIZZINESS AND (ROSURE ***	N TO UPPER RESPIRATORY
	CONTACT MAY CAUSE TISSUE NEC	ROSIS.
SYMPTOMS OF EXPOSURE +++	· ·	
	RRITATION OF MUCOUS MEMBRANE Evere irritation or burns.	S AND RESPIRATORY TRACT;
	BASED ON TESTING RESULTS *** Ingested or absorbed throug	H SKIN.
SKIN CONTACT+++	FIRST AID INSTRUCTIONS	
REMOVE CLOTHING.WASH A For 15 Min.immediately Eye contact+++	REA WITH LARGE AMOUNTS OF SO Contact Physician	AP SOLUTION OR WATER
IMMEDIATELY FLUSH EYES "Yysician for addition	WITH WATER FOR 15 MINUTES.I IAL TREATMENT	MMEDIATELY CONTACT A
TREATMENT.IMMEDIATELY	ITAMINATED AREA.APPLY NECESSA Contact a Physician.	RY FIRST AID
	Y MOUTH TO AN UNCONSCIOUS OR .Immed.contact Physician.dil	
STOMACH USING 3-4 GLAS		
SPILL INSTRUCTIONS***	SPILL, DISPOSAL AND FIRE INST	
ON ABSORBENT MATERIAL. Characteristics of the	PLACE IN WASTE DISPOSAL CONT Absorbed Material, or any co	AINER. THE WASTE NTAMINATED SOIL,
	N ACCORDANCE WITH RCRA REGULA S.FLUSH AREA WITH WATER.SPREA	
DISPOSAL INSTRUCTIONS*** WATER CONTAMINATED WIT	H THIS PRODUCT MAY BE SENT TO	
	TY,IN ACCORDANCE WITH ANY LOU Ent facility or discharged u	
INCINERATE OR BURY I FIRE EXTINGUISHING INSTRU		
APPARATUS(FULL FACE-PI		NTAINED BREATHING
Y CHEMICAL, CARBON DI	UAIDE, FUAN UK WATER	

MATERIAL SAFETY DATA SHEET (PAGE 3 OF 3) ATTACH. 5 Cont.

· ; ....

PRODUCT: OPTI-MEEN EFFECTIVE DATE 05-18-89 80240 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 ORGANIC VAPOR CARTRIDGES. RECOMMENDED SKIN PROTECTION \*\*\* GAUNTLET-TYPE NEOPRENE GLOVES, CHEMICAL RESISTANT APRON WASH OFF AFTER EACH USE.REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION \*\*\* SPLASH PROOF CHEMICAL GOGGLES.FACE SHIELD -----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* KEEP DRUMS & PAILS CLOSED WHEN NOT IN USE. STORE IN COOL VENTILATED LOCATION.STORE AWAY FROM OXIDIZERS HANDLING INSTRUCTIONS \*\*\* IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE COMBUSTIBLE. DO NOT USE AROUND SPARKS OR FLAMES. BOND CONTAINERS DURING FILLING OR DISCHARGE WHEN PERFORMED AT TEMPERATURES AT OR **\*BOVE THE PRODUCT FLASH POINT.** THIS MSDS COMPLIES WITH THE OSHA HAZARD COMMUNICATION STANDARD HAROLD M. HERSH (ENVIRONMENTAL 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: 0.25 GALLONS DUE TO CYCLOHEXYLAMINE ... RCRA: IF THIS PRODUCT IS DISCARDED AS A WASTE, THE RCRA HAZARDOUS WASTE IDENTIFICATION NUMBER IS: D001=IGNITABLE;D002=CORROSIVE ...DOT HAZARD CLASSIFICATION: CORROSIVE TO SKIN.COMBUSTIBLE ... DOT SHIPPING DESIGNATION IS: UN1760 CORROSIVE LIQUID, N.O.S. ... 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: CYCLOHEXYLAMINE(108-91-8) 41.0-50.0% ; .... SARA SECTION 313 CHEMICALS: NONE PRESENT IN SIGNIFICANT AMOUNTS ... SARA SECTION 312 HAZARD CLASS: IMMEDIATE(ACUTE), DELAYED(CHRONIC) AND FIRE ...MICHIGAN CRITICAL MATERIALS: NONE PRESENT IN SIGNIFICANT AMOUNTS NFPA/HMIS : HEALTH - 3 ; FIRE - 2 ; REACTIVITY - 0 ; SPECIAL - CORR ; PE - D



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ATTACHMENT 5 CONT. Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

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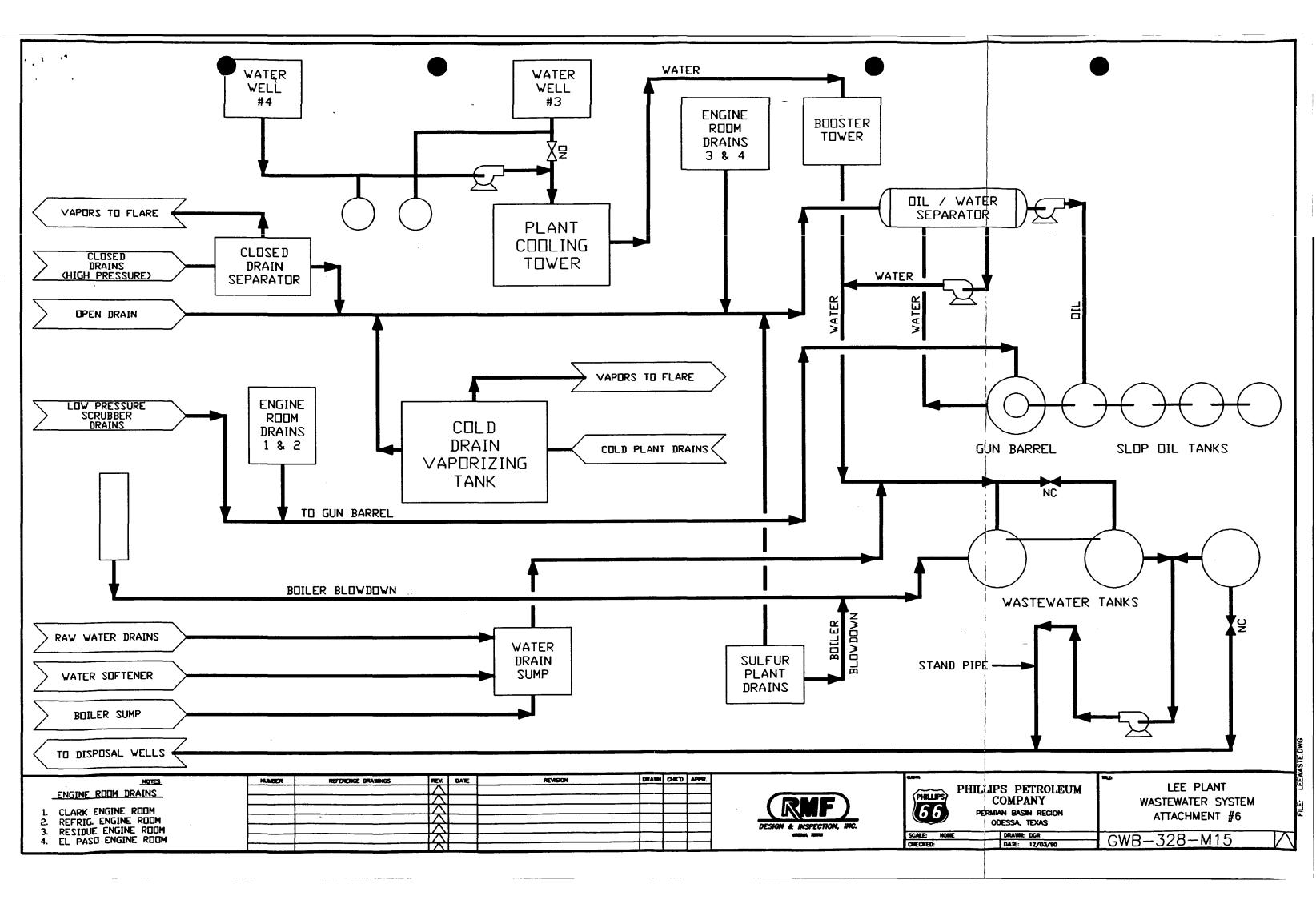
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(	MATERIAL SA EMERGENCY TELEP	FETY DATA SHEET	
	EMERGENCY TELEP PRODUCT : FERROSPERSE	HONE NUMBER 215/333-3300 EFFECTIVE DATE 1/84	*************** * NFPA * HEALTH - 2
	HAZARDOUS	INGREDIENTS	* FIRE - 0 * REACTIVITY-0
	OSHA INGREDIENT PERMISSIRLE EXPOSU Sodium hydroxide-2mg/N3	RE LIMIT:	* SPECIAL - ALK ************************************
	ACGIH INGREDIENT TLV-TWA: SODIUM HYDROXIDE-2MG/M3(CEILING	•	
	*** GENERIC	DESCRIPTION ***	
	A WATER SOLUTION OF FOLYCARBOXYLIC AND SODIUM HYDROXIDE.	ACID SALT, POLYOXYALKYLENE	GLYCOL
	SECTION 2TYPICAL P	HYSICAL RATA	
	PH: AS IS (APPROX.) 12.5	B.FT.UF DR B.RANGE: >200	
	FL.FT.(REG.F): >200 SETA(CC)	SF.GR.(70/700F)OR DENSITY:	1.029
	VAPDR FRESSURE(mmHG): 25 VISC CPS700F: ND EVAP.RATE: <1 ETHER=1	VAFOR DENSITY(AIR=1): <1	
	VISC CPS700F: ND	ZVOLATILES: 93.8	
	PHYSICAL STATE: LIQUID	ADDEADANCE: COLORIESE	
		AFFEARANCE: COLORLESS FREEZE FOINT(DEG.F): ND	
	SPORT NORE	TREEZE FOIRTOEGTETT RD	
ł	REACTIVIT	Y DATA	
	THERMAL DECOMPOSITION YIELDS OXIDE STABLE	S OF C,N,S,OR P IF PRESENT,	
	HEALTH HA	ZARD EFFECTS	
	ACUTE SKIN EFFECTS***		
	SLIGHTLY IRRITATING TO THE SKIN		
	ACUTE EYE EFFECTS***		
	MODERATELY IRRITATING TO THE EYES		
	ACUTE RESPIRATORY EFFECTS***	UDDED DECOTOATOON TOACT	
	MISTS/AEROSOLS CAUSE IRRITATION TO CHRONIC EFFECTS***	UPPER RESPIRATURT TRACT	
	CHRONIC EFFECTS OF THIS FORMULATIO	N HAVE NOT YET BEEN FULLY EV	VALUATED
	FIRST AI	D INSTRUCTIONS	
	SKIN CONTACT***		
	REMOVE CONTAMINATED CLOTHING.WASH		JANTITY OF
	SOAP SOLUTION OR WATER FOR 15 MINU EYE CONTACT***		
	IMMEDIATELY FLUSH EYES WITH WATER PHYSICIAN FOR ADDITIONAL TREATMENT		CONTACT A
	INHALATION EXPOSURE*** Remove victim from contaminated ar		RIATE
	FIRST AID TREATMENT AS NECESSARY	EN IU ENGON HINIHIEL AFFRUI	- NIMIE .
	GENERAL-DO NOT FEED ANYTHING BY NO	UTH TO AN UNCONSCIDUS OR CO	NVULSIVE VICTIM
	SPECIFIC- DO NOT INDUCE VOMITING.I STOMACH USING 3-4 GLASSE	MHED.CONTACT PHYSICIAN.DILU	

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ATTACH. 5 Cont. -SPILL, DISPOSAL AND FIRE ---SECTION 6-----STRUCTIONS------SPILL INSTRUCTIONS### GENERAL-VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT. CONTAIN AND ABSORD 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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA HAY BE SLIPPERY.IF SO, SPREAD -SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT HAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAN OR WATER. FOAN OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT ----SECTION 7-----SPECIAL PROTECTIVE EQUIPMENT-----VENTILATION PROTECTION\*\*\* ADEQUATE VENTILATION RECOMMENDED RESFIRATORY PROTECTION\*\*\* IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST/FUME CARTRIDGES **RECOMMENDED SKIN PROTECTION\*\*\*** RUBBER GLOVES REFLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SPLASH PROOF CHEMICAL GOGGLES -----SECTION 8------STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- ALKALINE.DO NOT HIX WITH ACIDIC MATERIAL. -----SECTION 9-----FEDERAL REGULATIONS------FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY FROTECTION USE PROPERLY FITTED MSHA/NIOSH AFPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR AFPARATUS. FDA(21CFR) INGREDIENTS AUTHORIZED UNDER: SECTION 173.310 CWA(40CFR)REPORTABLE QUANTITY: AS IS FRODUCT (HAZARDOUS SUBSTANCE) 77,790GAL (SODIUM HYDROXIDE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND FOULTRY FLANTS- AUTHORIZATION: SEC.GG THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREDF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATC



ŀ	Visco 950 ATTACH	MENT 7	<u> </u>
		yphosphate in ethylene glycol	
		Organic Organic	
s	SECTION 2 - HAZARDOUS INGREDIENTS		
Γ	MATERIAL OR C	OMPONENT	*
	Ethylene Glycol		2
	SECTION 3 - PHYSICAL PROPERTIES	······	
Γ	Bolling Point, 760 MM HG	Melting Point	
-	Specific Gravity (H20=1) 1.33 @60 F	Vapor Pressure	
-	Vapor Density (Air=1)	Solubility in H20, % By WL Soluble	
-	% Volatiles By Vol.	Evaporation Rate (Butyl Acetate=1)	
s S	SECTION 4 - FLAMMABILITY AND EXPLOSIV	odor pH (1% Dispersion) 4.5-5 EPROPERTIES	
╞	Fiammable Limits in Alr, % By VoL	Lower Upper	
	Extinguishing Media CO <sub>2</sub> , Dry chemical, alcohol for Special Fire Fighting Procedures NODE Unusual Fire and Explosion Hazard	I	
	None SECTION 5 - HEALTH HAZARD DATA		
	Thirshold Limit Value None for the product. Ethyler Effects of Overexposure	e glycol (vapor) 100ppm	
	May cause irritation. May be	harmful if swallowed.	
. [	EMERGENCY AND FIRST AID PROCEDURES Eyes Flush with water for 15 min	utes. Call a physician.	
-	Swn Wash thoroughly with soap a	nd water.	

SECTION 6 - REACTIVI DATA ATTACH. 7 Cont. Stable XX Stabilitys Unstable 🛛 Conditions to Avoid Strong oxidizers Materials to Avoid\_ 950 Hazardous Decomposition Products Visco Will Not Occur Hazardous Polymerization: May Occur **Conditions to Avoid** SECTION 7 - SPILL OR LEAK PROCEDURES Produci Steps to Take in Case Material is Released or Spilled \_ Contain with absorbent material. 2901 001 ТЕЛГІЕLO ЛОАО ІІ ОАК ВАООК, ІLLІNOIВ 60521 **V N P A N** No special method. Waste Disposal Method U 1 SECTION 8 - SPECIAL PROTECTION INFORMATION ٩ U N None normally required Type of Respiratory Protection Required\_ Ш Ventilation: Local Exhaust 🛛; Mechanical (General) 📑; Special (Specify)\_\_\_\_\_ \_ Other (Specify)\_ I Ü Safety glasses Rubber Eye Protection Protective Gloves 0 None normally required 0 Other Protective Equipment\_ 1 ٢ Ζ SECTION 9 - SPECIAL PRECAUTIONS None Handling and Storage Precaution Do not take internally. Avoid eye and skin contact. Dc Other Precautions\_ not breathe vapors if generated. Toxicology & Industrial THEHygiene Consultant Prepared By 3-28-78

22122 

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# 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. <u>C-1950-W</u> Customer No. 3355796 Report No. <u>35060</u>

Report Date <u>1-25-84</u>

Date Received <u>1-10-84</u>

mg/L

Report of tests on: Water

Client:	Phillips F	Petroleum
Identification:	Lee Plant,	Wastewater

•		
AluminumLess		2
ArsenicLess		0.05
BariumLess		1
Boron		0.7
CadmiumLess		0.01
ChromiumLess	Than	0.05
CobaltLess	Than	0.1
CopperLess	Than	0.1
IronLess		0.2
LeadLess		0.05
ManganeseLess		0.05
MercuryLess		0.002
MolybdenumLess		1
NickelLess		0.5
SeleniumLess		0.01
Silver		0.05
ZincLess	Than	0.05
Sulfate		1714
Chloride		2595
Fluoride		1.2
Nitrate		9.0
CyanideLess	Than	0.001
Phenols		0.23
Total Dissolved Solids @ 180° C		5294

Technician: KLH , PCB , GMB

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

BOUTHWESTERN LABORATORIES

Dur letters and reports use for the exclusive use of the cferit to whom they are addressed. The use of our nome must receive our prior written approval. Dur letters and reports apply only to the sample leasted and/or inspected, and are not necessarily indicative of the quantities of apparently identical or similar products.

ATTACHMENT 8	8
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## MATERIAL SAFETY DATA SHEET

(Essentially similar to U.S. Department of Labor Form OSHA-20 and generally accepted in Canada for information purposes) An explanation of the terms used herein may be found in OSHA publication 2265, available from OSHA regional or area offices. Do Not Duplicate This Form, Request an Original.



M-4837

## I PRODUCT IDENTIFICATION

PRODUCT Molecular Sieve Type 4ADG

CHEMICAL NAME	Sodium Alumino silicate	SYNONYMS	Zeolite	
FORMULA		CHEMICAL FAMILY	Molecular Sieve	
	Na20 Al2 03 SiO2	MOLECULAR WEIGHT	Not Applicable	

TRADE NAME UNION CARBIDE® Molecular Sieve

IL HAZARDOUS INGREDIENTS

A complex of elements and compounds composed of material shown below. NOTE: In the table below, the symbol "<" means "less than".

NOTE: In the table below, the symbol < means less that .

MATERIAL (CAS N	ło.)	Wt (%)	1983-1984 ACGIH TLV-TWA (OSHA-PEL)	
Sodium Oxide	(1313-59-3)	< 30	None established (None established)	
Silicon Oxide	(14808-60-7)	< 50	Use quartz formula (Use quartz formula)	
Aluminum Oxide	(1344-28-1)	< 40	Nuisance particulate (Nuisance dust) 10 mg/m <sup>3</sup> Total dust (15 mg/m <sup>3</sup> Respirable fraction) 5 mg/m <sup>3</sup> Respirable dust (5 mg/m <sup>3</sup> Respirable fraction)	

	III. PH	YSICAL DATA	
BOILING POINT, 760 mm. Hg	Not Applicable	FREEZING POINT	Not Applicable
SPECIFIC GRAVITY (H2O = 1)	1.1	VAPOR PRESSURE AT 20°C.	Not Applicable
VAPOR DENSITY (air = 1)	Not Applicable	SOLUBILITY IN WATEB % by wt	Not Applicable

Not Applicable

In the USA 304 - 744-3487

APPEARANCE AND ODOR

PERCENT VOLATILES

**BY VOLUME** 

Depending on product may appear as bead, pellet, mesh, cake or powder; odorless.

In Canada 514 - 645-5311

Not Applicable

EMERGENCY PHONE NUMBER

**EVAPORATION RATE** 

(Butyl Acetate = 1)

IN CASE OF EMERGENCIES involving this material, further information is available at all times:

M-4837

For routine information contact your local supplier

Union Carbide requests the users of this product to study this Material Safety Data Sheet (MSDS) and become aware of product hazards and safety information. To promote safe use of this product a user should (1) notify its employees, agents and contractors of the information on this MSDS and any product hazards and safety information, (2) furnish this same information to each of its customers for the product, and (3) request such customers to notify their employees and customers for the product of the same product hazards and safety information.

PRODUCT:



IV HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE See Section II - 5 mg/m<sup>3</sup> (ACGIH-1983-1984) as respirable dust (nuisance particulate)

#### EFFECTS OF ACUTE EXPOSURE:

SWALLOWING - None known

SKIN CONTACT - May cause irritation and reddening

EYE CONTACT - May cause irritation

INHALATION - May cause irritation of the nose and throat, accompanied by cough and chest discomfort.

EFFECTS OF CHRONIC EXPOSURE - None known

#### EMERGENCY AND FIRST AID PROCEDURES:

SWALLOWING - Drink large amounts of water

SKIN CONTACT - Wash with soap and water

EYE CONTACT - Immediately flush with water for at least 15 minutes

INHALATION - Remove to fresh air. If breathing is difficult, oxygen may be administered. If breathing has stopped, administer artificial respiration.

If any irritation or other symptoms persist, see a physician.

NOTE TO PHYSICIAN — This product is a desiccant and generates heat as it adsorbs water. The used product can .ontain material of a hazardous nature. Identify that material and treat accordingly.

<u>\_</u>5 . • •

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ATTACHMENT 8 CONT.

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M-4837

LASH POINT est method)	Does	not burn		AUTOIGNIT		Not Applicable
AMMABLE LIMI AIR, % by volum		LOWER	Not Applicable		UPPER	Not Applicable
TINGUISHING	AEDIA					
nused material wil	l not b	urn. Use media	appropriate for surro	unding fire.		
ECIAL FIRE FIG				. <u></u>	······································	
						re. The user of this product
ust identity the ha	azanţus c	n the retained	material and inform t	ne fire fighters (	of these hazard	15.
	÷ V					
NUSUAL FIRE A						
			es are not flammable. illing point of water. I			ever, they can get quite hot.
ment mist welled [	icy Can	Incal to the DO	ming point of water, i		ouce the tempe	erature to sate limits.
					· ···	
		A State of the second	Constantia El			
			VI. REAC	TIVITÝ DAŤ	A	
STABILITY		DITIONS TO		ΓΙVΙΤΫ́, ĎΑΤ	A	
		DITIONS TO		ΓΙVΙΤΫ́, DAŤ	A	
		IDITIONS TO	AVOID			e which may result in burn.
NSTABLE STABL	E		AVOID Moisture (water Sudden contact wi	) can cause rise th high concent	in temperature trations of cher	e which may result in burn. micals having high heats of
NSTABLE STABL	E (mate	rials to avoid)	AVOID Moisture (water Sudden contact wi adsorption such as	) can cause rise th high concent	in temperature trations of cher	
ICOMPATIBILITY	E ( (mate	rials to avoid) SITION PROD	AVOID Moisture (water Sudden contact wi adsorption such as UCTS	) can cause rise th high concent olefins, HCI, et	in temperature trations of cher tc.	micals having high heats of
AZARDOUS DEC	E ( (mate OMPO: other n	rials to avoid) SITION PROD naterials that c	AVOID Moisture (water Sudden contact wi adsorption such as UCTS contact the molecula	) can cause rise th high concent olefins, HCI, et r sieve during t	in temperature trations of cher tc. normal use car	micals having high heats of
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NSTABLE STABL X ICOMPATIBILITY AZARDOUS DEC ydrocarbons and o asonable to expec- bes not readily de ccur, the products	(mate OMPO: other n t that c compo would	rials to avoid) SITION PROD naterials that c decomposition se unless subje nclude the mix	AVOID Moisture (water Sudden contact wi adsorption such as UCTS contact the molecula products will come f ected to extreme terr < of oxides listed in Se	) can cause rise th high concent olefins, HCI, et r sieve during r rom these retai operature or ch ection II.	in temperature trations of cher tc. normal use car ined materials of	micals having high heats of n be retained on the sieve. It is of use. The molecular sieve itself
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WASTE DISPOSAL METHOD

Discard any product, residue, disposable container or liner in an environmentally acceptable manner, in full compliance with federal, state and local regulations.



# VIII SPECIAL PROTECTION INFORMATION

#### **RESPIRATORY PROTECTION** (specify type)

Where there is excessive dustiness, wear a respirator selected as per OSHA 29 CFR 1910.134 and approved by NIOSH/MSHA

VENTILATION	LOCAL EXHAUST
	As appropriate to minimize dust
	MECHANICAL (general)
	Not Applicable
	SPECIAL
	Not Applicable
	OTHER Not Applicable
PROTECTIVE G	LOVES Recommended
EYE PROTECTI	ON Safety glasses or goggles selected as per OSHA 29 CFR 1910.133
EYE PROTECTI	

IX. SPECIAL PRECAUTIONS

Causes eye irritation. Breathing dust may be harmful. May cause skin irritation. Open container slowly to avoid dust. Do not get in eyes. Avoid breathing dust and prolonged contact with skin. Use with adequate ventilation. Keep container closed. Wash thoroughly after handling. Do not ingest.

Before using you should know the hazards of the products to be adsorbed on the molecular sieve. The products could be flammable or toxic. You should know and follow all the safety precautions related to the adsorbed products.

#### OTHER HANDLING AND STORAGE CONDITIONS

pH range if in aqueous slurry 8 - 11

The opinions expressed herein are those of qualified experts within Union Carbide. We believe that the information contained herein is current as of the date of this Material Safety Data Sheet. Since the use of this information and these opinions and the conditions of use of the product are not within the control of Union Carbide, it is the user's obligation to determine the conditions of safe use of the product.



GENERAL OFFICES IN THE USA: Union Carbide Corporation Molecular Sieves Department Old Ridgebury Road Danbury, CT 06817

IN CANADA: Union Carbide Canada Limited Molecular Sieves Department 123 Eglinton Avenue East Toronto, Ontario M4P IJ3

Other offices in principal cities all over the world.

ATTACHMENT 9



SPECIALITY ALUMINAS

SECTION 3-2 EFFECTIVE 7-15-76 Supersedes 8-1-72 (Corr. 12-5-74)

# S-501 ALUMINA PRODUCT DATA

#### PRINCIPAL USES

As a sulfation contamination resistant sulfur recovery catalyst used in natural gas plants, refineries, and smelters having Claus process plants and other sulfur recovery type plants.

#### GRADES

3 x 6 mesh For special sizing contact nearest Kaiser Chemical Sales Office.

#### TYPICAL CHEMICAL ANALYSIS

(Percent on	Dry	Basis)	
-------------	-----	--------	--

SiO <sub>2</sub>	0.02
Fe <sub>2</sub> O <sub>3</sub>	0.02
Na <sub>2</sub> O	0.45
Loss on ignition	6.0
Al <sub>2</sub> O <sub>3</sub> & Inorganic Promoter*	93.5%

\*non toxic, non-volatile

## TYPICAL PHYSICAL PROPERTIES

Form Surface Area Pore Volume Mean Pore Diameter Bulk Density, packed Abrasion Loss Crushing Strength Sizing Balls 250 sq. meters per gram .46 cc per gram 70 Angstroms 50 lb./per cubic foot 2% 20 lbs. force + 3 mesh—3%. -6 mesh—3%

#### SHIPPING INFORMATION

Container:

Weight: Bagged: Shipping Point: Bagged shipments in multiwall, moisture-proof bags. Also available in fiber or steel drums 100 pounds net Baton Rouge, Louisana

The information contained in this data sheet, to the best of our knowledge, is true and accurate. Any recommendations or suggestions are made without warranty or guarantee, since the conditions of use are beyond our control. Nothing contained herein shall be construed to imply the permission, inducement, or recommendation to practice any invention covered by any patent owned by Kaiser Aluminum and Chemical Corporation or by others, without authority from the owner of the patent.



ATTACHMENT 9 CONT.



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SECTION 3-2 EFFECTIVE 10-1:80 Supermides 7-15-76

a terreta de la composición de la compo

S-201 ALUMINA PRODUCT DATA

# PRINCIPAL USES

As a sulfur conversion catalyst used in natural gas plants, refineries and smelters having Claus process plants and other sulfur recovery type plants. 

# GRADES

#### 3×6mesh.

For special sizing contact nearest Naiser Chemical Sales Office.

TYPICAL CHENICAL ANALYSIS TYPICAL CHENICAL ANALYSIS SiOL Fe<sub>2</sub>O<sub>2</sub> Na<sub>2</sub>O Loss on ignitions AL<sub>2</sub>O<sub>2</sub> TYPICAL PHYSICAL PROPERTIES Form Surface Area 375 m<sup>2</sup>/mm

Form Swlace Area Bulk Density, packed Abrasion Loss Crushing Strength Sizing SHIPPHIG INFORMATION

SHIPPHIG INFORMATION

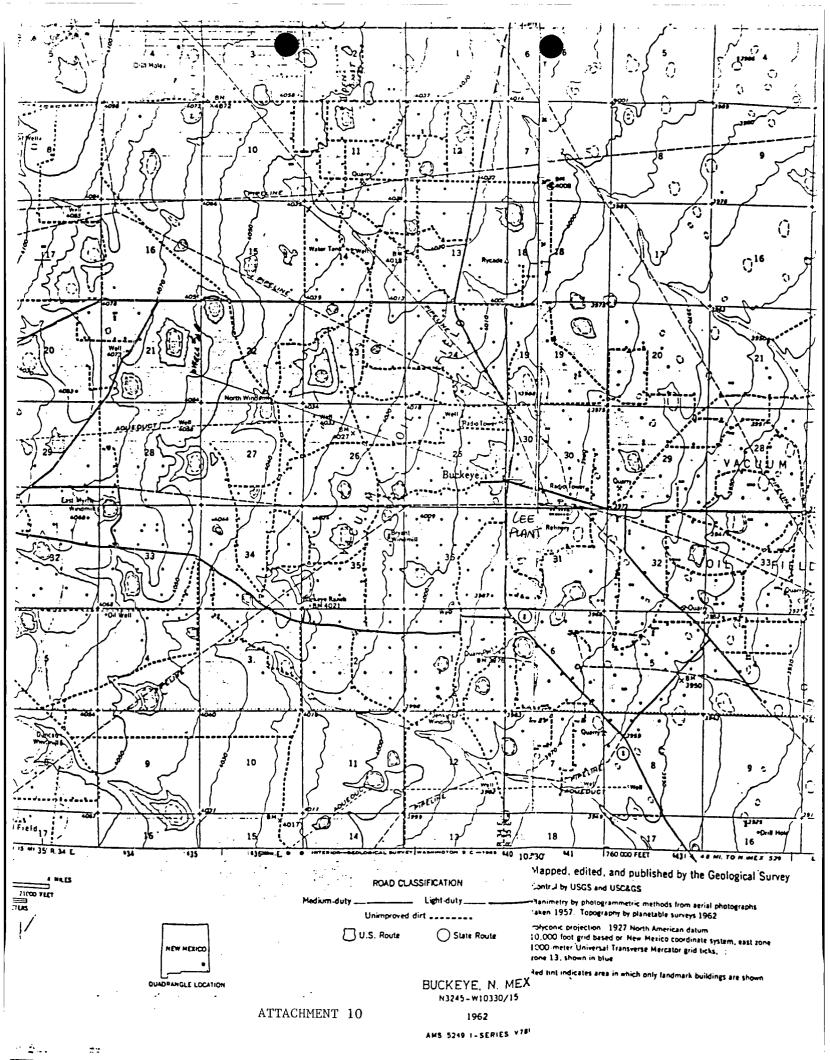
HIPPHIG INFORMATION Container: Bagged shipment: bags. Also availab bulk pneumatic tr 100 pounds net 300 pounds net

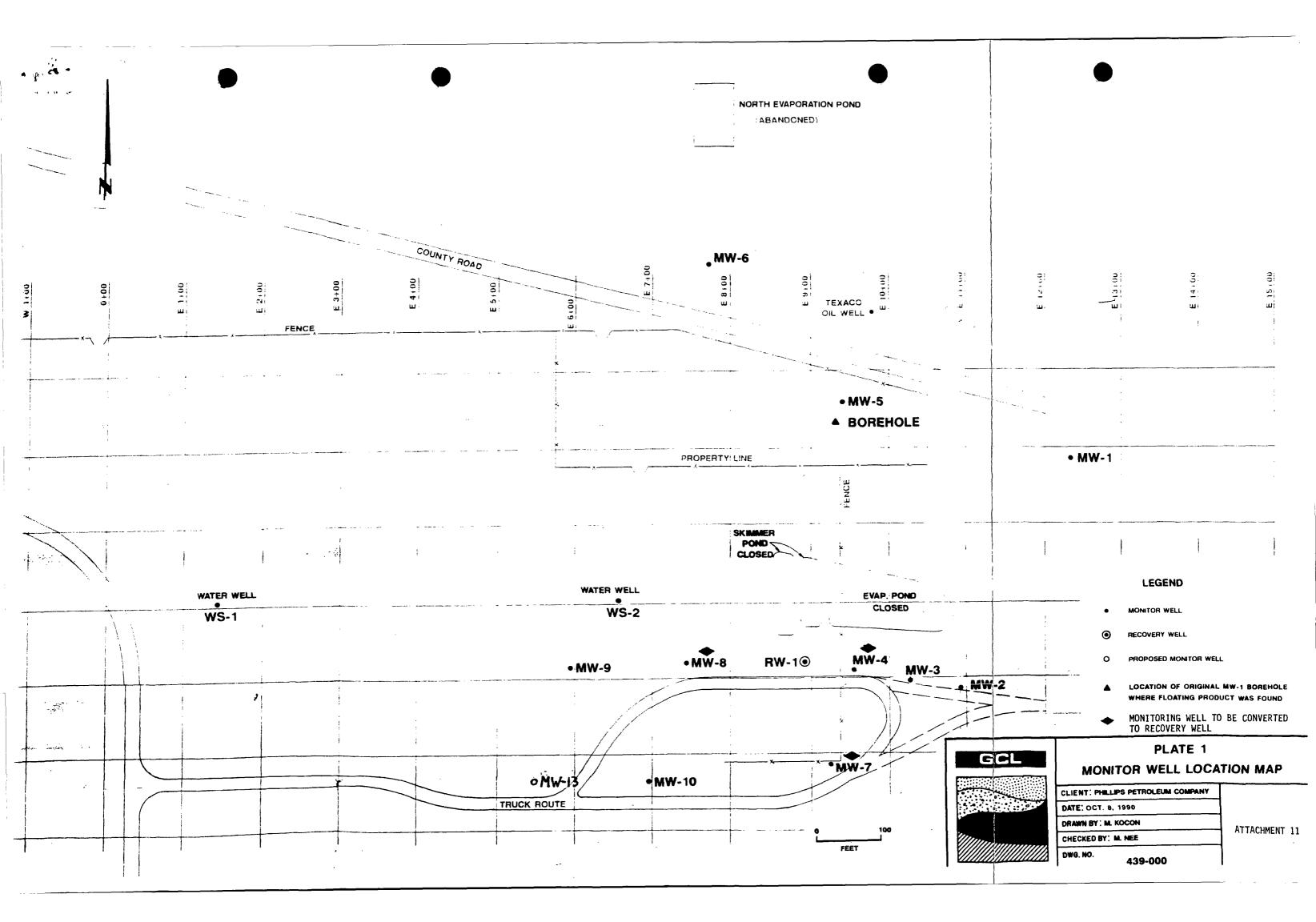
# Weight Baggedt

Fiber or Steel Drums

Barged shipments in multiwalk moisture-proof bags. Also available in fiber or steel drums and by bulk pneumatic trucks and bulk hopper-Fiber of Steel Drums: 300 pounds net Shipping Point: Baton Rouge, Louisiana

ng cantained harant shall be ca w one pairs annual by Annual Manual unte anné Chantucal Corporation av by others, with





STATE OF NEW MEXICO



## ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS

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

#### November 16, 1990

CERTIFIED MAIL RETURN RECEIPT NO. P-918-402-474

Michael D. Ford Phillips Petroleum Company 12 B2 Phillips Building Bartlesville, Oklahoma 74004

RE: REPORT OF SUBSURFACE INVESTIGATION PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT BUCKEYE, NEW MEXICO

Dear Mr. Ford:

The New Mexico Oil Conservation Division (OCD) has completed review of the October 9, 1990 "PHASE II REPORT OF SUBSURFACE INVESTIGATION, PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT" for the Phillips Lee Gas Plant in Buckeye, New Mexico.

On November 15, 1990, the OCD discussed, with you, our review of this document. During this conversation, several agreements were made between the OCD and Phillips regarding locations of additional monitor wells and additional remedial actions required. The following is a summary of these agreements:

- A) ADDITIONAL MONITOR WELLS
  - 1) Two monitor wells will be installed to attempt to define the extent of dissolved phase petroleum contamination downgradient of monitor well MW-10 in lieu of the proposed monitor well MW-13 location. One monitor well will be located approximately 150 feet west of monitor well MW-10. The second monitor well will be located approximately 150 west of monitor well MW-12.
  - 2) Monitor wells will be constructed as per previous investigations including a minimum of five feet of well screen above the water table.
  - 3) The two above mentioned monitor wells together with monitor wells MW-9, MW-10 and MW-12 will be sampled for aromatic organics as per previous investigations.

- 4) A report on the investigation will be submitted to OCD within ten days of receipt of the results of water quality sampling. The report will include depth to water and product thickness in all monitor wells.
- 5) Monitor well drilling will begin within 6 weeks of receipt of this letter.

#### B) REMEDIAL ACTIONS

- Monitor wells MW-7 and MW-8 will be converted to recovery wells. Pumps will be installed in these wells within 6 weeks of receipt of this letter.
- 2) Phillips will implement a system to recover floating product in monitor well MW-4.
- 3) Phillips will submit a discharge plan modification for disposal of pumped fluids from wells MW-4, MW-7 and MW-8 to OCD prior to initiation of pumping.
- 4) The long term monitoring plan will be deferred until the results of the additional investigations have been evaluated.

Please contact OCD prior to well drilling and water quality sampling so that the OCD may have the opportunity to have a representative present. The OCD looks forward to the submission of a report on the investigation.

Please be advised that OCD approval does not limit you to the work performed should the investigation fail to fully define the extent of contamination nor does approval relieve you of liability which may be actionable under any other laws and/or regulations. If you have any questions please contact me at (505)827-5885.

Sincerely.

William C. Olson Hydrogeologist

xc: Jerry Sexton, OCD Hobbs District Office Martin Nee, Geoscience Consultants, Ltd. OIL CONSERVITION DIVISION RECEIVED

'90 OCT 31 RM 8 49

Revision #2 Rhonda simon 10-17-90

LEE GASOLINE PLANT CONTINGENCY PLAN BOOKHOLDERS

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Enclosed is a revision of the Lee Gasoline Plant Plan. Please update your book.

The following Sections were changed from State Highway #8 to State Highway 238: Section IV pages 1 & 2

Section VI Pages 3, 4, 5, 7, 8, 9, 10, 11, 13, 14, & 15.

Section VII page 2 Equipment Section XI page 1 Mobil Unit Numbers

CC: Mexico Oil Convservation Comm-Santa New Mexico Oil Convservation Comm.-Hobbs New Mexico Environmental Improvement Board New Mexico State Police Lea County Sheriff Department-Lovington Office Lea Regional Hospital Norte Vista Medical Center LTD. Nor-Lea General Hospital Dr. T. G. McCormick Hobbs Ambulance Service Lovington Ambulance Service Lovington Fire Department Hobbs Fire Department Phillips Petroleum Company-D. J. Fisher Area Manager Phillips Petroleum Company-E. C. Thompson Plant Supt. Phillips Petroleum Company-C. B. Campbell, Field Supv. Phillips Petroleum Company-R. F. Gilchrest. Maint. Supv. Phillips Petroleum Company-Control Room, Lee Plant Phillips Petroleum Company-Central Files Phillips Petroleum Company-Company-Gas Process/Supply Section



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PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region August 30, 1990\*

Lee Gasoline Plant <u>H2S Contingency Plan</u>

William J. Lemay, Director New Mexico Oil Conservation Commission State Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

In connection with Phillips Petroleum Company's Lee Gasoline Plant, enclosed you will find the following:

Revised H<sub>2</sub>S Contingency Plan for this facility; and Revised H<sub>2</sub>S Reporting Form for Division Rule 118.

The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway238 for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2/) mile to the plant. The legal description being as Unit letter O, Section 30, T17S, R35E, Lea County, New Mexico.

In the event of a hazardous  $H_2S$  release, you will be notified immediately.

If you have any questions regarding this Plan or the attachments, call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD nmocd

Attachments



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# PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

Lee Gasoline Plant H<u>2S Contingency Plan</u>

Mr. J. T. Sexton New Mexico Oil Conservation Division 1000 W. Broadway P. O. Box 1980 Hobbs, New Mexico 88240

Dear Mr. Sexton:

In connection, with Phillips Petroleum Company's Lee Gasoline Plant you will find the following:

Revised H<sub>2</sub>S Contingency Plan for this facility; and Revised H<sub>2</sub>S Reporting Form for Division Rule 118.

The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 233for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2) mile to the plant. The legal description being as Unit letter 0, Section 30, T17S, R35E, Lea County, New Mexico.

In the event of a hazardous H<sub>2</sub>S release, you will be notified immediately.

If you have any questions regarding this Plan or  $H_2S$  Reporting Form, call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:bpd

Enclosure nmocd.2



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# PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region August 30, 1990

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Hobbs Fire Department Mike Gray, Fire Chief 301 E. White Street Hobbs, New Mexico 88240

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway238 for nine (9) miles (at Buckeye) turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H<sub>2</sub>S release you may be requested to assist Phillips Petroleum Company in the following duties:

- 1. Assist in controlling a fire (See Section VII).
- 2. Assist in providing emergency medical services.

If you are notified that your assistance is needed during an emergency situation, proceed immediately to the staging area as designated in Section X. Wait at the staging area for further instructions from the supervisor in charge of emergency procedures.

This Plan will provide you with the necessary information needed to perform the above services; however, if your personnel need additional  $H_2S$  training, contact the Phillips Safety Director at (915) 368-1439.

If you have any questions regarding this plan, call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly.

Naomi B. Orbeck, PE Special Projects Supervisor

NBO: BPD

fire2 Attachments



INTER-OFFICE CORRESPONDENCE / SUBJECT:

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Lovington Fire Department Jack Davis, Fire Chief 213 S. Love Street Lovington, New Mexico 88260

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway238 for nine (9) miles (at Buckeye) turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to assist Phillips Petroleum Company in the following duties:

- 1. Assist in controlling a fire (See Section VII).
- 2. Assist in providing emergency medical services.

If you are notified that your assistance is needed during an emergency situation, proceed immediately to the staging area as designated in Section X. Wait at the staging area for further instructions from the supervisor in charge of emergency procedures.

This Plan will provide you with the necessary information needed to perform the above services; however, if your personnel need additional H<sub>2</sub>S training, contact the Phillips Safety Director at (915) 368-1439.

If you have any questions regarding this plan, call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Comi Obech.

Naomi B. Orbeck, PE Special Projects Supervisor

NBO: BPD

fire Attachments



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# PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Lt. Jerry Smith New Mexico State Police P. O. Box 1069 Hobbs, New Mexico 88241

In compliance with New Mexico Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 23B for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to assist Phillips Petroleum Company in the following duties:

- Secure the area and blockade the highways at designated points (See Section X).
- 2. Notify and evacuate the residents within the radius of exposure. (See Section V and Section X).

If Phillips Petroleum Company personnel arrive on the scene first, they will set up a temporary road block at the designated areas. Assemble your personnel at the staging area as designated in Section X. At that time you will be given further instructions by the supervisor in charge of emergency procedures.

If your personnel arrive on the scene first, proceed to blockade the roads at the designated areas as outlined in Sections X. If your assistance is needed to perform additional duties, you will be directed by the supervisor in charge of the emergency procedures.

Phillips Petroleum Company vehicles will be identified by emergency blinking lights. Company vehicles equipped with radios and walkie-talkies will be utilized by company personnel during the emergency procedures. Note the list of mobile unit radios in Section IX.



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PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

New Mexico Environmental Improvement Board 414 N. Taylor Hobbs, New Mexico 88240

Gentlemen:

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 238 for nine (9) miles (to Buckeye) turn left and travel approximatley one-half (1/2) mile to the plant. The legal description being as Unit letter O, Section 30, T17S, R35E, Lea County, New Mexico.

In the event of a hazardous  $H_2S$  emission you shall be notified of the situation as soon as possible.

This Plan will provide you with the location of the Lee Gasoline Plant and other necessary information (see Section XI). If you have any questions regarding this Plan, call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Maonij Orbech

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD

nmeib Attachments



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PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Lovington Emergency Medical Service P. O. Box 1269 Lovington, New Mexico 88260

Gentlemen:

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous H<sub>2</sub>S release you may be requested to assist Phillips Petroleum Company in the following duties:

1. Provide emergency medical services.

2. Provide ambulance service from the area to local medical facilities.

If you are notified that your ssistance is needed, report to the staging area as designated in Section X and wait for further instructions from the supervisor in charge of emergency procedures.

This Plan will provide you with the necessary information if your assistance is requested; however, if your personnel need additional H<sub>2</sub>S training, contact the Phillips Safety Director at (915) 368-1439.

If you have any questions regarding this Plan call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

aomi Debech

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD ambulance

Attachments



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PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Hobbs EMS Ambulance Service 301 East White St. Hobbs, New Mexico 88240

Gentlemen:

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 238 for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to assist Phillips Petroleum Company in the following duties:

1. Provide emergency medical services.

2. Provide ambulance service from the area to local medical facilities.

If you are notified that your ssistance is needed, report to the staging area as designated in Section X and wait for further instructions from the supervisor in charge of emergency procedures.

This Plan will provide you with the necessary information if your assistance is requested; however, if your personnel need additional  $H_2S$  training, contact the Phillips Safety Director at (915) 368-1439.

If you have any questions regarding this Plan call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD ambulance

Attachments



# PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Dr. T. G. McCormick 1801 North Dal Paso Hobbs, New Mexico 88240

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant, located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 208for nine (9) miles (to Buckeye) turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to provide medical services for person(s) being transported to the Lea Regional Hospital or other facilities by the Lovington EMS Ambulance Service.

If you have any questions regarding this Plan call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Caomi Oulech

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD doctor

Attachments



PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Sheriff George Teague Lea County Sheriff Department 215 N. Central Lovington, New Mexico 88260

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 238 for nine (9) miles (to Buckeye), turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to assist Phillips Petroleum Company in the following duties:

- 1. Secure the area and blockade the highways at designated points (See Section XI).
- 2. Notify and evacuate the residents within the radius of exposure. (See Section V and Section X).

If Phillips Petroleum Company personnel arrive on the scene first, they will set up temporary road blocks at the designated areas. Assemble your personnel at the staging area as designated in Section X. At that time you will be given further instructions by the supervisor in charge of emergency procedures.

If your personnel arrive on the scene first, proceed to blockade the roads at the designated areas as outlined in Sections X. If your assistance is needed to perform additional duties, you will be directed by the supervisor in charge of the emergency procedures.

Phillips Petroleum Company vehicles will be identified by emergency blinking lights. Company vehicles equipped with radios and walkie-talkies will be utilized by company personnel during the emergency procedures. Note the list of mobile unit radios in Section IX.



PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Lea Regional Hospital Lovington Highway Hobbs, New Mexico 88240

Attention: Head Nurse

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway <sup>238</sup>for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to provide medical facilities and services. You will be notified if the Lovington EMS Ambulance Service is transporting injured persons to your facility.

If you have any questions regarding this Plan call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Maomi Orlech

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD hosp

Attachments



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PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990\*

New Mexico Oil Conservation Commission Hydrogen Sulfide H2S <u>Contingency Plan Lee Gasoline Plant</u>

Norte Vista Medical Center Ltd. 2410 N. Fowler Hobbs, New Mexico 88240

Attention: Industrial Relations Dir.

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway238 for nine (9) miles (to Buckeye) then turn left and travel one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to provide medical facilities and services. You will be notified if the Hobbs EMS Ambulance Service is transporting injured persons to your facility.

If you have any questions regarding this Plan call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Cami Ocheck

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD hosp1

Attachments



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# PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

August 30, 1990

New Mexico Oil Conservation Commission Hydrogen Sulfide H<sub>2</sub>S <u>Contingency Plan Lee Gasoline Plant</u>

Nor-Lea General Hospital 1600 N. Main Lovington, New Mexico 88260

Attention: Head Nurse

In compliance with New Mexico Oil Conservation Commission Rule 118, Phillips Petroleum Company is providing the attached Contingency Plan for the Lee Gasoline Plant. The facility is located approximately seven (7) miles west of Lovington, New Mexico on State Highway #82 turn left on State Highway 238for nine (9) miles (to Buckeye) then turn left and travel approximately one-half (1/2) mile to the plant.

In the event of a hazardous  $H_2S$  release you may be requested to provide medical facilities and services. You will be notified if the Lovington EMS Ambulance Service is transporting injured persons to your facility.

If you have any questions regarding this Plan call Phillips Petroleum Company, Gas Process/Supply Section, Virgie Martin (915) 368-1404 or Bernadette Dillard (915) 368-1573.

Yours truly,

Naomi B. Orbeck, PE Special Projects Supervisor

NBO:BPD hosp2

Attachments

#### Fire Protection

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Available for use in fighting fires at various locations covered by this plan, are approximately 600 employees who have been trained in firefighting techniques common to the industry. These employees may be called for duty from maintenance and plant groups throughout the entire Permian Basin Region.

Personnel of the plant or booster experiencing the fire emergency will man the fire equipment in the capacity in which they have been trained. The only exception to this rule would be when a fire truck or pumping unit is dispatched to the scene and the driver or operator of this equipment will remain the operator of same under direction of the Phillips supervisor.

#### Fresh Air Breating Equipment Available at Lee Gasoline Plant

Control Room

Clark 5# Engine Room

North of Plant Oil Stg. Tank

N W 220 HS Accumalator

East of Switch Rack "C"

Sulphur Recovery Unit

Plan Firehouse

- 1 30-min Scott Air-Pak
- 6 Spare Cylinders For 5 min SKA-Pak
- 1 7 Cylinder 300 Cu Ft. Cascade breathing air system refill station.
- 1 300 Cu Ft. Cart Mounted Unite
- 2 Spare 30 Min Air-Pak

# Fixed H<sub>2</sub>S Monitors

- 1 "Rexnard" Fixed Monitor with 10 Sensor Heads Located at:
  - 5 Sulphur Plant
  - 4 Treaters (North & South)
  - 1 Process Control Room

# IX. MOBILE UNIT NUMBERS

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To Reach personnel by mobile radios, first dial 1-505-397-5789 or 1-505-397-5599. At the tone dial radio number listed below:

NAME		VEHICLE EOUIPPED WITH BREATHING EQUIPMENT
NAME_	RADIO #	DREATHING EQUIPMENT
C. B. Campbell	1-331	
R. F. Gilchrest	1-332	
S. C. Jeesen	1-353	1 300 cu ft breathing air cylinder with SKA-PAK hose line work unit
E. C. Thompson	1-322	
Eldon Hetrick	1-362	
B. A. Ivy	1-358	1 300 cu ft breathing air cylinder with SKA-P <b>A</b> K hose line work unit
D. A. Payne, Jr.	1-357	HOSE THE WORK UNIC
Bill Pritchard	1-360	
P. M. Sewall	1-361	1 300 cuft breathing air cylinder with SKA-PAK hose line work unit
Pablo Chavez	1-356	
Ben Molina	1-359	
Stan Gregory	1-354	
Ron Kelley	1-237	
Luther Thompson	1-212	
D. J. Fisher	1-211	
J. F. Richey	1-351	
J. A. Aranda	1-355	
L.H. Garcia	1-352	
Lee Control Room	1-403	
J. R. Welch	1-059	
S. A. Miley	1-315	

Geoscience Consultants, Ltd.

500 Copper Avenue N.W. Suite 200 Albuquerque, New Mexico 87102 (505) 842-0001 FAX (505) 842-0595



October 18, 1990

RECEIVED

Mr. Bill Olson New Mexico Oil Conservation Division State Land Office Building 310 Old Santa Fe Trail, Room 206 Santa Fe, NM 87501 OCT 2 2 1990

OIL CONSERVATION DIV. SANTA FE

## RE: SUBMISSION OF PHASE II SUBSURFACE INVESTIGATION REPORT

Dear Mr. Olson:

Enclosed please find Phillips' Phase II Report on Subsurface Investigation, Phillips 66 Natural Gas Company, Lee Gas Plant. If you have any questions or comments, please call me in Albuquerque at 842-0001.

Sincerely, GEOSCIENCE CONSULTANTS, LTD.

Martin J. Nee Project Hydrogeologist

MJN/0439/OLSON02.LTR

Enclosures

cc (w/out Enclosures): Mr. M. Ford, Bartlesville Mr. D. Jelmini, Odessa Mr. E.C. Thompson, Hobbs cc (w/Enclosures): Mr. E. W. Seay, Hobbs

CONSERVATION MEMORANDUM OF MEET	TING OR CONVERSATION
Time /	Date 10/10
Telephone Personal	440 Date 10/17/90
Originating Party	Other Parties
Martin Nee - Geoscience Consultant	, Cill Olson - OCD
Subject	
Phillips Lee Plant	
Discussion	
Phillips is unrently raviavin	the final report on investigation
OCD should recieve report	t by Mon 10/22
	· · · · · · · · · · · · · · · · · · ·
Conclusions or Agreements	
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Distribution	Signed Mill Son

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STATE OF NEW MEXICO ON CONSERVATION DIVISION MEMORANDUM OF MEETING OR CONVERSATION				
Telephone Personal	Time /030		Date 10/1/90	
Originating Par	ty		Other Parties	<u> </u>
Marta Nie - Geoxiane C	ons trants It.	Bill C	lson - OCP	
Subject		ļ		
Phillps Lee Report an	ed Gient B	loontiel	f Apport	
Discussion		<u> </u>		<u> </u>
60R - Raction Soil sample expect to have repor	s complete t en ut it.	but have	pproximately 2 males	
Philips Lee Plant - just vill sen copert	Einishing (epi nd to Milie should be	Ford fe	- revia. OCD by 10/10/90	
<u>Conclusions or Agreements</u>				
Distribution Phillips Lee file 6BR HSite file	Sig	gned Bi	V cloon	

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STATE OF NEW MEXICO OIL CONSERVATION DIVISION

# MEMORANDUM OF MEETING OR CONVERSATION

Date Time 7/18 Telephone 1300 Personal Originating Party Other Parties Shr P0 1205 l G t. Subject lleme ll in ۲ July 30, 1990 Discussion 2 61 Ð mos (5 11/11 lui Ô 05 silling Ì 5 Ke 1 250 Conclusions or Agreements 1990 F 601 920 this Cr. Ъ C آم e un Shw Oh OLD Sc DIVOC WO. 10 7**6**0 7/1 Signed Distribution f./e U an

NEW MEXICO OIL CONSERVATION DIVISION OIL CONSERVOTEDICATION OF FIRE, BREAKS, SPILLS, LEAKS, AND BLOWOUTS I/Bolt Petroloum ADDRESS ALPORT 90 0 GASO V OIL OTHER\* FIRE DREAK SPILL LEAK ЭF PIPE IYPE OF DRLG PROD TALK  $_{\rm PLNT}^{\rm GASO} X$ RFY LINE FACILITY WELL WELL BTTY WARE OF FACILITY Lee Plant Sulfur Recovery Unit LOCATION OF FACILITY (QUARTER/QUAR-RGE. COULLIY TER SECTION OR FOOTAGE DESCRIPTION) 30 35 E LEA DISTANCE AND DIRECTION FROM NEAR-EST TOWN OR PROMIMENT LANDMARK DATE ARD HOUR DATE AND HOUR OF OCCURENCE 9-30-90 1:20 To 7AM OF DISCOVERY 9-30-90 1:20 AM WAS IMMEDIATE IF YES, 393-6/61 YES 1 KO INT RE-TO MHOM Answering Service @ 4 AM NOTICE GIVEN? QUIRED ΒY. DATE MOMMike Kelley Plant Operator AND HOUR 9-30-90 4AM TYPE OF QUANTITY VOLUME RE-FLUID LOST OF LOSS 233 MSCF COVERED 0 DID ANY FLUIDS REACH YES **QUANTITY** NO 0 A MAYERCOURSE? IF YES, DESCRIDE FULLY\*\* DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN\*\* 235 MSCF of Acid gas Flared = 15458 Lbs SO2 Released Electrical Control Problems DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN\*\* Almosphere None DESCRIPTION OTHER\* FARMING URBAN GRAZ ING X OF AREA SURFACE CLAY SHOW SANDY SANDY ROCKY WET DRY CONDITIONS LOAM X DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)\*\* Moderate North Easterly Wind. 60° 9 90% Humidity I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KROWLEDGE AND BELIEF ATTACH ADDITIONAL SHEETS IF RECESSARY GLED

STATE OF NEW MEXICO



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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

July 26, 1990

CERTIFIED MAIL RETURN RECEIPT NO. P-918-402-279

Mr. Michael D. Ford Phillips Petroleum Company 12 Bs Phillips Building Bartlesville, Oklahoma 74004

RE: Discharge Plan GW-2 Lea Gas Processing Plant Lea County, New Mexico

Dear Mr. Ford:

On May 5, 1986, the renewal of ground water discharge plan, GW-2 for the Phillips Lea Gas Processing Plant located in the SW/4 SW/4, Section 30, Township 17 South, Range 35 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on March 16, 1991.

If your 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 are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application.





Mr. Michael D. Ford July 26, 1990 Page -2-

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

Please note that all gas plants, refineries and compressor stations in excess of 25 years of age will be required to submit plans for, or the results of, an underground drainline testing program as a requirement for discharge plan renewal.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5884.

Sincerely,

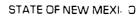
David G. Boyer, Hydrogeologist Environmental Bureau Chief

DGB/sl

Enclosure

cc: OCD Hobbs Office

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ENERGY, MINERALS AND NATURAL RES JURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS

POST OFFICE 80X 2088 STATE LAND OFFICE 8UILDING SANTA FE, NEW MEXICO 87504 (505) 827-5800

July 2, 1990

CERTIFIED MAIL RETURN RECEIPT NO. P-918-402-330

Michael D. Ford Phillips Petroleum Company 12 B2 Phillips Building Bartlesville, Oklahoma 74004

#### RE:

## PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT REPORT OF SUBSURFACE INVESTIGATION

Dear Mr. Ford:

The New Mexico Oil Conservation Division (OCD) has completed review of the May 30, 1990 "REPORT OF SUBSURFACE INVESTIGATION, PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT" for the Phillips Lee Gas Plant in Buckeye, New Mexico.

On June 28, 1990, the OCD discussed, with you, their review of this document and Phillips request for a modification of the Phillips Lee Gas Plant Discharge Plan GW-2. During this conversation, the OCD made recommendations on the proposed locations of additional monitor wells with which Phillips agreed.

The OCD approves of Phillips May 30, 1990 modification to the Phillips Lee Gas Plant Discharge Plan GW-2 regarding the discharge of approximately three gallons per minute of water/product from recovery well RW-1 into the plant waste water system.

In addition, the OCD approves of the recommendations in Phillips May 30, 1990 "REPORT OF SUBSURFACE INVESTIGATION, PHILLIPS 66 NATURAL GAS COMPANY LEE GAS PLANT" to install additional monitor wells to define the extent of dissolved phase petroleum-related contaminants in ground water conditioned upon the following agreements:

 The location of monitor well P-9 will be moved approximately 20 feet due west of its proposed location to provide a 150 foot spacing between monitor well P-9 and MW-8.

- 2) Phillips will install a fourth monitor well, designated P-12, 300 feet due south of monitor well MW-8 and 150 feet due west of monitor well P-11.
- 3) Monitor wells will be constructed as per previous investigations including a minimum of five feet of well screen above the water table.
- 4) Monitor wells will be sampled for aromatic and halogenated organics as per previous investigations and a report on the investigation including sampling results will be submitted to OCD within six weeks of water quality sampling.

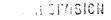
The OCD understands that RW-1 recovery operations will begin immediately upon approval and that monitor well drilling will begin within 3 weeks of receipt of OCD's approval. Please contact OCD prior to well drilling and water quality sampling so that the OCD may have the opportunity to have a representative present. The OCD looks forward to the submission of a report on the investigation.

Please be advised that approval of this work plan does not limit you to the work performed should the investigation fail to fully define the extent of contamination nor does approval relieve you of liability which may be actionable under any other laws and/or regulations. If you have any questions please contact me at (505)827-5885.

Sincerely, William J. Lemay Director

WJL/WCO

xc: Jerry Sexton, OCD Hobbs District Office William C. Olson, OCD Environmental Bureau Martin Nee, Geoscience Consultants, Ltd.



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# PHILLIPS PETROLEUM COMPANY

BARTLESVILLE, OKLAHOMA 74004

'93 MRY 18 AM 8 47

QUALITY, ENVIRONMENT AND SAFETY

May 16, 1990

Requested Information Groundwater Remediation Action Lee Gasoline Plant <u>Discharge Plan No. GWR-2</u>

REGISTERED MAIL RETURN RECEIPT NO. P-06

Mr. William C. Olson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504

Dear Mr. Olson:

We received your letters containing requirements and requesting additional information regarding the groundwater remediation action at our Lee Plant. A list of the items contained in your letters with our responses follows:

- 1. Water levels must be measured prior to all samplings to determine hydraulic gradient.
- Response: Water levels have been measured in the monitor wells prior to each sampling event. Attachment 1 contains a table which shows the water elevation data to date. Water level data for the additional monitoring/recovery wells recently installed will be provided in the technical report.
- 2. A plot plan is to be submitted that includes the monitor well locations, and that includes the evaporation pond and other topographic features immediately north of the plant.
- Response: A plot plan which shows the above mentioned features has been provided to your office. This plot plan will be updated to show the location of the additional monitoring/recovery wells recently installed. The updated plot plan will be provided in the technical report detailing installation of the additional wells.
- 3. Plant water well #2 is to be sampled after purging sufficient water to obtain a representative aquifer sample. Information as to depth, construction details, screen placement, etc., shall be provided in the May 30th technical report.
- Response: Plant water well #2 was purged of 3 casing volumes of water and sampled on 3/7/90. Samples were analyzed for benzene, ethylbenzene, toluene and total xylenes. The results of these samples are contained in Attachment 2. It should be noted the existing monitor wells and plant water well #1 were also sampled at this time for the same constituents. These analyses are also contained in Attachment 2.

Plant water well #2 was installed in 1944. The drillers log for this well indicates caliche from the surface to a depth of 24 feet and sand from a depth of 24 feet to the total depth of the well (147 feet). The total depth of the well at the time of the recent sampling was measured at 140 feet. Depth to water was 97.5 feet. The well is constructed of 8" steel casing. There was no information available in our files regarding the wells screened length or screened interval.

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- 4. Analysis results from sampling of the plant water wells from November, 1988, to the present shall be provided to the OCD.
- Response: All analyses from sampling of the plant water wells from November, 1988, to the present are contained in Attachment 3.
- 5. Please provide the OCD a copy of the following documents that were produced pursuant to investigations that Phillips performed as required by the New Mexico Environmental Improvement Division (NMEID):
  - A. July 24, 1984, "Report of Samples Taken at Phillips Lee".
  - B. July 24, 1984, "Geology Report".
  - C. July 30, 1984, "Chemical and Physical Analyses for Water Samples".
  - D. The results of the September 1988 Soil Vapor Survey.
- Response: The information contained in the above named documents is available in the Closure & Post-Closure Plan Sampling & Analysis Report submitted to the NMEID for this facility. A copy of this report is found in Attachment 4. A copy of the September 1988 Soil Vapor Survey report is found in Attachment 5.
- 6. Please provide the OCD with any documentation of the presence of free-phase hydrocarbons in the saturated zone underlying the facility. The work plan states on page 1 that "the results of the initial investigation indicated that both free-phase and dissolved phase hydrocarbons occurred in the saturated zone beneath the site". Although OCD files contain the results of water quality analyses showing the presence of dissolved phase hydrocarbons in groundwater samples from Phillips monitor wells, no documentation can be found regarding the presence of free-phase hydrocarbons.
- Response: During the drilling of the second set of monitor wells required by the NMEID, we discovered some free-phase hydrocarbon material in what was to be the upgradient well. We secured a sample of this hydrocarbon material for analysis and then plugged the well since it could not be used for upgradient monitoring purposes. Mr. Dave Boyer of your office was then notified in a letter dated August 11, 1988 of a discharge of hydrocarbon material to the uppermost aquifer at Lee Plant. A copy of the analysis of this hydrocarbon material is found in Attachment 6.

Free-phase hydrocarbon material was also discovered in the No. 4 monitoring well at the site during sampling conducted on 3/7/90. Mr. Roger Anderson of your office was notified by phone the same date of this problem. Analysis of the hydrocarbon material from the No. 4 monitoring well is found in Attachment 7.

- 7. Please provide the OCD with documentation about the modified EPA Method 8015 analytical technique.
- Response: Documentation regarding the modified EPA Method 8015 analytical technique will be provided in the technical report.

We appreciate your cooperation in this matter. If you should have any questions regarding this information, please contact me at (918) 661-0478.

Very truly yours,

Michael D. Ford

Michael D. Ford Environmental Scientist

MDF: LEEGWREM

Attachments

cc: Mr. Mike Selke - GCL, Albuquerque

STATE OF OIL CONSERVATION DIVISION MEMORANDUM OF MEETING OR CONVERSATION 4/19/90 Time Date Telephone 16/5 Personal Other Parties Originating Party Nike Selke Obon - 6CL -DCD 842-0001 Subject Plan Remediati e Discussion NO GC Scriy 0 กาเ ITe pomit SEO 6CI tile  $\pm_{i}$ 5 Conclusions or Agreements # John ith SEO Honan 622-65 Co -will him. Con t 40 Signed **Distribution** fle

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS GOVERNOR

#### MEMORANDUM

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

TO: David Boyer, OCD Environmental Bureau Chief

FROM: Bill Olson, Geologist III

DATE: April 2, 1990

RE: PHILLIPS LEE GAS PLANT REMEDIAL INVESTIGATION SUMMARY

The following is a summary, in chronological order of events and actions taken regarding the 1988 discovery of petroleum related contaminants in ground water underlying the Phillips 66 Natural Gas Company Lee Plant located in Buckeye, New Mexico. OCD regulatory actions prior to August 11, 1988 can be found in the Phillips Petroleum Lee Buckeye Discharge Plan File #GW-2. Additional information prior to August 11, 1988 on RCRA activities related to closure of the waste water evaporation pond can be found in the files of the New Mexico Environmental Improvement Division's (EID) Hazardous Waste Bureau.

- August 11, 1988 Phillips letter notifying OCD of the discovery of a hydrocarbon discharge to ground water during the course of a RCRA investigation of the waste water evaporation pond and the hiring of a consultant to perform a contamination investigation. Included were the May 1988 ground water sampling results required by the EID Hazardous Waste Bureau.
- August 19, 1988 Phillips submits to OCD a copy of the June 6, 1988 " REPORT ON THE INSTALLATION OF A GROUND WATER MONITORING SYSTEM AT THE PHILLIPS 66 NATURAL GAS COMPANY LEE PLANT" which was originally submitted to the EID Hazardous Waste Bureau.
- September 20, 1988 Phillips samples the Lee Plant water supply and process wells #1, #3 and #4. Well #1 contained 48 ppb of benzene. Well #4 contained 8.5 ppb of benzene.
- November 7, 1988 The EID Hobbs field office samples the Phillips Lee Gas Plant well #1 and #3. Low levels of trihalomethanes consistent

with a chlorinated water supply were found in well #3. Well #1 contained 50 ppb of benzene.

- November 22, 1988 Phillips sends a letter to EID Hazardous Waste supplying EID with the 1980 plot plan for the plant and a revised map of new monitor well locations.
- November 30, 1988 OCD performs a discharge plan inspection.
- July 18, 1989 EPA RCRA Enforcement Branch sends a letter to EID Hazardous Waste providing EPA's interpretation of the petroleum exemption.
- September 13, 1989 EID sends a letter to Phillips exempting Phillips from RCRA regulation under the petroleum exemption.
- January 25, 1990 OCD and Phillips meet in Santa Fe to discuss Phillips technical approach to perform a remedial investigation of petroleum contaminated ground water. Discussion included submission of a work plan and reports covering definition of free floating product and dissolved phase hydrocarbons.
- January 26, 1990 OCD letter to Phillips confirming the January 25, 1990 discussions and approving the technical approach of the proposed remedial investigation.
- February 16, 1990 Phillips consultant submits a letter to OCD transmitting the "WORK PLAN FOR THE PHILLIPS LEE PLANT INVESTIGATION".
- February 20, 1990 Phillips consultant submits a letter to OCD transmitting a plat map for the site.
- March 7, 1990 Phillips calls OCD to report the presence of 2 feet of floating product in monitor well 4.
- March 14, 1990 OCD inspects the proposed locations of monitor wells.
- March 19, 1990 OCD approves the February 16, 1990 "WORK PLAN FOR THE PHILLIPS LEE PLANT INVESTIGATION" and requests that Phillips provide OCD with past studies performed for the EID Hazardous Waste Bureau.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

Time 1630 4/2/90 Date Telephone Personal Other Parties Originating Party Mile Selke (0)-DC - GCL 15.00 842-0001 Subject Ð 6 5 5 -Ce lant Discussion (oCL W45 Ø Continsec Lohy/ 43 to IGINT to mone west Galori Irad m in NOC ater would ¢к see 51 MW-3 ML ar **3**0 h 1.1 5e ť west INES る cl 0 mare < 5 B1 RCRA work EPNG AC 20 bore d Ň On stime Jould 5664 h. SON a de m h Dun Droba cover Conclusions or Agreements 4" well #2 to 100-150 more asenxi Wes? 11 102 atd 10 AOSE N Signed **Distribution** []'/e

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STATE OF NEW MEXICO OIL CONSERVATION DIVISION MEMORANDUM OF MEETING	G OR CONVERSATION
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STATE OF NEW MEXICO OIL CONSERVATION DIVISION

#### MEMORANDUM OF MEETING OR CONVERSATION

Time Date 4/2/90 Telephone 1100 Personal Other Parties Originating Party Bill Olon - DCD artih SCL loc Subject P Ges el 26 Discussion Ħ, 4 well C Y -1 nous an 0C NON dia rl. 110 DUE cecision need beter reliens WOr to 6 , Conclusions or Agreements He will buck at 3:30 pm Ch appros. Distribution Signed Bil ile

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

**OIL CONSERVATION DIVISION** 

GARREY CARRUTHERS

TO:

#### MEMORANDUM

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

David Boyer, OCD Environmental Bureau Chief

FROM: Bill Olson, Geologist III

DATE: April 2, 1990

RE: PHILLIPS LEE GAS PLANT REMEDIAL INVESTIGATION SUMMARY

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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

DIL CONSERVATION DIVISION

GARREY CARRUTHERS GOVERNOR POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICO 87504 (505) 827-5800

March 19, 1990

#### CERTIFIED MAIL RETURN RECEIPT NO. P-918-402-108

Mr. Michael D. Ford Environmental Analyst Phillips 66 Natural Gas Company 4001 Penbrook Odessa, Texas 79762

Dear Mr. Ford:

The New Mexico Oil Conservation Division (OCD) has reviewed the February 16, 1990 "Work Plan for Phillips Lee Plant Investigation" which was submitted to OCD by your consultant, Geoscience Consultants, Ltd.

Upon review of the work plan and the Phillips Lee Gas Plant files, OCD has found referenced various documents of which OCD has no record. OCD understands that these documents were produced pursuant to investigations that Phillips performed as required by the New Mexico Environmental Improvement Division. The following is a list of missing documents:

- 1. July 24, 1984, "Report of Samples Taken at Phillips Lee".
- 2. July 24, 1984, "Geology Report".
- 3. July 30, 1984, "Chemical and Physical Analyses for Water Samples".
- 4. The results of the September 1988 Soil Vapor Survey.
- 5. Any documentation of the presence of free-phase hydrocarbons in the saturated zone underlying the facility. The work plan states on page 1 that "the results of the initial investigation indicated that both free-phase and dissolved phase hydrocarbons occurred in the saturated zone beneath the site". Although OCD files contain the results of water quality analyses showing the presence of dissolved phase hydrocarbons in ground water samples from Phillips monitor wells, no documentation can be found regarding the presence of free-phase hydrocarbons.

Mr. Michael D. Ford March 19, 1990 Page -2-

Although the Phillips Lee Gas Plant files are missing the above information, the OCD believes the lack of this information should not hinder your attempts to locate the source and extent of hydrocarbon contamination or the commencement of a recovery system for floating product. Therefore, OCD approves of the work elements and schedule submitted in the February 16, 1990 Work Plan for Phillips Lee Plant Investigation with the condition that Phillips submit the above missing information to OCD along with the technical report which is due on May 30, 1990.

In addition, OCD asks that the technical report, include documentation about the modified EPA Method 8015 analytical technique and any additional information requested in OCD's January 26, 1990 correspondence with Phillips.

If you have any questions regarding this letter or the information requested, please contact me at (505) 827-5885.

Sincerely.

William C. Olson Hydrogeologist

WCO/sl

cc: J. Sexton, OCD Hobbs Office Michael Selke, Geoscience Consultants, Ltd.

STATE CHE NEW MEXICO OIL CONSERVATION DIVISION

#### MEMORANDUM OF MEETING OR CONVERSATION

Time Date 1430 90 Telephone Personal Originating Party Other Parties GC Milke Selke () 000 Subject Fo hì e mines 0 Discussion MN-4. 1.3 cove hr C Pro monter Clip CRP anal OC 105 w Conclusions or Agreements  $\mathcal{O}$ will revise 7s appround φ work invest. 19 190 determin lixac た ocit er him in hri 2 12 -2 aNto V ISTI Distribution Signed 

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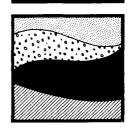
 Albuquerque, New Mexico 87102

 FAX (505) 842-0595

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**Geoscience Consultants, Ltd.** 

(505) 842-0001 FAX (505) 842-0595



February 20, 1990

Mr. David G. Boyer Hydrogeologist New Mexico Oil Conservation Division Land Office Building P.O. Box 2088 Santa Fe, New Mexico 87504-2088

#### RE: PLAT FOR PHILLIPS LEE GAS PLANT, BUCKEYE, NEW MEXICO

Dear Mr. Boyer:

Please find enclosed a plat of the Lee Gas Plant property. Tract number 5 is the area north of the plant that is missing from the work plan that was submitted last week. If I cannot locate a better quality map of the entire plant this week I will have a composite made of the two available maps that have now been submitted.

Please call me or Randy Hicks at (505) 842-0001 if you have any questions.

Yours very truly, GEOSCIENCE CONSULTANTS, LTD.

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Michael W. Selke Director of Hydrogeologic Services

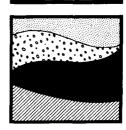
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Enclosure

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#### **Geoscience Consultants, Ltd.**

500 Copper Avenue N.W. Suite 200 Albuquerque, New Mexico 87102 (505) 842-0001 FAX (505) 842-0595



C

February 16, 1990

Mr. David G. Boyer Hydrogeologist New Mexico Oil Conservation Division Land Office Building P.O. Box 2088 Santa Fe, New Mexico 87504-2088

#### **RE: WORK PLAN FOR PHILLIPS LEE PLANT INVESTIGATION**

Dear Mr. Boyer:

Please find enclosed the proposed work plan for the subsurface investigation at Phillips Lee Gas Plant, Buckeye, New Mexico. The plot plan included in the work plan is from the existing discharge plan and does not include the area north of the plant. Some difficulty has been encountered locating a reproducable map of this area. I am expecting to receive a better quality map from the Lee Plant Manager early next week and I will forward it to you immediately.

The permit application for the recovery system has been submitted to the New Mexico State Engineer's office.

Drilling at the site has been tentatively scheduled for the second week in March. I will inform you of the final schedule as soon as a contractual agreement has been reached with the drilling contractor.

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Please call me or Randy Hicks at (505) 842-0001 if you have any questions.

Yours very truly, GEOSCIENCE CONSULTANTS, LTD.

(allac

Michael W. Selke Director of Hydrogeologic Services

MWS/llb/0439/BOYER01.LTR

RECEIVED

FEB 1 9 1990

OIL CONSERVATION DIV. SANTA FE

Enclosure

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Remediation F.Re

GARREY CARRUTHERS

January 26, 1990

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

CERTIFIED MAIL RETURN RECEIPT NO. P-918-402-214

Mr. Michael D. Ford, Environmental Analyst PHILLIPS 66 NATURAL GAS COMPANY 4001 Penbrook Odessa, Texas 79762

RE: Ground Water Remediation Action at Lee Plant

Dear Mr. Ford:

This letter is to confirm the agreement reached with you, other Phillips representatives, your consultant Geoscience, and OCD regarding the technical work and scheduling of the remedial action to be undertaken at your Lee Gas Plant to recover free floating and dissolved phase hydrocarbons. Your proposed technical approach and schedule is attached to this letter.

Under Section 1-203.A. of the Water Quality Control Commission you are required to take such corrective actions as are necessary or appropriate to contain or remove or mitigate the damage caused by the discharge. Minimum requirements are that the source of the hydrocarbons be located, additional surface or subsurface discharges be stopped, floating or free product recovered, and dissolved hydrocarbons removed so that ground water meets WQCC standards. Your proposal begins this process by initating drilling to locate the source and extent of contamination, and commencing recovery of floating product.

Your proposed technical approach, presented at the January 25th meeting, is hereby approved. As discussed at the meeting, the following additional items should be included either as part of the work plan or submitted separately:

- 1. Water levels must be measured prior to all samplings to determine hydraulic gradient.
- 2. A plot plan is to be submitted that includes the monitor well locations, and that includes the evaporation pond and other topographic features immediately north of the plant.

Mr. Michael D. Ford January 26, 1990 Page -2-

- 3. Plant water well #2 is to be sampled after purging sufficient water to obtain a representative aquifer water sample. Information as to depth, construction details, screen placement, etc., shall be provided in the May 30th technical report.
- 4. OCD shall be notified several days prior to expected drilling to allow an observer the opportunity to be present.
- 5. Analysis results from sampling of the plant water wells from November, 1988, to the present shall be provided to OCD.

If you have any questions regarding this letter or the information requested, please contact me at 827-5812.

Sincerely,

Inde Koger

DGB/sl

Enclosure

cc: J. Sexton, OCD Hobbs Office NMEID - Groundwater NMEID - Hazardous Waste Walter Kramer, Phillips Petroleum Michael Selke, Geoscience Consultant

David G. Boyer, Hydrogeologist Environmental Bureau Chief

#### TECHNCIAL APPROACH FOR RECOVERY OF FREE FLOATING AND DISSOLVED PHASE HYDROCARBONS AT PHILLIPS LEE PLANT, BUCKEYE, NEW MEXICO

- 1) APPLY FOR RECOVERY WELL PERMITS AND SUBMIT WORK PLAN TO NMOCD (by Feb 10)
- 2) DEFINE FREE-PHASE HYDROCARBON PLUME BOUNDARIES:

1.5

INSTALL ONE 4-INCH MONITOR WELL UPGRADIENT FROM THE EVAPORATION POND AND NEAR THE CENTER OF THE PLUME (by Apr 30)

INSTALL ONE 4-INCH MONITOR WELL CROSS-GRADIENT (WEST) FROM THE APPROXIMATE CENTER OF THE PLUME (by Apr 30)

INSTALL ONE 4-INCH MONITOR WELL UPGRADIENT (NORTH) FROM THE EVAPORATION POND, AND DOWNGRADIENT FROM THE SMALL EVAPORATION POND LOCATED NORTH OF THE PLANT

DEVELOP AND SAMPLE ALL MONITOR WELLS (by Apr 30)

- 3) INSTALL ONE 6-INCH RECOVERY WELL NEAR THE CENTER OF THE KNOWN FLOATING HYDROCARBON PLUME (by Apr 30)
- 4) SUBMIT TECHNICAL REPORT (INCLUDING PLANS FOR ADDITIONAL WORK TO DEFINE THE DISSOLVED PHASE PLUME IF NECESSARY) AND DRAFT DISCHARGE PLAN MODIFICATION REQUEST (by May 30)
- 5) INSTALL RECOVERY PUMP AND BEGIN 3 GPM (MINIMUM) RECOVERY PROGRAM TO DISCHARGE TO APPROVED WASTEWATER DISPOSAL SYSTEM (by May 30)
- 6) MONITOR EFFECTIVENESS OF RECOVERY SYSTEM AND INSTALL ADDI-TIONAL MONITOR WELLS IF NECESSARY AND SUBMIT FINAL DISCHARGE PLAN MODIFICATION (by Sep 30)

STATE OF EW MEXICO CONSERVATION MEMORANDUM OF MEETING OR CONVERSATION Date Time Personal Telephone 9 Km 1/25/1990 Other Parties Originating Party Ankerson, Selke/Geoscience Boys ins Nat (sat Mike Son ENV. ANalyS Kramer, Para ject Plan 00 eme Discussion Inveal A come in lo pr they, ·4. D æ 9CM an nou Conclusions or Agreements appr Distribution Phillips heependiation Sile Signed A FR



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MICHAEL D. FORD ENVIRONMENTAL ANALYST - TREATING AND ENVIRONMENTAL

PERMIAN BASIN REGION EXPLORATION AND PRODUCTION GROUP PHILLIPS PETROLEUM COMPANY 4001 PENBROOK, ROOM 443 ODESSA, TX 79762 BUS: 915 367-1316 RES: 915 368-7365



R. H. PARA DIRECTOR OF SAFETY & EQUIPMENT INSPECTION PERMIAN BASIN REGION

EASTERN DIVISION EXPLORATION & PRODUCTION PHILLIPS PETROLEUM COMPANY 4001 PENBROOK ODESSA, TX 79762 915 367-1439



GCL

MICHAEL W. SELKE Director of Hydrogeologic Services (505) 842-0001

Geoscience Consultants, Ltd. 500 Copper NW, Suite 200 Albuquerque, NM 87102 FAX (505) 842-0595

Albuquerque • Washington, DC • Los Angeles Project Offices Nationwide



WALTER F. KRAMER ENVIRONMENTAL SCIENTIST SOLID WASTE & GROUND WATER BRANCH

ENVIRONMENTAL SERVICES PHILLIPS PETROLEUM COMPANY BARTLESVILLE, OKLAHOMA 74004

(918) 661-9101

#### TECHNCIAL APPROACH FOR RECOVERY OF FREE FLOATING AND DISSOLVED PHASE HYDROCARBONS AT PHILLIPS LEE PLANT, BUCKEYE, NEW MEXICO

- 1) APPLY FOR RECOVERY WELL PERMITS AND SUBMIT WORK PLAN TO NMOCD (by Feb 10)
- 2) DEFINE FREE-PHASE HYDROCARBON PLUME BOUNDARIES:

INSTALL ONE 4-INCH MONITOR WELL UPGRADIENT FROM THE EVAPORATION POND AND NEAR THE CENTER OF THE PLUME (by Apr 30)

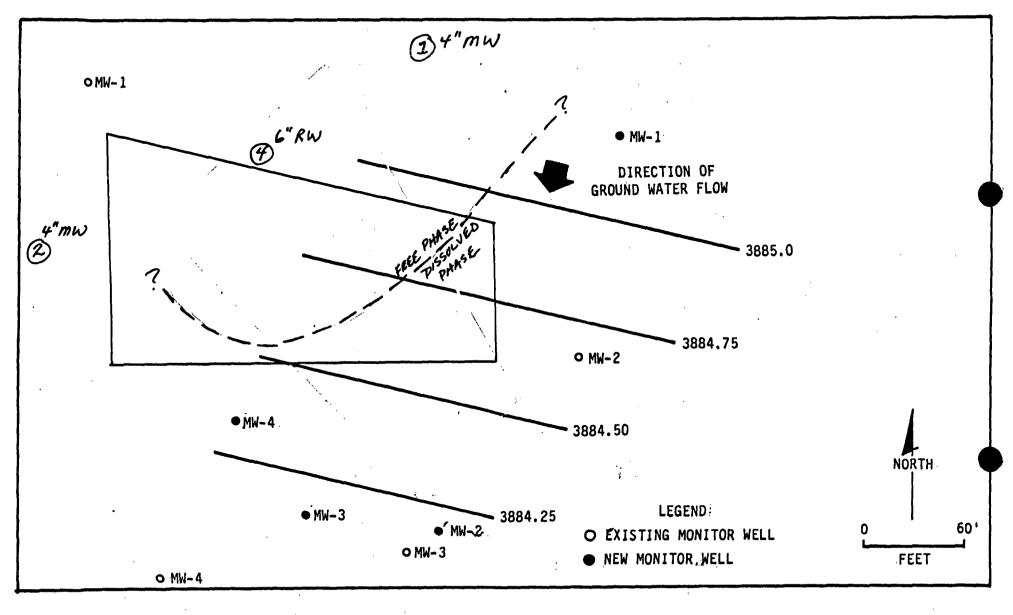
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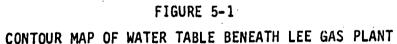
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New Mexico Health and Environment Department

GARREY CARRUTHERS

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,

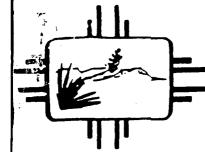
More Maya unque. Suzanne Moore-Mayne

Water Resource Specialist II Hazardous Waste Program

SMM/vga

Encl.

- ENVIRONMENTAL IMPROVEMENT DIVISION -Harold Runnels Building 1190 St. Francis Dr. Santa Fa, New Maxico 87502



New Mexico Health and Environment Department

Dennis Boyd Secretary

MICHAEL J. BURKHART Deputy Secretary

RICHARD MITZELFELT

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

Mr. Ballard September 13, 1989 Page 2

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,

Boydhamil

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 PR

ECTION AGENCY

REGION 6 1445 ROSS AVENUE, BUITE 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 nonexempted 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

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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.

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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 characteristics 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.

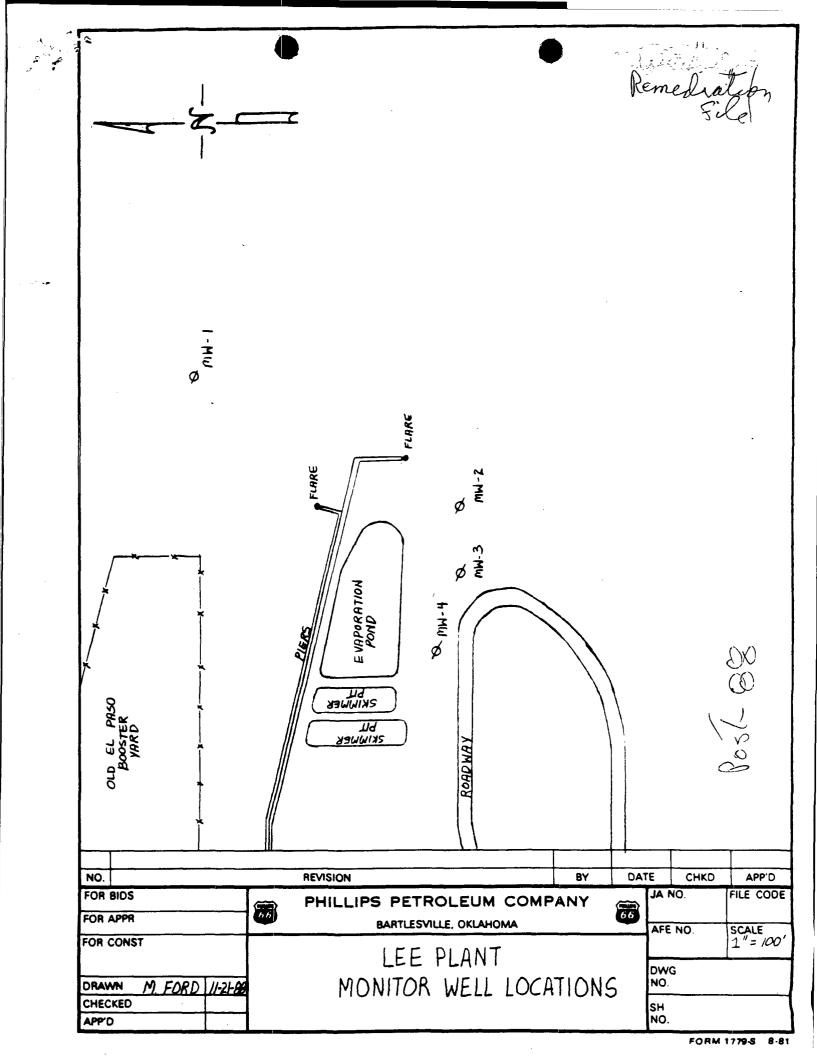
The interpretations of the exemption contained in this letter are consistent with those of EPA's Office of General Counsel.

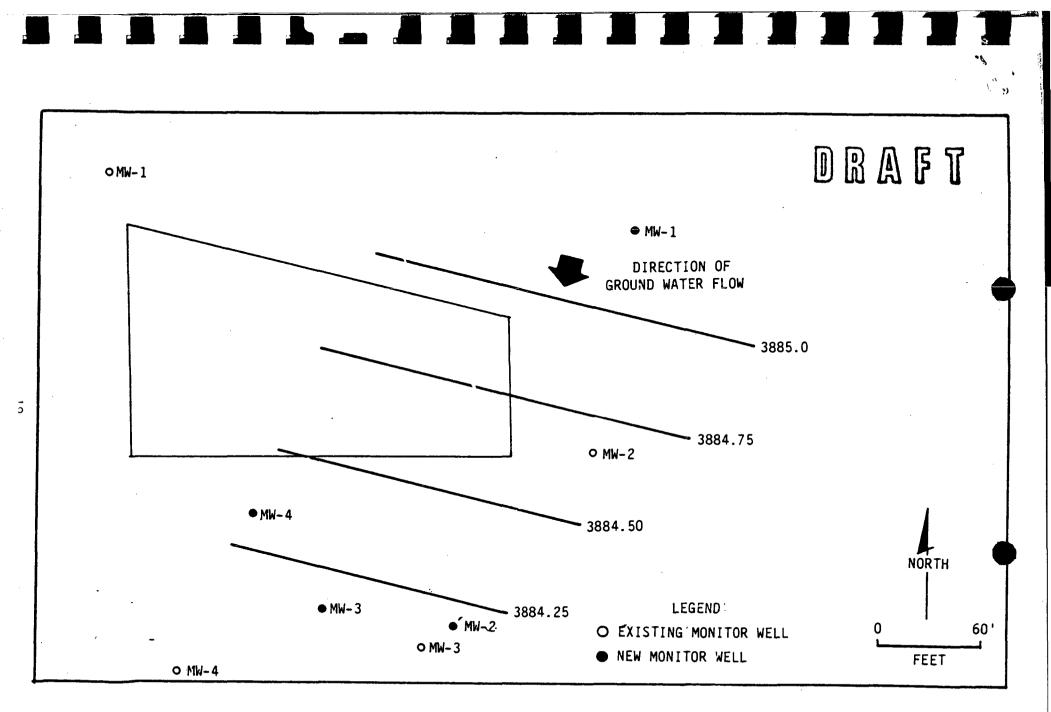
I would suggest that EID review Phillip's analysis and all available information to determine if the cooling tower cleaning waste is EP-toxic for chromium or is not. You should also determine what quantity of waste is generated and if this waste is/was placed in the surface impoundments after 1980. Although 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, 2ac.com

Randall E. Brown, Chief RCRA Enforcement Branch

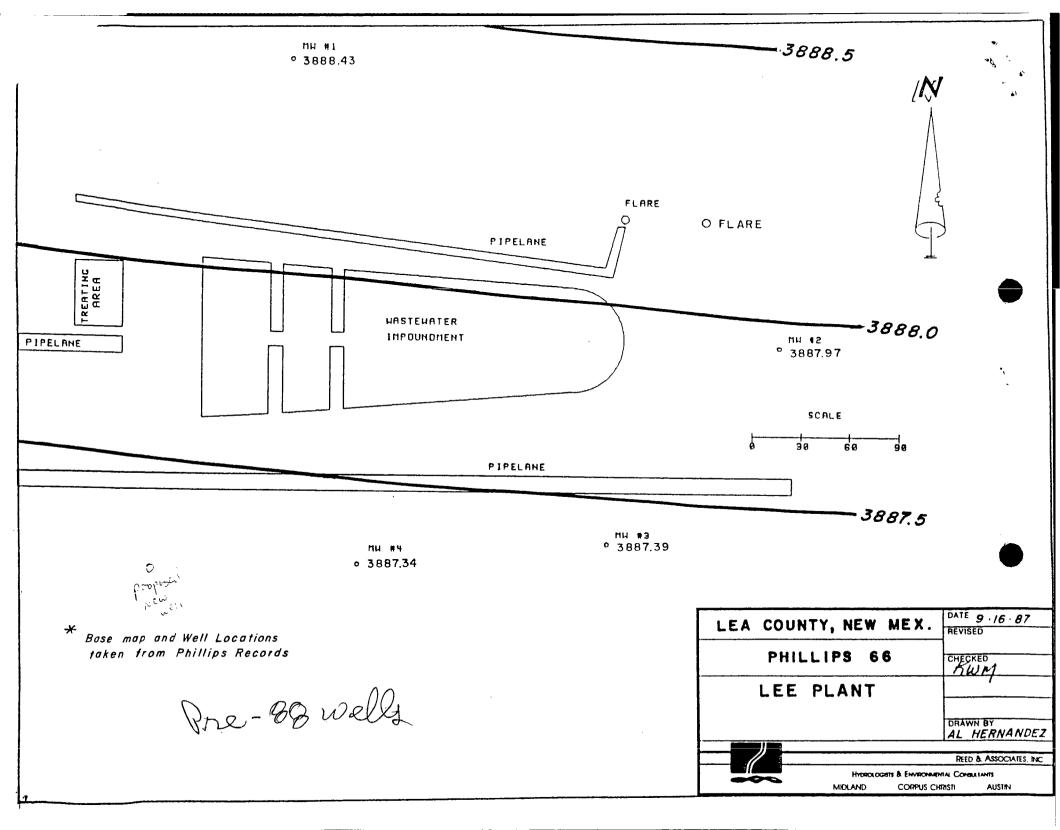
cc: Tracy Huges Office of General Counsel NMEID





# FIGURE 5-1

CONTOUR MAP OF WATER TABLE BENEATH LEE GAS PLANT



Phillips jee N Well # 1 - Drinking H.O a de will bennes as stand hy 4 H (H)37 De Bro Explositiony EL 1422 morels water Ŧ ₩® # - Spane drinking Ø#4. use low capacity 0 S. +3 - Standby Prozett mourised for drinking - no henzone 70435 #3 Coolimy #2 Amine #4 - Process wale, DAPS Benene CRYpgenic, JCRYpgenic, JLuni Cinly Smith - Phillips mylrogeologiat Bartlesville +3~0.3miles-Notes of Boog 11/30/88 AMR

Remediation File



### PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

November 22, 1988

Monitor Well Locations Lee Gasoline Plant

CERTIFIED MAIL RETURN RECEIPT NO. P-512 089 608

Mr. John Gould New Mexico Environmental Improvement Division P. O. Box 968 Santa Fe, New Mexico 87503

Dear Mr. Gould:

Per our recent phone conversation and in response to your letter of September 26, 1988, attached please find information which shows the correct location of the new Lee Plant monitor wells in relation to the abandoned evaporation pond. I have included the following:

- 1. 1980 plot plan of the plant which shows the location of the abandoned ponds.
- 2. Surveyed location of the new monitor wells.
- 3. New drawing which shows the relationship of the wells to the abandoned ponds.

Figures 2-1 and 5-1 of the Lee Plant Groundwater Monitoring System Installation Report, prepared by Geoscience Consultants Ltd. (GCL), should be replaced with the new drawing. GCL was not aware of the exact location of the abandoned evaporation pond when the wells were installed as the pond has been backfilled for several years.

Your statement that regulated wastes in the evaporation pond, i.e., chromium containing cooling tower blowdown, had the ability to mix with liquids from the skimmer ponds is incorrect. The ponds were constructed in a manner which prevented backflow of wastewater from the evaporation pond into the skimmer ponds. Cooling tower blowdown was discharged directly into the evaporation pond.

If you should have any questions regarding this information, please contact me at (915) 367-1316.

Very truly yours,

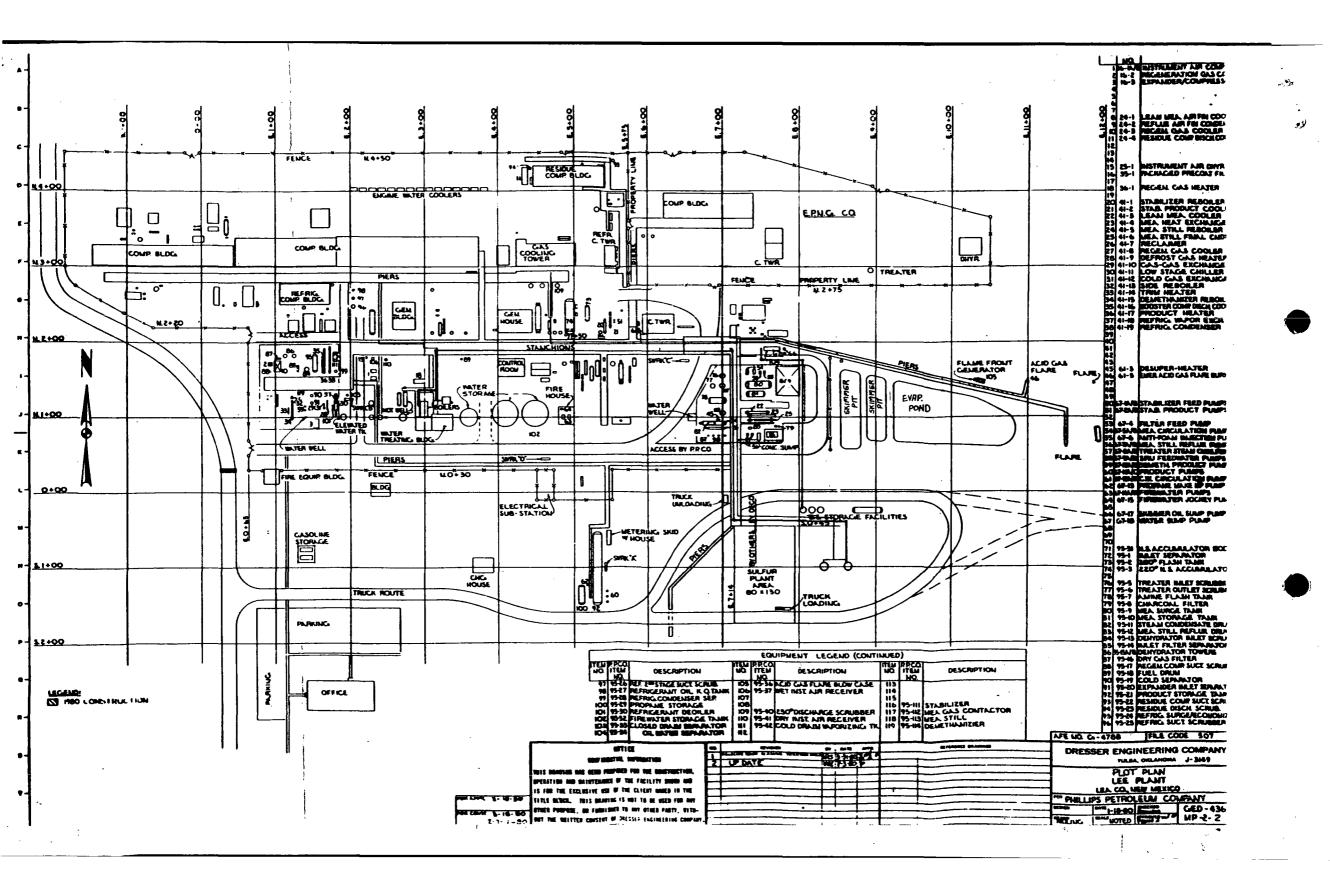
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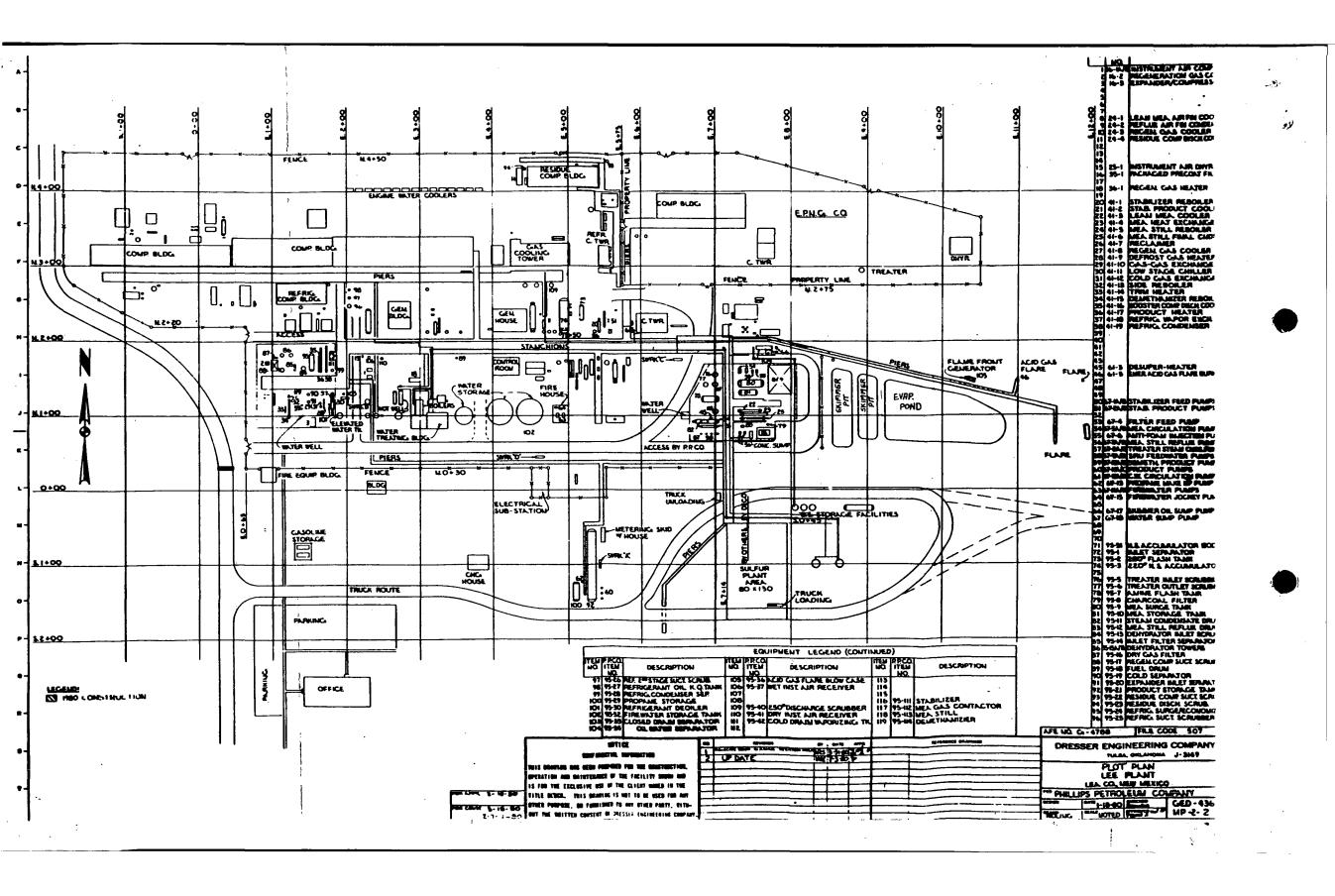
Michael D. Ford Environmental Analyst

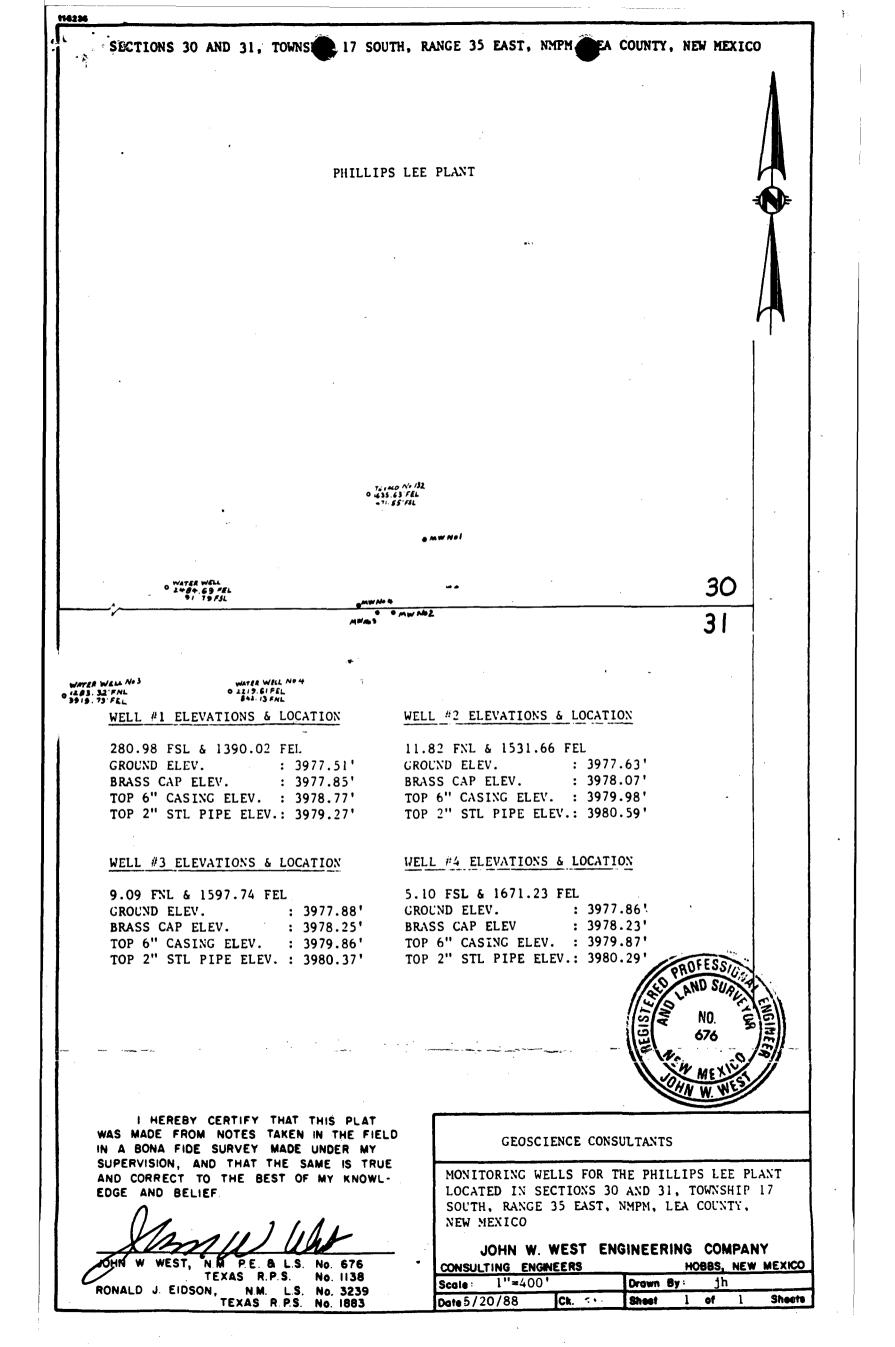
MDF

Attachments

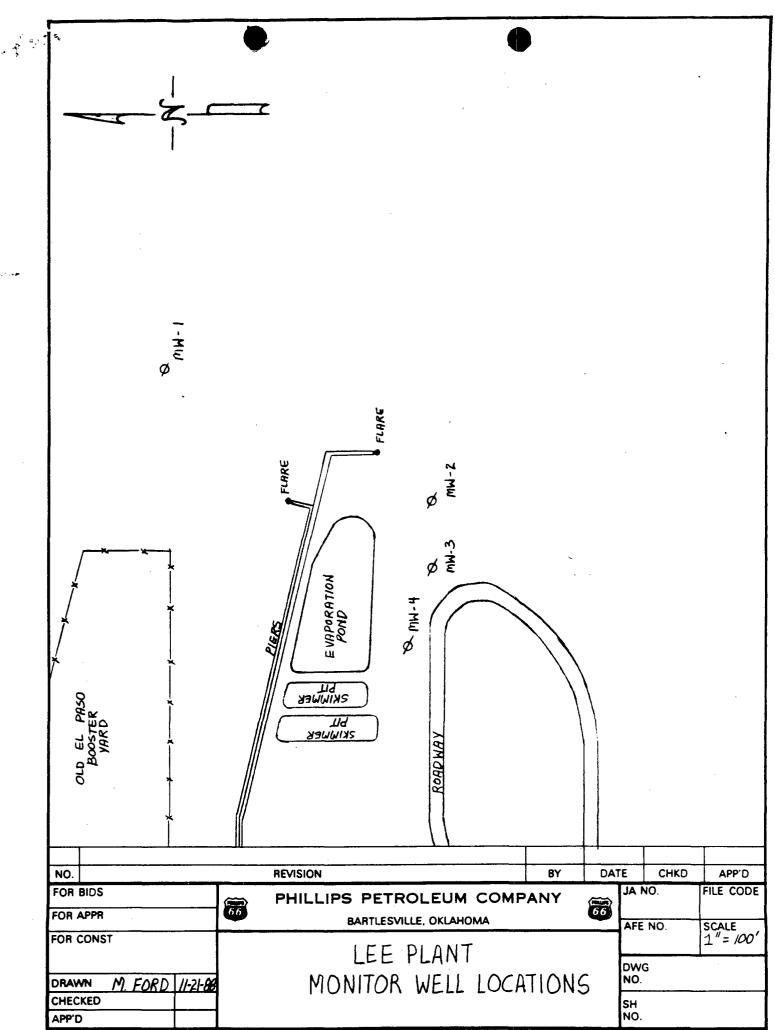
cc: Geoscience Consultants, Ltd. 500 Copper Avenue, NW Suite 200 Albuquerque, New Mexico 87102 bcc: Knut Am (r) W. B. Berry (r) D. J. Fisher (r) E. C. Thompson B. F. Ballard R. B. Copeland R. H. Para (r) Central Files







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#### Geoscience Consultants, Ltd.

500 Copper Avenue NW, Suite 200 Albuquerque, New Mexico 87102 (505) 842-0001 FAX (505) 842-0595

1109 Spring Street, Suite 706 Silver Spring, Maryland 20910 (301) 587-2088



August 19, 1988

Mr. Dave Boyer Environmental Bureau Chief New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

RE: REPORT ON THE INSTALLATION OF A GROUND-WATER MONITORING SYSTEM AT PHILLIPS 66 NATURAL GAS COMPANY LEE PLANT

Dear Mr. Boyer:

As per the request of Mr. Frantz, Phillips 66 Natural Gas Company, I have enclosed a copy of the above-referenced report. If you require any additional information, please contact myself or Mike Selke at (505) 842-0001.

Sincerely, GEOSCIENCE CONSULTANTS, LTD.

Wilson Hodges

Carol Wilson Hodges Program Manager

CWH\dlu\PHIL\BOYER.LTR

Enclosure

cc. Mr. Mike Ford, Phillips 66





PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

August 11, 1988

Notification of Discharge

CERTIFIED MAIL RETURN RECEIPT NO. P-512 089 614

Mr. Dave Boyer Environmental Bureau Chief New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

AUG 1 5 1988

Dear Mr. Boyer:

In compliance with Section 1-203 of the Water Quality Control Commission regulations, this is to notify you of a discharge of hydrocarbon material to the uppermost aquifer at our Lee Gasoline Plant.

As you are aware, we recently completed installation of new groundwater monitoring well systems at our four southeastern New Mexico plants (Artesia, Eunice, Lee and Lusk). The new systems were installed as a result of a Compliance Order issued by the New Mexico Environmental Improvement Division. The first set of samples from the new wells were taken during the month of May. Analysis results were recently received by this office (copies attached).

You will note from the analyses that water in the No. 4 well at Lee Plant shows some evidence of hydrocarbon contamination. Hydrocarbon contamination was also detected in the original upgradient well located approximately 250 feet north of the No. 4 well. We have requested our consultants on this project (Geoscience Consultants, Ltd. of Albuquerque) provide you with a copy of their document entitled "Report on the Installation of a Ground-Water Monitoring System at Phillips 66 Natural Gas Company Lee Plant" for additional detailed information.

Phillips has contracted GCL to perform a contamination assessment of the Lee Plant site. GCL plans to conduct a soil gas vapor survey as the first step in this project. We would like to schedule a meeting with you and your staff to further discuss our strategies for remediation of this problem. Please contact Mike Ford of this office to schedule a meeting date.

Questions regarding this information should be directed to Mike Ford of this office at (915) 367-1316.

Very truly yours,

L. L. Frantz

Manager, Permian Basin Region

LLF:MDF

Attachments









PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

June 5, 1987

Wastewater Discharge Plan Lee Plant, GWR-2

Mr. David Boyer New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Boyer:

This is to notify you the new engine pad drain system at Lee Plant was put into service on May 1, 1987. A new drain system was required in order to renew the wastewater discharge plan for this facility. We appreciate the cooperation extended by you and your office in granting the extension we needed to get the system operational.

Yours truly,

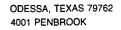
D. Ford

Michael D. Ford Environmental Analyst

MDF LPDP



## PHILLIPS PETROLEUM COMPANY



AIL P. 140, 239 c47/35ERVATION DIVISION February 23, 1987

Groundwater Discharge Plan <u>Lee Plant, GWR-2</u>

CERTIFIED MAIL RECEIPT NO. P 140 39 C4735ERVATION SANTA FE

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

Dear Mr. LeMay:

Phillips has received your letter dated February 11, 1987 granting a ninety day extension of the March 1, 1987 completion date for installation of the engine pad drain system. Your letter requested drawings of the system be submitted by March 1, 1987 as a condition of obtaining the extension. We respectfully submit the attached engineering design drawings of the engine pad drain system for your review.

Construction of the engine pad drain system has been initiated. We will notify your office when construction is complete and the system is operational.

We appreciate your cooperation in this matter. If you should have any questions regarding this information, please contact me at (915) 367-1316.

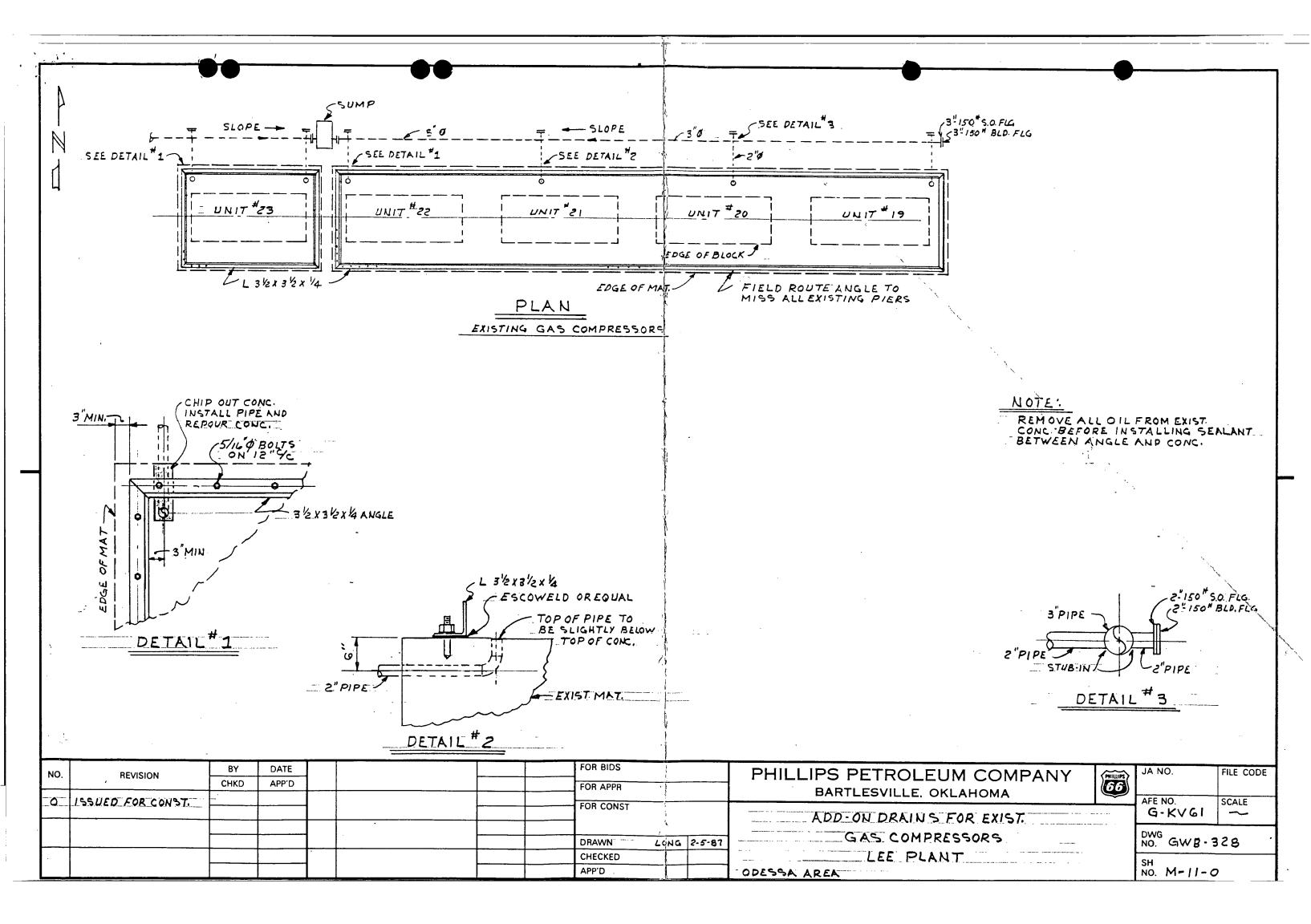
Yours truly,

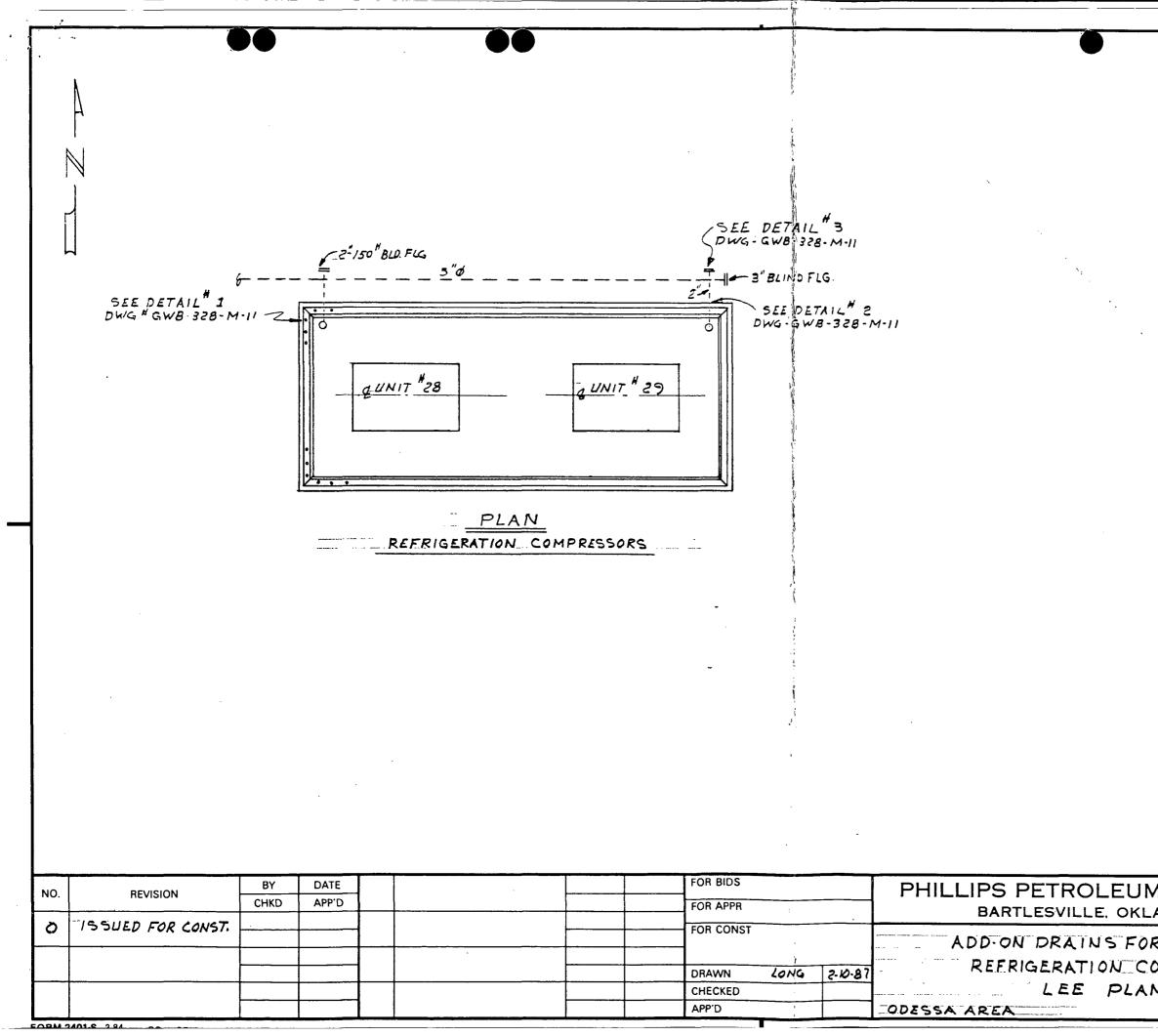
Michael D. Ford

Michael D. Ford Environmental Analyst

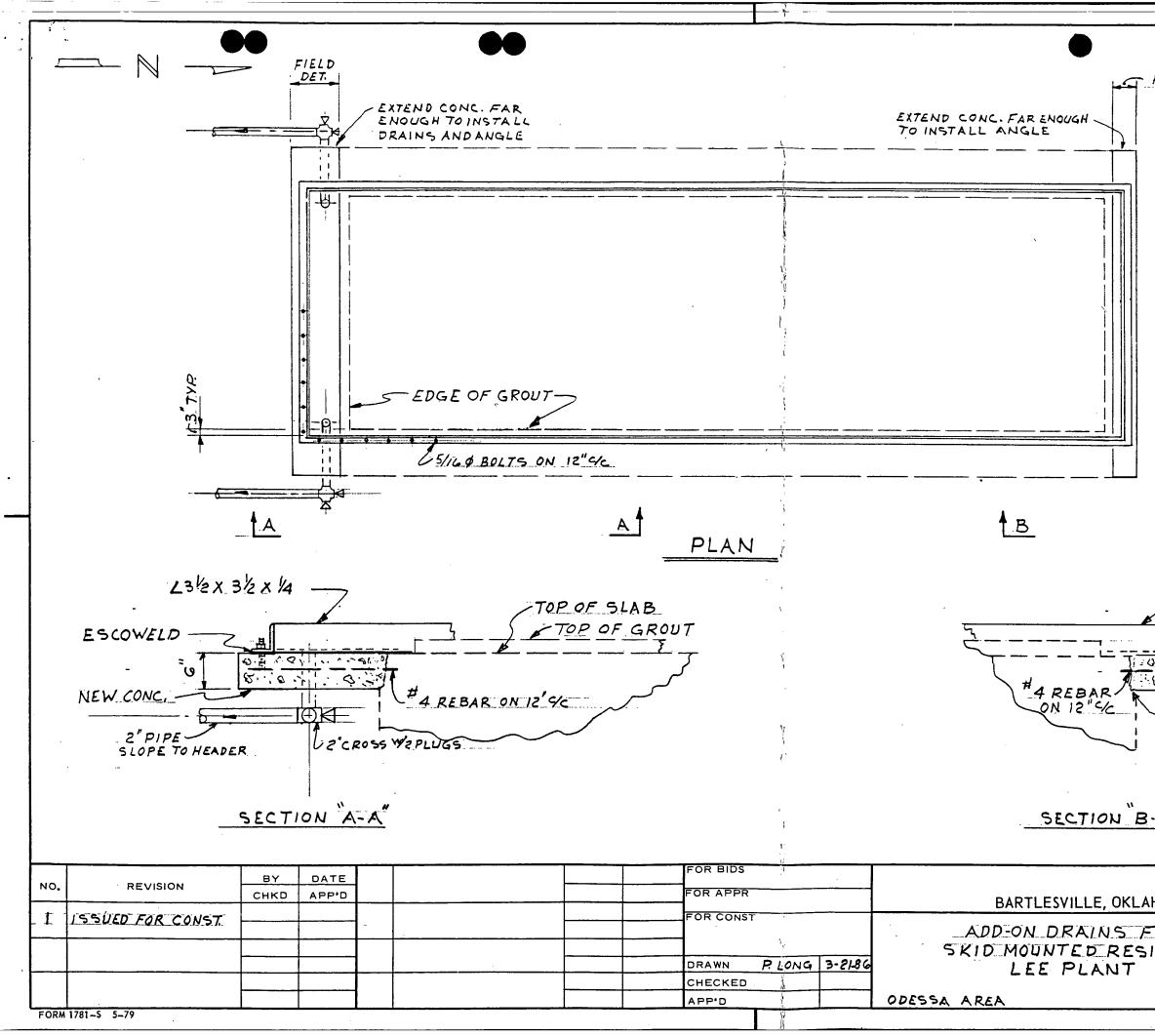
MDF LPDP

Attachments



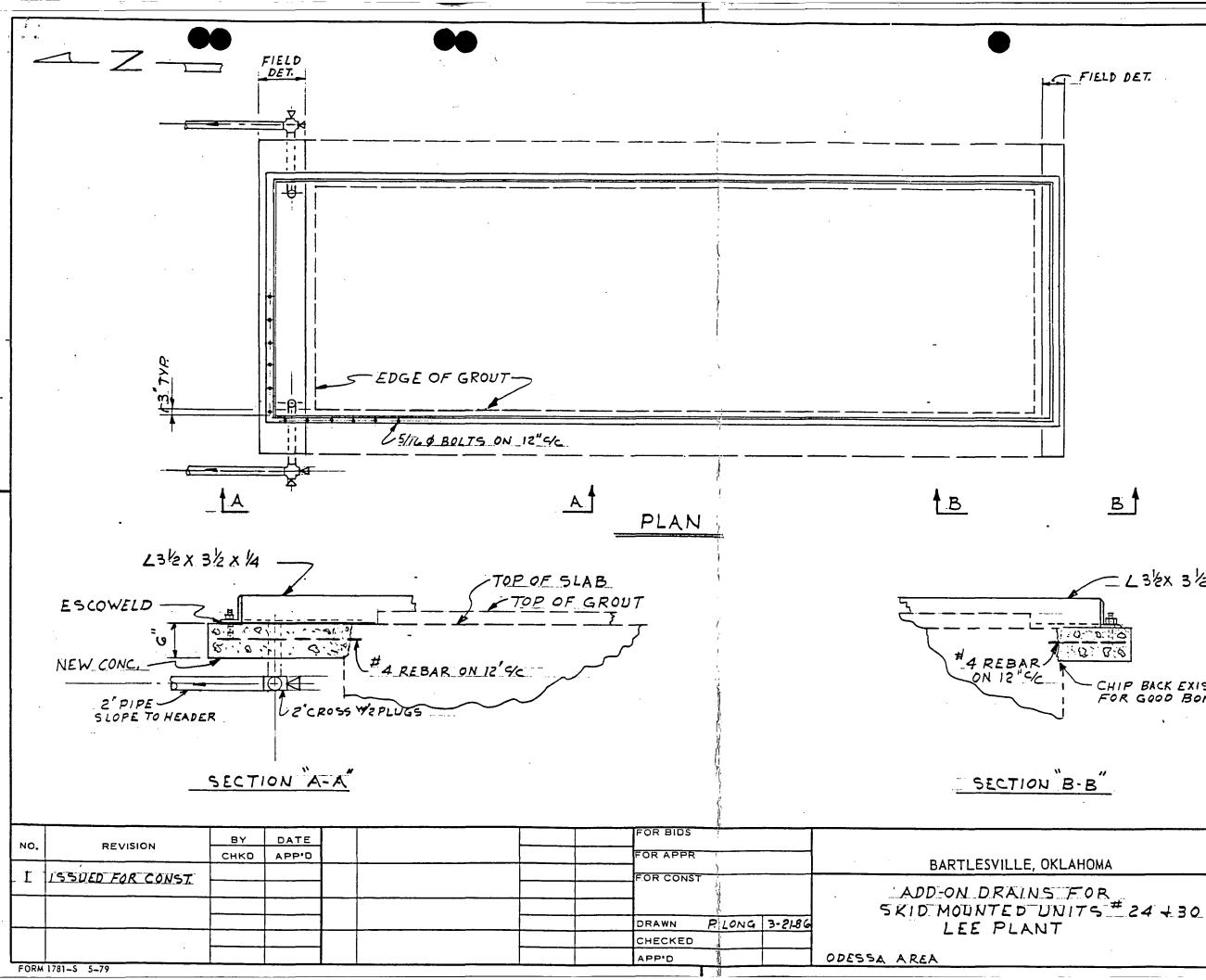


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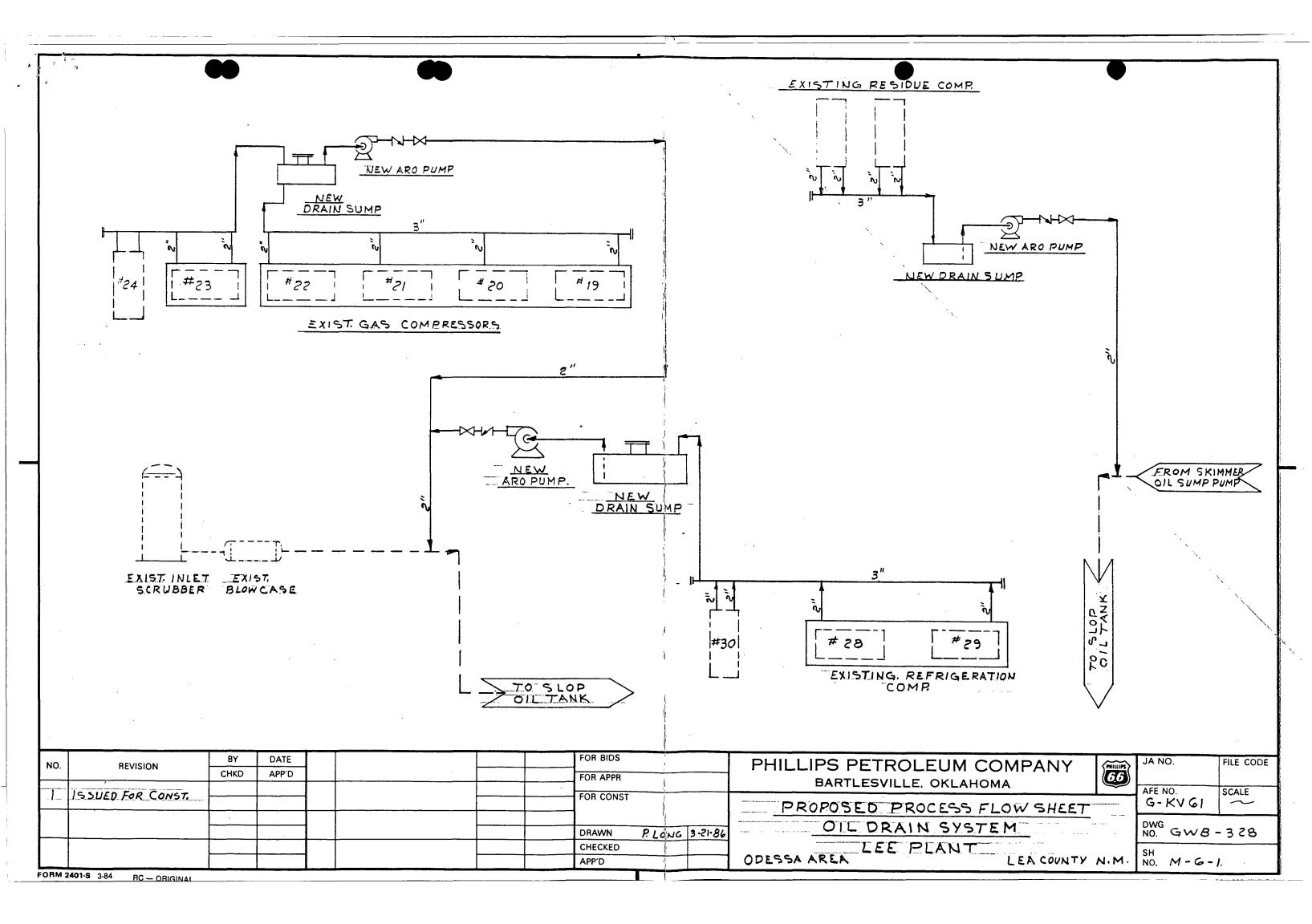


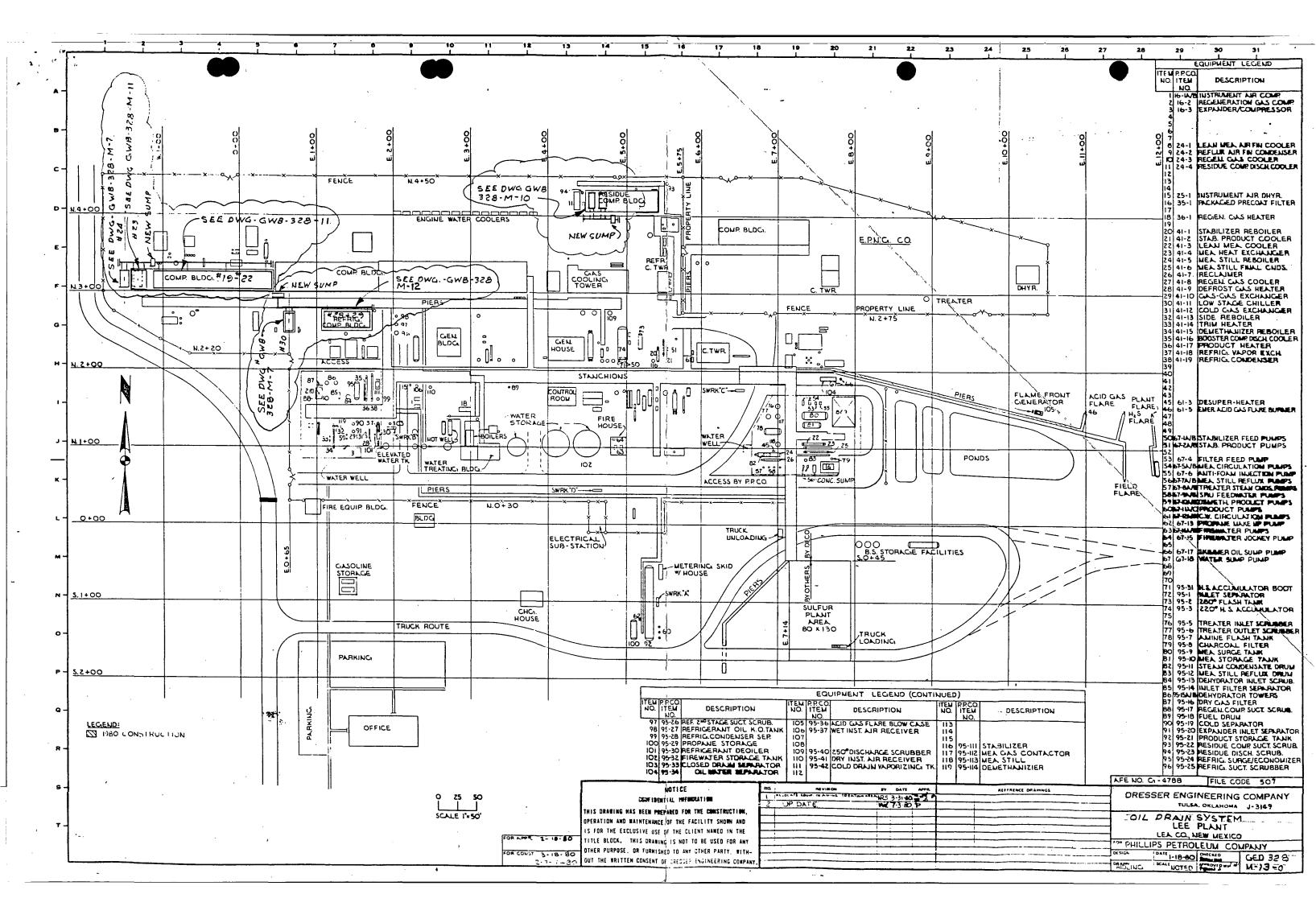
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STATE OF NEW MEXICO

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION



February 11, 1987

GARREY CARRUTHERS

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87501 (505) 827-5800

27

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. C. W. Zahn Phillips Petroleum Co. 4001 Penbrook Odessa, Texas 79762

RE: DISCHARGE PLAN GW-2 LEE PLANT

Dear Mr. Zahn:

We have received your letter dated February 5, 1987, requesting a ninety (90) day extension of the March 1, 1987 completion date for the installation of a drain system around the engine rooms. The extension is requested due to delays in the engineering design of the system.

Phillips is hereby granted an extension until June 1, 1987 for completion of Item 2 in your April 14, 1986 letter. This extension is granted to allow completion of the engineering design and construction of the engine foundation, pad drains and piping.

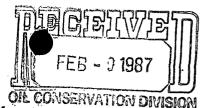
Complete design drawings shall be supplied to the OCD prior to March 1, 1987. Please notify this office when construction is complete and the system is functioning.

If you have any questions, please feel free to contact Roger Anderson at (505) 827-5885.

Sincerely, WILLIAM J. LEMAY Director

WJL:RCA:dp

cc: OCD-Hobbs



SANTA FE



#### PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

Permian Basin Region

EXPLORATION AND PRODUCTION GROUP

February 5, 1987

Groundwater Discharge Plan Lee Plant, GWR-2

CERTIFIED MAIL RECEIPT NO. P 140 239 468

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

Dear Mr. LeMay:

This letter is written to request a ninety day extension to the March 1, 1987 deadline established for installation of a drain system around the engine rooms at our Lee Plant. We will be unable to meet the deadline due to delays in the engineering design of the system. The other additional work required to renew the discharge plan has been completed.

We appreciate your cooperation in this matter. Questions regarding this request should be directed to Mike Ford of this office at (915) 367-1316.

Yours truly,

C.W. Zahn

C. W. Zahn Process Engineering Director

CWZ:MDF LPDP

# NOTIFICATION OF FIRE BREAKS. SPILLS, LEAKS, AND BLOWOUTS

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	SERVATIO	N. DIVISION								
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PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

OIL CONSERVATION DIVISION SANTA FE

ΏPR 1

ODESSA, TEXAS 79762 4001 PENBROOK

April 14, 1986

Groundwater Discharge Plan Lee Plant GWR-2

Mr. Roger C. Anderson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Anderson:

This letter is written to submit the following completion timetable for correcting problem areas at our Lee Plant. A completion timetable was requested by your office in order to continue the discharge plan review process.

- The leak from Cooper engine jacket water pump has been eliminated by replacing the pump packing gland with a mechanical seal. No further work will be required at this time.
- 2) The accumulation of oil around the engine rooms will be eliminated with the installation of a new drain system. This system will consist of engine foundation and pad drains and the piping necessary to tie this system into the existing slop oil system. The new drain system will be installed by March 1, 1987. Clean-up of the area will be ongoing, with final clean-up proceeding after the completion of the new drain system.
- 3) The oily mess between the El Paso yard and the amine treater was caused by an overflow of the oil/water separator. This occurred because the valve used to drain water from the slop oil system back to the oil/water separator was left open for an extended period of time. A high level alarm will be installed in the sumps of each of the two oil/water separator pumps. The alarms will notify the plant operator in the event of a pump failure or abnormally high liquid rates. Since the plant is attended 24 hours a day, the alarms will give sufficient warning for plant personnel to prevent a carryover. This alarm system will be installed by September 1, 1986.
- 4) The plant slop oil system capacity will be increased by the addition of a 500 bbl tank. This will increase the total slop oil storage capacity to 1400 bbls. The installation of the new tank will be completed by December 31, 1986. The area around the slop oil tanks has been cleaned up.

Mr. Roger C. Anderson Groundwater Discharge Plan Lee Plant GWR-2 Page 2

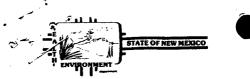
Questions regarding the completion timetable and plant revisions should be directed to M. D. Ford of this office at (915) 367-1316.

1

Very truly yours,

È J. E. Jennings Agent, Permian Basin Region

JEJ:MDF:ggp



ENVIRONMENTAL IMPROVEMENT DIVISION P.O. Box 968 Santa Fe, New Mexico 87504 505-984-0020

4/7/86

Dare -Here is a summary of on results for Phillips Antesia, Eunice, Les + Lugke. I have the original lab sheets if you want to see them.

- Ann C.

x 2931

Copymach Bel Ritz

#### **RESULTS OF SAMPLING**

#### PHILLIPS PETROLEUM GAS REFINERIES

#### ARTESIA, EUNICE, LEE AND LUSK

1985

Attached are the results for the New Mexico Environmental Improvement Division's samples taken at the Phillips plants in August 1986: At each plant, samples were taken from each of the RCRA wells (4 wells per plant). At Lusk and Artesia, samples were also taken from surface impoundments. Table 1 identifies each sample.

All samples were collectd by Alice Barr with the assistance of Kelley Crossman. The samples were appropriately preserved and shipped under chain-of-custody to the State Laboratory in Albuquerque for analysis. Table 2 gives the analytical procedure for each parameter. Note that calcium and magnesium are reported under both General Chemistry and Metals. The Gen. Chem results were obtained by the Water Chemistry Section using wet analytical techniques; the Metals results were obtained by the Metals Section using ICAP.

#### All results are in milligrams per liter (mg/l), except as follows:

рH	pH units
conductivity	micromhos/cm (lab cond. at 25 °C)
temperature	degrees Celcius
organics	parts per billion

Abbreviations and symbols used to report the results are as follows:

Cond.	conductivity
GEN. CHEM.	general chemistry
ND	not detected (see below)
NR	not reported
PPB	parts per`billion
Temp.	temperature (in Celcius)
TDS	total dissolved solids
TOC < > []	(total filterable residue) total organic carbon less than greater than approximately tentative identification

The value of many metals is reported as ND (none detected). The detection limits, in mg/l, were as follows:

Arsenic	0.005
Mercury	0.0005
Selenium	0.005
Manganese	0.05
All others	0.1

# TABLE 1. SAMPLE IDENTIFICATION, PHILLIPS PETROLEUM PLANTS

NOTE: The designation of a well as upgradient or downgradient is Phillip's designation.

## Phillips Petroleum -- Artesia

monitoring well 1, downgradient monitoring well 3, upgradient monitoring well 6, downgradient first RCRA pond, surface water first RCRA pond, sediment second pond (middle), sediment third pond, surface water Field blank using deionized water
monitoring well 1, upgradient
monitoring well 2, downgradient monitoring well 3, downgradient
monitoring well 4, downgradient
monitoring well 1, upgradient
monitoring well 2, downgradient monitoring well 3, downgradient
monitoring well 4, downgradient
Field blank using deionized water

Phillips Petroleum -- Lusk

MW-1	monitoring well 1, upgradient
MW-2	monitoring well 2, downgradient
MW-3	monitoring well 3, downgradient
MW-4	monitoring well 4, downgradient
R-PND,w	RCRA pond, surface water
R-PND,s	RCRA pond, sediment
O-PND,s	Oily pond next to RCRA pond, sludge
	- ) (

## TABLE 2. ANALYTICAL METHODS

PARAMETER	PRESERVATION	ANALYTICAL METHOD
<u>Gen. Chem.</u> Field pH Field Cond. Calcium Magnesium Sodium Potassium Bicarbonate Chloride Sulfate TDS Fluoride Nitrate-N TOC	none none ice ice ice ice ice ice ice ice ice ic	Hach Mini pH Meter Yellow Springs S-C-T Meter EPA Method 215.2 EPA Methods 130.2 and 215.2 Std. Methods 325(b) Std. Methods 325(b) EPA Method 310.1 EPA Method 325.2 EPA Method 375.2 EPA Method 160.1 EPA Method 340.2 EPA Method 352.2 EPA Method 352.2 EPA Method 415.1
<u>Metals</u> Arsenic Mercury Selenium All others (ICAP Scan) <u>Organics</u> GC/MS Purgeables	HNO3 HNO3 HNO3 HNO3 ICe	EPA Method 206.2 EPA Method 245.1 EPA Method 270.2 EPA Method 207 EPA Method 624

# PHILLIPS PETROLEUM -- LEE

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	MW-1	MW-2	MW-3	MW-4	Blank*
GEN CHEM Field pH Field Cond. Field Temp. Lab pH Lab Cond. Calcium Magnesium Sodium Potassium Bicarbonate Chloride Sulfate TDS Fluoride Nitrate-N TOC	7.9 345 23 8.1 385 24.0 12.2 32.2 0.82 120.9 32.5 43.8 233 1.78 0.63 44.9	7.3 475 25 8.21 453 41.6 16.6 36.8 1.56 199 32.3 43.4 323 0.79 0.96 8.13	7.4 490 25 7.96 487 60.0 19.5 25.3 1.17 157.4 41.9 41.7 328 0.63 1.91 1.4	7.5 468 23 7.97 415 60.0 12.0 16.1 0.78 156 34.2 39.2 310 0.56 2.45 2.51	- 7.25 34 4.0 4.9 0 0 7 1.6 4.3 20 0.10 1.70 < 1
METALS Arsenic Mercury Selenium Aluminum Barium Beryllium Boron Cadmium Cadmium Calcium Chromium Cobalt Copper Iron Lead Magnesium Manganese Molybdenum Nickel Silicon Silver Strontium Tin Vanadium Ytrrium Zinc	0.008 ND ND 1.5 0.1 ND 0.1 ND 33 ND ND ND 0.9 ND 5.7 0.5 ND ND 12 ND ND 12 ND 0.3 ND ND ND ND ND ND ND ND ND ND ND ND ND	ND ND 0.4 0.1 ND ND ND ND ND ND ND ND 0.4 ND 11 0.4 ND 14 ND 0.6 ND ND ND ND ND ND	ND ND 0.4 0.1 ND ND 53 ND ND ND 0.7 ND 8.1 0.14 ND 13 ND 13 ND 0.5 ND ND ND ND ND ND ND	ND ND 0.2 0.2 ND ND 67 ND ND 0.3 ND 11 0.4 ND 13 ND 0.6 ND ND 13 ND 0.6 ND ND ND ND ND ND ND ND ND ND ND ND ND	ND ND ND ND ND ND ND ND ND ND ND ND ND N

\* Sample containers filled in the field from NMEID deionized water container.

# PHILLIPS PETROLEUM -- LEE

## Gas Chromatograph/Mass Spectrometer Purgeable Screen

Results in [brackets] are tentative (unconfirmed) results.

SAMPLE	ORGANICS DETECTED	РРВ
MW-1	Benzene Toluene m-Xylene o-Xylene [Tetrahydrofuran] [Butanone]	47 17 6 [>500] [>500]
MW-2	Tetrahydrofuran Butanone [Pentene] [Cyclohexane]	[>20] [>20] [5] [40]
MW-3	[Tetrahydrofuran]	[>50]
MW-4	[Tetrahydrofuran]	[>200]
Blank*	Trichloromethane Bromodichloromethane Bibromochloromethane Bromoform	25 7 5 4

\* Sample containers filled in the field from NMEID deionized water container.



# UNITED STATES DEPARTMENT OF THE INTERIOR FISH AND WILDLIFE SERVICE

Field Supervisor Ecological Services, USFWS Post Office Box 4487 Albuquerque, New Mexico 87196

March 31, 1986

OIL CONSERVATION DIVISION SANTA FE

Mr. R. L. Stamets, Director Oil Conseration Division State of New Mexico State Land Office Building P. O. Box 2088 Santa Fe, New Mexico 87504-2088

Dear Mr. Stamets:

This letter responds to the public notice dated March 31, 1986 for proposed discharge plans submitted to your division. We have reviewed the following plans and have not identified any resource issues of concern to our agency. Renewal of these plans should not have a significant impact upon plants, fish, shellfish or wildlife resources of New Mexico.

- Phillips 66 Natural Gas Co. Buckeye Plant, Lea County, New Mexico (GW-2)Texaco Producing Inc. Eunice No. 1, Lea County, New Mexico (GW-3)
- Texaco Producing Inc. Eunice No. 2, Lea County, New Mexico (GW-4)
- (GW-5)
  - Warren Petroleum Company, Eunice Gas Processing Plant, Lea County, New Mexico
  - Giant Refinery Company; Ciniza Refinery, Gallup, McKinley (GW-32) County, New Mexico

These comments represent the views of the Fish and Wildlife Service. Thank you for the opportunity to review and comment on the proposed plans. If you have any questions concrning our comments please contact Tom O'Brien at (505) 766-3966 or FTS 474-3966.

Sincerely yours John C. Peterson

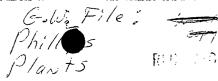
ield Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico Director, New Mexico Health and Environment Department, Environmental Improvement Division, Santa Fe, New Mexico

Regional Administrator, Environmental Protection Agency, Dallas, Texas Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico





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#### PHILLIPS PETROLEUM COMPANY

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BARTLESVILLE, OKLAHOMA 74004 PHONE: 918 661-6600 CABLE CODE: PHILPETROL TELEX: 49-2455

HAZARDOUS WASTE SECTION

ENGINEERING AND SERVICES

March 21, 1986

Lusk, (Lee,) Eunice and Artesia Plants Supplemental Sampling Results

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jack Ellvinger, Environmental Supervisor Hazardous Waste Section New Mexico Environmental Improvement Division P. O. Box 968 Harold-Runnels Building Santa Fe, NM 87501-0968

Dear Mr. Ellvinger:

Samples were procured from the Lusk, Lee, Eunice and Artesia Plants' water sampling wells and surface impoundments in the Fall of 1985 during a joint sampling effort by Phillips and the New Mexico Environmental Improvement Division (EID). Each sample that was procured was split between Phillips and the EID. Results of the analysis of Phillips' samples are attached.

Referring to the attached data, please note that for the Lusk, Lee and Eunice Plants, "well #1" corresponds to the "upgradient" well; in the case of the Artesia Plant, "well #3" is the upgradient well. Samples from monitoring wells #1 and #2 at the Eunice Plant were lost because the containers holding these samples froze and broke while being stored in a laboratory refrigerator prior to analysis. Analyses of the samples for metals were performed by Southwestern Laboratories of Midland, Texas. Analyses of the samples for volatile and semivolatile compounds were performed by the Phillips Research Center, located in Bartlesville, Oklahoma.

Phillips requests that EID provide Phillips a copy of all analytical results from the analysis of EID's split samples from the Lusk, Lee, Eunice and Artesia Plants.

It is Phillips' understanding that EID is currently preparing a public notice which, when published by EID in a local newspaper (or broadcast via radio or television), will extend to the public and to Phillips the opportunity to submit comments on the closure plans previously submitted by Phillips for the Lusk, Lee, Eunice and Artesia Plants. The Lusk plan is dated January 23, 1984; the other three plans are dated July 27, 1984. Following the comment period and after any questions are adequately addressed, EID will proceed with the administrative actions necessary to RCRA-close the Lusk, Lee, Eunice and Artesia Plants. Mr. Jack Ellvinger, Environmental Supervisor March 21, 1986 Page 2

If you have any questions regarding the Lusk, Lee, Eunice or Artesia Plants, please contact either Frank Collis at (918) 661-1063 or W. C. Stoltz at (918) 661-5613.

Very truly yours,

B. F. Ballard, Director Environment Control 10 D4 Phillips Building

BFB:FPC:tsv/B:002 Enclosure

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# SOUTHWESTERN LABORATORIES

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

119904

	1703 W. Industrial Avenue (915 - 683-3348)	٠	P.O. Box 2150		d, Texas 79701 5.3355796
	-			File No	C-1950-W
				Report No.	36762
				Report Date	9-23-85
Report of tests on:	Water			Date Received	8-28-85
Cient:	Phillips Petroleum Company			Delivered By	A. Hubble

denufication:

Lee Plant, Well No. 1

		mg/L
ArsenicLes	s than	0.05
BariumLes	s than	1
CadmiumLes	s than	0.01
ChromiumLes	s than	0.05
Lead		0.05
MercuryLes	s than	0.002
SeleniumLes	s than	0.01
SilverLes	s than	0.05
NickelLes	s than	0.2

Schnician: JDN, GMB, LT, MT

3cc Phillips Petroleum Co. ries Attn: Mike Ford

Cyanide-----

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# SOUTHWESTERN LABORATORIES

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

119904

	1703 W. Industrial Avenue (915 - 683-3348)	•	P.O. Box 2150	) • Midland Client No	d, Texas 79701 3. 3355796
. · · · .	-			File No	C-1950-W
:				Report No.	36763
				Report Date	9-23-85
Report of tests on:	Water			Date Received	8-28-85
Client:	Phillips Petroleum Company			Delivered By	A. Hubble

Identification:

Lee Plant, Well No. 2

		<u></u>
ArsenicLess	than	0.05
BariumLess	than	1
CadmiumLess	than	0.01
ChromiumLess	than	0.05
LeadLess	than	0.05
MercuryLess	than	0.002
SeleniumLess	than	0.01
SilverLess	than	0.05
NickelLess	than	0.2
		_
CyanideLess	than	0.001

Technican: JDN, GMB, LT, MT

Comes 3cc Phillips Petroleum Co. Attn: Mike Ford

BORATORIES

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Sur letters and reports are for the exclusive use of the caent to whom they are addressed. The use of our hame must receive run chor written approve in intervence on new receiver and approve camping



# SOUTHWESTERN LABORATORIES

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

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	1703 W. Industrial Avenue (915 - 683-3348) • P.O. Box 21	50 • Midland Texas 79701 Client No. 3355796
	-	File NoC-1950-W
		Report No36764
		Report Date9-23-85
Report of tests on:	Water	Date Received8-28-85
Cient:	Phillips Petroleum Company	Delivered By <u>A. Hubble</u>

centification:

Lee Plant, Well No. 3

		mg/L
ArsenicLess t	han	0.05
BariumLess t	han	1
CadmiumLess t	han	0.01
ChromiumLess t	han	0.05
LeadLess t	han	0.05
MercuryLess t	han	0.002
SeleniumLess t	han	0.01
SilverLess t	han:	0.05
NickelLess t	han	0.2
CyanideLess t	han	0.001

isconician: JDN, GMB, LT, MT

Tomes 3cc Phillips Pet. Co. Attn: Mike Ford

BORATORIES

So the for the exclusive use of the prendital womm mey are more storested. The use of our name must receive our prior worten approval. Our effect indication of the call of

SwL

# SOUTHWESTERN LABORATORIES

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

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	- -	Fie N	o. <u>C-1950-W</u>
		Repor	τNo. <u>36765</u>
		Repor	t Date9-23-85
Report of tests on:	Water	Date	Received 8-28-85
Client:	Phillips Petroleum Company	Delive	ered By A. Hubble

Identification: Lee Plant, Well No. 4

		mg/L
ArsenicLess	than	0.05
BariumLess	than	1
CadmiumLess	than	0.01
ChromiumLess	than	0.05
LeadLess	than	0.05
MercuryLess	than	0.002
SeleniumLess	than	0.01
SilverLess	than	0.05
NickelLess	than	0.2
CyanideLess	than	0.001
-1		

Technician: JDN, GMB, LT, MT

Comes 3cc Phillips Petroleum Co. Attn: Mike Ford

ary Th

Our letters and reports are for the excusive use of the client to whom they are addressed. The use of our name must receive our phon written approval. Our letters and reports approvel to the sample to state and/or inspected, and are not necessarily indicative of the quantities of apparently identical or similar products.

Attachment to Olb-1-86

# TABLE I

#### VOLATILE ORGANIC ANALYSIS OF LEE MONITORING WELL WATERS

Sample received: August 28, 1985

Analysis		Concentra	tion, ppb		WGCC
	M.W. #1	<u>M.W. #2</u>	<u>M.W. #3</u>	<u>M.W.</u> #4	Brink King Lunker Stava a. a
Chloromethane -	*2*6	2.5	-2-9	4757	NO STONELENT
Vinyl Chloride	<1.	<1.	<1.	<1.	· · ·
Chloroethane	<1.	<1.	<1.	<1.	
Bromomethane	<1.	<1.	<1.	<1.	
l,l-dichloroethylene	<1.	<1.	<1.	<1.	· · ·
Methylene Chloride	7:0	-5-73	4.7	-6-0-	100 ppb
trans-1,2-dichloroethylene	<1.	<1.	<1.	<1.	
1,1-dichloroethane	<1.	<1.	<1.	<1.	
Chloroform	x1=4	1.4	177	-1755	100 ppb
1,2-dichloroethane	<1.	<1.	<1.	<1.	
1,1,1-trichloroethane	<1.	<1.	<1.	<1.	
Benzene	4.6	<1	6.1	1.4_	10 dyg
Carbontetrachloride	<1.	<1.	<1.	<1.	
1,2-dichloropropane	<1.	<1.	202	<1.	No Standard
Bromodichloromethane	<1.	<1.	<1.	<1.	
Trichloroethylene	<1.	-<1.	<1.	<1.	
2-chloroethylvinyl Ether	<1.	<1.	<1.	<1.	
trans-1,3-dichloropropene	<1.	<1.	<1.	<1.	
cis-1,3-dichloropropene	<1.	<1.	<1.	<1.	
1,1,2-trichloroethane	<1.	<1.	<1.	<1.	
Toluene	2.1'	<1.	161.	<1.	TSC PPS
Dibromochloromethane	71.	<1.	<1.	<1.	, /
1,1,2,2-tetrachloroethylene	<1.	<1.	<1.	<1.	
Chlorobenzene	<1.	<1.	<1.	<1.	
Ethylbenzene	<1.	<1.	<1.	<1.	
Bromoform	<1.	<1.	<1.	<1.	•
1,1,2,2-tetrachloroethane	<1.	<1.	<1.	<1.	
Fluorobenzene	<1.	<1.	<1.	<1.	· ·
31509-36-	1	2	3	4	

#### Attachment to Olb-20-86

#### TABLE I

#### SEMIVOLATILE ORGANIC ANALYSES OF LEE MONITORING WELL WATERS

Sample received: August 28, 1985

Analysis	Concentration, ppb					
	<u>M.W. #1</u>	<u>M.W. #2</u>	<u>M.W.</u> #3	<u>M.W.</u> #4		
Bis(2-chloroethyl)ether	<20	<20	<20	<20		
1,3-dichlorobenzene	<20	<20 .	<20	<20		
1,4-dichlorobenzene	<20	<20	<20	<20		
1,2-dichlorobenzene	<20	<20	<20	<20		
Bis(2-chloroisopropyl)ether	<20	<20	<20	<20		
N-mitorsodi-n-propylamine	<20	<20	<20	<20		
Nitrobenzene	<20	<20	<20	<20		
Hexachloroethane	<20	<20	<20	<20		
Isophorone	<20	<20	<20	<20		
n-nitrosodimethylamine	<20	<20	<20	<20		
Bis-(2-chloroethoxy)methane	<20	<20	<20	<20		
1,2,4-trichlorobenzene	<20	<20	<20	<20		
Naphthalene	<20	<20	<20	<20		
Hexachlorobutadiene	<20	<20	<20	<20		
	<20	<20	<20	<20		
Hexachlorocyclopentadiene	<20	<20	<20	<20		
2-chloronaphthalene	<20	<20	<20	<20		
2,6-dinitrotoluene			<20	<20		
Dimethylphthalate	<20	<20		<20		
Acenaphthylene	<20	<20	<20	<20		
Acenaphthene	<20	<20	<20			
2,4-dinitrotoluene	<20	<20	<20	<20		
Diethylphthalate	<20	<20	<20	40 <20		
Fluorene	<20 <20	<20 <20	<20 <20	<20		
4-chlorophenylphenylether	<20	<20	<20	53		
N-nitrosodiphenylamine -	<20	<20	<20	<20		
4-bromophenylphenylether	<20	<20	<20	<20		
Hexachlorobenzene	<20	<20	<20	<20		
Phenanthrene	<20	<20	<20	<20		
Anthracene Debuggel abshalata	<20	<20	<20	<20		
Dibutyl phthalate Fluoranthene	<20	<20	<20	<20		
Pyrene	<20	<20	<20	<20		
Benzylbutylphthalate	<20	<20	<20	<20		
	<20	<20	<20	<20		
Bis(2-ethylhexyl)phthalate	<20	<20	<20	<20		
Benzidine	<20	<20	<20	<20		
Di-n-octylphthalate		<20	<20	<20		
Benzo(b&k)fluoranthene	<20 <20		<20	<20		
Benzo(a)pyrene		<20	<20	<20		
3-3'-dichlorobenzidine	<20	<20 <20	<20	<20		
Chrysene & benzo(a)anthracene	<20			<20		
Indeno(1,2,3-c,d)pyrene	<20	<20	<20	<20		
Dibenzo(a,h)anthracene	<20	<20	<20			
Benzo(g,h,i)perylene	<20	<20	<20	<20		
Phenol	<20	<20	<20	<20		
2-chlcrophenol	<20	- <20	<20	<20		
2-nitrophenol	<20	<20	<20	<20		
2,4-dimethylphenol	<20	<20	<20	<20		
2,4-dichlorophenol	<20	<20	<20	<20		
4-chloro-3-methylphenol	<20	<20	<20	<20		
2,4,6-trichlorophenol	<20	<20	<20	<20		
2,4-dinitrophenol	<20	<20	<20	<20		
4-mitrophenol	<20	<20	<20	<20		
2-methyl-4,6-dinitrophenol	<20	<20	<20	<20		
Pentachlorophenol	<20	<20	<20	<20		
31509-36-	1	2	. 3	4		

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#### AFFIDAVIT OF PUBLICATION

State of New Mexico,

County of Lea.

1. .

#### Robert L. Summers

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 in a supplement thereof for a period

of \_

One\_\_\_\_\_ weeks. Beginning with the issue dated

\_March 31\_\_\_\_, 19 86\_\_\_

and ending with the issue dated

March est. unnin Publisher.

Sworn and subscribed to before

me this day of Notary Public

My Commission expires

(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 March 31, 1986 NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION Notice is hereby given that pursuant to New Mexico Water Quali-

180

ty Control Commission Regulations, the following proposed discharge plans have been submitted for approval 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-2) Phillips 66 Natural Gas Company, Lee (Buckeye) Plant, J.E. Jennings, Agent, 4001 Penbrook, Odessa, Texas 79762, proposes to renew the previously approved discharge plan at its facility located in the SW/4SE/4 of Section 30, Township 17 South, Range 35 East (NMPM), Lea County, New Mexico. Approximately 57,000 gallons per day of process, boiler and cooling tower waste water with a total dissolved solids content of approximately 5300 mg/1 will be discharged to holding tanks. The discharge water will then be pumped to Rice Engineering for final disposal via OCD-approved deep well injection. Ground water most likely to be affected by any discharge at the surface is at a depth of about 85 feet and has a total dissolved solid concentration of approximately 600 mg/1.

(GW-3) Texaco Producing Inc., Eunice No. 1 Gas Processing Plant (formerly Getty Eunice No. 1), J. Anderson, Manager, Natural Gas Plants Division, P.O. Box 1650, Tulsa, Oklahoma, 74102, proposes to renew the previously approved discharge plan at its facility located in the NW/4SW/4 of Section 27, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 91,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved solids content of approximately 7000 mg/1 will be discharged to a lined pond for storage prior to final disposal via OCD-approved deep well in-jection at site. Other lined pits hold brine water for LPG storage well use. The ground water most likely to be affected from any discharge at the surface is at a depth of about 65 feet and has a total dissolved solids concentration of approximately 1700 mg/1

(GW-4) Texaco Producing Inc., Eunice No. 2 Gas Processing Plant (formerly Getty Eunice No. 2), J. Anderson, Manager, Natural Gas Plants Division, P.O. Box 1650, Tulsa, Oklahoma, 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/ASE/4 of Section 28, Township 21 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 24,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved content of approx-imately 7100 mg/1 will be discharged to a pipeline operated by Aqua Incorporated for final disposal via OCD approved deep well injection. The ground water most likely to be affected from any discharge at the surface is at a depth of about 70 feet and has a total dissolved solids concentration ranging from 1200 to 2600 mg/1. (GW-5) Warren Petroleum Company, Eunice Gas Processing Plant, L.T. Reed, Director, Environmental Affairs, P.O. Box 1589, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4 of Section 3, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 45,000 gallons per day of process, boiler, and cooling tower water, with a total dissolved solids content of approximately 3600 mg/3 will be discharged to metal holding tanks for storage prior to final disposal via OCD-approved deep well injection at the sites. The ground water most likely to be affected from any discharge at the surface is

at a depth of about 90 feet and has a total dissolved solids concentration ranging from about 400 to 2000 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 of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by an 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

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 pro-posed plan based on information in the plan and information submitted at the hearing.

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of March, 1986.

To be published on or before March 31, 1986. STATE OF NEW MEXICO OIL CONSERVATION DIVISION R.L. STAMETS Director

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	SCIENTIFIC LA 700 Camino de	ealth and Environment ABORATORY DIVISION Salud NE IM 87106 — (505) 841-2	J			VATER CHEM	
	15 86	NO WC 971	USER CODE 🗌 5930	o∼ 🗆 59600 🖄 O	THER: 822	235	
Collection DATE S6 02 2 Collection TIME	Ц	SITE INFORM- ► ATION		LLIPS LKR	PLANT	FINAL	EFFLUENT
Collected by - Person		se load	Collection site descriptio	"Sample fr	om Ty	Ink. one	prior
L		/	and the second sec		Two	prior TI	BH
SEND FINAL REPORT TO	NM OIL CON State Land Santa Fe,	Carl Same	ISION	8	for K	mhilule ing	additus ection
Attn	<u>David Br</u>	oyer . 1 COM	SANTA IF	***************			· · · · · · · · · · · · · · · · · · ·
SAMPLING CO			لي ا` الاسا ≥ الاسري		Station/ well code Owner		
Bailed Dipped	Pump Tap	Water level		Discharge	<u></u>	Sample type	2,13,
pH (00400)	7-8.0	Conductivity (Unco	rrected)	Water Temp. (00010)	<b>)°°</b>	Conductivity at 25	
Field comments	- 0,0	1	<u>50 pinno</u>	L			µ
	******		<b></b>		fatrit,		
						,	
No. of samples	. 1	IT - Check prope		field with			
submitted		IF: Whole sample (Non-filtered)		mbrane filter	ml H₂SO₄/I	L added	
🗆 NA: No ac	id added 🛛	Other- <i>specify:</i>					4
ANALYTICAL	RESULTS from	m SAMPLES					
NF, NA			Units Date analyze			Units	Date analyzed
Conductivity ( 25°C (00095)		<u> </u>	imho	Calcium (00915)		mg/l mg/l	
🛛 🗇 Total non-filter	ahle			🗇 Sodium (00930)		mg/l	
residue (suspi				<ul> <li>Potassium (00935)</li> <li>Bicarbonate (00440)</li> </ul>		mg/l	
(00530)			mg/i	- Chloride (00940)		mg/l	
D Other:				<ul> <li>□ Sulfate (00945)</li> <li>□ Total filterable residue</li> </ul>			
Other:			<del></del>	- (dissolved) (70300)	·	mg/i	
NF, A-H2SO4				- Other:			
D Nitrate-N+, N	itrate-N			F, A-H <sub>2</sub> SO <sub>4</sub>			
total (00630)			mg/l mg/l	- 2 Nitrate-N + , Nitrate-I	N 5.5	U	3/26
Total Kjeldahl-				dissolved (00631)		""g"	5/00
()		<u> </u>	mg/l	- (00608)	/·	<u>23</u> mg/l	
demand (0034		I	mg/l	- Total Kjeldahl-N ()	4.	18 mg/i	3/17-
Total organic c ( )	arbon		mg/l	- Other:			
Other:				Analyst	Date Re	aported , Revie	wedby
D Other:					41	7 86 (	in the second se
1 - h - nata a canada a t							
Laboratory remark	(S	-	•				
	(S	-					

	RATORY DIVISION		ERAL WATER CHEMISTRY
DATE RECEIVED 315 186 NO.	WC 975 USER [ 5930	о 🗆 59600 🕅 отне	ER: 82235
Collection DATE	ATION	LIPS LEET	PLANT FINAL EFFLUE
Collected by - Person/Agency	Collection site descriptio	"Sample ho	m Tank one prio
LOYER HUDERSON		7	To flow into Tank
ENVIRONMENTA SEND NM OIL CONSE FINAL State Land O REPORT Santa Fe, NM Attn:David_Boye	RVATION DIVISION ffice Bldg, PO Box 208 87501 r		aion/
SAMPLING CONDITIONS	L'IL Contraction	AND CELON DUMPERSON	
□ Bailed □ Pump V 又 Dipped □ Tap	Vater level ULL UUTVOE	Discharge	Sample type
	conductivity (Uncorrected) 27,570 μmho	Water Temp. (00010)	°C Conductivity at 25 °C (00094)
Field comments			
SAMPLE FIELD TREATMENT -	- Check proper boxes		
	Whole sample Wr. Filtered in	field with	
submitted		mbrane filter	H <sub>2</sub> SO <sub>4</sub> /L added
NA: No acid added D Oth	ner-specify:		
ANALYTICAL RESULTS from S	AMPLES Units Date analyze	d F, NA	Units Date analyze
		X Calcium (00915)	<u></u>
25°C (00095)	µmho	– 💢 Magnesium (00925) 🕱 Sodium (00930)	<u> </u>
Total non-filterable		Potassium (00935)	<u>30,4</u> mg/l <u>1</u>
residue (suspended) (00530)	mg/l	Bicarbonate (00440)	$\frac{153}{9/7}$ mg/l $\frac{3/13}{3/9}$
Other:		Chloride (00940)	$\frac{-9/7}{293} mg/l \frac{3/7}{3/27}$
☐ Other:	····	Total filterable residue	
□ Other:		- (dissolved) (70300)	$\frac{2190}{0.0} mg/1 \frac{418}{31/3}$
NF, A-H <sub>2</sub> SO <sub>4</sub>		A Other: CO3	0.0 3/13
D Nitrate-N+, Nitrate-N		F, A-H <sub>2</sub> SO <sub>4</sub>	
total (00630)	mg/l	- 🗆 Nitrate-N + , Nitrate-N	
Ammonia-N total (00610)			mg/l
	mg/l	dissolved (00631)	····
Chemical oxygen	mg/l	Ammonia-N dissolved	
demand (00340)			mg/l
	mg/i	Ammonia-N dissolved (00608)	
demand (00340)	mg/i	Ammonia-N dissolved (00608) Total Kjeldahl-N () Other:	mg/l mg/l
demand (00340) Total organic carbon ( )	mg/i	<ul> <li>Ammonia-N dissolved (00608)</li> <li>Total Kjeldahl-N</li> <li>())</li> </ul>	mg/l mg/l Date Reported Reviewed by
demand (00340)	mg/i	Ammonia-N dissolved (00608) Total Kjeldahl-N () Other:	mg/l mg/l
demand (00340)	mg/i	Ammonia-N dissolved (00608) Total Kjeldahl-N () Other:	mg/l mg/l Date Reported Reviewed by

SLD 726 (12/84) DISTRIBUTION: WHITE - EID, GW&HW Bureau CANARY - WS System PINK - EID Local Office GOLDENROD - SLD

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	SCIENTIFIC LA 700 Camino de		۱. ۱		leav		CTFY
11		M 87106 — (505) 841-2		· · · · · · · · · · · · · · · · · · ·			
	586		USER 59300	<u>) 🗆 59600 🕅 (T</u>	HER: 82	235	•
Collection TIME		SITE INFORM- ► ATION	Sample location PH1	LIPS LEKE	PLANT	FINAL 1	EFFLUENT
Collected by - Person/A	AUDERS	5m 1000		Sample, fre	m T	mk one	prior
SEND I FINAL REPORT TO	ENVIRONMEN	TAL BUREAU SERVATION DIV Office Bldg, NM 87501	, PO Box 208	SERVATION DIVISION	Two Two for K Sistion/	prior To mkililo	BH addition
			Ξ.	· · ·	well code Owner		
SAMPLING CO		Water level				Completion	
	□ Pump □ Tap	vvaler level		Discharge		Sample type	B
pH (00400)	- 8.0	Conductivity (Unco	rrected) <u> γ</u> μ mho	Water Temp. (00010)	<b>)°</b>	Conductivity at 25	°C (00094) µmho
Field comments					~	<u> </u>	
No. of samples submitted	1- □ N d added □ 0	(Non-filtered) Other- <i>specify:</i>	<b>Ε</b> F: Filtered in 0.45 μmer	· · · · · · · · · · · · · · · · · · ·	n <del>  H<sub>2</sub>SO4/</del>	added <i>4-m</i>	
NEXA	<u></u>		Units Date analyzed			Units	Date analyzed
Conductivity (C 25°C (00095) Total non-filtera residue (susper (00530) Cother: TCA Cother: AS	ble	· · · · · · · · · · · · · · · · · · ·	mho <u>3/20/84</u> <u>4/9/86</u> <u>3/18/86</u>	<ul> <li>Calcium (00915)</li> <li>Magnesium (00925)</li> <li>Sodium (00930)</li> <li>Potassium (00935)</li> <li>Bicarbonate (00440)</li> <li>Chloride (00940)</li> <li>Sulfate (00945)</li> <li>Total filterable residue (dissolved) (70300)</li> <li>Other:</li> </ul>		mg/i _ mg/i _ mg/i _	
NF, A-H2SO4							
<ul> <li>Nitrate-N +, Nit total (00630)</li> <li>Ammonia-N tota</li> <li>Total Kjeldahl-N ( )</li> <li>Chemical oxyge demand (00340</li> <li>Total organic ca</li> </ul>	al (00610)		mg/i mg/i mg/i mg/i	F, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N <sup>+</sup> , Nitrate-N dissolved (00631) Ammonia-N dissolved (00608) Total Kjeldahi-N () Other:		mg/l _ mg/l _ mg/l _	
() Other:		I	mg/l				
D Other:				Analyst	Date R	eported Review	in A here
Laboratory remarks	······································				Sample	2 Digntet	

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Lab Number: H 472 Date Submitted: 3/5/86 Boyer By:

Sample Die: Phillips Lee Plant Date Analyzed: <u>3/20/86</u> Reviewed By: Jim Cally Date Reported: <u>4/18/86</u>

Element	ICAP VALUE (MG/L)	AA VALUE (MG/L)
Aluminum		
Barium	0.2	
Berylium	20.1	
Boron	0.2	
Cadmium	<0.1	
Calcium	220.	
Chromium	<u> </u>	
Cobalt	20.1	
Copper	40.1	
Iron	0.1	·
Lead	<0.1	
Magnesium	40.	
Mangan <b>ese</b>	20.05	
Molybdenum		
Nickel		
Silicon	a4.	
Silver	۷۵.	
Strontium	2.1	
Tin	<0.1	
Vanadium	<0.1	······
Zinc	<0.1	
Arsenic		0.021
Selenium		
Mercury		<0.0005

\_1\_1 SCIENTIFIC ABORATORY DIVISION 86-0234-C 700 Camino de Salud NE STATE OF NEW MEXICO Albuquerque, NM 87106 841-2570 ENVILONMENT DAVID G. BOYER S.L.D. No.: OR-234 REPORT TO: PLEASE PRINT DATE REC. : 3/4NEW MEXICO OIL CONSERVATION DIV. P.O. BOX 2088 SLD PRIORITY #: 📿 SANTA FE, NM 87504-2088 827-5812 USER CODE: |8|2|2|3|5| PHONE(S): SUBMITTER: SUBMITTER CODE: SAMPLE TYPE: WATER , SOIL , OTHER SAMPLE TYPE CODE: COLLECTED: DA (AS ) - 11 :SOURCE: Phillip Lee NEAREST CITY: ' CODE: CODE: LOCATION: pH=7.5-8; Conductivity=2750 umho/cm at 22 °C; Chlorine Residual=\_\_ Dissolved Oxygen= mg/l; Alkalinity=\_\_\_\_; Flow Rate=\_\_\_ Sampling Location, Methods and Remarks (i.e. odors, etc.) Somplesnom top tank one prior to Flourento tank 2, prios to pH and mhilitos addition I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. ( Howing and activities. Method of shipment to the Laboratory Honn Larriel This form accompanies <u>Septum Vials</u>, Glass Jugs, Containers are marked as follows to indicate preservation: NP: No preservation; sample stored at room temperature. NP: P-Ice Sample stored in an ice bath (not frozen). P-Na<sub>2</sub>S<sub>2</sub>O<sub>3</sub>; Sample preserved with Na<sub>2</sub>S<sub>2</sub>O<sub>3</sub> to remove chlorine residual. I (we) certify that this sample was transferred from to at (location) onʻ - : \_\_\_\_\_ and that the statements in this block are correct. Evidentiary Seals: Not Sealed 
Seals Intact: Yes No Signatures \_\_\_\_\_ (we) certify that this sample was transferred from at (location)\_\_\_ to on \_ and that the statements in this block are correct. Evidentiary Seals: Not Sealed Seals Intact: Yes No Signatures \_\_\_\_

			à				
PL		CHECK THE APPROPRIATE			ATE 7	AB. No.: ORG-	L SCREENS
QUALITATIVE	QUANTITATIVE	PURGEAI SCREEI	BLE NS	QUALITATIVE	QUANTITATIVE	EXTRACTAE	SLE
		ALIPHATIC HYDROCARBON	and the second			ALIPHATIC HYDROCAR	
1-V		AROMATIC HYDROCARBON HALOGENATED HYDROCARB	1			CHLORINATED HYDROCA	and the second
$+\alpha$	-d	GAS CHROMATOGRAPH/MAS		+	┠	CHLOROPHENOXY ACID HYDROCARBON FUEL SO	
						ORGANOPHOSPHATE PES	
				-		POLYCHLORINATED BIT	PHENYLS (PCB's)
						POLYNUCLEAR AROMAT	IC HYDROCARBONS
		·····	· · ·			TRIAZINE HERBICIDES	5
<u> </u>		· · · · · · · · · · · · · · · · · · ·			<u>-</u>		
		SPECIFIC COMF	POUNDS			SPECIFIC COMP	OUNDS
<b> </b>							
		· · · · · · · · · · · · · · · · · · ·					
REM	ARKS	:			L	· · · · · · · · · · · · · · · · · · ·	
	· - ·	AL	NALYTICAL	RE	SUL	TS	anan a sa
	CON	1POUND	[PPB]	COMPOUND [PPB]			[PPB]
ar	oma	tie hydrocarbons *		h	lon	enated hydrocarbon	**
		zene	4650		1 Ai	rotorm	-2
	tol	vene	2550				
		xulene	74				
	m	-xulene	300				
•	A -	surlene	118				
				**	De	etection Limit	1
	y.an w. <u>.</u>	hydrafa waana		<b>*</b> 1	DETE	CTION LIMIT	1
Ā	REMA	RKS:					
							-
						·	
		······································					
l Con	1 ( a )		ERTIFICATE OF ANA		CAL P		
I c	ertif	Intact: YesNO y that I followed stan	idard laboratory	proce	dure		ite: ilysis of this
sam	ple u	inless otherwise noted	and that the sta	temer	its i	n this block and the	
on	this	page accurately reflect	t the analytical	resu	lts	tor this sample.	
I ce	ertif	of analysis: <u>3/17/86</u> Ty that I have reviewed	and concur with	the	anal	ytical results før th	his sample and
with	n the	statements in this bl	ock. Reviewers	signa	ture	: K. Menehen	

	CIENTIFIC LAE 00 Camino de S		N	Gi		NATER CHEM OGEN ANALY	
DATE RECEIVED 3	5 86 1	AB WC 973	USER CODE	o □ 59600 🕅 c	отнея: 82	235	
Collection DATE 36 02 21 Collection TIME		SITE	Sample location	25 LEE D.		WATER	WELL
Collected by - Person/Age	YER ANOL	REPARACD	Collection site descriptio	WATER	NEL	IN FRONT	T VARD GEUIC
REPORT S	VVIRONMEN 4 OIL CONS tate Land anta Fe, 1 David Boy		VISION PO BOX 208 A	R 1 5 1985	Station/ well code		
SAMPLING CON					Owner		
	Pump Tap	Water level		Discharge		Sample type	S
PH (00400)		Conductivity (Unco		Water Temp. (00010)	/ °C	Conductivity at 25	
SAMPLE FIELD No. of samples submitted		Whole sample (Non-filtered)	F. Filtered in	field with mbrane filter	ml H₂SO₄/	L added	·······
ANALYTICAL RE		SAMPLES	Units Date analyze	1 F, NA		Units	Date analyzed
Conductivity (Co 25°C (00095)	, 		<i>u</i> mho	□ Calcium (00915) □ Magnesium (00925) □ Sodium (00930)		mg/l mg/l mg/l	
<ul> <li>Total non-filterab residue (suspend (00530)</li> <li>Other:</li> <li>Other:</li> <li>Other:</li> <li>Other:</li> </ul>			mg/l	<ul> <li>Potassium (00935)</li> <li>Bicarbonate (00440)</li> <li>Chloride (00940)</li> <li>Sulfate (00945)</li> <li>Total filterable residue (dissolved) (70300)</li> </ul>		mg/l mg/l _	
NF, A-H2SO4				Other:			
Nitrate-N +, Nitra	ite-N		<u></u>	F, A-H₂ SO₄			
total (00630)	(00610)		mg/l	Nitrate-N + , Nitrate-I dissolved (00631)		9 mg/l	3/26
<ul> <li>Total Kjeldahl-N</li> <li>( )</li> <li>Chemical oxyger</li> </ul>			mg/l	<ul> <li>Ammonia-N dissolve</li> <li>(00608)</li> <li>Total Kjeldahl-N</li> </ul>	_ < 0	<u> </u>	4/2
demand (00340) Total organic carl ( )	 Don	· · · · · · · · · · · · · · · · · · ·	mg/l	( ) Other:	20	, / mg/ł .	3/17
□ Other: □ Other:				Analyst	Date Re Y	eported Review	wed,by
Laboratory remarks	<u> </u>					ليصدق قصيد	

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	SCIENTIFIC LAE 700 Camino de S Albuquerque, NM	1 87106 — (50 <b>1</b> -	N -2555	٩	NITR	NATER CI OGEN AN		
DATE RECEIVED 3	15 86 N	AB WC 977	USER CODE  59300	🛛 🖸 59600 🕅 от	HER: 82	235		
Collection DATE 86 02 21 Collection TIME	4	SITE	Sample location	s hee Do	MESTIC	WAT	ER I	WELL
10.45 Collected by - Person//	Agency /		Collection site description	WATER	WEL	IN F	RONT	YARD
L5	SOYER/ANDI	Seson (CD)		].	NEXT	To L	eyog.	EVIC
SEND FINAL REPORT TO	NM OIL CONS	NM 87501	VISION , PO Box 2088 DECIPE	2 8 1986	PLA-A			
SAMPLING CO	NDITIONS			vation division	Owner			
<ul> <li>Bailed</li> <li>Dipped</li> </ul>	X Pump	Water level	S/	Discharge		Sample type		
pH (00400)	7	Conductivity (Unco 4 S	N	Water Temp. (00010)	°C	Conductivity		; (00094) µmho
Field comments			<u> </u>					
SAMPLE FIELD	TREATMEN	T — Check prope	er boxes				······································	
No. of samples		Whole sample	F: Filtered in f		nl H₂SO₄/	Ladded		
submitted	id added 🗆 C	(Non-filtered)		ield with	nl H₂SO₄/	L added		
submitted	id added	(Non-filtered) Other-specify:		nbrane filter DA: 211	nl H₂SO₄/		Units	Date analyzed
submitted	id added	(Non-filtered) Other-specify:	风 <sup>Γ</sup> : 0.45 μmen	F, NA Calcium (00915)	  	8	ت mg/I 	3-6 11
Submitted NA: No act ANALYTICAL F NF, NA	id added  Corrected)	(Non-filtered) Other-specify: SAMPLES	又「: 0.45 µmen Units Date analyzed	F, NA         Calcium (00915)         Magnesium (00925)         Sodium (00930)         Potassium (00935)         Bicarbonate (00440)         Chloride (00940)         Sulfate (00945)         Total filterable residue (dissolved) (70300)	140 4.8 35.37 5.07 19	2 37.3 40.3	ت_ mg/I	3-6 n 11 3/13 3/19 3/27 4/8
submitted NA: No aci ANALYTICAL F NF, NA Conductivity (C 25°C (00095) Total non-filtera residue (suspe (00530) Other: Other:	id added  Corrected)	(Non-filtered) Other-specify: SAMPLES	又「: 0.45 µmen Units Date analyzed µmho	F, NA         Calcium (00915)         Magnesium (00925)         Sodium (00930)         Potassium (00935)         Bicarbonate (00440)         Chloride (00940)         Sulfate (00945)         Total filterable residue (dissolved) (70300)         Other:       C03	140 4.8 35.37 5.07 19	8 7 37.3 40.3	mg/l mg/l mg/l mg/l mg/l mg/l	7-6 11 11 3/13 3/19 3/27
Submitted NA: No aci ANALYTICAL F NF, NA Conductivity (C 25°C (00095) Total non-filtera residue (suspe (00530) Other: Other: Other: Other: NF, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nit total (00630) Ammonia-N tot Total Kjeldahl-N () Chemical oxyg	id added  Corrected) Corrected) able inded) trate-N tal (00610) N en	(Non-filtered) Other-specify: SAMPLES	X       Γ: 0.45 μmen         Units Date analyzed         μmho         mg/l	F, NA         Calcium (00915)         Magnesium (00925)         Sodium (00930)         Potassium (00935)         Bicarbonate (00440)         Chloride (00940)         Sulfate (00945)         Total filterable residue (dissolved) (70300)	140 4.8 35.37 5.07 19	8 37.3 40.3 343 .0	mg/l mg/l mg/l mg/l mg/l mg/l	3-6 n 11 3/13 3/19 3/27 4/8
submitted NA: No aci ANALYTICAL F NF, NA Conductivity (C 25°C (00095) Total non-filtera residue (suspe (00530) Other: Other: Other: Other: NF, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Ni total (00630) Ammonia-N tot Total Kjeldahl-N ()	id added  Corrected) Corrected) able inded) trate-N tal (00610)	(Non-filtered) Other-specify: SAMPLES		F, NA         Calcium (00915)         Magnesium (00925)         Sodium (00930)         Potassium (00935)         Bicarbonate (00440)         Chloride (00940)         Sulfate (00945)         Total filterable residue (dissolved) (70300)         Other:         F, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nitrate-N dissolved (00631)         Ammonia-N dissolved (00608)	140 4.8 35.37 5.07 19	8 2- 37.3 40.3 343 .0	mg/l mg/l mg/l mg/l mg/l mg/l mg/l	3-6 n 11 3/13 3/19 3/27 4/8
Submitted NA: No aci ANALYTICAL F NF, NA Conductivity (C 25°C (00095) Total non-filtera residue (suspe (00530) Other: Other: Other: Other: NF, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Ni total (00630) Ammonia-N tot Total Kjeldahl-N () Chemical oxyg demand (00340)	id added  Corrected) Corrected) able inded) trate-N tal (00610)	(Non-filtered) Other-specify: SAMPLES	X       Γ: 0.45 μmen         Units Date analyzed         μmho         mg/l	F. NA         Calcium (00915)         Magnesium (00925)         Sodium (00930)         Potassium (00935)         Bicarbonate (00440)         Chloride (00945)         Total filterable residue (dissolved) (70300)         Other:         F. A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nitrate-N dissolved (00631)         Ammonia-N dissolved (00608)         Total Kjeldahl-N (		8 2- 37.3 40.3 3 343 .0	mg/l mg/l mg/l mg/l mg/l mg/l mg/l mg/l	$ \frac{3^{-6}}{2} $ $ \frac{1}{13} $ $ \frac{3/13}{3/27} $ $ \frac{3/27}{4/8} $ $ \frac{1}{2}/13 $

SLD 726 (12/84) DISTRIBUTION: WHITE - EID, GW&HW Bureau CANARY - WS System PINK - EID Local Office GOLDENROD - SLD

SCIENTIFIC L 700 Camino de	ealth and Environt Department ABORATORY DON e Salud NE NM 87106 — (505) 841-2555		lesu	MERCHEM	ISTOV
DATE RECEIVED 3 5 86	LAB HM 467 USER 593	oo 🗋 59600 🕅 🕅 ෆ	гнея: 82	235	
Collection DATE 36 02 21 Collection TIME	SITE	~		WATER	WELL
Collected by - Person/Agency	Collection site descript	ION WATER	NEL	To Cevo	T VARD GLUIC
SEND NM OIL CO FINAL State Lan	NTAL BUREAU NSERVATION DIVISION d Office Bldg, PO Box 20 NM 87501 over				
			Station/ well code Owner	······	<u></u>
SAMPLING CONDITIONS           Bailed         A           Dipped         Tap	Water level	Discharge		Sample type	Q
pH (00400)	Conductivity (Uncorrected) 486 µmho	Water Temp. (00010)	°C	Conductivity at 25	
Field comments         SAMPLE FIELD TREATMENT         No. of samples         submitted         NA: No acid added         ANALYTICAL RESULTS from         No.         Conductivity (Corrected)         25°C (00095)	NF: Whole sample (Non-filtered) Other- <i>specify</i> :	ed F, NA Calcium (00915) Magnesium (00925)		Units mg/i mg/i	Date analyzed
<ul> <li>□ Total non-filterable residue (suspended) (00530)</li> <li>○ Other: JCAP SCAN</li> <li>□ Other:</li> <li>□ Other:</li> <li>□ NF, A-H₂SO₄</li> </ul>	/ mg/l	<ul> <li>Sodium (00930)</li> <li>Potassium (00935)</li> <li>Bicarbonate (00440)</li> <li>Chloride (00940)</li> <li>Sulfate (00945)</li> <li>Total filterable residue (dissolved) (70300)</li> <li>Other:</li> </ul>		mg/l . mg/l . mg/l . mg/l . mg/l . mg/l .	······································
<ul> <li>Nitrate-N +, Nitrate-N total (00630)</li> <li>Ammonia-N total (00610)</li> <li>Total Kjeldahl-N (</li> <li>Chemical oxygen demand (00340)</li> <li>Total organic carbon (</li> <li>)</li> </ul>	mg/l mg/l mg/l mg/l mg/l mg/l	F, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nitrate-N dissolved (00631) Armmonia-N dissolved (00608) Total Kjeldahl-N () Other:		mg/l mg/l mg/l	
Conter: Conter: Caboratory remarks		Analyst		eported Review 26 86 June 26 96 June 26 June 26 June 26 June 26 June 26 June 26 June 26 June 26 June 27 June 26	ned by a achly

SLD 726 (12/84) DISTRIBUTION: WHITE - EID, GW&HW Bureau CANARY - WS System PINK - EID Local Office GOLDENROD - SLD

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467 Lab Number: Date Submitted: 3/5/81Boyer By:

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Sample de: Phillips Lee Domestre
Date Analyzed: 3/20/86
Reviewed By: Am Ashlar
Date Reported: 3/26/86

Element	ICAP VALUE(MG/L)	AA VALUE (MG/L)	<del></del>
Aluminum	<0.1		
Barium	0.1		
Berylium	20.1		
Boron	<0.1		
Cadmium	<0.1		
Calcium	7/		
Chromium		J	
Cobalt	20.1		
Copper	<u> </u>		
Iron	<u> &lt;0.1</u>	· · · · · · · · · · · · · · · · · · ·	
Lead	<0.1		
Magnesium	7.9		
Manganese	0.20	<u></u>	
Molybdenum	20.1		
Nickel	×0.		
Silicon	<u></u>		
Silver	40.1		
Strontium	0.6		
Tin	<b>∠</b> 0.		
Vanadium	<b>40</b> , <b>)</b>		
Zinc	20.1		
Arsenic			
Selenium			
Mercury			

SCIENTIFIC ABORATORY DIVISION 86- 0228-700 Camino de Salud NE STATE OF NEW MEXICO Albuquerque, NM 87106 841-2570 ENVIRONMENT DAVID G. BOYER S.L.D. NO.: OR- 228 A, B REPORT TO: PLEASE PRINT DATE REC. : 3/NEW MEXICO OF CONSERVATION DIV. With I have the P.O. BOX 2088 SLD: PRIORITY #: SANTA FE, 3NM 87504-2088 827-5812 USER CODE: |8|2|2|3|5| PHONE(S): DAVIZ SUBMITTER: SUBMITTER CODE: SAMPLE TYPE: WATER X, SOIL , OTHER SAMPLE TYPE CODE: | | COLLECTED: Bb/D/2/-10: 45 BY AVR CODE: VYNNDDHHMMIIImestre Water well-Phillip code: 11 + SOURCE: AQUIFER lant CODE: NEAREST CITY: Habbe CODE: LOCATION: pH= 7; Conductivity= 490 umho/cm at 2/ °C; Chlorine Residual=\_\_\_ Dissolved Oxygen=\_\_\_\_mg/l; Alkalinity=\_\_\_\_; Flow Rate=\_ Sampling Location, Methods and Remarks (i.e. odors, etc.) Water well in son prond next to cryogene I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. Method of shipment to the Laboratory Have carnied This form accompanies \_\_\_\_\_Septum Vials, \_\_\_\_Glass Jugs, Containers are marked as follows to indicate preservation: NP: No preservation; sample stored at room temperature.
P-Ice Sample stored in an ice bath (not frozen). 7 P-Na,S,O,; Sample preserved with Na,S,O, to remove chlorine residual ... I (we) certify that this sample was transferred from to at (location) onʻ \_\_\_\_ and that the statements in this block are correct. ATE AND TIME Evidentiary Seals: Not Sealed \_\_\_\_\_ Seals Intact: Yes \_\_\_\_ No \_\_\_\_ Signatures \_\_\_\_ (we) certify that this sample was transferred from \_\_\_\_\_ at (location)\_\_\_\_\_ to on and that the statements in this block are correct. ATE AND TIME Evidentiary Seals: Not Sealed Seals Intact: Yes No Signatures \_\_\_\_

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		SES REQUESTED	BOXES BELON TO	TN	JDTC	L ATE 7	AB. No.: ORG-	ZZQ.
	QUIRE						SUSPECTED OR REQUIRED	1
QUALITATIVE	QUANTITATIVE	PURGEA	BLE		QUAL ITATIVE	QUANTITATIVE	EXTRACTAI	BLE
TI LAU Ç	QUANT.	SCRÉE	NS		QUALT	QUANT	SCREEN	S
		ALIPHATIC HYDROCARBO	N SCREEN				ALIPHATIC HYDROCAF	RBONS
K	$\boldsymbol{\mathcal{A}}$	AROMATIC HYDROCARBON					CHLORINATED HYDROC	CARBON PESTICIDES
X	X	HALOGENATED HYDROCAR					CHLOROPHENOXY ACII	DHERBICIDES
		GAS CHROMATOGRAPH/MA	SS SPECTROMETER	$\square$		L	HYDROCARBON FUEL S	
				Ц		<u> </u>	ORGANOPHOSPHATE PH	
							POLYCHLORINATED BI	
				$\square$			POLYNUCLEAR AROMAT	TIC HYDROCARBONS
		· ·	•	$\left  \right $		<b> </b>	TRIAZINE HERBICIDE	<u>S</u>
		SPECIFIC COM	POUNDS				SPECIFIC COMF	POUNDS
 				Π				
				Π				
				$\Box$				
REM	ARKS	:					· · · · · · · · · · · · · · · · · · ·	
							4	
			NALYTICAL		RE	SUL	TS	
		1POUND	[PPB]	Π	С	OM	POUND	[РРВ]
ur	AMA	tic hydrocarbons	*mone detected	И				
6	JAD	enated hydrocarbon	** datestas	1				
	ing the	enarea nyarocurban	MANE METCESPA	11				
				$\mathbb{H}$				
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		.1			*1	e D	etection Limit	
							CTION LIMIT	
F	REMA	RKS:		*			· · · · · · · · · · · · · · · · · · ·	
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0	1(2)		ERTIFICATE OF AN			AL P		
		Intact: Yes NO				dure		ate:
		nless otherwise noted						
on	this	page accurately refle	ct the analytica	1	resu	ilts	for this sample.	
Date	≥(s)	of analysis: 3/6/86	. Analys	ť	's si	Ignat	ure: Jan C. Elen	
		y that I have reviewe						his sample and
with	1 the	e statements in this b	LOCK. Reviewers	S	ilgna	ture	: p Mayle hem	
							V	

SCI 700	ENTIFIC LAB Camino de S			FN G		
DATE RECEIVED 35	186 N	BWC978	USER CODE 🗌 59300	□ 59600 🕅 O	THER: 82235	
Collection DATE		SITE	Sample location PH	ILLIPS LB	~	
Collection TIME		ATION	E M	JUF JACK	LET GOOLIN	Ca HAD
Collected by Person/Agency	- ANDE	RSON /OCD				
ENV SEND NM FINAL Sta REPORT San	IRONMENI OIL CONS	TAL BUREAU SERVATION DIV Office Bldg NM 87501	, PO Box 2088	3 1986 JUJ	Station/ well code	
SAMPLING COND	TIONS		UIL CONSLIN	ALION DIVISION	Owner	
□ Bailed □ Ø Dipped □	Pump Tap	Water level	e_t+ *	Discharge	Sample t	<b>`</b>
pH (00400) 8,5	·	Conductivity (Unco 310C		Water Temp. (00010) 24D		<u>RAB</u> vity at 25°C (00094) µmho
submitted		(Non-Initered) Other-specify:-			ml H₂SO₄/L added	
NF, NA			Units Date analyzed			Units Date analyzed
Conductivity (Corre 25°C (00095) Total non-filterable	cted) 		umho	<ul> <li>Calcium (00915)</li> <li>Magnesium (00925)</li> <li>Sodium (00930)</li> <li>Potassium (00935)</li> </ul>	<u> </u>	mg/l7~6 mg/l mg/l mg/l
residue (suspended (00530) Other:	(t 		mg/l	Bicarbonate (00440)	1125 186	mg/l3//3 mg/l3//9
<ul> <li>Other:</li> <li>Other:</li> </ul>				Contraction Contra	 3275	mg/I <u>3/27</u> mg/I <u>4/4</u>
NF, A-H₂SO₄				Cother: COS	57.1	3/13
Nitrate-N+, Nitrate total (00630)	-N		ma/l	F, A-H <sub>2</sub> SO <sub>4</sub>		
total (00630) Ammonia-N total (0 Total Kjeldahl-N	0610)		mg/l mg/l	<ul> <li>Nitrate-N + , Nitrate-N</li> <li>dissolved (00631)</li> <li>Ammonia-N dissolve</li> </ul>		mg/l
() Chemical oxygen demand (00340)			mg/l	(00608) Total Kjeldahl-N		_ mg/l
<ul> <li>Total organic carbon</li> <li>( )</li> <li>Other:</li> </ul>	 		mg/l	( ) Other:		_ mg/l
C Other:			······································	Analyst	Date Reported 4 14 86	Reviewed by
Laboratory remarks	Pavio					ily residuc.
SLD 726 (12/84)		5°C, the	MOST	CANARY - WS System	PINK - EID Local Off	- Cr

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	New Mexico Hea SCIENTIFIC LAE 700 Camino de S Albuquerque, NA	BORATORY DIV	F/V	·····	Hea		
PATE RECEIVED 3	15 86 H	AB HM464	USER CODE 🗌 5930	o 🗆 59600 🕅	X OTHER: 82	235	
Collection DATE		SITE	Sample location $\mathcal{P}\mathcal{H}$		BE PL	ALT	
Collection TIME		ATION	Collection site descriptio	SIDE JA		COLLUGA -	I-10
Collected byRerson/		REON TOCK		ENGIN	c Jacké	7 Codling	H30
SEND FINAL REPORT TO		SERVATION DIV Office Bidg NM 87501		8	   Station/		
					well code		
SAMPLING CC	NDITIONS				Owner	۰ 	
D Bailed	Pump Tap	Water level		Discharge		Sample type	ξ
pH (00400)	5	Conductivity (Unco		Water Temp. (00010)	/n •c	Conductivity at 25°	C (00094)
ろ, Field comments	.)	3100	) µmho	24	0 0	<u> </u>	µmho
No. of samples submitted	I INF	(Non-filtered) Other-specify:	M F. Filtered in	· · · · · · · · · · · · · · · · · · ·	2-mLL125Ozd	Ladded Am	
Conductivity (	Corrected		Units Date analyze	Calcium (00915)	· · · · · · · · · · · · · · · · · · ·		Date analyzed
25°C (00095)		+	<i>i</i> mho	🗕 🗆 Magnesium (009		mg/l mg/l	
🗆 Total non-filter	able			<ul> <li>Sodium (00930)</li> <li>Potassium (00933)</li> </ul>		mg/l mg/l	
residue (suspe (00530)	anded)		mo/l	Bicarbonate (004	40)	mg/l	
Diner: IC	AP SCAD			Chloride (00940)		mg/!	
U Other:				<ul> <li>□ Sulfate (00945)</li> <li>□ Total filterable resi</li> </ul>	idue	mg/1	
D Other:				- (dissolved) (7030	0)	ma/i	
NF, A-H2SO4				D Other:			
□ Nitrate-N+, N	itrate-N			F, A-H <sub>2</sub> SO <sub>4</sub>			
total (00630)	tal (00610)		mg/l	Nitrate-N + , Nitra disastuat (00001)			
🗆 Total Kjeldahi-i			•	dissolved (00631)		mg/l	
()		····	mg/l	- (00608)		mg/l	
demand (0034	0)		mg/l	- Total Kjeldahi-N		mg/l	
Total organic c ( )	arbon		mg/l	Dther:		····j·· -	
C Other:	<u> </u>		····	Analyst	Date R	eported Review	ed by
Other:				-		26 86 1	asply
Laboratory remark	is				Sout	a Dia to	0
				· · · · · · · · · · · · · · · · · · ·	f	ð	

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Lab Number: 9464 Date Submitted: 3/5/86 Boser By:

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Sample Dde: <u>Phillips Lee Plant</u> Date Analyzed: <u>3/20/86</u> Am Bakly Reviewed By:\_\_\_ Date Reported: /3/26/8

Element	ICAP VALUE (MG/L)	AA VALUE (MG/L)	
Aluminum		· · · · · · · · · · · · · · · · · · ·	
Barium	40.1		
Berylium	_<0.1		
Boron	35.		
Cadmium	20.1		
Calcium	6.3		
Chromium			
Cobalt	<u> </u>		
Copper	2.5		
Iron	1.1		
Lead	0.7		
Magnesium	0.53		
Manganese	0.13		
Molybdenum	<0.		
Nickel	<0.	······································	
Silicon	0.4		
Silver	<u> ~0.1</u>		
Strontium	20.1		
Tin			
Vanadium	<u> </u>		
Zinc	<u>D.9</u>		
Arsenic			
Selenium		·	
Mercury			

SCIENTIFIC ABORATORY DIVISION 700 Camino de Salud NE STATE OF NEW MEXICO Albuquerque, NM 87106 841-2570 86- 0237-C DAVID G. BOYER S.L.D. No.: OR-REPORT TO: PLEASE PRINT DATE REC. : NEW MEXICO OIL CONSERVATION DIV. P.O. BOX 2088 SED PRIORITY #: SANTA FE, NM 87504=2088 827-5812 0 220 USER CODE: | 8 | 2 | 2 | 3 | 5 | 1. 1.1 PHONE(S): TRIAS RANGE SUBMITTER CODE: 1 SUBMITTER: SAMPLE TYPE: WATER , SOIL , OTHER SAMPLE TYPE CODE: | | 'D:55 ву(Д COLLECTED: 06/07/2/-/ CODE: | | | | SOURCE: Knone CODE: AQUIFER DEPTH ino H. CODE: | | | | | NEAREST CITY: LOCATION: TOWNSHIP RANGE SECTION TRACTS S; Conductivity= 2/20 umho/cm at 40 °C; Chlorine Residual= pH= 5 Dissolved Oxygen= mg/l; Alkalinity= ; Flow Rate=\_\_\_; Sampling Location, Methods and Remarks (i.e. odors, etc.) I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. Armst Method of shipment to the Laboratory Hanne This form accompanies Containers are marked as follows to indicate preservation: No preservation; sample stored at room temperature. - NP: N\_P-Ice P-Ice Sample stored in an ice bath (not frozen). P-Na<sub>2</sub>S<sub>2</sub>O<sub>3</sub>; Sample preserved with Na<sub>2</sub>S<sub>2</sub>O<sub>3</sub> to remove chlorine residual. Sample stored in an ice bath (not frozen). I (we) certify that this sample was transferred from to at (location) onʻ \_\_\_\_ and that the statements in this block are correct. DATE AND TIME Evidentiary Seals: Not Sealed 🗌 Seals Intact: Yes 🗌 No 🦳 Signatures (we) certify that this sample was transferred from \_\_\_\_\_ at (location) to on and that the statements in this block are correct. ATE AND TIME Evidentiary Seals: Not Sealed Seals Intact: Yes No Signatures \_\_\_

QUAL IT AT IVE	RURGEABLE		QUALITATIVE	QUANTITATIVE	EXTRACTAI		
QUAN	SCREENS		QUAL	QUAN	SCREEN	S	
	ALIPHATIC HYDROCARBON SCRE				ALIPHATIC HYDROCAF		
XX	AROMATIC HYDROCARBON SCREEN HALOGENATED HYDROCARBON SC	1			CHLORINATED HYDROCARBON PESTICIDES CHLOROPHENOXY ACID HERBICIDES		
_XX	GAS CHROMATOGRAPH/MASS SPEC				HYDROCARBON FUEL SCREEN		
					ORGANOPHOSPHATE PESTICIDES		
					POLYCHLORINATED BIPHENYLS (PCB's) POLYNUCLEAR AROMATIC HYDROCARBONS TRIAZINE HERBICIDES		
	· SPECIFIC COMPOUNDS				SPECIFIC COMPOUNDS		
REMARKS					terrent and the second s	****	
REMARKS		TICAL	RES		_TS		
	ANALY	(TICAL PB]	1		TS POUND		
CO		>B]	1			[PPB]	
CO Arama	ANALY MPOUND [PF tie hydrocarbons ** mone	PB] detected	С			[PPB]	
CO Arama		PB] detected	С			[PPB]	
CO Anna	ANALY MPOUND [PF tie hydrocarbons ** mone	PB] detected	С			[PPB]	
CO Anna	ANALY MPOUND [PF tie hydrocarbons ** mone	PB] detected	С				
CO Anna	ANALY MPOUND [PF tie hydrocarbons ** mone	PB] detected	С			[PPB]	
CO Arnma	ANALY MPOUND [PF tie hydrocarbons ** mone	PB] detected	C	OMF De:	POUND tection Limit	[PPB] 	
CO arama haloge	ANALY MPOUND CPF tie hydrocarbons ** mone anated hydrocarbons * mone	PB] detected	C	OMF De:	POUND		
CO arama haloge	ANALY MPOUND [PF tie hydrocarbons ** mone	PB] detected	C	OMF De:	POUND tection Limit		
CO aroma haloge	ANALY MPOUND CPF tie hydrocarbons ** mone anated hydrocarbons * mone	PB] detected	C	OMF De:	POUND tection Limit		
CO aroma haloge	ANALY MPOUND CPF tie hydrocarbons ** mone anated hydrocarbons * mone	PB] detected	C	OMF De:	POUND tection Limit		
CO aroma haloge	ANALY MPOUND CPF tie hydrocarbons ** mone anated hydrocarbons * mone	PB] detected do tected	C	OMF De 1 DE TE	POUND teetion Limit CTION LIMIT		
CO Arnma haloge REMF	ANALY MPOUND CPF tie hydrocarbons ** mone enated hydrocarbons * mone RKS: CERTIFIC	PB] detected datected	C 7 ** * I	OMF De 1 DE TE	POUND teetion Limit CTION LIMIT PERSONNEL		
CO Aroma haloge REMF Seal(s) I certi	ANALY MPOUND CPF tie hydrocarbons ** mone anated hydrocarbons * mone	PB] detected detected detected CATE OF ANA 1(s) broken laboratory	C *** * I LYTIC by: proce	OMF	POUND tection Limit CTION LIMIT , PERSONNEL des on handling and an	10 10 10 10 ate: alysis of this	

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	New Mexico Hea SCIENTIFIC LAE 700 Camino de S	BORATORY DIVISIO	nt Departme DN	ent		NERAL				
11		A 87106 — (505) 841					nuu			515
DATE RECEIVED	15 86 N	8BWC 981	USER	59300	🗆 59600 🕅 от	HER: 8	2235			
Collection DATE <u>86</u> 02 21 Collection TIME		SITE INFORM-► ATION	Sample loca	ation PH1	LLIPS LEE	PLA	WT	Co	DUN DUN	16 TOWER
1105			Collection si	ite description						
Collected by - Person/A		ESON BCD	••••••			SU	)	ORX	UER	. σF
/						Coo			Tow	
SEND FINAL SEPORT SEPORT	VM OIL CONS		9, PO Bo	675						
SAMPLING CO	NDITIONS			APR 2	8 1980	Station/ well code Owner				
Bailed	Pump Tap	Water level	OIL CL	SAN	TION DWIEION Discharge	·	Sar		pe AB	
рн (00400)	5	Conductivity (Unc	prrected) 55	µmho	Water Temp. (00010)	/ •c	; Cor	nductiv	ity at 25	°C (00094) µmho
Field comments										
			-							
SAMPLE FIELD	TREATMEN	<b>F</b> — Check prop	er boxes		· · · · · · · · · · · · · · · · · · ·					
No. of samples				Citizen et la di						
				Filtered in fi		nl H <sub>2</sub> SO,	/L ad	Ided		
submitted /		(Non-filtered)		0.45 µmem		nl H₂SO,	₄/L ad	lded		
		(Non-filtered)				nl H₂SO,	₄/L ad	lded		
submitted /	d added 🗆 C	(Non-filtered)	( <b>F</b> ; (		brane filter	ni H <sub>2</sub> SO,	₄/L ad	lded	Units	Date analyzed
submitted NA: No acid ANALYTICAL R NF, NA Conductivity (C	d added  □ C ESULTS from	(Non-filtered)	( <b>F</b> ; (	0.45 µmem	F, NA		2	lded	Units mg/l	3-6
submitted NA: No action ANALYTICAL R NF, NA	d added  □ C ESULTS from	(Non-filtered)	( <b>F</b> ; (	0.45 µmem	F, NA Calcium (00915) Magnesium (00925)		2	lded	mg/l_ mg/l_	
submitted NA: No active ANALYTICAL R NF, NA Conductivity (C 25°C (00095)	d added  C ESULTS from orrected) bie	(Non-filtered)	Units Date	0.45 µmem	F, NA		2		mg/l	3-6 ""
submitted NA: No acid ANALYTICAL R NF, NA Conductivity (C 25°C (00095) Total non-filteral residue (susper	d added  C ESULTS from orrected) bie	(Non-filtered)	Units Date	0.45 µmem	F, NA         Ø Calcium (00915)         A Calcium (00925)         A Calcium (00930)         Potassium (00935)         Bicarbonate (00440)		2 26 21.3 29.3 138		mg/l _ mg/l _ mg/l _ mg/l _ mg/l _	3-6 "" " 3/13
submitted NA: No active ANALYTICAL R NF, NA Conductivity (C 25°C (00095)	d added  C ESULTS from orrected) bie	(Non-filtered)	Units Date	0.45 μmem	F, NA         Ø Calcium (00915)         Ø Calcium (00925)         Ø Sodium (00930)         Ø Potassium (00935)         Ø Bicarbonate (00440)         Ø Chloride (00940)		2 21/3 29/3 138 436		mg/l _ mg/l _ mg/l _ mg/l _ mg/l _	3-6 " " " " " " 3/13 3//9
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submitted NA: No acid ANALYTICAL R NF, NA Conductivity (C 25°C (00095) Total non-filteral residue (susper (00530) Other:	d added  C ESULTS from orrected) bie	(Non-filtered)	Units Date	0.45 μmem	F, NA         Ø Calcium (00915)         Ø Magnesium (00925)         Ø Sodium (00930)         Ø Potassium (00935)         Ø Bicarbonate (00440)         Ø Chloride (00945)         Ø Sulfate (00945)         Ø Total filterable residue	  	2 2 1 2 1 3 1 3 8 1 3 8 1 3 8 1 3 8 1 3 8 1 3 8 1 3 8 5 0 3	?	mg/l _ mg/l _ mg/l _ mg/l _ mg/l _	3-6 "" "" "" " " " " " " " " " " " " " "
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submitted NA: No acid ANALYTICAL R NF, NA Conductivity (C 25°C (00095) Total non-filteral residue (susper (00530) Total non-filteral residue (susper (00530) Other: Other: NF, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nit total (00630) Ammonia-N tota Total Kjeldahl-N ( )	d added C ESULTS from orrected) ble nded) rate-N al (00610)	(Non-filtered)	<u>Units Date</u> <u>units Date</u> <u>units Date</u> <u>units Date</u> <u>units Date</u>	0.45 μmem	F, NA         ✓ Calcium (00915)         ✓ Magnesium (00925)         ✓ Sodium (00930)         ✓ Potassium (00935)         ✓ Bicarbonate (00440)         ✓ Chloride (00940)         ✓ Sulfate (00945)         ✓ Total filterable residue (dissolved) (70300)         ✓ Other:         ✓         F, A-H₂ SO₄         □ Nitrate-N + , Nitrate-N		2 2 1 2 1 3 1 3 8 1 3 8 1 3 8 1 3 8 1 3 8 1 3 8 1 3 8 5 0 3	?	mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ _	3-6 "" "" "" " " " " " " " " " " " " " "
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submitted NA: No acid ANALYTICAL R NF, NA Conductivity (C 25 °C (00095) Total non-filteral residue (susper (00530) Other: Other: Other: NF, A-H <sub>2</sub> SO <sub>4</sub> Nitrate-N + , Nit total (00630) Ammonia-N tota Total Kjeldahl-N () Chemical oxyge demand (00340) Total organic ca () Other: Other:	d added C ESULTS from orrected) ble nded) rate-N al (00610) on phi n ble n d d d d d d d d d d d d d	(Non-filtered)	 Units Date      	0.45 μmem	F. NA         ✓ Calcium (00915)         ✓ Magnesium (00925)         ✓ Sodium (00930)         ✓ Potassium (00935)         ✓ Bicarbonate (00440)         ✓ Chloride (00945)         ✓ Total filterable residue (dissolved) (70300)         ✓ Other:         ✓         ✓ Nitrate-N + , Nitrate-N dissolved (00631)         Ammonia-N dissolved (00608)         □ Total Kjeldahl-N (         (         ○ Other:		2 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	9 3	mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ mg/l _ _	3-6 " " " " " " " " " " " " " " " " " " "

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SLD 726 (12/84) DISTRIBUTION: WHITE - EID, GW&HW Bureau

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	SCIENTIFIC 700 Camino	Health and Environment LABORATORY DIVISION de Salud NE a, NM 87106 — (505) 841-2	PN				Meta/
DATE RECEIVED 3	15 86	NO APC 463	USER CODE 🗌 5930	o □ 59600 🖄 c	THER: 82	235	
Collection DATE RG 022)		AM SITE	Sample location PH	ILLIPS LEE	PLAN	UT COOL	ING TOWER
Collection TIME		ATION	Collection site descriptio	'n	· · · ·		
Collected by - Person/		DERSON BOD			SW	CORNE	ROF
SEND FINAL REPORT TO	NM OIL C State La	ENTAL BUREAU ONSERVATION DIV nd Office Bldg, , NM 87501 Boyer	ISION PO Box 208	8	- <u>Coo</u> r		
					Station/ well code	<u></u>	••••••••••••••••••••••••••••••••••••••
SAMPLING CO	NDITIONS				Owner	- <del></del>	
Dipped	Pump Tap	Water level		Discharge	L	Sample type	3
pH (00400)	5	Conductivity (Uncon	rrected) 5 - 4 μmho	Water Temp. (00010)		Conductivity at	25°C (00094) µmho
Field comments	<u> </u>			´	/	<u> </u>	
No. of samples submitted	id added	ENT — Check prope NF: Whole sample (Non-filtered)	Filtered in	field with mbrane filter	<del>111230</del> 4/	Ładded <i>f. n</i>	nlcon HNG.
ANALYTICAL F	RESULTS fi		Jnits Date analyze	dif. NA		Unit	s Date analyzed
Conductivity (0 25°C (00095)	Corrected)		mho	Calcium (00915)	······································	mg/	//
Total non-filtera	able			🗆 Sodium (00930)		mg/	/1
residue (suspe (00530)			ma/l	Potassium (00935)     Bicarbonate (00440)		mg/ mg/	
De Other: JCA	oschn=			Chloride (00940)		mg/ mg/	
<ul> <li>Other:</li> <li>Other:</li> </ul>				<ul> <li>Total filterable residue</li> <li>(dissolved) (70300)</li> </ul>		mg/	
NF, A-H2SO4				Other:			
Nitrate-N +, Ni total (00630)	trate-N		mg/l	F, A-H₂ SO₄			
	al (00610)		ng/l	<ul> <li>Nitrate-N + , Nitrate-I</li> <li>dissolved (00631)</li> </ul>	N	mg/	1
Total Kjeldahl-N	<b>.</b>	1	ng/l	🗆 Ammonia-N dissolve	ed		
Chemical oxyg demand (0034)	0)		mg/l	- (00608)    - Total Kjeldahl-N - ( )		mg/ mg/	· ·
Total organic ca . ( )	arbon	, r	ng/l				
Other: Other:			· ••••••••	Analyst		eported Rev	viewed by
D Other:				• 4.	3.	26 86 (	Jim askly
Laboratory remarks	S				·····	(	<u> </u>
	· · · · · ·				<u></u>		

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463 Lab Number: Date Submitted: 3/5/86 Boyer By:

Sample de: <u>Phillips Les Plant</u> Date Analyzed: <u>3/20/86</u> Reviewed By: <u>Jin Ashly</u> Date Reported: <u>3/26/85</u>

Element	ICAP VALUE(MG/L)	AA VALUE (MG/L)
Aluminum	40.1	
Barium	0.1	
Berylium	20.1	
Boron	0.2	
Cadmium	40.1	
Calcium	220.	
Chromium	<u> </u>	
Cobalt	<0.	
Copper	0.2	·
Iron	0.3	
Lead	20.1	
Magnesium	35.	
Manganese	20,05	
Molybdenum		
Nickel		
Silicon	<u>23.</u>	
Silver		
Strontium	1.9	
Tin	<u> </u>	
Vanadium	<0.	
Zinc	D.2	
Arsenic		
Selenium		
Mercury		

SCIENTIFIC ABORATORY DIVISION 700 Camino de Salud NE STATE OF NEW MEXICO Albuquerque, NM 87106 841-2570 86- 0238-C S.L.D. NO .: OR- 238-4.B DAVID-G-BOYER REPORT TO: PLEASE PRINT THE NEW MEXTCO OIL CONSERVATION DIV. DATE REC. : P.O. BOX 2088 SLD PRIORITY #: SANTA FE, NM 87504-2088 827-5812 USER CODE: |8|2|2|3|5| PHONE (S): AVIL BOUER SUBMITTER: SUBMITTER CODE: SAMPLE TYPE: WATER X, SOIL , OTHER SAMPLE TYPE CODE: COLLECTED: 86/02/21-11: 15 BY 4/2 CODE: 1111111 and Cooling Towe CODE: \_\_\_\_\_ SOURCE: + | | | | |NEAREST CITY: CODE: | | | | | | | LOCATION: -CODE: TOWNSHIP RANGE SECTION TRACTS pH= 6.5; Conductivity=/455 umho/cm at 14\_°C; Chlorine Residual=\_ Dissolved Oxygen= mg/l; Alkalinity= ; Flow Rate= Sampling Location, Methods and Remarks (i.e. odors, etc.) I certify that the statements in this block accurately reflect the results of my field analyses, observations and activities. Method of shipment to the Laboratory Hand Connell This form accompanies Septum Vials, Glass Jugs, Containers are marked as follows to indicate preservation: NP:No preservation; sample stored at room temperature.P-IceSample stored in an ice bath (not frozen).P-Na2S203; Sample preserved with Na2S203 to remove chlorine residual. I (we) certify that this sample was transferred from \_\_\_\_ to \_\_\_\_\_ at (location)\_\_\_\_\_ onʻ \_ and that the statements in this block are correct. DATE AND TIME Evidentiary Seals: Not Sealed 🗌 Seals Intact: Yes 🗌 No 🗍 Signatures (we) certify that this sample was transferred from at (location) to on and that the statements in this block are correct. ATE AND TIME Evidentiary Seals: Not Sealed Seals Intact: Yes No Signatures

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The proving and cooling in the proving and cooling unoc Wnoc 12 va .seluT ,198.. L.f..., and the subsequent consecutive Sworn and subscribed to before me, a Notary Public in and says that he is .NAT'L ADV. MGR. of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of being duly sworn declares and Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed ns court costs; that the notice, n copy of which is hereto attached, was published in ..... day H.H.M. .....,198. for the County of Bernalillo and State of New Mexico, times, the first publication being on the ... Statement to come at end of month. JUNC NOIST, 4 1986 M THOMAS J. SMITHSON AND T 0 Erindia this .......Ry... day of ..... ACCOUNT NUMBER said paper in the regular daily edition, ..... PRICE STATE OF NEW MEXICO **County of Bernalillo** Josepherenenenenenenenenenenenen NOTARY PUBLIC-NEW MEXICO St S BLASI EDJ-15 (R-2/86) Notary Bond Filled with Secretary of seccesses applications VICINE J. : <u>or</u> My Commission Explices: g OFFICIA Signaturb: Control Commission Regulations, the Eclowing proposed discharge plan has been submitted for approval to the Director of the Oil Conservation Polysion. State Land Office Building, P.O. Box 2088, Santa Fe, New Maxico 87504-2088. Telephone (505)827-5800. and the NK of ship 15 North Notice is hereby given that pur-(GW-32) Giart Refining Company SIALE UP NEW MEXICU ENERGY AND MINERALS DEPART by given that bur OUL CONSERVATION DIVISION are located Highway 40. Man <u>Cisic</u> miles east of G **Associated** a/504-2. a/504-2. a/504-2. a/201-5. a/201-Gia. Shows a submered of the s Thalional Welco, PULL I

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## PUBLIC NOTICE

## NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION HAZARDOUS WASTE SECTION P.O.Box 968 Santa Fe, New Mexico 87504

### PUBLIC NOTICE NO. 6

March 28,1986

### NOTICE OF INTENT TO TERMINATE INTERIM STATUS AND TO CLOSE THE SURFACE IMPOUNDMENT USED FOR THE DISPOSAL AND TREATMENT OF HAZARDOUS WASTE

The State of New Mexico is authorized to operate a hazardous waste management program in lieu of the Federal program for those portions of the Resource Conservation and Recovery Act (RCRA) in effect prior to the enactment of the Hazardous and Solid Waste Amendments of 1984 (HSWA). The HWSA imposes additional requirements on hazardous waste management facilities which will be administered and enforced by the U.S. Environmental Protection Agency (EPA) until the State of New Mexico receives additional authorization for these requirements. Therefore, both the EPA and the New Mexico Environmental Improvement Division (NMEID) of the State Health and Environment Department will determine whether to approve Phillip's Petroleum Lee Natural Gas Plant (Phillip's Lee Plant) request for termination of interim status and the proposed closure plan.

Under authority of the New Mexico Hazardous Waste Act (§ 74-4-1 et. seq. NMSA 1983 Repl. Pamp.) and the New Mexico Hazardous Waste Management Regulations (HWMR-2), the NMEID proposes to terminate the interim status of <u>Phillip's Lee</u> Plant, EPA I.D. Number NMD000709659, located one mile east of Buckeye, New Mexico (32° 48'N, 103° 29'W) and to approve a closure plan for the surface impoundment used for the treatment and disposal of hazardous waste at that site. Phillip's Lee Plant is involved in the production of natural gas and has conducted treatment and disposal of hazardous wastes associated with those processes.

The decision to terminate interim status is based on Phillip's Lee Plant request to withdraw its Part A application for a hazardous waste disposal and treatment permit. As a result of changes in its waste management practices, the company will no longer be subject to the requirements of HWMR-2, Section 206.C. for the disposal and treatment of hazardous wastes. Termination of interim status is to be accomplished through permit denial. The cause for this permit denial is a request by the Company and does not suggest any wrongdoing on the part of the Company.

The proposed closure plan describes the procedures to be used to demonstrate that none of the standing liquids, waste and waste residues, the liner (if any) and underlying and surrounding contaminated soil remaining are hazardous waste. If that demonstration can be made then the surface impoundment is no longer subject to the requirements of HWMR-2 as provided for in Section 206.C.6.f.(2).

Persons wishing to comment upon the proposed termination of interim status or upon the proposed closure plan, or who wish to request a public hearing, should submit, in writing, comments and requests, along with the requestor's name and

address to the New Mexico Health and Environment Department, Environmental Improvement Division, 1190 St. Francis Drive, P.O.Box 968, Santa Fe, New Mexico 87504-0968, ATTENTION: Peter H. Pache. Requests for a public hearing shall state the nature of the issues proposed to be raised in the hearing. These comments and/or requests must be received no later than May 19,1986 to be considered.

The administrative record for these decisions consist of a permit application (Part A), a "notice of intent to terminate interim status", a fact sheet, a closure plan, and related correspondence. The administrative record may be reviewed at either the EID District Office, 200 E. 5th Street, Roswell, New Mexico, or the EID Central Office, Harold Runnels Building, 1190 St. Francis Drive, Santa Fe, New Mexico.

To obtain a copy of the administrative record or any part thereof, please contact: Peter H. Pache, Program Manager

Hazardous Waste Section New Mexico Environmental Improvement Division 1190 St. Francis Drive, P.O.Box 968 Santa Fe, New Mexico 87504-0968 (505) 827-2924

All written comments submitted on the proposed termination of interim status and/or the proposed closure plan will be considered in formulating a final decision. The EID will notify Phillip's Lee Plant and each person who submitted a written comment during the public comment period of the final decisions or of any public hearing which may be scheduled.

If, after consideration of all written comments, these proposed actions become EID's final decisions, EID will issue to Phillip's Lee Plant a Notice of Termination, immediately terminating the interim status of the Company's facility. The Notice of Termination will require that the Company's closure activities be performed in conformity with applicable State law, as well as within the terms of the Company's closure plan.

## FACT SHEET

# Intent to Terminate Interim Status and to Close Under the New Mexico Hazardous Waste Act

<u>Activity</u>: Termination of Phillips Petroleum Company's Lee Natural Gas Plant Interim Status and closure of it's surface impoundment.

Facility Name: Lee Natural Gas Plant

EPA I.D. Number: NMD000709659

Location: The plant is located approximately seven miles East and ten miles South of Lovington, New Mexico

Landowner: Phillips Petroleum Company

Facility Operator: Phillips Petroleum Company

#### Comment Period:

Any person, including the applicant, who wishes to comment on the tentative decisions to terminate the facility's interim status and to approve the proposed closure plan may do so by submitting written comments to the New Mexico Environmental Improvement Division (NMEID), Harold Runnels Building, 1190 St. Francis Drive, P. O. Box 968, Santa Fe, New Mexico 87504-0968, ATTENTION: Peter H. Pache, (505) 827-2924. All such comments must be received by May 19, 1986 to be considered. Note that the termination of interim status is achieved through permit denial, as required by EID regulations; however, no wrongdoing on the part of the facility is to be inferred.

### Procedures for Requesting a Hearing:

Any person, including the applicant, who wishes to request a public hearing concerning the proposed actions may do so by submitting a written request to the New Mexico Environmental Improvement Division (NMEID), P. O. Box 968, Harold Runnels Building, 1190 St. Francis Drive, Santa Fe, New Mexico, 87504-0968, ATTENTION: Peter H. Pache. Any request for a hearing shall be submitted in writing and shall state the nature of the issues proposed to be raised in the hearing. All requests must include the requestor's name and address. Requests for a hearing must be received by April 30, 1986 to be considered.

#### Interim Status Activities:

Since November 19, 1980, Phillips Petroleum Company's Lee Natural Gas Plant has been operating under interim status (defined in N.M. Hazardous Waste Management Regulations) as a hazardous waste disposal facility. Primary industrial activities conducted at the facility include processing raw natural gas for liquid hydrocarbon recovery and processing acid gas for recovery of elemental sulfur. These activities require use of a cooling tower; chemicals containing chromium, a corrosion inhibitor and characteristic toxic waste, were used in the cooling tower until October 4, 1983. On October 4, 1983, the use of chromium at the facility was discontinued. All wastes have been disposed of in an unlined surface impoundment on site.

### <u>Reasons Supporting Decision to Terminate Interim Status:</u>

On August 3, 1984, Phillips Petroleum Company submitted a revised closure and post-closure plan for the Lee Natural Gas Plant surface impoundment which was used for disposal of cooling tower blowdown water containing chromium. In the closure plan Phillips states that the use of chromium contained in cooling tower blowdown water has been discontinued and requests that the interim status authorization to operate be withdrawn. NMEID's review of the closure and post closure plan indicated that the company's request to withdraw interim status and retain their EPA I.D. Number was justified. Therefore NMEID is hereby formally proposing to terminate Lee Natural Gas Plant's Interim Status by denying a permit.

#### Closure of the Facility:

The facility is currently operating under interim status. If this tentative decision becomes the final administrative disposition of the permit application, interim status will terminate and closure will begin immediately. Phillip's Lee Natural Gas Plant closure plan has been previously submitted and reviewed by NMEID. A copy is available for public review at the NMEID Central Office, Harold Runnels Building, 1190 St. Francis Drive, Santa Fe, New Mexico and the NMEID District IV Office at 200 East Fifth Street, Roswell, New Mexico. The public notice and this fact sheet include the proposed approval of the closure plan for this facility's surface impoundment. The public is provided an opportunity to submit written comments on the plan, or request a public hearing as previously described elsewhere in this fact sheet. The owner/operator must implement the approved closure plan in accordance with its stipulated time schedule.

If the groundwater has been or will be impacted by a release of hazardous constituents from the surface impoundment, closure of the impoundment shall not relieve Phillips Petroleum Company of remedial liability.

#### **Final Decisions:**

All written comments submitted on the proposed termination of interim status and/or the proposed closure plan will be considered in formulating a final decision. The NMEID will notify Phillips Petroleum Company and each person who submitted a written comment during the public comment period of the final decisions made, or of any public hearing which may be scheduled.

### NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY AND MINERALS DEPARIMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval 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-2) Phillips 66 Natural Gas Company, Lee (Buckeye) Plant, J. E. Jennings, Agent, 4001 Penbrook, Odessa, Texas 79762, proposes to renew the previously approved discharge plan at its facility located in the SW/4 SE/4 of Section 30, Township 17 South, Range 35 East (NMPM), Lea County, New Mexico. Approximately 57,000 gallons per day of process, boiler and cooling tower waste water with a total dissolved solids content of approximately 5300 mg/l will be discharged to holding tanks. The discharge water will then be pumped to Rice Engineering for final disposal via OCD-approved deep well injection. Ground water most likely to be affected by any discharge at the surface is at a depth of about 85 feet and has a total dissolved solid concentration of approximately 600 mg/l.

(GW-3) Texaco Producing Inc., Eunice No. 1 Gas Processing Plant (formerly Getty Eunice No. 1), J. Anderson, Manager, Natural Gas Plants Division, P. O. Box 1650, Tulsa, Oklahoma, 74102, proposes to renew the previously approved discharge plan at its facility located in the NW/4 SW/4 of Section 27, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 91,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved solids content of approximately 7000 mg/l will be discharged to a lined pond for storage prior to final disposal via OCD-approved deep well injection at site. Other lined pits hold brine water for LPG storage well use. The ground water most likely to be affected from any discharge at the surface is at a depth of about 65 feet and has a total dissolved solids concentration of approximately 1700 mg/l.

(GW-4) Texaco Producing Inc., Eunice No. 2 Gas Processing Plant (formerly Getty Eunice No. 2), J. Anderson, Manager, Natural Gas Plants Division, P. O. Box 1650, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4 SE/4 of Section 28, Township 21 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 24,300 gallons per day of process, boiler, and cooling tower water, with a total dissolved content of approximately 7100 mg/l will be discharged to a pipeline operated by Aqua Incorporated for final disposal via OCD-approved deep well injection. The ground water most likely to be affected from any discharge at the surface is at a depth of about 70 feet and has a total dissolved solids concentration ranging from 1200 to 2600 mg/l.

(GW-5) Warren Petroleum Company, Eunice Gas Processing Plant, L. T. Reed, Director, Environmental Affairs, P. O. Box 1589, Tulsa, Oklahoma 74102, proposes to renew the previously approved discharge plan at its facility located in the NE/4 of Section 3, Township 22 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 45,000 gallons per day of process, boiler, and cooling tower water, with a total dissolved solids content of approximately 3600 mg/l will be discharged to metal holding tanks for storage prior to final disposal via OCD-approved deep well injection at the sites. The ground water most likely to be affected from any discharge at the surface is at a depth of about 90 feet and has a total dissolved solids concentration ranging from about 400 to 2000 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 of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by an 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 the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of March, 1986. To be published on or before March 31, 1986.

> STATE OF NEW MEXICO OIL CONSERVATION DIVISION

Luni R. L. STAMETS

Director

SEAL

50 YEARS

STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION



GOVERNOR

March 17, 1986

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87501 (505) 827-5800

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. J. E. Jennings Agent, Permian Basin Region Phillips 66 Natural Gas Co. 4001 Penbrook Odessa, Texas 79762

RE: DISCHARGE PLAN GW-2 PHILLIPS LEE GAS PLANT

Dear Mr. Jennings:

We have received your letter dated March 12, 1986, requesting an extension until June 1, 1986 to operate without an approved discharge plan. Original discharge plan approval expired March 16, 1986. Your renewal application is dated February 20, 1986. The extension is requested to allow your engineering section to evaluate and submit system revisions to correct problem areas discovered during an OCD plant inspection on February 21, 1986. It is our understanding a completion timetable and drain system plans will be forwarded to the OCD office by April 15, 1986.

Pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations and for good cause shown, Phillips is hereby granted an extension and approval until June 1, 1986, or until discharge plan approval, whichever is earlier, to discharge without an approved discharge plan. This extension is granted to allow completion of engineering study by Phillips, completion of the discharge plan review by the OCD, exchange of comments and submittal of clarifying information, if needed. Also, public notice will be issued, and if a public hearing is needed on the proposed discharge plan, an additional extension will be granted consistent with the timeframe of any public hearing.



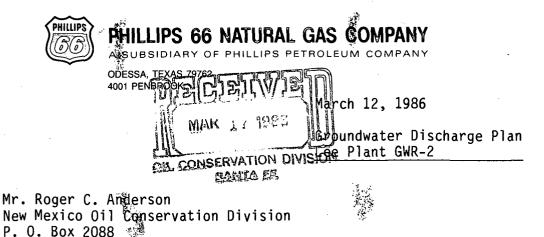
Mr. J. E. Jennings March 17, 1986 Page 2

If you have any questions or comments, please feel free to contact Roger Anderson at (505) 827-5885 or Dave Boyer at (505) 827-5812.

Sincerely alli Ř. L. STAMETS Director

RLS:RCA:dp

cc: Dave Boyer OCD, Hobbs Mike Ford, Phillips



Santa Fe, New Mexico 87501

Dear Mr. Anderson:

Phillips recently received your letter of February 26, 1986 detailing the problem areas noted in your inspection of Lee Plant. The inspection was performed as part of the discharge plan renewal process. The current discharge plan is scheduled to expire on March 16, 1986.

We are hereby requesting an extension until June 1, 1986 to operate without an approved discharge plan. Our engineering section is currently evaluating drain system revisions we can put in place to correct the problem areas. A completion timetable along with the drain system plans will be forwarded by April 15, 1986 so you may continue the review process.

Questions regarding this request should be directed to Mike Ford of this office at (915) 367-1316.

Very truly yours,

E. Jennings

Agent, Permian Basin Region

JEJ:MDF:ggp



MEMORANDUM OF MEETING OR CONVERSATION

Time Date 3/11/86 Telephone JPM Personal Originating Party Other Parties Dave Boyer - OCS mike for <u> しっしろ</u> Subject enewal Buckeye Discharge 4Lon leps etroleum Discussion 6. Engineering stahl will ores correct meetion done. **E**s qd request to have a Few wee The need uner i Nese and Aubmittim Table To correct mo Conclusions or Agreements Ford will send request For a l'completeil until une 1 To get renews on approval Son a eten ommen Distribution Phillips Buckeye Sile Signed HIX Royg

50 YEARS



STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION



GOVERNOR

February 26, 1986

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE. NEW MEXICO 87501 (505) 827-5800

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

Mr. M. D. Ford Phillips 66 Natural Gas Co. 4001 Penbrook Odessa, Texas 79762

> Re: Discharge Plan for Phillips Lee Gas Plant GWR-2

Dear Mr. Ford:

The OCD has received your application for renewal of the discharge plan for the above-referenced plant and is currently reviewing it. A plant inspection was conducted on February 21, 1986, by David Boyer, OCD Environmental Bureau Chief, and myself, As a result of this inspection, a number of areas of concern were viewed and a commitment from Phillips Petroleum with a completion timetable to correct or eliminate these areas is required to continue the review process. The areas requiring correcting are listed below:

- 1) The jacket water pump for the Cooper engine room needs to be repaired, replaced, or eliminated through a modification of the cooling system. This pump is leaking badly at this time and the leakage is not contained.
- 2) The ground area under the piping system south of and along the Clark and Cooper engine rooms shows evidence of piping leakage and rinsing of the engine room floor onto the ground. This area requires cleanup and installation of a containment system under the piping to collect any future leaks.
- 3) The oil on the surface area between the El Paso Booster yard and the Amine treating unit indicates either the oil separator or the steel pump (#19 & #20 your Attachment #1) have recently overflowed. This spill required cleanup and installation of emergency storage and/or an emergency alarm system to prevent future spills.

Mr. M. D. Ford February 26, 1986 Page 2

> 4) The slop oil tanks (#31 your Attachment #1) have overflowed into the containment area. It was reported that 1300 Bbls of crude was received in your inlet gas and your slop oil storage was not adequate to handle those volumes. The containment area should be cleaned and, since the volumes of crude oil received with inlet gas is not controllable by Phillips, measures should be taken to increase the slop oil storage capacity.

The OCD is presently reviewing discharge plan renewals carefully and the review time can extend for several months. Phillips Petroleum's commitment to correct the above items with a reasonable timetable for completion can expedite this system.

If you have any questions, please do not hesitate to contact Dave Boyer or myself at (505) 827-5885.

Sincerely,

net

ROGER C. ANDERSON Environmental Engineer

RCA:dp

cc: R. L. Stamets Dave Boyer OCD - Hobbs

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PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK

February 20, 1986

Groundwater Discharge Plan Lee Plant, GWR-2

Mr. David Boyer 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 Lee Plant, Lea County, New Mexico. The current Groundwater Discharge Plan is scheduled to expire on March 16, 1986. The wastewater disposal system has not been changed from what was approved in the original discharge plan.

Questions regarding this information should be directed to Mike Ford of this office at (915) 367-1316.

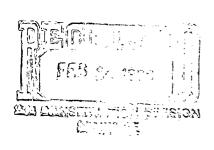
Very truly yours,

J. E. Jennings

Agent, Permian Basin Region

JEJ:MDF:ggp

Attachments



### DISCHARGE PLAN PHILLIPS 66 NATURAL GAS COMPANY LEE GASOLINE PLANT SECTION 30, TOWNSHIP 17 SOUTH, RANGE 35 EAST, LEA COUNTY

#### I. GENERAL PROCESS DESCRIPTION

Lee Plant's basic function is to remove the ethane and heavier hydrocarbon fractions from casinghead and gas well gas. The plant receives sour hydrocarbon gas streams from 5 and 250 psig gathering systems. The gas from the 5 psig system is compressed to 250 psig so that the total gas stream entering the plant's amine contactor (first stage of processing) is at 250 psig. The amine contactor uses monoethanolamine to remove the hydrogen sulfide and carbon dioxide from the inlet gas stream. The hydrogen sulfide and carbon dioxide removed in the sweetening process is sent to the plant's sulfur recovery unit. The sweet gas from the amine contactor is split into two streams. One stream is sent to our processing plant located near Eunice, New Mexico. The second stream is compressed from 250 to 750 psig and is then routed to a molecular sieve dehydrator where the gas is dehydrated to a water content of less than 1 ppmv. From the dehydrator the gas stream flows to a turboexpander plant where it is cooled by propane refrigeration and expansion to a temperature of approximately  $-140^{\circ}F$ .

The turboexpander plant produces two hydrocarbon streams, the first being a liquid hydrocarbon stream comprised of approximately 85 percent 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 500 psig and is sent to a 10' I.D.  $\times$  108' S/S, 550 psig MWP vessel for temporary storage before being delivered to a pipeline for sale. The second hydrocarbon stream produced from the turboexpander is comprised primarily of methane gas. This gas is compressed to 750 psig before being sold to El Paso Natural Gas Company.

Attachments 1 and 2 are a plot plan and process flow sheet of the plant.

#### II. PLANT WATER SYSTEMS

A. Raw Water

Lee Plant receives its water from a total of three wells located in Sections 30 and 31, Township 17 South, Range 35 East, Lea County. The wells are completed at a depth of approximately 230 feet and supply an average of 1770 bbl/day of water to the plant. Attachment 3 is an analysis of this water.

B. Potable Water

A small fraction of the raw water is chlorinated and used as potable water for the plant's office and control room.

#### C. Cooling Tower System

The cooling tower system is comprised of three open recirculating cooling towers referred to as the booster, engine, and plant cooling towers. The booster cooling tower, smallest of the three, has a recirculation rate of 1080 gpm with an approximate raw water make-up rate of 19 gpm. The engine cooling tower has a recirculation rate of 1860 gpm with an approximate raw water make-up rate of 28 gpm. The plant cooling tower, largest of the three, has a recirculation rate of 3500 gpm with an approximate raw water make-up rate of 63 gpm. The plant cooling towers is recirculated until the impurities in the water are concentrated to five times their inlet concentrations, producing approximately 900 bbl/day of wastewater. This wastewater is piped directly to the plant's wastewater holding tanks. The following chemicals, with their specific feed rates, are being added to the cooling tower waters for scale, corrosion, and biological treatment:

Chemical	Feed Rate (gal/day)
Betz 2020	3.87
Betz 20K	2.89
Inhibitor 562 C	1.00
Betz 409	.3
Slimicide C-30	.42
Slimicide J-12	.08

Material safety data sheets for these chemicals are found in Attachment 4.

D. Boiler Water System

The boiler water system is comprised of a zeolite water softener, four boilers (two process and two waste heat boilers in the sulfur plant) which produce 250 psig steam, and three sulfur plant condensers which produce 50 psig steam used in the various plant processes. The raw make-up water to this system passes through the zeolite softener which removes calcium and magnesium in the make-up water. The treated water from the softener flows to a holding tank before being pumped into the boilers and sulfur plant condensers. All condensate produced from the use of the 50 and 250 psig steam is returned to the boiler feed-water tank for reuse. Approximately 450 bbl/day of boiler blowdown wastewater is produced and piped directly to the plant's wastewater holding tanks. The following chemicals, with their specific feed rates, are being added to the boiler waters for scale and corrosion treatment:

)

Chemical	Feed Rate (gal/day)
Balance Plymer 6400	.3
Corrogen	Dry Powder
Magni - Form 305	1.2
Liquimine VI	2.3
Ferrosperse	1.0

Material safety data sheets for these chemicals are found in Attachment 5.

#### E. Engine Cooling Systems

A mixture of Betz Corr-Shield 736, a molybdate based compound (Attachment 5A), and water is used as coolant in the jacket water systems of all engines at the plant. The plant has five engine rooms referred to as the Clark, Cooper, Refrigeration, Residue, and El Paso engine rooms. The Clark and Cooper engine rooms have their own jacket water pumps, storage tanks, and air fin coolers. The jacket water storage tank for the Clark engine room is an above ground horizontal vessel constructed of steel (#1, Attachment 1). The storage tank for the Cooper engine room consists of a below ground sump constructed of concrete (#5, Attachment 1). Engines in the remaining engine rooms have individual, self-contained cooling systems.

Coolant from engines in the Clark and Cooper engine rooms 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. Coolant in engines equipped with self-contained cooling systems is drained into barrels before an engine is worked on. Coolant is placed back in the engine when the work is completed.

#### III. PLANT DRAIN SYSTEMS

A. Engine Oil Drain Systems

Lube oil in all of the plant engines is changed by draining the "spent" oil charge from an engine into barrels and then replacing with a "fresh" charge of lube oil. The spent lube oil is transferred into an above ground lube oil sump (#3, Attachment 1) and is then pressured to the plant's slop oil storage tanks.

Atmospheric drains, designed to catch leaking oil from the engines, are in place around the plant's engine rooms. Drains from the Clark, Cooper, and Residue engine rooms flow to the below ground engine drain sump (#2, Attachment 1) constructed of externally coated steel. Liquids from the sump are pumped into the low pressure scrubber drain system. Drains from the Residue and El Paso engine rooms are tied into the plant's open drain system. Attachment 6 is a process flowsheet of this system.

B. Closed (High Pressure) Drain System

The closed drain system is a pressure drain system constructed of buried, externally coated, schedule 40 steel pipe. The drain system is tied into an above ground separator (#8, Attachment 1) where liquids with low specific gravities vapor off. Vapors from the separator are burned in the plant flare. Liquids which do not vapor off in the separator flow into the open drain system. Attachment 6 is a process flow sheet of this system.



#### C. Cold Drain System

The cold drain system is an atmospheric drain system constructed of buried, stainless steel pipe connected to an above ground cold drain vaporizing tank (#7, Attachment 1). Drain liquids from the turboexpander (cold plant) flow to the vaporizing tank where they are heated. Vapors produced from heating the drain liquids in the tank are burned in the plant flare. Liquids which do not vapor off flow into the open drain system. Attachment 6 is a process flow sheet of this system.

D. Low Pressure Scrubber Drain System

The low pressure scrubber drain system receives waste liquids from the plant's low pressure (5 psig) inlet gas scrubbers. The drain lines are constructed of buried, externally coated, schedule 40 steel pipe. The waste liquids are piped to an above ground "gun barrel" (#30, Attachment 1) where oil and water are separated. Oil from the "gun barrel" flows directly to the plant's slop oil storage tanks. Water from the "gun barrel is piped directly to the open drain system's oil/water separator. Attachment 6 is a process flow sheet of this system.

E. 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, internally coated steel oil/water separator (#19, Attachment 1). Oil from the separator flows into a below grade steel sump (#20, Attachment 1) from which it is pumped to the plant's slop oil storage tanks. Water from the separator flows into a second below grade steel sump (#21, Attachment 1) and is then pumped to the plant's wastewater holding tanks. Attachment 6 is a process flow sheet of this system.

F. Final Wastewater Disposal System

Wastewater from the open drain oil/water separator, boiler blowdown, and cooling tower blowdown enter the #1 wastewater tank where they are commingled. Any solids in the wastewater will settle out in this tank. Wastewater from the #1 tank then overflows into the #2 tank where it is treated with acid to maintain a pH of 6.0 to 6.5. Wastewater from the #2 tank flows through a sock filter, used to remove any remaining solid particles, into the final wastewater tank. Wastewater in the final tank is treated with Visco 950 (Attachment 7) for scale inhibition before it gravity feeds into Rice Engineering's flow line. The wastewater is disposed of in Rice Engineering's Vacuum Salt Water Disposal System (Class II injection well). Attachment 7A is a detailed chemical analysis of the final wastewater stream.

All three of the wastewater tanks are 750 barrel capacity and have been internally coated. If a leak or failure is detected, the system will be shut in and the wastewater trucked to a nearby permitted disposal facility.

#### IV. SOLID WASTE DISPOSAL

A. General Waste

The small amount of solid waste generated at the plant is handled in one of two ways. The spent paper products (ie., paper towels, sacks, etc.) are burned in a safe manner at the plant. The non-combustible items (ie., pieces of pipe, concrete, etc.) are disposed of in an adjacent landfill owned by Texaco's Buckeye Plant.

B. Spent Molecular Sieve

Approximately every 3 to 4 years the molecular sieve dehydrators at the plant are recharged. The spent molecular sieve (Attachment 8) is disposed of in the adjacent landfill owned by Texaco. Approximately 28,000 pounds of this material are disposed of each time the beds are recharged.

C. Spent Sulfur Catalyst

Approximately once every five years the catalyst in the sulfur recovery unit converter beds are recharged. The spent catalyst (Attachment 9) is disposed of in the adjacent landfill owned by Texaco. Approximately 29,000 pounds of this material are disposed of each time the beds are recharged.

#### V. SPILL/LEAK PREVENTION AND HOUSEKEEPING PROCEDURES

The plant's underground vessels and piping are visually inspected and/or pressure tested prior to being put in service. The vessels and lines are externally and/or internally coated to ensure against corrosion. This equipment is checked continuously by operators who are on duty 24 hours per day. Any leaks would be detected by the operators and corrected. Operators are required to notify the plant superintendent of any leak. If the leak is significant, the plant superintendent will notify the Oil Conservation Division in accordance with Rule 116.

#### VI. MISCELLANEOUS INFORMATION

A. Sanitary Wastes

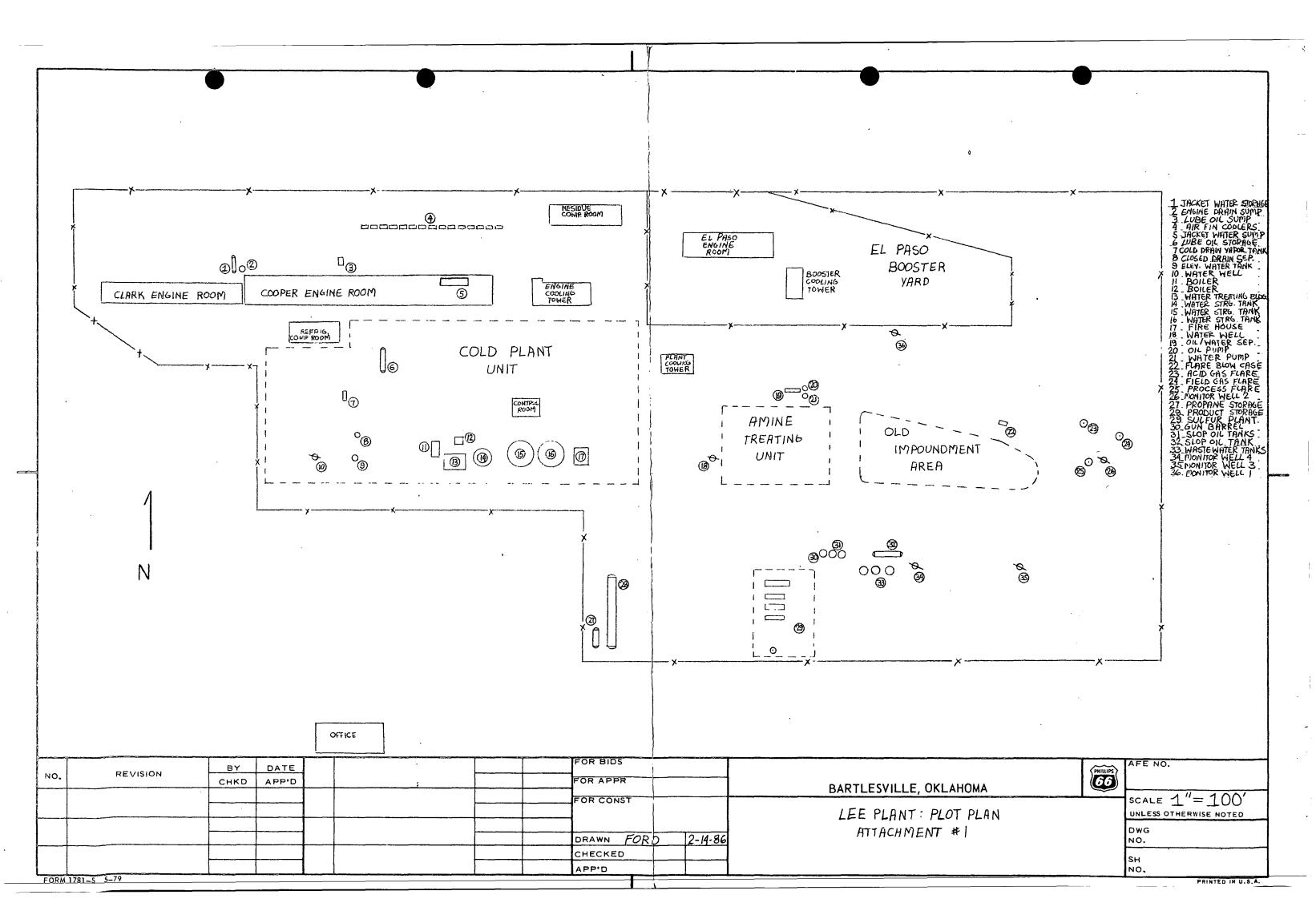
Sanitary wastes from the plant and office are handled by a septic tank and leach field.

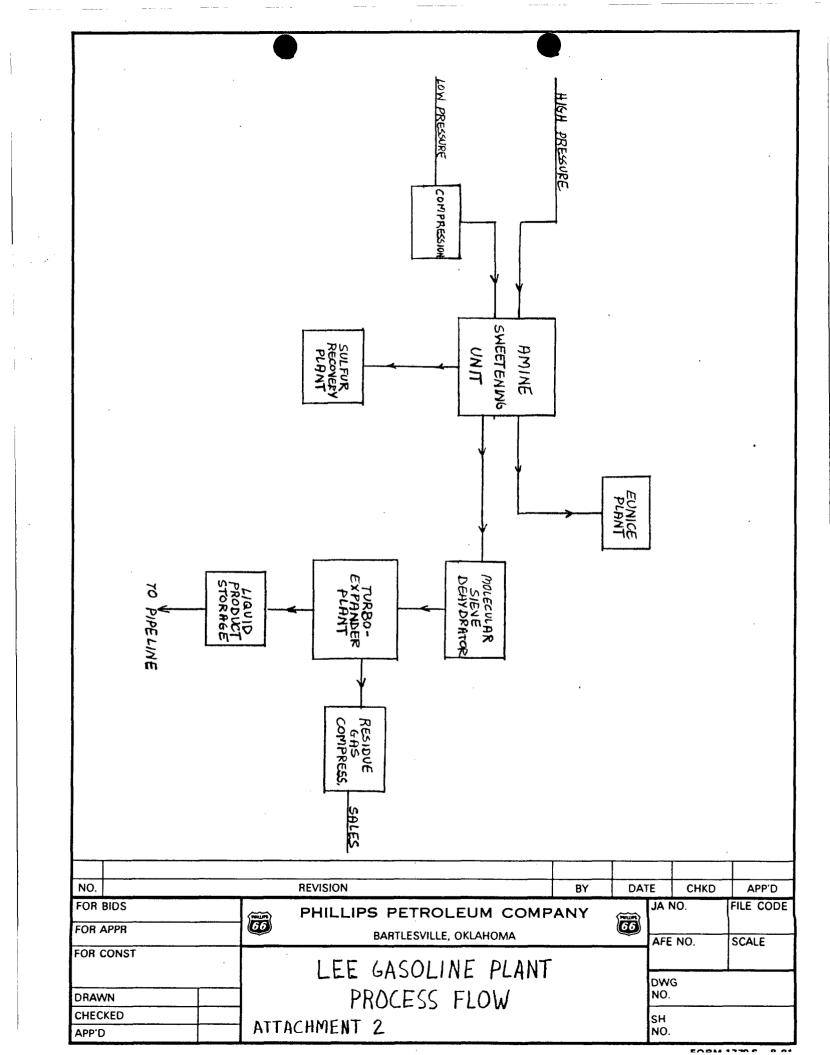
B. Plant Topography

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





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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. <u>C-1950-W</u> Customer No. 3355796 Report No. <u>35059</u>

Report Date \_\_\_\_<u>1 - 2 4 - 8 4</u>\_\_\_\_

Date Received 1-10-84

Report of tests on: Water

Phillips Petroleum

Identification:

Client:

Lee Plant, Raw Water

mg/L Aluminum-----Less Than 2 ----Less Than · 0.05 Arsenic-----Barium-----Less Than 1 Boron-----Less Than 0.1 Cadmium------Less Than 0.01 Chromium-----Less Than 0.05 Cobalt-----Less Than 0.1 ----Less Than Copper----0.1 Iron-----Less Than 0.2 Lead-----Less Than 0.05 -----Less Than 0.05 Manganese----------Less Than 0.002 Mercury---Molybdenum-----Less Than 1 -----Less Than Nickel-----0.5 Selenium-----Less Than 0.01 Silver-----Less Than 0.05 Zinc-----Less Than 0.05 Sulfate------33 Chloride------156 Fluoride------0.6 13.3 Nitrate-----Cyanide-----Less Than 0.001 Phenols-------Less Than 0.001

Total Dissolved Solids @ 180° C----- 592

Technician: KLH, PCB, GMB

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

SOUTHWESTERN LABORATORIES

Our letters and reports are for the exclusive use of the client to whom they are addressed. The use of our name must receive our prior written approval. Our letters and reports apply only to the sample tested and/or inspected, and are not necessarily indicative of the quantities of apparently identical or similar products.

ATTACHMENT 4



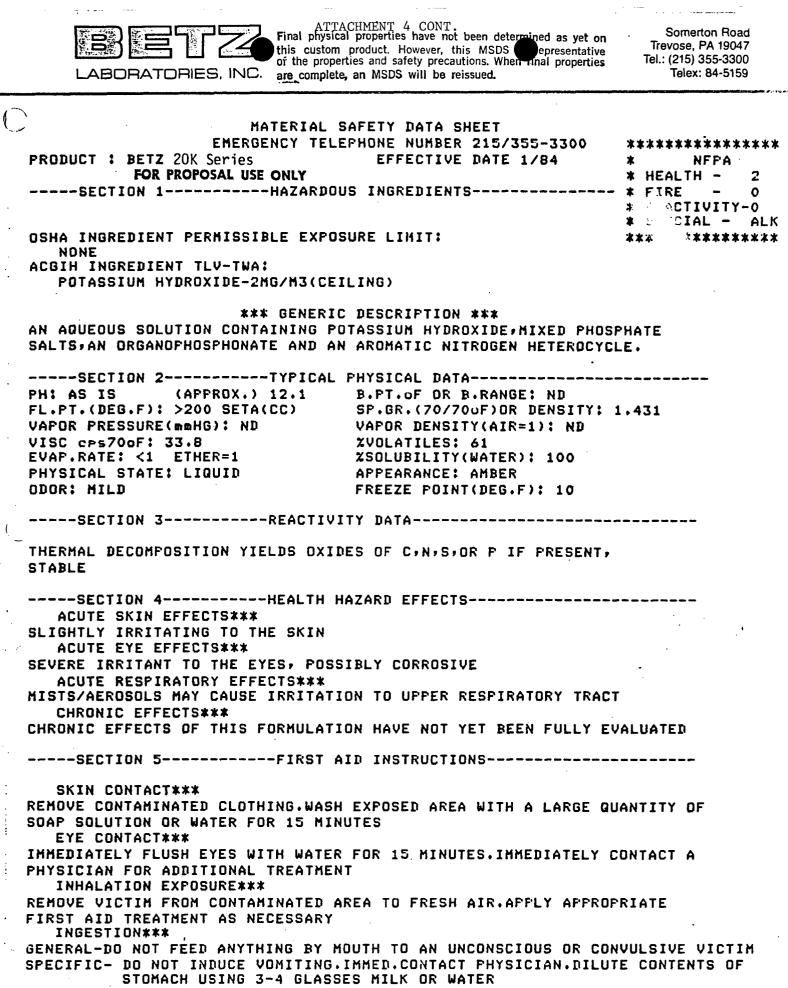
1

Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

	SAFETY DATA SHEET .EPHONE NUMBER 215/355-3300 EFFECTIVE DATE 1/84	* NFPA
HAZARDO		* HEALTH - 1 - * FIRE - 0 * REMOTIVITY-0 * SPECTAL
OSHA INGREDIENT PERMISSIBLE EXPO None	SURE LIMIT:	*******
ACGIH INGREDIENT TLV-TWA: None		
*** GENERI An Aqueous Solution of an Acryla	C DESCRIPTION *** TE COPOLYMER.	
SECTION 2TYPICAL		
FH: AS IS (AFFROX.) 5.3		
FL.PT.(DEG.F): >200 SETA(CC)		1.125
VAPOR PRESSURE(mmHG): 20 VISC cps70of: 19.5 EVAP.RATE: <1 ETHER=1	VAPOR DENSITY(AIR=1); <1	
V15C CP5700F: 19.5 Enab Date: 21 Ether-1	ZVULATILES; NU Veniuritity/NATER	
PHYSICAL STATE: LIQUID	APPEARANCE! COLORIESS TO RE	
ODOR: MILD	FREEZE POINT(DEG.F): <-27	
REACTION 3REACTIV		
THERMAL DECOMPOSITION YIELDS OXI Stable	DES OF C,N,S,OR F IF PRESENT,	
HEALTH	HAZARD EFFECTS	
ACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN		
ACUTE EYE EFFECTS***		
SLIGHTLY IRRITATING TO THE EYES		
ACUTE RESPIRATORY EFFECTS***		
MISTS/AEROSOLS CAUSE IRRITATION CHRONIC EFFECTS***	TO UPPER RESPIRATORY TRACT	
CHRONIC EFFECTS OF THIS FORMULAT	ION HAVE NOT YET BEEN FULLY E	VALUATED
FIRST SFIRST	AID INSTRUCTIONS	
SKIN CONTACT***		
REMOVE CONTAMINATED CLOTHING.WAS	SH EXPOSED AREA WITH A LARGE G	WANTITY OF
SOAP SOLUTION OR WATER FOR 15 MI EYE CONTACT***	NUTES	
IMMEDIATELY FLUSH EYES WITH WATE Physician for additional treatme		CONTACT A
INHALATION EXPOSURE***		
REMOVE VICTIM FROM CONTAMINATED		JFRIATE ·
FIRST AID TREATMENT AS NECESSARY INGESTION***		
GENERAL-DO NOT FEED ANYTHING BY	MOUTH TO AN UNCONSCIOUS OF CO	NVULSIVE VICTIM
SPECIFIC- DILUTE CONTENTS OF STO		
METHODS.IMMEDIATELY CO		
COR 228A 8201		OV Errated in U.S.A

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-----SECTION 6------ SPILL, DISFOSAL AND FIRE INTRUCTIONS------GENERAL-VENTILATE AREA, USE SPECIFIED FROTECTIVE EQUIPMENT, CONTAIN AND ABSORB ON ABSORBENT MATERIAL.FLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL, OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SPREAD SAND OR GRIT. DISFOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NEDES FERMIT FRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE FRESSURE 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 ----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 VAFOR AND DUST/MIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SPLASH PROOF CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING FRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMENIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- NORMAL CHEMICAL HANDLING ----SECTION 9-----FEDERAL REGULATIONS------FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. CWA(40CFR)REPORTABLE QUANTITY: AS IS FRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR); IF DISCARDED, THIS MATERIAL BEARS HWI# NOT AFFLICABLE DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED HEAT AND FOULTRY PLANTS- AUTHORIZATION: SEC.G5,G7 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED, TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR



OVER

----SECTION 6------SPILL, DISPOSAL AND FIRE INSTRUCTIONS-----SPILL INSTRUCTIONS\*XXX ENERAL-VENTILATE AREA, USE CIFIED PROTECTIVE EQUIPMENT.CONTAIN IND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. 'HE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL, OR ANY CONTAMINATED OIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS. FECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SD, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* JENERAL-WATER CONTAMINATED WITH THIS FRODUCT MAY BE SENT TO A SANITARY BEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR ISCHARGED UNDER A NPDES PERMIT 'RODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* ENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED REATHING APPARATUS(FULL FACE-FIECE TYPE). IRY CHEMICAL, CARBON DIDXIDE, FOAN OR WATER ----SECTION 7-----SPECIAL PROTECTIVE EQUIPMENT------VENTILATION PROTECTION\*\*\* DEQUATE VENTILATION TO MAINTAIN AIR CONTAMINANTS BELOW EXPOSURE LIMITS RECOMMENDED RESPIRATORY PROTECTION\*\*\* F VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY. ISE A RESPIRATOR WITH DUST/MIST/FUME CARTRIDGES **RECOMMENDED SKIN PROTECTION\*\*\*** UBBER GLOVES EFLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* PLASH PROOF CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* ENERAL-KEEP CONTAINER CLOSED PECIFIC- PROTECT FROM FREEZING HANDLING INSTRUCTIONS\*\*\* ENERAL-INMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE PECIFIC- ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL. IFRA(40CFR): EPA REG.NO. NOT APPLICABLE SHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH PPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS, OTHERWISE, USE SUPPLIED IR APPARATUS. WA(40CFR)REPORTABLE QUANTITY: AS IS FRODUCT (HAZARDOUS SUBSTANCE) 1901GAL (POTASSIUM HYDROXIDE) CRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D002 OT(49CFR)CLASSIFICATION: NOT APPLICABLE SDA FEDERALLY INSPECTED MEAT AND FOULTRY FLANTS- AUTHORIZATION: NONE HIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND ECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE ATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO ND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. · HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDINATOR



ATTACHMENT 4 CONT. Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

4		
١	MATERIAL SAFETY DATA SHEET Emergency telephone number 215/355-3300 Froduct : Inhibitor 562C Effective date 1/84	
	SECTION 1HAZARDOUS INGREDIENTS	* FIRE - 0 * REACTIVITY-0
	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: Sodium Hydroxide-2mg/m3 Acgih Ingredient TLV-TWA: Sodium Hydroxide-2mg/m3(ceiling)	* SPECIAL - ALK *******
	*** GENERIC DESCRIPTION *** AN AQUEOUS MIXTURE OF AN AROMATIC NITROGEN HETEROCYCLE AND SO	DIUM HYDROXIDE.
	SECTION 2TYPICAL PHYSICAL BATA PH: AS IS (APPROX.) 12.8 B.PT.oF OR B.RANGE: ND FL.PT.(DEG.F): >200 SETA(CC) SP.GR.(70/700F)OR DENSITY: VAFOR PRESSURE(mmHG): ND VAFOR DENSITY(AIR=1): ND VISC CPS700F: 3.6 ZVOLATILES: ND EVAF.RATE: ND WATER=1 ZSOLUBILITY(WATER): 100 PHYSICAL STATE: LIGUID APPEARANCE: LIGHT AMBER ODOR: NONE FREEZE POINT(DEG.F): 13	
۱	SECTION 3REACTIVITY DATA	•
	THERMAL DECOMPOSITION YIELDS OXIDES OF C,N,S,OR F IF FRESENT, STABLE	
	SECTION 4HEALTH HAZARD EFFECTS ACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS*** MODERATELY IRRITATING TO THE EYES ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT CHRONIC EFFECTS*** CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY EV	
	SECTION 5FIRST AID INSTRUCTIONS	
·	SKIN CONTACT*** REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QU SOAP SOLUTION OR WATER FOR 15 MINUTES EYE CONTACT*** IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY OF PHYSICIAN FOR ADDITIONAL TREATMENT INHALATION EXPOSURE*** REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROF FIRST AID TREATMENT AS NECESSARY INGESTION*** JENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR COM SPECIFIC- DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUT	CONTACT A PRIATE NVULSIVE VICTIM
	STONACH USING 3-4 GLASSES MILK OR WATER	OVER

1

-----SECTION 6------ FILL, DISFOSAL AND FIRE IN CUCTIONS------GENERAL-VENTILATE AREA, USE SPECIFIED FROTECTIVE 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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY. SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NFDES FERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-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 -----SECTION 7-----SPECIAL PROTECTIVE EQUIPHENT------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/HIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* GAUNTLET TYPE RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SFLASH PROOF CHEMICAL GOGGLES, FACE SHIELD -----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- 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------FIFRA(40CFR): EPA REG.ND. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR AFFARATUS. CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) 9,321GAL (SODIUM HYDROXIDE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL REARS HWI# D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND FOULTRY PLANTS- AUTHORIZATION: SEC.G5,G7 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM.WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR



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ATTACHMENT 4 CONT. Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

MATERIAL SAFETY NATA SHEFT	
EMERGENCY TELEFHONE NUMBER 215/355-3300 FRODUCT : BETZ 409 EFFECTIVE DATE 1/84	* NFFA
SECTION 1HAZARDOUS INGREDIENTS	* HEALTH - 2 * FIRE - 0 * REACTIVITY-0
OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: Sodium Hydroxide-2mg/m3 Acgih ingredient tlv-twa:	* SPECIAL - ALK **************
SODIUM HYDROXIDE-2MG/M3(CEILING),ETHYLENE GLYCOL-10MG/M3(S	TEL=20MG/M3)
*** GENERIC DESCRIPTION *** A WATER SOLUTION OF AN ALKYLPHENOXYPOLYALKYLENE GLYCOL ETHER, ETHYLENE OXIDE-PROPYLENE OXIDE COPOLYMER,ALKYLENE GLYCOL,	
SILICONE EMULSION AND SODIUM HYDROXIDE.	
PH: AS IS(APPRDX+) 12+4B+PT+oF DR B+RANGE: >200FL+FT+(DEG+F): >200 SETA(CC)SF+GR+(70/700F)OR DENSITY:	
VAPOR PRESSURE(mmHG): NDVAPOR DENSITY(AIR=1): NDVISC CPE700F: 9.4%VOLATILES: NDEVAP.RATE: <1 ETHER=1	
FHYSICAL STATE: LIQUIDAFFEARANCE: COLORLESSODOR: NONEFREEZE FOINT(DEG.F): 25	
SECTION 3REACTIVITY DATA	
THERMAL DECOMPOSITION YIELDS OXIDES OF C,N,S,OR F IF PRESENT, STABLE	
SECTION 4HEALTH HAZARD EFFECTSACUTE SKIN EFFECTS***	
SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS***	
MODERATELY IRRITATING TO THE EYES ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION TO UFFER RESPIRATORY TRACT	
CHRONIC EFFECTS***	
CHRUNIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY E	
SECTION 5FIRST AID INSTRUCTIONS	
SKIN CONTACT*** REMOVE CONTAMINATED CLOTHING,WASH EXFOSED AREA WITH A LARGE Q SDAF SOLUTION OR WATER FOR 13 MINUTES EYE CONTACT***	UANTITY OF
IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY FHYSICIAN FOR ADDITIONAL TREATMENT INHALATION EXPOSURE***	CONTACT A
REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPRO FIRST AID TREATMENT AS NECESSARY INGESTION***	
GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OF CO SPECIFIC- DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILU	
STOMACH USING 3-4 GLASSES MILK OF WATER	OVER

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-----SECTION 6------- PILL, DISPOSAL AND FIRE IN CTIONS------SFILL INSTRUCTIONS\*\*\* GENERAL-VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT, CONTAIN AND ABSORD ON ABSORDENT 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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NFDES FERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-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 -----SECTION 7-----SPECIAL PROTECTIVE EQUIPHENT---------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 AND DUST/MIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REFLACE AS NECESSARY **RECOMMENDED EYE PROTECTION\*\*\*** SPLASH PROOF CHEMICAL GOGGLES -----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL. FIFRA(40CFR); EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) 94,177GAL (SODIUM HYDROXIDE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS- AUTHORIZATION: SEC.65,67 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM.WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDINATOR



ATTACHMENT 4 CONT. Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

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C	•	
MATERIAL	SAFETY DATA SHEET	
	LEPHONE NUMBER 215/355-3300	
		* NFPA
FRODUCT 🕻 SLIMICIDE C-30	EFFECTIVE DIFTE 1764	
SECTION 1HAZARD		* HEALTH - 2
SECIIUN IHAZARD	OUS INGREDIENIS	
		* REACTIVITY-O
		* SE TAL - CORR
OSHA INGREDIENT PERMISSIBLE EXP		****** (
DIMETHYLFORMAMIDE(SKIN)-30MG	/M3	
ACGIH INGREDIENT TLV-TWA:		
DIMETHYLFORMAMIDE(SKIN)-30MG	/M3(STEL=60MG/N3/	
*** GENER	IC DESCRIPTION ***	
BIS(TRICHLOROMETHYL)SULFONE, MET	HYLENE BIS THIOCYANATE AND I	NERT INGREDIENTS
	•	
SECTION 2TYPICA		
FH: 50% SOL• (APFROX•) 2•6	B.FT.oF OR B.KANGE: >200	
FL.PT.(DEG.F): 139 TAG(CC)		: 1.045
VAFOR PRESSURE(mmHG); 8	VAPOR DENSITY(AIR=1); >1	
VISC 005700F: 3.7	ZVOLATILES: ND	
VAFOR PRESSURE(mmHG): 8 VISC eps700F: 3.7 EVAP.RATE: <1 ETHER=1	%SOLUBILITY(WATER): 25	
PHYSICAL STATE: LIQUID		YELLOW
	FREEZE FOINT(DEG.F): <-30	
REACTION 3REACTI	VITY DATA	
THERMAL DECOMPOSITION YIELDS OX	IDES OF C,N,S,OR P IF PRESENT	Τ,
STABLE		
HEALTH	HAZARD EFFECTS	a = a = a = a = a
ACUTE SKIN EFFECTS***		
SLIGHTLY IRRITATING TO THE SKIN	ABSORBED BY SKIN	
ACUTE EYE EFFECTS***	ADOUNDED DI ONIN	
CORROSIVE TO THE EYES		
	-	
ACUTE RESPIRATORY EFFECTS***		
PROLONGED EXPOSURE MAY CAUSE DI	ZZINESS AND HEADACHE	
CHRONIC EFFECTS***		
CHRONIC EFFECTS OF THIS FORMULA	TION HAVE NOT YE? BEEN FULLY	EVALUATED
FIRST	AID INSTRUCTIONS	
SKIN CONTACT***		
REMOVE CONTAMINATED CLOTHING.WA	SH EXPOSED AREA WITH A LARGE	QUANTITY OF
SOAP SOLUTION OR WATER FOR 13 M	INUTES	
EYE CONTACT***		
IMMEDIATELY FLUSH EYES WITH WAT	ER FOR 15 MINUTES.IMMEDIATEL)	CONTACT A
PHYSICIAN FOR ADDITIONAL TREATM		
INHALATION EXPOSURE***		
REMOVE VICTIM FROM CONTAMINATED	AREA TO ERECH ATR. APPLY APPR	ROPRIATE
FIRST AID TREATMENT AS NECESSAR		VAL 1/ TU 1 P
INGESTION***	1	
ENERAL-DO NOT FEED ANYTHING BY		
SPECIFIC- DO NOT INDUCE VOMITIN		LUIE CUNTENTS OF
STOMACH USING 3-4 GLAS	SSES MILK OR WATER	
		OVER

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-----SECTION 6-------PILL, DISPOSAL AND FIRE IN RUCTIONS------SPILL INSTRUCTIONS\*\*\* GENERAL-VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT, CONTAIN AND ABSORB ON ABSORBENT MATERIAL, PLACE IN WASTE DISPOSAL CONTAINER, THE CONTAMINATED ABSORBENT SHOULD BE CONSIDERED A PESTICIDE AND DISPOSED OF IN AN APPROVED PESTICIDES LANDFILL OR INCINERATOR. SPECIFIC-PRODUCT IS A LACHRYMATOR!FLUSH CLEANED AREA CAUTIOUSLY WITH WATER DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR JISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN AN APPROVED PESTICIDE FACILITY FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE). ERY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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 SELF-CONTAINED BREATHING APPARATUS POSITIVE PRESSURE FULL FACEPIECE **RECOMMENDED SKIN PROTECTION\*\*\*** NEOPRENE GLOVES FEPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* TACE SHIELD, AIRTIGHT CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- KEEP AWAY FROM FLAMES OR SPARKS.GROUND DRUMS DURING FILLING OR DISCHARGE OPERATIONS HANDLING INSTRUCTIONS\*\*\* (ENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- COMBUSTIBLE FIFRA(40CFR): EPA REG.NO. 3876-61 USHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR AFFARATUS. CWA(40CFR)REPORTABLE QUANTITY: AS IS FRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR); IF DISCARDED, THIS MATERIAL BEARS HWI# DO01 DOT(49CFR)CLASSIFICATION: CORROSIVE TO SKIN.COMBUSTIBLE USDA FEDERALLY INSPECTED NEAT AND FOULTRY PLANTS- AUTHORIZATION: SEC.65,67 THIS FORM IS ESSENTIALLY EQUAL TO USHA 20 FORM.WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

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LABORATORIES, INC.	ATTACHMENT 4 CONT.	Somerton F Trevose, PA 190 Tel.: (215) 355-3300 Telex: 84-5159
	L SAFETY DATA SHEET	an a
EMERGENCY T	ELEPHONE NUMBER 215/355-3300	************
PRODUCT : SLIMICIDE J-12	EFFECTIVE DATE 1/84	* NFPA
		# HEALTH - 2
HAZAR	DOUS INGREDIENTS	
		REACTIVITY-0
•		* SPECIAL
OSHA INGREDIENT PERMISSIBLE EX	TATT.	
	IOBORE LIMIT.	
TIN, ORGANIC-0.1MG/M3		
ACGIH INGREDIENT TLV-TWA:		
TIN,ORGANIC AS SN(SKIN)-0.1	MG/M3(STEL=0.2MG/M3)	
••• GENE	RIC DESCRIPTION ***	
AN AQUEOUS SOLUTION OF N-ALKYL	DIMETHYL BENZYL AMMONIUM CHL	ORIDE.BIS
(TRIBUTYL TIN)OXIDE, SODIUM HYD		•
SECTION 2TYPIC	AL PHYSICAL DATA	
PH: AS IS (APPROX.) 11.9		
FL.PT.(DEG.F): 129 SETA(CC)		• 0 988
VAPOR PRESSURE(mmHG): 25	VADOR DENSTRY(ATP-1). /1	. 0.900
	%VOLATILES: ND	
VISC cps70oF: 31.5	•	
EVAP.RATE: <1 ETHER=1	\$SOLUBILITY(WATER): 100	
PHYSICAL STATE: LIQUID	APPEARANCE: TAN	
ODOR: SWEET	FREEZE POINT(DEG.F): 28	
REACT		
AERMAL DECOMPOSITION YIELDS OF STABLE	XIDES OF C,N,S,OR P IF PRESEN:	Γ,
SECTION 4HEALT	H HAZARD EFFECTS	
ACUTE SKIN EFFECTS###		
SEVERE IRRITANT TO THE SKIN.AB	SORBED BY SKIN	
ACUTE EYE EFFECTS***		
CORROSIVE TO THE EYES		
ACUTE RESPIRATORY EFFECTS**		
MISTS/AEROSOLS CAUSE IRRITATIO		
CHRONIC EFFECTS***	N IO OFFER RESFIRMIONI INACI	
CHRONIC EFFECTS OF THIS FORMUL.	ATION HAVE NOT YET BEEN FULLY	EVALUATED
FIRS	T ALD INSTRUCTIONS	
SKIN CONTACT ***		
REMOVE CONTAMINATED CLOTHING.W.		QUANTITY OF
SOAP SOLUTION OR WATER FOR 15	MINUTES	
EYE CONTACT###		
IMMEDIATELY FLUSH EYES WITH WA		CONTACT A
PHYSICIAN FOR ADDITIONAL TREAT	MENT	
INHALATION EXPOSURE***		
REMOVE VICTIM FROM CONTAMINATE		ROPRIATE
FIRST AID TREATMENT AS NECESSAI	RY	
INGESTION####		•
	Y MOUTH TO AN UNCONSCIOUS OR (	CONVULSIVE VICTIM
SPECIFIC- DILUTE CONTENTS OF S		
METHODS.IMMEDIATELY (		
		OVER

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SPILL INSTRUCTIONS GENERAL-VENTILATE AREA, US SPECIFIED PROTECTIVE EQUIDENT.CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER.THE CONTAMINATED ABSORBENT SHOULD BE CONSIDERED A PESTICIDE AND DISPOSED OF IN AN APPROVED PESTICIDES LANDFILL OR INCINERATOR. SPECIFIC-REMOVE IGNITION SOURCES.FLUSH AREA WITH WATER.SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR **DISCHARGED UNDER A NPDES PERMIT** PRODUCT (AS IS) - INCINERATE OR BURY IN AN APPROVED PESTICIDE FACILITY FIRE EXTINGUISHING INSTRUCTIONS\*\*\* **GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED** BREATHING APPARATUS(FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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 PESTICIDES FILTER/CARTRIDGES 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 \*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- KEEP AWAY FROM FLAMES OR SPARKS.GROUND DRUMS DURING FILLING OR DISCHARGE OPERATIONS HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- COMBUSTIBLE ----SECTION 9-----FEDERAL REGULATIONS-----FIFRA(40CFR): EPA REG.NO. 3876-34 OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# DOO1 DOT(49CFR)CLASSIFICATION: COMBUSTIBLE USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS- AUTHORIZATION: SEC.G5.G7 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

> HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR



ATTACHMENT 5 Final physical properties have not been determined as yet on this custom product. However, this MSDS the properties and safety precautions. When final properties are complete, an MSDS will be reissued.

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are comp	lete, an MSDS will be reissued.	
	BAFETY DATA BHEET	
	EPHONE NUMBER 215/355-3300	
PRODUCT : BALANCED POLYMER 6400 Se		≭ NFFA
FOR PROPOSAL USE	ONLY	* HEALTH - 2
BECTION 1HAZARDO	US INUREDIENTS	
		* RESTIVITY-O * SF. SIAL - ALK
DSHA INGREDIENT PERMISSIBLE EXPO	SURF LIMIT:	
SODIUM HYDROXIDE-2MG/M3		ক ক ক ক ব ४ कि की की की की की की की की की
ACGIH INGREDIENT TLV-TWA:		
SODIUM HYDROXIDE-2MG/M3(CEILI	NG )	
	C DESCRIPTION ***	
AN AQUEDUS SOLUTION CONTAINING AN		ASALTS OF EDTA-
NITRATE, SILICATE, SULFITE, POLYCAR)		
POLYALKYLENE GLYCOLJANHYDROUS POL BECTION 2TYPICAL	PHYSICAL DATA	
rn.	BIFIIOF OK BIKHNOLI 2200	
FL.PT.(DEG.F): >200 SETA(CC)	SPGR.(70/70oF) OR DENSITY:	
VAPOR PRESSURE(mmHG): 18	VAPOR DENSITY(AIR=1): <1	
VISC CPS70oF; <10	ZVOLATILES: ND	
EVAP.RATE: <1 ETHER=1	ZSOLUBILITY(WATER): 100	
PHYSICAL STATE: LIQUID		
DIOR: NONE	FREEZE POINT(DEG.F); 25 TO	41
REACTION 3REACTIV	[TY DATA	
1		
THERMAL DECOMPOSITION YIELDS OXII	BES OF C;N;S;OR P IF PRESENT;	
STABLE		
BECTION 4HEALTH H	AZARD FFFECTS	
ACUTE SKIN EFFECTS***		
SEVERE IRRITANT TO THE SKIN		
ACUTE EYE EFFECTS***		
SEVERE IRRITANT TO THE EYES	· · · ·	
ACUTE RESPIRATORY EFFECTS***		
MISTS/AEROSOLS MAY CAUSE IRRITATI	ON TO UPPER RESPIRATORY TRAC	Т
CHRONIC EFFECTS***		
CHRONIC EFFECTS OF THIS FORMULATI	ON HAVE NOT YET BEEN FULLY E	VALUATED
BECTION 5FIRST A	ID INSTRUCTIONS	
SKIN CONTACT***		
REMOVE CONTAMINATED CLOTHING.WASH	LEXPOSED AREA WITH A LARGE D	UANTITY OF
SDAP SOLUTION OR WATER FOR 15 MIN		
EYE CONTACT***		
IMMEDIATELY FLUSH EYES WITH WATER		CONTACT A
PHYSICIAN FOR ADDITIONAL TREATMEN	11	
INHALATION EXPOSURE*** REMOVE VICTIM FROM CONTAMINATED A	REA TH ERECH ATE ADDI V ADDDA	PRIATE
FIRST AID TREATMENT AS NECESSARY	INCH IV FREDH MIRIHFFLI MPFKU	INTE
INGESTION***		
GENERAL-DO NOT FEED ANYTHING BY M	OUTH TO AN UNCONSCIOUS OR CO	NULSIVE VICTIM
SPECIFIC- DO NOT INDUCE VOMITING.		
STOMACH USING 3-4 GLASS		
		OVER

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----BECTION 6-----BPILLDDISPOSAL AND FIRE INSTRUCTIONS------SPILL INSTRUCTIONS\*\*\* GENERAL-VENTILATE AREA, U BPECIFIED PROTECTIVE EQUEMENT.CONTAIN AND ABBORB ON ABBORBENT MATERIAL, PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABBORBED MATERIAL, OR ANY CONTAMINATED BOIL, BHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS. SPECIFIC- FLUBH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SFREAD BAND OR BRIT. DIBPOSAL INSTRUCTIONS\*\*\* BENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A BANITARY BEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DIBCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUIBHING INSTRUCTIONS\*\*\* GENERAL-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 -----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/HIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SFLASH PROOF CHEMICAL GOGGLES -----SECTION 8------STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEF CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING.IF FROZEN, THAN 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. FIFRA(40CFR); EFA REG.NO, NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LINITATIONS, OTHERWISE, USE SUPPLIED AIR APPARATUS. FDA(21CFR) INGREDIENTS AUTHORIZED UNDER: CONTACT BETZ CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS- AUTHORIZATION: CONTACT BETZ THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM, WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDIN. TO

Balanced Polymer



ATTACHMENT 5 CONT.



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()	MATERIAL SAFETY DATA SHEET
	EMERGENCY TELEPHONE NUMBER 215/355-3300 PRODUCT : CORROGEN EFFECTIVE DATE 1/84 NFPA
	<pre># HEALTH = 2 # HEALTH = 2 # FIRE = - # FIRE = - # REACTIVITY=0 # SPECIAL = -</pre>
	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: NUISANCE PARTICULATE-TOTAL DUST-15MG/M3, RESPIRABLE DUST-5MG/M3 ACGIH INGREDIENT TLV-TWA:
	NUISANCE PARTICULATE-TOTAL DUST-10MG/M3, RESPIRABLE DUST-5MG/M3
	GENERIC DESCRIPTION *** A POWDER MIXTURE OF A SULFITE SALT AND A COBALT SALT.
	SECTION 2TYPICALPHYSICAL DATAPH: 5% SOL.(APPROX.) 10.0B.PT.OF OR B.RANGE: NAFL.PT.(DEG.F): NASP.GR.(70/70oF)OR DENSITY: 90LBS/CU.FT.VAPOR PRESSURE(mmHG): NAVAPOR DENSITY(AIR=1): NAVISC cps70oF: ND\$VOLATILES: NAEVAP.RATE: NA WATER=1\$SOLUBILITY(WATER): 50PHYSICAL STATE: SOLIDAPPEARANCE: WHITE POWDERODOR: SLIGHT SULFURFREEZE POINT(DEG.F): NA
. (	SECTION 3REACTIVITY DATA
	THERMAL DECOMPOSITION YIELDS OXIDES OF C,N,S,OR P IF PRESENT, REDUCING AGENT.DO NOT STORE OR MIX WITH OXIDIZING AGENTS
	SECTION 4HEALTH HAZARD EFFECTSACUTE SKIN EFFECTS*** ACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS***
	MODERATELY IRRITATING TO THE EYES
	ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT CHRONIC EFFECTS***
	CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY EVALUATED
	SECTION 5FIRST 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*** GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM SPECIFIC- DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD METHODS.IMMEDIATELY CONTACT A PHYSICIAN
	OVER

----SECTION 6-----SPILL, DISPOSAL AND FIRE INSTRUCTIONS-----SPILL INSTRUCTIONS \*\*/ GENERAL-VENTILATE AREA, WE SPECIFIED PROTECTIVE EQUIPMENT.SWEEP UP AND PLACE IN WASTE DISPOSAL CONTAINER. SPECIFIC- SPILL RESIDUE MAY BE NEUTRALIZED WITH 3% HYDROGEN PEROXIDE SOLUTION DISPOSAL INSTRUCTIONS \*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT (AS IS) - INCINERATE OF BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS \*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER -----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/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION # # # AIRTIGHT CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- KEEP DRY HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- NORMAL CHEMICAL HANDLING -----FEDERAL REGULATIONS------FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. FDA(21CFR) INGREDIENTS AUTHORIZED UNDER: SECTION 173.310 CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# NOT APPLICABLE DOT(49CFR)CLASSIFICATION: NOT APPLICABLE THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR

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ATTACHMENT 5 CONT.

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Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

(	BETT MATERIAL SAFETY DATA SHEET
. 50	BETZ MATERIAL SAFETY DATA SHEET EMERGENCY TELEPHONE NUMBER 215/355-3300 PRODUCT : MAGNI-FORM 305 EFFECTIVE DATE 3/84 HEALTH - 2
	PRODUCT : MAGNI-FORM 305
	# HEALTH - 2
	SECTION 1HAZARDOUS INGREDIENTS * FIRE - 0
	* R. ACTIVITY-O
	* SecolAL
	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT:
	HYDROQUINONE-2MG/M3 AND QUINONE-0.4MG/M3, DIETHYLAMINO ETHANOL(SKIN)-50MG/M3
	ACGIH INGREDIENT TLV-TWA:
	HYDROQUINONE-2MG/M3(STEL=4MG/M3) AND
	QUINONE-0.4MG/M3(STEL=1MG/M3),DIETHYLAMINO ETHANOL(SKIN)-50MG/M3
	### GENERIC DESCRIPTION ###
	AN AQUEOUS BLEND OF ALKOXY ALIPHATIC AMINE, N-SUBSTITUTED ALKANOLAMINE AND
	HYDROQUINONE.
-	SECTION 2TYPICAL PHYSICAL DATA
	PH: AS IS (APPROX.) 11.0 B.PT. of OR B.RANGE: ND
	FL.PT.(DEG.F): >200 SETA(CC) SP.GR.(70/70oF)OR DENSITY: $1.007$
	$VADOP PRESSURF(mmHG) \cdot 20 \qquad VADOR DENSITY(ATP-1) \cdot 1$
	VAPOR PRESSURE(mmHG): 20VAPOR DENSITY(AIR=1): <1VISC cps70oF: 6.5\$VOLATILES: 70EVAP.RATE: ND WATER=1\$SOLUBILITY(WATER): 100
	EVAP. RATE: ND WATER=1 \$SOLUBILITY (WATER): 100
	PHYSICAL STATE: LIQUID APPEARANCE: BROWN
	ODOR: MILD FREEZE POINT(DEG.F): 18
	· · · · · · · · · · · · · · · · · · ·
(	SECTION 3REACTIVITY DATA
	THERMAL DECOMPOSITION YIELDS OXIDES OF C, N, S OR P IF PRESENT,
	REDUCING AGENT.DO NOT STORE OR MIX WITH OXIDIZING AGENTS.
	HYDROQUINONE MAY OXIDIZE TO QUINONE(SEE SECTION 1).
	SECTION 4HEALTH HAZARD EFFECTS
	ACUTE SKIN EFFECTS###
	SEVERE IRRITANT TO THE SKIN.ABSORBED BY SKIN.SKIN SENSITIZER.
	ACUTE EYE EFFECTS***
	SEVERE IRRITANT TO THE EYES, POSSIBLY CORROSIVE
	ACUTE RESPIRATORY EFFECTS***
	IRRITATION OF UPPER RESPIRATORY TRACT.PROLONGED EXPOSURE MAY CAUSE
·	DIZZINESS AND HEADACHE
	CHRONIC EFFECTS###
	CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY EVALUATED
	SECTION 5FIRST 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###
	GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSIVE VICTIM
	SPECIFIC- DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF THE STANDARD
	METHODS.IMMEDIATELY CONTACT A PHYSICIAN
	COR 228A 8201

## PRODUCT: MAGNI-FORM 305 -----SECTION 6------SPILL, DISPOSAL AND FIRE INSTRUCTIONS------SPILL INSTRUCTIONS\*\*\* GENERAL-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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER.IN ACCORDANCE WITH ANY LOCAL AGREEMENT.A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT (AS IS) - INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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 AND DUST/MIST/FUME CART PIDGES 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\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING.IF FROZEN.THAW COMPLETELY AND MIX THOROUGHLY PRIOR TO USE HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFOIE REUSE SPECIFIC- ALKALINE.DO NOT MIX WITH ACIDIC MATERIAL. ----SECTION 9-----FEDERAL REGULATIONS------OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESP. RATORY EQUIPMENT WITHIN USE LIMITATIONS. OTHERWISE, USE SUPPLIED AIR APPARATUS. CWA(40CFR) REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# NOT APPLICABLE DOT(49CFR)CLASSIFICATION: NOT APPLICABLE THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM.WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR

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ATTACHMENT 5 CONT.

Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

$\bigcirc$	MATERIAL SAFETY DATA SHEET EMERGENCY TELEPHONE NUMBER 215/355-3300 PRODUCT : LIQUIMINE VI EFFECTIVE DATE 1/84	**************** * NFPA * HEALTH - 2
	SECTION 1HAZARDOUS INGREDIENTS	<pre># FIRE - 1 # REACTIVITY-0 # SPECIAL - CORR</pre>
	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: NONE	
	ACGIH INGREDIENT TLV-TWA: CYCLOHEXYLAMINE(SKIN)-40MG/M3	
	*** GENERIC DESCRIPTION ***	
	A WATER SOLUTION OF A CYCLOALIPHATIC AMINE, AN ALKYLALKANOLAMI AND AN EDTA SALT.	NE
	SECTION 2TYPICAL PHYSICAL DATA	
	PH: AS IS (APPROX.) 13.2 B.PT. oF OR B.RANGE: >200	
	FL.PT.(DEG.F): 123 SETA(CC) SP.GR.(70/70oF)OR DENSITY: (	.964
	VAPOR PRESSURE(mmHG): NDVAPOR DENSITY(AIR=1): NDVISC cps70oF: ND\$VOLATILES: NDEVAP.RATE: <1	
	VISC cps70oF: ND %VOLATILES: ND	
	EVAP.RATE: <1 ETHER=1 \$SOLUBILITY(WATER): 100	
	PHYSICAL STATE: LIQUID APPEARANCE: COLORLESS	
•	ODOR: AMINE FREEZE POINT(DEG.F): 24	
	SECTION 3REACTIVITY DATA	
	THERMAL DECOMPOSITION YIELDS OXIDES OF C,N,S,OR P IF PRESENT, STABLE	
	SECTION 4HEALTH HAZARD EFFECTS ACUTE SKIN EFFECTS*** CORROSIVE, ABSORBED BY SKIN	
	ACUTE EYE EFFECTS*** CORROSIVE TO THE EYES	
	ACUTE RESPIRATORY EFFECTS***	
	PROLONGED EXPOSURE MAY CAUSE DIZZINESS AND HEADACHE CHRONIC EFFECTS***	
	CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY EV	ALUATED
	SECTION 5FIRST 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***	<b>,</b>
	REMOVE VICTIM FROM CONTAMINATED AREA.APPLY NECESSARY FIRST AID TREATMENT.IMMEDIATELY CONTACT A PHYSICIAN. INGESTION***	,
	GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CON SPECIFIC- DILUTE CONTENTS OF STOMACH.INDUCE VOMITING BY ONE OF	
·	METHODS.IMMEDIATELY CONTACT A PHYSICIAN	THE STRUCKID
		OVER

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----SECTION 6-----SPILL, DISPOSAL AND FIRE INSTRUCTIONS------SPILL INSTRUCTIONS \*\* GENERAL-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. SPECIFIC- REMOVE IGNITION SOURCES.FLUSH AREA WITH WATER.SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER.IN ACCORDANCE WITH ANY LOCAL AGREEMENT.A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS) - INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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 RECOMMENDED SKIN PROTECTION GAUNTLET-TYPE RUBBER GLOVES. RUBBER BOOTS AND CHEMICAL RESISTANT APRON REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SPLASH PROOF CHEMICAL GOGGLES.FACE SHIELD ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- KEEP AWAY FROM FLAMES OR SPARKS.GROUND DRUMS DURING FILLING OR DISCHARGE OPERATIONS HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- COMBUSTIBLE.CORROSIVE TO SKIN AND/OR EYES. ----SECTION 9-----FEDERAL REGULATIONS------FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. CWA(40 CFR) REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) NOT APPLICABLE RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D001, D002 DOT(49CFR)CLASSIFICATION: CORROSIVE TO SKIN.COMBUSTIBLE THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR



ATTACHMENT 5 CONT.



Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159

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	MATERIAL SAFETY DATA SHEET Emergency telephone number 215/333-3300 Product : Ferrosperse Effective date 1/84	
,		* HEALTH - 2
	SECTION 1HAZARDOUS INGREDIENTS	* FIRE - 0 * REACTIVITY-0 * SPECIAL - ALK
	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: Sodium Hydroxide-2mg/n3 Acgih Ingredient TLV-TWA: Sodium Hydroxide-2mg/m3(ceiling)	* SFECIAL - ALK ****************
	*** GENERIC DESCRIPTION ***	
	A WATER SOLUTION OF POLYCARBOXYLIC ACID SALT, POLYOXYALKYLENE ( AND SODIUM HYDROXIDE.	BLYCOL
	SECTION 2TYPICAL PHYSICAL DATA PH: AS IS (APPROX.) 12.5 B.PT.OF OR B.RANGE: >200 FL.PT.(DEG.F): >200 SETA(CC) SP.GR.(70/70oF)OR DENSITY: : VAPOR PRESSURE(mmHG): 25 VAFOR DENSITY(AIR=1): <1 VISC CPS70oF: ND ZVOLATILES: 93.8 EVAP.RATE: <1 ETHER=1 ZSOLUBILITY(WATER): 100	
	PHYSICAL STATE: LIQUID APPEARANCE: COLORLESS	
	ODOR: NONE FREEZE FOINT(DEG.F): ND	
í	SECTION 3REACTIVITY DATA	
\	THERMAL DECOMPOSITION YIELDS OXIDES OF C,N,S,OR P IF PRESENT, STABLE	
	SECTION 4HEALTH HAZARD EFFECTSACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS*** MODERATELY IRRITATING TO THE EYES ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT CHRONIC EFFECTS*** CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY EV	
	SECTION 5FIRST AID INSTRUCTIONS	
	SKIN CONTACT*** REMOVE CONTAMINATED CLOTHING.WASH EXFOSED AREA WITH A LARGE QU SOAP SOLUTION OR WATER FOR 15 MINUTES EYE CONTACT*** IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY C PHYSICIAN FOR ADDITIONAL TREATMENT	
	INHALATION EXFOSURE*** REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROP FIRST AID TREATMENT AS NECESSARY INGESTION***	RIATE
	GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CON SPECIFIC- DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUT STOMACH USING 3-4 GLASSES MILK OR WATER	

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-----SECTION 6------ SPILL, DISPOSAL AND FIRE INTRUCTIONS------SPILL INSTRUCTIONS\*\* GENERAL-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. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER, IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NFDES PERMIT PRODUCT(AS IS)- INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS(FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAN OR WATER, FOAM OR WATER CREATE A SLIPPERY CONDITION.SPREAD SAND OR GRIT ----SECTION 7-----SPECIAL PROTECTIVE EQUIPMENT----------VENTILATION PROTECTION\*\*\* ADEQUATE VENTILATION RECOMMENDED RESPIRATORY FROTECTION\*\*\* IF VENTILATION IS INADEQUATE OR SIGNIFICANT PRODUCT EXPOSURE IS LIKELY, USE A RESPIRATOR WITH DUST/MIST/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SPLASH PROOF CHEMICAL GOGGLES ----SECTION 8-----STORAGE AND HANDLING PRECAUTIONS------STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- PROTECT FROM FREEZING HANDLING INSTRUCTIONS\*\*\* GENERAL-IMMEDIATELY REMOVE CONTAMINATED CLOTHING, WASH BEFORE REUSE SPECIFIC- ALKALINE.DO NOT HIX WITH ACIDIC MATERIAL. FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. FDA(21CFR) INGREDIENTS AUTHORIZED UNDER: SECTION 173.310 CWA(40CFR)REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) 77,790GAL (SODIUM HYDROXIDE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D002 **DOT(49CFR)CLASSIFICATION: NOT APPLICABLE** USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS- AUTHORIZATION: SEC.G6 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM.WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH ENVIRONMENTAL INFORMATION COORDINATOR

	ATTACHMENT 5A				
(	LABORATORIES, INC.	Somerton Road Trevose, PA 19047 Tel.: (215) 355-3300 Telex: 84-5159			
·	MATERIAL SAFETY DATA SHEET EMERGENCY TELEPHONE NUMBER 215/355-3300 PRODUCT : CORR-SHIELD 736 EFFECTIVE DATE 1/84	••••••••••••••••••••••••••••••••••••••			
	SECTION 1HAZARDOUS INGREDIENTS	<ul> <li>FIRE - 0</li> <li>REACTIVITY-0</li> <li>SPECIAL - ALK</li> </ul>			
•	OSHA INGREDIENT PERMISSIBLE EXPOSURE LIMIT: SODIUM HYDROXIDE-2MG/M3, MOLYBDENUM (SOL)-5MG/M3 ACGIH INGREDIENT TLV-TWA: SODIUM HYROXIDE-2MG/M3(CEILING), MOLYBDENUM (SOL)-5MG/M3(STR	EL = 10 MG/M3)			
•	AN AQUEOUS SOLUTION CONTAINING SODIUM HYDROXIDE, A SALT OF EDTA A MOLYBDATE SALT, A NITRITE SALT, A POLYCARBOXYLIC ACID AND AN	ι,			
	AROMATIC NITROGEN HETEROCYCLESECTION 2TYPICAL PHYSICAL DATAPH: AS IS(APPROX.) 12.8B.PT.OF OR B.RANGE: >200FL.PT.(DEG.F): >200 SETA(CC)VAPOR PRESSURE(mmHG): NDVAPOR DENSITY(AIR=1): ND				
	VISC cps70oF: 4.2\$VOLATILES: NDEVAP.RATE: <1				
!	SECTION 3REACTIVITY DATA	· ·			
	THERMAL DECOMPOSITION YIELDS OXIDES OF C,N,S,OR P IF PRESENT, STABLE				
	SECTION 4HEALTH HAZARD EFFECTS ACUTE SKIN EFFECTS*** SLIGHTLY IRRITATING TO THE SKIN ACUTE EYE EFFECTS***				
	MODERATELY IRRITATING TO THE EYES ACUTE RESPIRATORY EFFECTS*** MISTS/AEROSOLS CAUSE IRRITATION TO UPPER RESPIRATORY TRACT				
	CHRONIC EFFECTS*** CHRONIC EFFECTS OF THIS FORMULATION HAVE NOT YET BEEN FULLY EV	ALUATED			
	SECTION 5FIRST AID INSTRUCTIONS				
	SKIN CONTACT*** REMOVE CONTAMINATED CLOTHING.WASH EXPOSED AREA WITH A LARGE QU SOAP SOLUTION OR WATER FOR 15 MINUTES EYE CONTACT***				
	IMMEDIATELY FLUSH EYES WITH WATER FOR 15 MINUTES.IMMEDIATELY C PHYSICIAN FOR ADDITIONAL TREATMENT INHALATION EXPOSURE*** REMOVE VICTIM FROM CONTAMINATED AREA TO FRESH AIR.APPLY APPROP				
ı	FIRST AID TREATMENT AS NECESSARY INGESTION***				
	GENERAL-DO NOT FEED ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CON SPECIFIC- DO NOT INDUCE VOMITING.IMMED.CONTACT PHYSICIAN.DILUT STOMACH USING 3-4 GLASSES MILK OR WATER	E CONTENTS OF			
		OVER			

COR 228A 8201

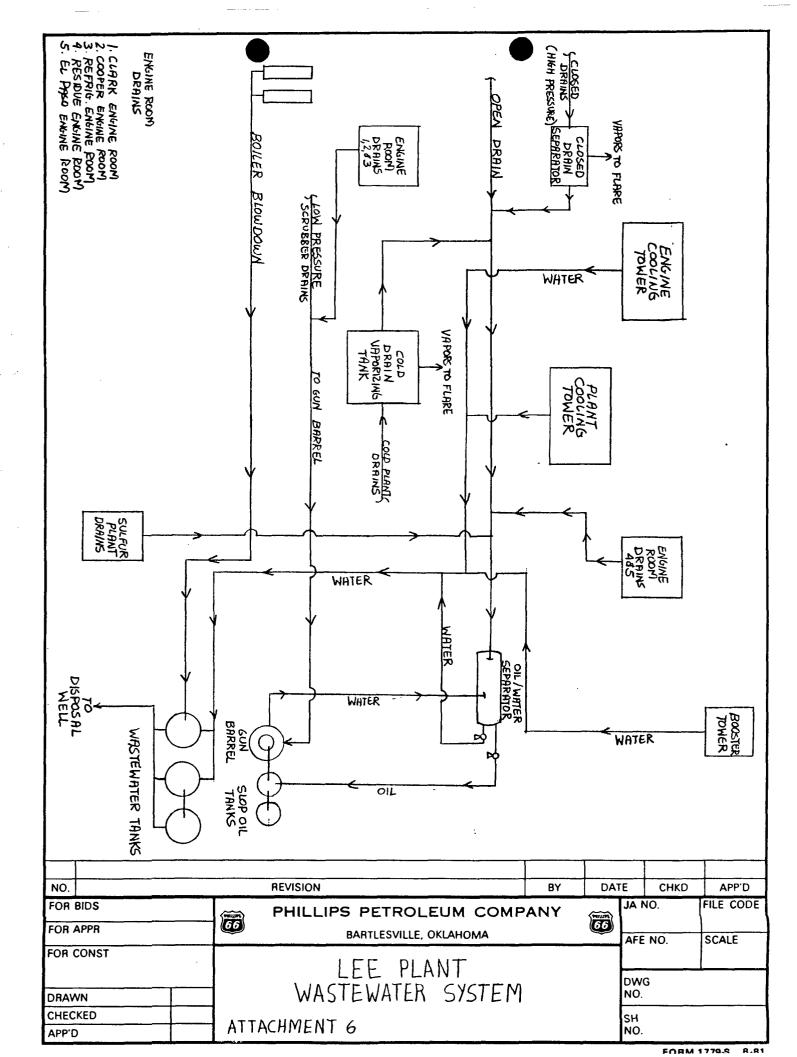
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----SECTION 6-----SPILL, DISPOSAL AND FIRE INSTRUCTIONS SPILL INSTRUCTIONS\*\* GENERAL-VENTILATE AREA, USE SPECIFIED PROTECTIVE EQUIPMENT. CONTAIN AND ABSORB ON ABSORBENT MATERIAL.PLACE IN WASTE DISPOSAL CONTAINER. THE WASTE CHARACTERISTICS OF THE ABSORBED MATERIAL, OR ANY CONTAMINATED SOIL, SHOULD BE DETERMINED IN ACCORDANCE WITH RCRA REGULATIONS. SPECIFIC- FLUSH AREA WITH WATER.WET AREA MAY BE SLIPPERY.IF SO, SPREAD SAND OR GRIT. DISPOSAL INSTRUCTIONS\*\*\* GENERAL-WATER CONTAMINATED WITH THIS PRODUCT MAY BE SENT TO A SANITARY SEWER. IN ACCORDANCE WITH ANY LOCAL AGREEMENT, A TREATMENT FACILITY OR DISCHARGED UNDER A NPDES PERMIT PRODUCT(AS IS) - INCINERATE OR BURY IN APPROVED LANDFILL FIRE EXTINGUISHING INSTRUCTIONS\*\*\* GENERAL-FIREFIGHTERS SHOULD WEAR POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (FULL FACE-PIECE TYPE). DRY CHEMICAL, CARBON DIOXIDE, FOAM OR WATER ----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/FUME CARTRIDGES RECOMMENDED SKIN PROTECTION\*\*\* RUBBER GLOVES REPLACE AS NECESSARY RECOMMENDED EYE PROTECTION\*\*\* SPLASH PROOF CHEMICAL GOGGLES ----SECTION 8------STORAGE AND HANDLING PRECAUTIONS-----STORAGE INSTRUCTIONS\*\*\* GENERAL-KEEP CONTAINER CLOSED SPECIFIC- 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------FIFRA(40CFR): EPA REG.NO. NOT APPLICABLE OSHA(29CFR)-FOR RESPIRATORY PROTECTION USE PROPERLY. FITTED MSHA/NIOSH APPROVED RESPIRATORY EQUIPMENT WITHIN USE LIMITATIONS.OTHERWISE, USE SUPPLIED AIR APPARATUS. CWA(40 CFR) REPORTABLE QUANTITY: AS IS PRODUCT (HAZARDOUS SUBSTANCE) 101GAL (SODIUM NITRITE), 23,350GAL (SODIUM HYDROXIDE) RCRA(40CFR): IF DISCARDED, THIS MATERIAL BEARS HWI# D002 DOT(49CFR)CLASSIFICATION: NOT APPLICABLE USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS- AUTHORIZATION: SEC.G5 THIS FORM IS ESSENTIALLY EQUAL TO OSHA 20 FORM. WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, BETZ LABORATORIES, INC. MAKES NO WARR'ANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON. HAROLD M. HERSH

ENVIRONMENTAL INFORMATION COORDINATOR



An aqueous organo-polyphosphate in ethylene glycol SynonymsOrganOrgan	·				
Organ	1				
	nic				
SECTION 2 - HAZARDOUS INGREDIENTS					
MATERIAL OR COMPONENT	*				
Ethylene Glycol	28				
AL SA					
SECTION 3 - PHYSICAL PROPERTIES	•				
Bolling Point, 760 MM HG Melting Point					
> N     Specific Gravity (H2D=1)     Vapor Pressure       Z N     1.33 @60°F					
Vapor Density (Air=1)     Solubility in H20, % By WL	<del></del>				
Appearance and Odor					
Dark brown liquid with a bland odor pH (1% Dispersion) 4	4.5-5.0				
Q w     SECTION 4 FLAMMABILITY AND EXPLOSIVE PROPERTIES       U w     Flash Point (Test Method)					
\$200°F     (PMCC)       Fiammable Limits in Air, % By Vol.     Lower					
Lo Extinguishing Media U U CO <sub>2</sub> , Dry chemical, alcohol foam					
D w Special Fire Fighting Procedures					
U: None ·					
U: None · Ja Unusual Fire and Explosion Hazard Co None					
Unusual Fire and Explosion Hazard	:				
Unusual Fire and Explosion Hazard None SECTION 5 - HEALTH HAZARD DATA Threshold Limit Value None for the product. Ethylene glycol (vapor) 100ppm	:				
Unusual Fire and Explosion Hazard None SECTION 5 - HEALTH HAZARD DATA Threshold Limit Value None for the product. Ethylene glycol (vapor) 100ppm Effects of Overexposure	:				
Unusual Fire and Explosion Hazard None SECTION 5 - HEALTH HAZARD DATA Threshold Limit Value None for the product. Ethylene glycol (vapor) 100ppm					
Unusual Fire and Explosion Hazard None SECTION 5 - HEALTH HAZARD DATA Threshold Limit Value None for the product. Ethylene glycol (vapor) 100ppm Effects of Overexposure May cause irritation. May be harmful if swallowed.	:				
Unusual Fire and Explosion Hazard None SECTION 5 - HEALTH HAZARD DATA Threshold Limit Value None for the product. Ethylene glycol (vapor) 100ppm Effects of Overexposure May cause irritation. May be harmful if swallowed.					
Unusual Fire and Explosion Hazard None SECTION 5 - HEALTH HAZARD DATA Threshold Limit Value None for the product. Ethylene glycol (vapor) 100ppm Effects of Overexposure May cause irritation. May be harmful if swallowed. EMERGENCY AND FIRST AID PROCEDURES Eyes Flush with water for 15 minutes. Call a physician.	:				

Sw[

# SCHITHWESTERN 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. <u>C-1950-W</u> Customer No. 3355796 Report No. <u>35060</u>

> > Report Date <u>1-25-84</u>

Dete Received <u>1-10-84</u>

Report of tests on: Water

Client:

# Phillips Petroleum

Identification:

.

Lee Plant, Wastewater

	-	mg/L
AluminumLess !	Than -	2
ArsenicLess		0.05
BariumLess		1
Boron		0.7
CadmiumLess !	Than	0.01
ChromiumLess		0.05
CobaltLess !		0.1
CopperLess 5		0.1
IronLess 1		0.2
LeadLess		0.05
ManganeseLess		0.05
		0.002
MercuryLess		
MolybdenumLess		1
NickelLess 1		0.5
SeleniumLess 1		0.01
SilverLess 1		0.05
ZincLess 1	ſhan	0.05
Sulfate		1714
Chloride		2595
Fluoride		1.2
Nitrate		9.0
CyanideLess 1	nhan (	0.001
Cyantue	Indh	0.001

Total Dissolved Solids @ 180° C----- 5294

Technician: KLH, PCB, GMB

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

BOUTHWEBTERN LABORATORIES

Our letters and reports are for the exclusive use of the effect to whom they are addressed. The use of our name must receive our prior written approval. Our letters and reports apply only to the sample tested and/or inspected, and are not necessarily indicative of the quantities of apparently identical or similar products.



# MATERIAL SAFETY DATA SHEET

(Essentially similar to U.S. Department of Labor Form OSHA-20 and generally accepted in Canada for information purposes) An explanation of the terms used herein may be found in OSHA publication 2265, available from OSHA regional or area offices, Do Not Duplicate This Form. Request an Original.

M-4837

# 

PRODUCT Molecular Sieve Type 4ADG

CHEMICAL NAME	Sodium Alumino silicate	SYNONYMS	Zeolite	
FORMULA		CHEMICAL FAMILY	Molecular Sieve	
	$Na_2OAI_2O_3SiO_2$	MOLECULAR WEIGHT	Not Applicable	<u> </u>

#### TRADE NAME UNION CARBIDE<sup>®</sup> Molecular Sieve

A LEAST AND A LEAS

A complex of elements and compounds composed of material shown below. NOTE: In the table below, the symbol "<" means "less than".

 MATERIAL (CASI	No.)	Wt (%)	1983-1984 ACGIH TLV-TWA (OSHA-PEL)
Sodium Oxide	(1313-59-3)	< 30	None established (None established)
Silicon Oxide	(14808-60-7)	< 50	Use quartz formula (Use quartz formula)
Aluminum Oxide	(1344-28-1)	< 40	Nuisance particulate (Nuisance dust) 10 mg/m <sup>3</sup> Total dust (15 mg/m <sup>3</sup> Respirable fraction) 5 mg/m <sup>3</sup> Respirable dust (5 mg/m <sup>3</sup> Respirable fraction)

Sec. 16.	112	a standar	1.2.2	BP	11							**************************************
1.00	10.00	1. N. P. 1		N	11/11 2	a			. PHYSIC	<b>~ ^ I     ^ </b>	ΓΛ	LE TRUE REFERENCE
$\sim 2.5$		152 24 24 2	1. 6 66	P 13. 34	5 T + 5 - 1 - 7				PETANI			1
1.1.5	121103/22/23	A	10	123	1. 10. 0.10.11		1 1 2 3	12.45.6		JAL UA		3,20.912,1748
10.275	2 Ten	1111600.00	- 1. Oak 1. E	0.1.1.1					A State of the sta			

BOILING POINT, 760 mm. Hg	Not Applicable	FREEZING POINT	Not Applicable
SPECIFIC GRAVITY (H <sub>2</sub> O = 1)	1.1	VAPOR PRESSURE AT 20°C.	Not Applicable
VAPOR DENSITY (air = 1)	Not Applicable	SOLUBILITY IN WATER, % by wt.	Not Applicable
PERCENT VOLATILES BY VOLUME	Not Applicable	EVAPORATION RATE (Butyl Acetate = 1)	Not Applicable

APPEARANCE AND ODOR

M-4837

Depending on product may appear as bead, pellet, mesh, cake or powder; odorless.

# EMERGENCY PHONE NUMBER

IN CASE OF EMERGENCIES involving this material, further information is available at all times:

In the USA 304 – 744-3487

In Canada 514 – 645-5311

For routine information contact your local supplier

Union Carbide requests the users of this product to study this Material Safety Data Sheet (MSDS) and become aware of product hazards and safety information. To promote safe use of this product a user should (1) notify its employees, agents and contractors of the information on this MSDS and any product hazards and safety information, (2) furnish this same information to each of its customers for the product, and (3) request such customers to notify their employees and customers for the product of the same product hazards and safety information.

UNION CARBIDE CORPORATION D MOLECULAR SIEVES DEPARTMENT UNION CARBIDE CANADA LIMITED D MOLECULAR SIEVES DEPARTMENT

## 

**THRESHOLD LIMIT VALUE** See Section II – 5 mg/m<sup>3</sup> (ACGIH-1983–1984) as respirable dust (nuisance particulate)

#### **EFFECTS OF ACUTE EXPOSURE:**

SWALLOWING - None known

SKIN CONTACT - May cause irritation and reddening

**EYE CONTACT** — May cause irritation

INHALATION – May cause irritation of the nose and throat, accompanied by cough and chest discomfort.

EFFECTS OF CHRONIC EXPOSURE – None known

#### **EMERGENCY AND FIRST AID PROCEDURES:**

**SWALLOWING** – Drink large amounts of water

SKIN CONTACT – Wash with soap and water

EYE CONTACT - Immediately flush with water for at least 15 minutes

**INHALATION** – Remove to fresh air. If breathing is difficult, oxygen may be administered. If breathing has stopped, administer artificial respiration.

If any irritation or other symptoms persist, see a physician.

NOTE TO PHYSICIAN – This product is a desiccant and generates heat as it adsorbs water. The used product can contain material of a hazardous nature. Identify that material and treat accordingly.

PRODUCT:	Molecular S	Type 4ADG	
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	V	FIRE AND EXPLO	DSION HAZ	ARD DATA	
FLASH POINT (test method)	es not burn		AUTOIGNIT	TION	Not Applicable
FLAMMABLE LIMITS IN AIR, % by volume	LOWER	Not Applicable		UPPER	Not Applicable
EXTINCUIRUNC MEDI	^				

#### EXTINGUISHING MEDIA

Unused material will not burn. Use media appropriate for surrounding fire.

#### SPECIAL FIRE FIGHTING PROCEDURES

Depends on the use of the material. Used material may contain products of a hazardous nature. The user of this product must identify the hazards of the retained material and inform the fire fighters of these hazards.

#### UNUSUAL FIRE AND EXPLOSION HAZARDS

In their fresh unused state, molecular sieves are not flammable. When exposed to water, however, they can get quite hot. When first wetted they can heat to the boiling point of water. Flooding will reduce the temperature to safe limits.

		VI. REACTIVITY DATA
STABILITY	CONDITIONS TO A	AVOID
UNSTABLE STABLE		
X		Moisture (water) can cause rise in temperature which may result in burn.
INCOMPATIBILITY	(materials to avoid)	Sudden contact with high concentrations of chemicals having high heats of adsorption such as olefins, HCI, etc.

#### HAZARDOUS DECOMPOSITION PRODUCTS

Hydrocarbons and other materials that contact the molecular sieve during normal use can be retained on the sieve. It is reasonable to expect that decomposition products will come from these retained materials of use. The molecular sieve itself does not readily decompose unless subjected to extreme temperature or chemical conditions. If such decomposition did occur, the products would include the mix of oxides listed in Section II.

HAZARDOUS PO	LYMERIZATION	CONDITIONS TO AVOID
May Occur Will not Occur		None currently known
	x	
		VII: SPILL OR LEAK PROCEDURES

#### STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED

Sweep the spill area. Collect and place the spilled material in a waste disposal container. Avoid raising dust.

#### WASTE DISPOSAL METHOD

Discard any product, residue, disposable container or liner in an environmentally acceptable manner, in full compliance with federal, state and local regulations.

## THE REPORT OF A DESCRIPTION OF A DESCRIP

#### **RESPIRATORY PROTECTION (specify type)**

Where there is excessive dustiness, wear a respirator selected as per OSHA 29 CFR 1910.134 and approved by NIOSH/MSHA

	LOCAL EXHAUST				
	As appropriate to minimize dust				
	MECHANICAL (general)				
VENTILATION	Not Applicable				
	SPECIAL				
	Not Applicable				
	OTHER Not Applicable				
PROTECTIVE GI	OVES Recommended				
EYE PROTECTIO	N Safety glasses or goggles selected as per OSHA 29 CFR 1910.133				
OTHER PROTEC	TIVE EQUIPMENT				
	Eyewash fountain				

**IX. SPECIAL PRECAUTIONS** 

Causes eye irritation. Breathing dust may be harmful. May cause skin irritation. Open container slowly to avoid dust. Do not get in eyes. Avoid breathing dust and prolonged contact with skin. Use with adequate ventilation. Keep container closed. Wash thoroughly after handling. Do not ingest.

Before using you should know the hazards of the products to be adsorbed on the molecular sieve. The products could be flammable or toxic. You should know and follow all the safety precautions related to the adsorbed products.

#### OTHER HANDLING AND STORAGE CONDITIONS

pH range if in aqueous slurry 8 - 11

The opinions expressed herein are those of qualified experts within Union Carbide. We believe that the information contained herein is current as of the date of this Material Safety Data Sheet. Since the use of this information and these opinions and the conditions of use of the product are not within the control of Union Carbide, it is the user's obligation to determine the conditions of safe use of the product.



M-4837 84-0946 B/B4 1M

GENERAL OFFICES IN THE USA: Union Carbide Corporation Molecular Sieves Department Old Ridgebury Road Danbury, CT 06817

IN CANADA: Union Carbide Canada Limited Molecular Sieves Department 123 Eglinton Avenue East Toronto, Ontario M4P IJ3

Other offices in principal cities all over the world.

Lithographed in U.S.A.



ATTACHMENT 9



SECTION 3-2 EFFECTIVE 7-15-76 Supersedes 8-1-72 (Corr. 12-5-74)

## S-501 ALUMINA PRODUCT DATA

(Percent on Dry Basis)

#### **PRINCIPAL USES**

As a sulfation contamination resistant sulfur recovery catalyst used in natural gas plants, refineries, and smelters having Claus process plants and other sulfur recovery type plants.

#### GRADES

3 x 6 mesh

For special sizing contact nearest Kaiser Chemical Sales Office.

#### TYPICAL CHEMICAL ANALYSIS

SiO <sub>2</sub>	0.02
Fe <sub>2</sub> Õ <sub>3</sub>	0.02
Na <sub>2</sub> O	0.45
Loss on ignition	6.0
Al <sub>2</sub> O <sub>3</sub> & Inorganic Promoter*	93.5%

\*non toxic, non-volatile

#### TYPICAL PHYSICAL PROPERTIES

Form
Surface Area
Pore Volume
Mean Pore Diameter
Bulk Density, packed
Abrasion Loss
Crushing Strength
Sizing
•

Balls 250 sq. meters per gram .46 cc per gram 70 Angstroms 50 lb./per cubic foot 2% 20 lbs. force + 3 mesh-3%, -6 mesh-3%

#### SHIPPING INFORMATION

Container:

Weight: Bagged: Shipping Point: Bagged shipments in multiwall, moisture-proof bags. Also available in fiber or steel drums 100 pounds net Baton Rouge, Louisana

The information contained in this data sheet, to the bast of our knowledge, is true and accurate. Any recommendations or suggestions are made without warranty or guarantee, since the conditions of use are beyond our control. Nothing contained herein shall be construed to imply the permission, inducement, or recommendation to practice any invention covered by any patent owned by Kaiser Aluminum and Chemical Corporation or by others, without authority from the owner of the patent.



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ا المجمع المحمد الم المحمد 
PRINCIPAL USES

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ATTACHMENT 9 CONT.



SECTION EFFECTIVE 10-1:80

Superaedes 7-15-76

S-201 ALUMINA

As a sulfur conversion catalyst used in natural gas plants, refineries and smelters having: Claus process plants and other sulfur recovery type plants. 

### GRADES

3x6mesh.

For special sizing contact nearest Naiser Chemical Sales Office.

. . . .

TYPICAL CHEMICAL ANALYSIS 

 FYPICAL CHEMICAL ANALYSIS

 SO, FeQ,s
 0.07 0.02 0.02 0.035 6.0 9365

 Na,O Loss on ignitions
 0.07 0.02 0.35 6.0 9365

 FORM
 6.0 9365

 FYPICAL PHYSICAL PROPERTIES
 Balls 325 m²/gm: 44 lbs/lt\* 67.5 30lbs force + 3 mesh-3%, -6 mesh-3%

 SHIPPING INFORMATIONS
 Bagged shipments in multiwall, moisture-proof

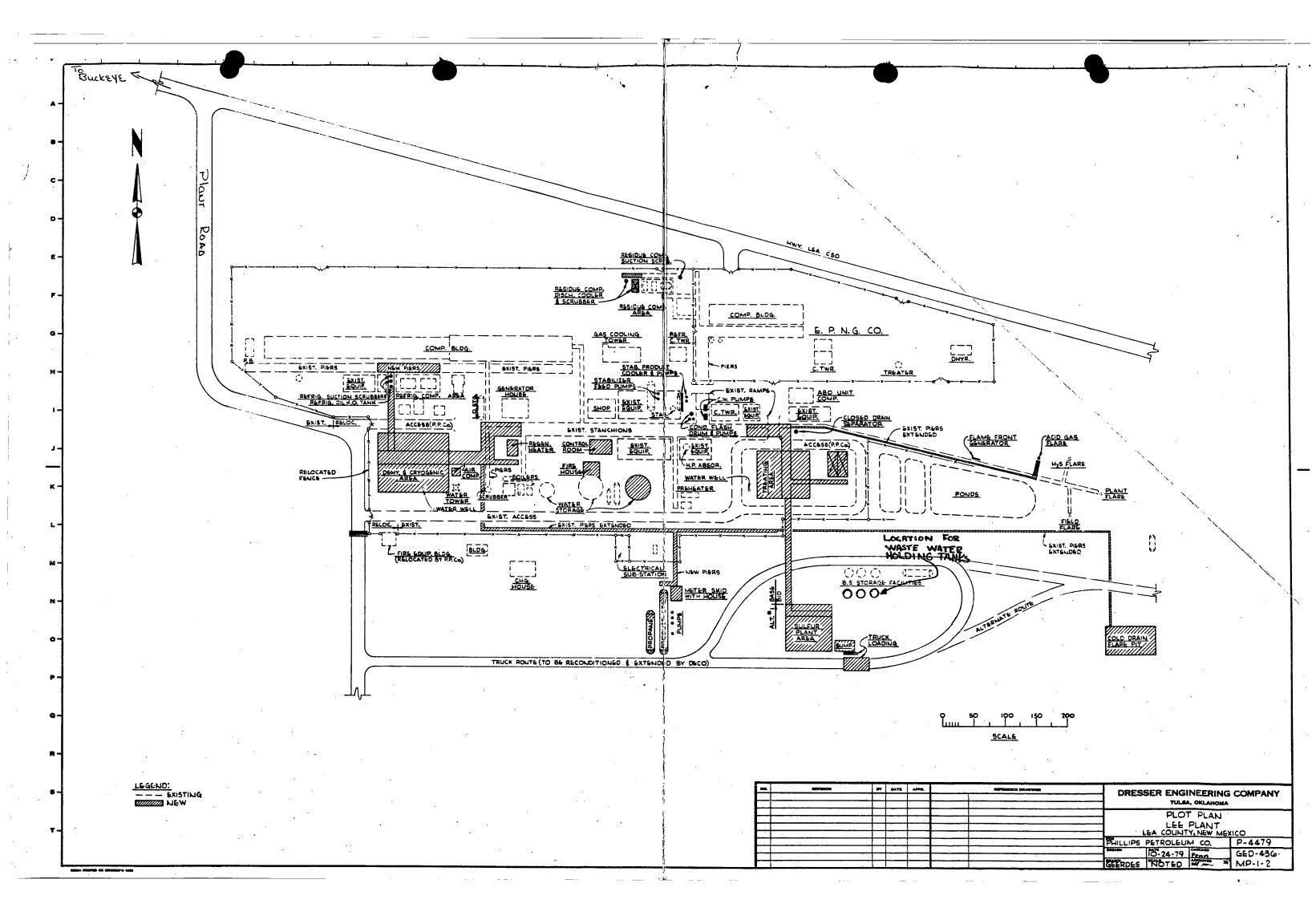
Container

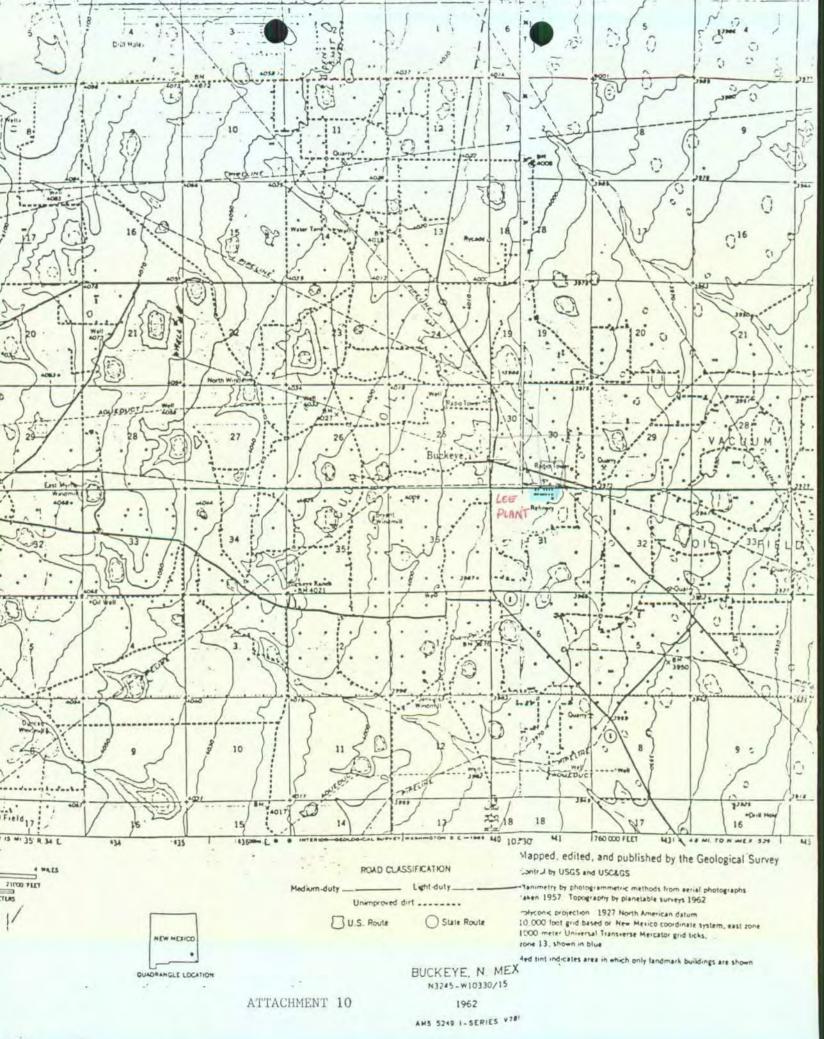
And a general the second second Shipping Point:

Bagged shipments in multiwall, moisture-proof bags. Also available in fiber or steel drums and by bulk pneumatic trucks and bulk hopper 100 nounds net Weight: Bagged: Fiber of Steel Drums: 300 pounds net Batom Rouge, Louisiana

the the conditions of use are b it is construct to make the servicesor, inducer and the second

Indicates change or addition from previous insule





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STATE OF NEW MEXICO



ENERGY AND MINERALS DEPARTMENT DIL CONSERVATION DIVISION



50 YEARS

GOVERNOR

August 19, 1985

POST OFFICE BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICO 87501 (505) 827-5808

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

Mr. E. E. Clark Phillips Petroleum Co. 4001 Penbrook Odessa, Texas 79762

Re: Discharge Plan GWR-2

Dear Mr. Clark:

On March 16, 1981, the ground water discharge plan, GWR-2, for the Lee (Buckeye) Gas 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 or less. The approval will expire on March 16, 1986.

If your 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.

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 Phil Baca or me at (505) 827-5812.

Sincerely, DAVID BOYER

Environmental Bureau Chief

DB/dr

cc: R. L. Stamets OCD - Hobbs

# P 505 905 955

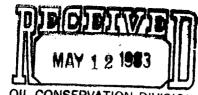
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED-NOT FOR INTERNATIONAL MAIL

(See Reverse)

1	Dec Reveise	
;	Sent to	
1	Mr. E.E. Clark	
	4001 Penbron	K
	P.O., State and ZIP Code	· · ·
	P.O., State and ZIP Code OdeSSG, TV, 4970	od
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to whom and Date Delivered	
	Return Receipt Showing to whom,	·
2	Date, and Address of Delivery	
PS Form 3800, Feb. 1982	TOTAL Postage and Fees	\$
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PHILLIPS

#### PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762 4001 PENBROOK OIL CONSERVATION DIVISION SANTA FE

EXPLORATION AND PRODUCTION GROUP Permian Basin Region

May 5, 1983

Amendment of Lee Gasoline Plant Discharge Plan

Mr. Joe D. Ramey, Director New Mexico Oil Conservation Division P.O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Ramey:

This letter is written to request an amendment, as per Regulation 3-109.F of the Water Quality Control Commission, to the approved discharge plan for our Lee (Buckeye) Gasoline Plant. The Plant is located in Section 30, Township 17 South, Range 35 East, Lea County, New Mexico.

In our original discharge plan, we stated that the wastewater would be disposed of in an approved injection well system owned and operated by Phillips in the East Vacuum Grayburg San Andres Unit. However, we found it to be to our advantage, due to possible water incompatibility with our wells' injection formation, to dispose of the wastewater through an injection well system owned and operated by Rice Engineering. An agreement was entered into with Rice Engineering stating they would dispose of all of our Lee Plant wastewater through their Vacuum Salt Water Disposal System. The volume of water disposed of is measured through gauging of our wastewater tank. We would request that the discharge plan be amended to reflect these changes.

If you should have any questions regarding this matter, please contact Bob Stubbs or Mike Ford of this office at (915) 367-1302.

Yours very truly,

E. E. Clark Manager, Permian Basin Region

MDF:plq







PHILLIPS PETROLEUM COMPANY BARTLESVILLE, OKLAHOMA 74004

SANTA FE 918 661-6600

EXPLORATION AND PRODUCTION GROUP

April 27, 1981

State of New Mexico Energy and Minerals Department P. O. Box 2088 State Land Office Building Santa Fe, NM 87501

Attention: Mr. R. L. Stamets

We are returning the Gasoline Plant Summary sheet with the changes for the Phillips plants. You will notice that the old Lee Plant is shutdown and the new cryogenic plant was started in April, 1981. The Lovington Plant has been shutdown and the gas is being processed at Lee Plant.

Sincerely,

L. R. Dodge

Gas Settlements Section 203 Denton Bldg. - Ext. 5018 (61-50)3 i'l mon Afottion

LRD:bc - RC

Attachment



# ENERGY AND MINERALS DEPARTMENT

BRUCE KING GOVERNOR

March 16, 1981

POST OFFICE, BOX 2088 STATE LAND OFFICE BUILDING SANTA FE, NEW MEXICD 67501 (505) 827-2434

Phillips Petroleum Company 4001 Penbrook Odessa, Texas 79762

Attention: Mr. E. E. Clark

Re: GWR-2

Gentlemen:

The discharge plan submitted for the discharge of boiler and cooling tower waters from your Lee (Buckeye) Plant located in Section 30, Township 17 South, Range 35 East, Lea County, New Mexico, is hereby approved.

The discharge plan was submitted pursuant to section 3-106 of the Water Quality Control Commission regulations. It is approved pursuant to section 109. Please note subsections 3-109.E and 3-109.F which provide for possible future amendment of the plan. Please also be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

Yours very truly,

JOE D. RAMEY Director

JDR/fd





ODESSA, TEXAS 79762 4001 PENBROOK

IPS PETROLEUM COMPANY CONSERVATION DIVISION SANTA FE

MAR02

NATURAL RESOURCES GROUP Exploration and Production

February 24, 1981

Lee Gasoline Plant Re: Discharge Plan

Mr. Joe D. Ramey, Director New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Ramey:

As requested by Mr. Parkhill of your office, attached is a plot plan of Phillips' Lee Plant, Lea County, New Mexico, showing the location of the holding tanks we propose to use for our plant waste water in compliance with Section 3-106-C of the Water Quality Control Commission Regulations. We plan to use three five-hundred (500) barrel tanks or equivalent available tankage as holding tanks.

If you need any further information in this matter, please contact Mr. A. B. Glasgow of this office, 915-367-1439.

Yours very truly,

E. E. Clark, Manager Permian Basin Region

RAJ:ps Attached

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PHILLE'S PETROLEUM CO. ( ) | LEE PLANT PLANT 3 PART OF SELA SEC 30, AND PART OF NE/4 SEC. 31, T-17-5, R-35-E, NMPM, 5 LEA COUNTY, N. MEXICO. PIT : #1 110'X 30' DEPTH OF 3' NO LINING #2 120'X 30' DEPTH OF 3' NO LINING #3 165'X110' DEPTH OF 3' NO LINING #4 600'x 300' DEMTH OF 3' No LINING

11.0 MARY GALLONS PER YEAR OF FLUIDS PLACED IN THE PITS.

WATER ANALYSIS

ATTACHED

Form 3081 4-64



PHILLIPS PETROLEUM

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MPANY

LABORATORY AMALYEIS RESULTS SUMMARY

course from: Lee 1	Plant	
ecured by: David	Vinger	Doto: 8/28/78
alysis No.: 61040		
Thlorides, ppm, NaCl	1693	
Chlorides, ppm, Cl	1034	
lkalinity, ppm CaCO3	188	
iardness, prm. CaCO3	1094	
Calcium, ppm, Ca	328	
Magnesium, ppm, Mg.	139	
Dissolved Solids, prm	1620	
Sulfates, ppm, Na2SO4	1035	
504	704	
Silicar pome Sig2	49	
Bicarbonates, ppm, HCO3	229	Man 2019 - 10 - 10 - 10 - 10 - 10 - 10 - 10 -
Total Iron Fe ppm	0	
	6.8	
Solometer Reading		20% 3%***********************************
\$ Salt	:265	Copies to:
lbs. Salt	.022	
and a summing a standar of the second statement of the second statement of the		
والموارية والمراقبة		
In the second of the second		
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		Manager Street
		C. A. A.L.

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY AND MINERALS DEPARTMENT OIL CONSERVATION DIVISION SANTA FE, NEW MEXICO

PUBLISHED 1/14/81 (ALB) 1/16/81 (46885)

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plans have been submitted for approval to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501, telephone (505) 827-3260.

PHILLIPS PETROLEUM COMPANY, Lee (Buckeye) Plant, West Star Route, Lovington, New Mexico 88260, also Bartlesville, Oklahoma 74004, proposes to discharge 29,400 gallons per day of boiler and cooling tower water into holding tanks located in the SW/4 SE/4 of Section 30, Township 17 South, Range 35 East. The discharge water will then be pumped to the injection well system for the approved East Vacuum Grayburg San Andres Unit Waterflood in the SW/4 SW/4 of Section 29, Township 17 South, Range 35 East, Lea County, New Mexico, for injection into an oil reservoir. Total dissolved solids of the discharge water is 9,000 mg/1. The applicant states that no ground water will be affected.

GETTY OIL COMPANY, Eunice No. 1 Gas Plant, P. O. Box 1137, Eunice, New Mexico 88231, also P. O. Box 3000, Tulsa, Oklahoma 74102, proposes to discharge 91,266 gallons per day of process, boiler and cooling tower water into lined pits located in the SW/4 SW/4 of Section 27, Township 22 South, Range 37 East, Lea County, New Mexico. The discharge water will be pumped from the lined pits into an injection well located in same above section. Total dissolved solids of the discharge water is about 7,000 mg/1.

GETTY OIL COMPANY, Eunice No. 2 Gas Plant, P. O. Box 1137, Eunice, New Mexico 88231, also P. O. Box 3000, Tulsa, Oklahoma 74102, proposes to discharge 24,318 gallons per day of process, boiler and cooling tower water produced in the SE/4 SE/4 of Section 28, Township 21 South, Range 37 East, Lea County, New Mexico. The discharge water will then be piped via 3 inch PVC pipeline into the Agua Incorporated salt water disposal system, which is 7,300 feet from plant where it will be injected in Agua disposal wells. Total dissolved solids of the discharge water is about 7,065 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 of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing shall 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 the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 9th day of January, 1981.

STATE OF NEW MEXICO

OIL CONSERVATION\_DIVISION JOE D. RAMEY

Director

SEAL



PHILLIPS PETROLEUM COMPAN

ODESSA, TEXAS 79762 4001 PENBROOK

NATURAL RESOURCES GF JUP Exploration and Production OIL CONSTRVATION DIVISION SANTA FE

December 19, 1980

Lee Gasoline Plant Application for Discharge Plan Approval

Mr. Joe D. Ramey, Director New Mexico 011 Conservation Commission P. O. Box 2088 Santa Fe, New Mexico 87501

Dear Mr. Ramey:

As required by Section 3-106-C of the Water Quality Control Commission Regulations and your letter of August 27, 1980, Phillips Petroleum Company submits the following proposed discharge plan for Lee Gasoline Plant, Lea County, New Mexico.

3-106-C-1. Quantity, quality and flow characteristics of the discharge;

An estimated 700 barrels of cooling tower and boiler blowdown will be discharged daily. Analyses of the two streams, individually and collectively, are attached.

2. Location of the discharge and of any bodies of water, water courses and ground water discharge sites within one mile of the outside perimeter of the discharge site, and existing or proposed wells to be used for monitoring;

The discharge will be collected in holding tanks at Lee Plant located in the SW/4 of the SE/4 of Section 30-T17S-R35E. The discharge will then be pumped to the injection system for the approved East Vacuum Grayburg San Andres Unit in the SW/4 of the SW/4 of Section 29-T17S-R35E for injection with the unit's waterflood water. There are no known water courses in this area. Since the discharge will not be in contact with the surface and the East Vacuum injection wells are completed as required by the NMOCC, well monitoring should not be required.

3. Depth to and TDS concentration of the ground water most likely to be affected by the discharge;

5. .S

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Raw water is supplied to Lee Plant by four water wells. Two are located in the N/2 of Section 31-T17S-R35E at an approximate depth of 230 feet. Two are located in the Lee Plant yard at an approximate depth of 145 feet. TDS concentration of water is approximately 450 ppm.

4. Flooding potential of the site;

None.

5. Location and design of site and method to be available for sampling, and for measurement or calculation of flow;

The discharge water will be gathered and contained in holding tanks at Lee Plant and then delivered by pipeline to the East Vacuum Grayburg San Andres Unit water injection system for subsurface injection. A flow meter will be installed at Lee Plant and flow meters are also installed on the wellhead of each East Vacuum Grayburg San Andres Unit injection well. Samples can be obtained from the holding tanks at Lee Plant or at the East Vacuum Unit.

 Depth to and lithological description of rock at base of alluvium below the discharge site if such information is available;

Not applicable for this discharge method.

7. Any additional information;

This is a proposed discharge plan. Construction will begin as soon as right of way and commission approval of the discharge plan are obtained.

If you have any questions regarding this matter, please contact Ms. Rita Johns of this office, (915) 367-1302.

B.Z. Parker

E. E. Clark Operations Manager

RAJ:ck

## LABO TORY ANALYSIS RESULTS SUMMAR

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W B.I. JACKSO.	NED.E. HALL	Date	12-16-80
No. 1-1514 B	1000000 15T. C.T.	BLOWDOWN ENGINE C.T.	(FRESH WATER) Les RAW
Chlorides, ppm, NaCl	1,320	746	67
Chlorides, opm, Cl	207	456	41
Alkalinity, ppm, CaC	<b>•</b>	39	166
Hardness, ppm, CaCO <sub>2</sub>	1,669	1, 792	22/
Calcium, ppm, Ca	492	534	110
Magnesium, ppm, Mg	106		<u> </u>
Dissolved Solids, p	pm <b>2,7</b> 00	3,150	450
Sulfates, ppm, Na <sub>2</sub> SO	. 89	96	
Sulfates, ppm, SO,	61	65	3
Silica, ppm, SiO <sub>2</sub>	130	/52	<u> </u>
Bicarbonates, ppm, H	co <sub>3</sub> 46	48	202
Total Iron, ppm. Fe	6	6	6
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LAB	ANALYSIS	RESULTS	SUMMA

B.J. JACKSON ;	D.C. HALL	Date	12-16-80
<u>L- 1514</u> BL:	WAGWA PIT	# 1 Boiler BLOWDOW	#2 Boiler BLOWDOWN
Chlorides, ppm, NaCl	5,062	1,464	1/42
Chlorides, ppm. Cl	3,093	894	698
lkalinity, ppm, CaCO3	226	F: 684	P = 554
		m=773	m : 657
Hardness, ppm, CaCO2	1436	0	<u></u>
Calcium, ppm, Ca	410	0	0
lagnesium, ppm, Mg	100	0	0
Dissolved Solids, ppm	9,000	4320	3600
Sulfates, ppm, Na2SO4	75	27	22
Sulfates, ppm, SO,	51	18	15
Silica, ppm, SiO2	/00	159	155
Bicarbonates, ppm, HCO3	275	943	80/
fotal Iron, ppm, Fe	6	/7	8
DH	7.8	/2.0	12.0
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ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING GOVERNOR

August 27, 1980

POST OFFICE BOX 2088 STATE LAND DFFICE BUILDING SANTA FE, NEW MEXICO 87501 (505) 827-2434

Mr. Ben Ballard Director of Environmental Control 10C4 PB Phillips Petroleum Company Bartlesville, Oklahoma 74004

Re: Request for Discharge Plan

Dear Mr. Ballard:

Under provisions of the regulations of the Water Quality Control Commission you are hereby notified that the filing of a discharge plan for Phillips' Lee (Buckeye) Plant (36-T17S-R35E) is required. Discharge plans are defined in Section 1-101.1 of the regulations and a copy of the regulations is enclosed for your convenience.

This plan should cover all discharge of effluent at the plant site or adjacent to the plant site. Section 3-106A. of the regulations requires submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this period is sought and approved.

The discharge plan should be prepared in accordance with Part 3 of the Regulations.

If there are any questions on this matter, please do not hesitate to call me or Thomas Parkhill at 827-3260. Mr. Parkhill has been assigned responsibility for review of all discharge plans.

Yours very truly,

JOE D. RAMEY Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs Phillips Petroleum Co., West Star Route, Lovington 88260