GW - 10

GENERAL CORRESPONDENCE

YEAR(S):

2004 - 1989

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 1

weeks.

Beginning with the issue dated

June 9 2004

and ending with the issue dated

June 9 2004

Kathi Bearden

Publisher

Sworn and subscribed to before me this 9th day of June 2004

Notary Public.

My Commission expires
November 27, 2004
(Seal)

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

LEGAL NOTICE
June 9, 2004

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-010) - Sid Richardson Energy Services Co., Robert L. Gawlik, (817) 390-8685, 201 Main Street, Suite 3000, Fort Worth, Texas 76102, has submitted a renewal discharge application for the Sid Richardson Gasoline Co. Jal #3 Gas Plant located in the SW/4 of Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 30,000 gallons per month of process waste with a total dissolved solids concentration of 2200 mg/l is collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of 90 feet with a total dissolved solids concentration of approximately 2,208 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 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 29th day of April, 2004.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
JOANNA PROKOP, Acting Director
(SEAL)
#20714

01100060000 02570440

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

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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 29th day of April, 2004.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

JOANNA PROKOP,
Acting Director

Legal #74435
Pub. June 9, 2004

SID RICHARDSON
ENERGY SERVICES CO.

201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102-3131
817 / 390-8685
FAX 817/339-7394
EMAIL: rlgawlik@sidrich.com

ROBERT L. GAWLIK
Manager, Environmental
Health & Safety

CERTIFIED MAIL – RETURN RECEIPT
7002 2030 0006 2061 4665

June 8, 2004

Mr. Roger Anderson
Oil Conservation Division
New Mexico Energy, Minerals, &
Natural Resources Department
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Subject: **Groundwater Discharge Plan Renewal Approval Conditions**
- **GW-010**

Dear Mr. Anderson:

Please find attached one signed copy of the Discharge Plan Approval Conditions for the Jal #3 Plant (GW-010) located in Lea County, New Mexico. The filling fee, as indicated in your letter, has been received by the OCD in Santa Fe for this location. Attached is a SRES check for the flat fee of $4,000.00 (Ck. #801518). Please note that a copy of this letter has also been sent to Mr. Chris Williams in the OCD Hobbs District office.

If there are any questions, please do not hesitate to give me a call at the number indicated above.

Sincerely,

Robert L. Gawlik
Manager, Environmental Health and Safety

Attachments
36-04

c: MRR/WJF/WAW/HH
David Maness – Jal #3
OCD Hobbs District office

SID RICHARDSON
ENERGY SERVICES CO. - JAL

201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102-3131
817 / 390-8685
FAX 817/339-7394
EMAIL: rlgawlik@sidrich.com

ROBERT L. GAWLIK
Manager, Environmental
Health & Safety

April 21, 2004

Via Federal Express

Mr. Roger Anderson
Oil Conservation Division
New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Subject: Groundwater Discharge Plan GW-010
Jal #3 Plant
Discharge Plan Application Renewal

Dear Mr. Anderson:

In accordance with New Mexico Water Quality Control Commission regulations, a Renewal Application of the referenced discharge plan is being submitted for your review.

Please find attached two copies of the Groundwater Discharge Plan (GW-010) Renewal Application for the Jal #3 Plant located in Lea County, New Mexico. Also attached, are the filing fee check (#801449) for the sum of $100.00 and the revised discharge plan for Jal #3 Plant. Please note that a copy has also been sent to Mr. Paul Sheeley in the Hobbs District office.

Revisions to the plan were minor, however we have reformatted and reissued the entire plan. Included in the plan, please note the change of the Company name and responsible parties. Sid Richardson Gasoline Co. has changed its name to Sid Richardson Energy Services Co. - Jal. Also, there were a few minor changes made within the body of the attached plan.

If there are any questions, please do not hesitate to give me a call at the number indicated above.

Sincerely,

Robert L. Gawlik
Manager, Environmental Health and Safety

Attachments
13-04
c: MRR/WJF/WAW/HH
David Maness - Jal #3 Plant Manager
Jimmy Payne - Monahans
Paul Sheeley @
New Mexico Oil Conservation Division
Hobbs District Office
1625 French Drive
Hobbs, New Mexico 88240

DOYLE HARTMAN
Oil Operator
500 NORTH MAIN
P.O. BOX 10426
MIDLAND, TEXAS 79702

(915) 684-4011
(915) 682-7616 FAX

November 6, 2002

Jamie Bailey, Director, Oil, Gas & Minerals Division
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, NM 87504-1148

Re: **Sid Richardson's November 5, 2002 phone (verbal) notice of its temporary shutdown next week of its Lea County Gathering System and Jal Plant No. 3**

Gentlemen:

Reference is made to our letter to Sid Richardson Energy Services Company, dated November 6, 2002, regarding Sid Richardson's verbal notice, by phone, of temporary shutdown next week of its Lea County Gathering System and Jal Plant Number 3, in Lea County, New Mexico. We are submitting a copy of this letter to you in effort to keep you apprized of the situation which may have a substantial effect on revenues, for the production month of November, 2002.

Thank you for your attention in this matter.

Very truly yours,

Doyle Hartman, Oil Operator

Doyle Hartman
Owner

cc: Ray B. Powell, M.S., D.V.M., Commissioner of Public Lands
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, NM 87504-1148

Lori Wrotenbery, Directory
State of New Mexico Oil Conservation Commission
1220 So. St. Francis Drive
Santa Fe, NM 87505

Larry Kehoe, Assistant Commissioner, Mineral Resources
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, NM 87504-1148

Kurt McFall, Director,
Royalty Management Division
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, NM 87504-1148

Charlotte Marx, Royalty Management Program
Minerals Management Service
Room 212A, DFC Building 85
Denver, CO 80225

James A. Davidson
201 West Wall, Suite 600
Wall Towers East
Midland, Texas 79701

DOYLE HARTMAN, Oil Operator (Dallas)

DOYLE HARTMAN, Oil Operator (Midland)

C:\DHOO_Wrk\Correspondence\St of NM shut-in notif ltr

DIVIDER PAGE

DOYLE HARTMAN
Oil Operator
500 NORTH MAIN
P.O. BOX 10426
MIDLAND, TEXAS 79702

(915) 684-4011
(915) 682-7616 FAX

November 6, 2002

Via Facsimile (817) 390-8606 and FedEx
Sid Richardson Energy Services Company
201 Main Street, Suite 3000
Fort Worth, Texas 76102-3131
Attn: Jim Wade, Vice-President, Gas Supply
Craig Strehl, President
Mitch Roper, Senior Vice President
David Tatum, Manager of Contracts Administration
Mike Custon, Manager, Gas Supply

Re: **Sid Richardson's November 5, 2002 phone (verbal) notice of its temporary shutdown next week of its Lea County Gathering System and Jal Plant No. 3**

Gentlemen:

Reference is made to Sid Richardson's verbal telephone notice, yesterday afternoon, to Mr. Ronnie Pryer, of our Jal Office, that next week, Sid Richardson will be temporarily shutting down its Jal Plant No. 3 and low-pressure Lea County Gathering System, for the alleged purpose of performing "plant or system maintenance". In this regard, Sid Richardson has asked that the herein enclosed substantial list of Doyle Hartman-operated Lea County, New Mexico wells be temporarily shut in, but gave no written details concerning the announced shut in.

In consideration of Sid Richardson's short verbal shut-in notice, and recognizing that the scheduled plant and system shutdown is oddly occurring at the onset of the 2002-2003 winter residential heating season (which is the period of peak gas demand), we are assuming that Sid Richardson must have a serious need to perform the subject plant maintenance, at this point in time. Therefore, since we wish to fully cooperate with Sid Richardson's necessary maintenance requirements, but (at this time) have essentially no written information as to the nature of the maintenance work that must be performed, we respectfully request that Sid Richardson provide written information as to the nature of the scheduled maintenance work, and the precise timing of the maintenance shutdown period; i.e., at precisely what time next week can Doyle Hartman's shut-in Lea County, New Mexico wells be returned to normal production, after the expedited completion of the necessary maintenance work.

As Sid Richardson can very well appreciate, all oil and gas revenues are critical to an independent oil and gas operator, which means that it is important that we fully maximize our oil and gas production, as well as peak pricing opportunities. Moreover, most above-average Lea County, New Mexico gas wells are today equipped with pumping units and are connected to supplemental field compression. Therefore, even though Sid Richardson's Gathering and Plant System may be scheduled for a necessary shutdown, we none the less must continue to pump fluids from our low-pressure gas wells, which pumping operations are made more difficult with wells being shut in.

Consequently, we respectfully ask that Sid Richardson promptly provide the above-referenced written information, regarding the nature and duration of the temporary shut in (next week) of our wells, so that we can manage the requested temporary shutins as efficiently as possible, and so that we can minimize any possible wellbore damage that could potentially result from the required shut in of our wells.

Sincerely yours,

Doyle Hartman, Oil Operator

Doyle Hartman
Owner

enclosures

lil

cc: **Facsimile (915) 570-6078**
Sid Richardson Energy Services Company
500 W. Texas Avenue, Suite 920
Midland, Texas 79701
Attn: Bob Milam, Manager of Gas Supply
Joe O'Hara, Manager of Gas Supply, West Texas Area

Facsimile (505) 395-2326
Sid Richardson Energy Services Company
P.O. Box 1226
Jal, New Mexico 88252
Attn: Randall Dunn, Lea County, New Mexico, Plant Manager
Norma Crawford, Secretary

Facsimile (505) 395-2345
David Maness, Jal No. 3, Plant Manager
Sid Richardson Energy Services Company
P.O. Box 1311
Jal, New Mexico 88252

Ronnie Pryer
1816 Breckon
Hobbs, New Mexico 88240

James A. Davidson
201 W. Wall, Suite 600
Midland, Texas 79701

DOYLE HARTMAN, Oil Operator (Dallas Office)

DOYLE HARTMAN, Oil Operator (Midland Office)
Don Mashburn
Steve Hartman
John Allred
Linda Land

DOYLE HARTMAN, Oil Operator (Jal Office)
Ronnie Pryer
William Pilkington
Oscar Lujan
Charlie Cowger
Mike Chance

DIVIDER PAGE

SID RICHARDSON ENERGY SERVICES
BOX 1226
JAL, NM 88252
505-395-2116

FAX

TO: Ronnie Pugh FROM: Norma Crawford

FAX: DATE 11/5/02

PHONE: PAGES: INCLUDING COVER

RE: CC:

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY

COMMENTS:

Car - 2183-
682-7616 Mid.

57000	BRITT #2	DOYLE HARTMAN	C	PRESTON J	915-661-9558	Ronnie
57001	ARNOTT RAMSEY HIGH PRESSUR	DOYLE HARTMAN	W	BECKHAM B		
57003	BRITT LAUGHLIN CPD	DOYLE HARTMAN	C	PRESTON J		
57009	BRITT #11	DOYLE HARTMAN	C	PRESTON J		
57010	SHERRILL CPD	DOYLE HARTMAN	W	BAEZA J		
57013	BRITT #12	DOYLE HARTMAN	C	PRESTON J		
57016	MEYER B CPD	DOYLE HARTMAN	M	PRESTON J		
57018	BATES #1	DOYLE HARTMAN	W	KIMBALL B		
57019	COWDEN CPD	DOYLE HARTMAN	M	THOMAS M		
58047	MEYERS CPD	DOYLE HARTMAN	M	GILLILAND F		
58061	SKELLY M STATE #4	DOYLE HARTMAN	W	BAEZA J		
58230	CUSTER STATE #1	DOYLE HARTMAN	W	BAEZA J		
58371	NEW MEXICO STATE AA #4	DOYLE HARTMAN	O	THOMAS M		
58522	JUSTIS #10	DOYLE HARTMAN	W	BECKHAM B		
58926	TURNER ST #3 AB REEVES #6&7	DOYLE HARTMAN	C	PRESTON J		
58932	DABBS #3	DOYLE HARTMAN	W	KIMBALL B		
58933	STATE E #2 & #4	DOYLE HARTMAN	O	COLE D		
59796	HOBBS #5	DOYLE HARTMAN	O	PRESTON J		
59814	DABBS #4	DOYLE HARTMAN	W	KIMBALL B		
59843	MEXICO E #2	DOYLE HARTMAN	M	THOMAS M		
59844	HOBBS K #2	DOYLE HARTMAN	O	THOMAS M		
59845	HOBBS L #1 - MEXICO E COM #1	DOYLE HARTMAN	O	THOMAS M		
59879	STATE J #5	DOYLE HARTMAN	O	PRESTON J		
59880	BATES #3	DOYLE HARTMAN	W	KIMBALL B		
59890	STATE J #6	DOYLE HARTMAN	O	PRESTON J		
59922	BATES #4	DOYLE HARTMAN	W	KIMBALL B		
59935	STATE H #5	DOYLE HARTMAN	O	THOMAS M		
59948	H M BRITT #1	DOYLE HARTMAN	C	PRESTON J		
59966	KING CPD	DOYLE HARTMAN	O	THOMAS M		
59969	JACK B-30 #3	DOYLE HARTMAN	M	BAEZA J		
59970	M S BERRYMAN #2	DOYLE HARTMAN	O	COLE D		
59980	WULFF STATE #1	DOYLE HARTMAN	C	PRESTON J		
59992	HANSEN CPD	DOYLE HARTMAN	C	PRESTON J		
59995	ARNOTT RAMSEY LOW PRESSUR	DOYLE HARTMAN	W	BECKHAM B		
59998	BRITT #5	DOYLE HARTMAN	C	PRESTON J		
59999	BRITT #4	DOYLE HARTMAN	C	PRESTON J		
60269	NEW MEXICO AA STATE #1	DOYLE HARTMAN	O	THOMAS M		
60373	STATE A COM #4 5	DOYLE HARTMAN	O	COLE D		
60811	VAN ZANDT #1	DOYLE HARTMAN	W	BAEZA J		

Area Pumpers.
William - W
Oscar - O
Charlie - C
Mike - M

SID FIELD

60818	MARTIN B #1	DOYLE HARTMAN	W	BAEZA J		
60945	ELLIOT B6 #1 CS	DOYLE HARTMAN	O	COLE D		
60954	MYERS B FED RAA #13	DOYLE HARTMAN	M	BAEZA J		
61226	STATE J #4	DOYLE HARTMAN	O	PRESTON J		
61283	BRITT #14	DOYLE HARTMAN	C	PRESTON J		
61511	JAGK A-20 10	DOYLE HARTMAN	M	BAEZA J		
61529	JACK A 20 #9	DOYLE HARTMAN	M	BAEZA J		
61880	ETZ #4	DOYLE HARTMAN	W	BECKHAM B		
63826	FM BURLESON WN #2	DOYLE HARTMAN	W	STEADHAM S		
64008	THOMAS A #1	DOYLE HARTMAN	M	BAEZA J		
64061	MYERS B FEDERAL #26 29	DOYLE HARTMAN	M	BAEZA J		
64105	F M BURLESON WN #3	DOYLE HARTMAN	W	BECKHAM B		
64112	MEXICO G CPD	DOYLE HARTMAN	M	BAEZA J		
68328	BRITT A 6 #1	DOYLE HARTMAN	C	PRESTON J		
63496	HANAGAN #3 5	Driftwood Oil, LLC		BECKHAM B	431-0522	Bugg
63915	CONDITT #1	Driftwood Oil, LLC		BECKHAM B		
68216	KOONTZ #1	Driftwood Oil, LLC		BECKHAM B		
58825	C M CARLSON B-26 FED #3	EARL R. BRUNO CO.		KIMBALL B		
60696	CARLSON FEDERAL A #1	EARL R. BRUNO CO.		KIMBALL B		
60712	C M CARLSON B26 FED #4	EARL R. BRUNO CO.		KIMBALL B		
63057	CARLSON A #1 2 3	EARL R. BRUNO CO.		STEADHAM S		
63612	CARLSON B25 1	EARL R. BRUNO CO.		KIMBALL B		
64110	J H McCLURE B #23 & B #24	EARL R. BRUNO CO.		STEADHAM S		
57015	CURRY STATE #4	ENDEAVOR ENERGY RESOURCES, L.P.		ROWLAND M		
63164	STUART LANGLIE MTX UT 101	ENERGEN RESOURCES CORPORATION		STEADHAM S		
59649	EUMONT GAS COM 1 #4	EXXON MOBIL CORPORATION		PRESTON J		
59650	EUMONT GAS COM NO 1 #3	EXXON MOBIL CORPORATION		PRESTON J		
59653	EUMONT GAS COM 1 #5	EXXON MOBIL CORPORATION		PRESTON J		
60665	EUMONT GAS COM 1 #1	EXXON MOBIL CORPORATION		PRESTON J		
59724	SDX CPD #1	FEAGAN GATHERING COMPANY		THOMAS M		
59772	MEYERS B FED #1	FEAGAN GATHERING COMPANY		BAEZA J		
59795	MEYERS FEDERAL #7	FEAGAN GATHERING COMPANY		BAEZA J		
03520	THOMAS 17 #1 2 3	FULFER OIL & CATTLE CO. LLC		BAEZA J	431-0522.	Bugg

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

November 20, 1998
RLG-125-98

CERTIFIED MAIL – RETURN RECEIPT
P 115 630 545

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

Re: Discharge Plan Renewal GW-010
Sid Richardson Gasoline Co.
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. Anderson:

Attached is the signed copy of the NMOCD's Conditions of Approval for Discharge Plan GW-010 for SRGCo.'s Jal #3 Gas Processing Plant. In accordance with WQCC Regulation 3114, enclosed is our check (#902231) for $1,667.50, which represents the fee for renewing the subject discharge plan.

We appreciate your and Mr. Jack Ford's time, attention and prompt handling of this renewal request. If there should be any further questions, please do not hesitate to call me.

Sincerely,

Robert L. Gawlik

RLG:gdw
Attachments

c: C. P. O'Farrell/H. Harless – w/attachment
M. R. Roper/W. J. Farley – w/attachment
K. C. Clark – w/attachment
G. W. Washburn – w/attachment
J. D. Payne – w/attachment
Wayne Price (NMOCD – Hobbs) – w/attachment

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

November 16, 1998

Mr. Robert Gawlik
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, Texas 76102

RE: Discharge Plan Stipulations
GW-010 Jal Gas Plant
Lea County, New Mexico

Dear Mr. Gawlik:

Enclosed are corrected stipulations (Page 2 of 3 only) which should be attached to the approved Discharge Plan Renewal, dated October 30, 1998. Kindly replace the Page 2 of 3 of the stipulations which was sent with the original renewal approval and replace with the attached Page 2 of 3.

Thank you for your comments to bring this to our attention.

Sincerely,

W. Jack Ford, C.P.G., P.G.
Oil Conservation Division

cc: OCD Hobbs District Office

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102
817-390-8600

FACSIMILE TRANSMISSION COVER SHEET

DATE: November 6, 1998 **TO:** Mr. W. Jack Ford
COMPANY: New Mexico Oil Conservation Division
LOCATION Santa Fe New Mexico
FAX #: 505-827-8177 **TOTAL PAGES INCLUDING COVER:** 2
MESSAGE:

RE: **Discharge Plan Renewal GW-010** / Jal #3 Gas Plant / Lea County, New Mexico

There are two items that we would like to request a variance on or at least a rewording of the condition. Please consider our request for changes in the discharge plan approval conditions:

Send new Stipulations Sent 11-17-98

#10 *Underground Process/Wastewater Lines: All underground process / wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing*

The first sentence within the #10 condition statement implies that our system must undergo a retest now. SRGCo. completed testing (prior to July 1995) according to the requirements and conditions listed in our 1993 Discharge Plan Renewal. According to our schedule we are not due to complete our next test until July 2000. We request that the #10 condition be changed to read as follows:

#10 *Underground Process/Wastewater Lines: All underground process / wastewater pipelines must be tested to demonstrate their mechanical integrity, maintain records to verify testing and retest every 5 years thereafter. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.*

Our second request is with the #12 approval condition as follows:

#12 *Housekeeping: All systems designed for spill collection / prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.*

Conducting weekly inspections as part of the condition requirement is not a problem. During normal operator rounds these systems are actually looked at numerous times during a shift. If a problem is discovered it is handled at that time and complete records are maintained on all reportable spills. Before, during and after storm events our facility operators make regular rounds throughout the plant. Storm events in Southeast New Mexico are few and far between.

Our facility is staffed and operates on a 24-hours- per-day, 7-days-a-week and 365-days-a-year schedule. We request that as far as the record keeping and retention requirements as stated in condition #12 be limited to an annual report that is maintained on site in the Discharge Plan file. The annual report will indicate any problems during the year with our system. If there were no problems during the year the annual report would reflect the same and be signed by the facility manager. Records of reportable spills filed with the OCD will also be a part of our record.

It is requested that #12 approval condition read as follows:

> #12 *Housekeeping: All systems designed for spill collection / prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. An annual report of conditions, spills, overtopping, etc. will be retained on site for a period of five years.*

Your consideration of this request will be greatly appreciated. Please respond as soon as practical so that I can have the signed Discharge Plan Approval Conditions in to your office by our due date of November 13, 1998.

We appreciate your time, attention and prompt handling of this renewal request. If there should be any further questions, please do not hesitate to call me.

CPO/HH
MRR/WJF
KCC GWW

FROM: Robert Gawlik, Environmental Health and Safety Associate
PHONE: **817-390-8685** OUR FAX NUMBER IS: **817-390-8663**
IF YOU NEED A RESEND, PLEASE CALL: **817-390-8632**

NOTICE OF PUBLICATION

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

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

(GW-010) - Sid Richardson Gasoline Co., Robert L. Gawlik, (817) 390-8600, 201 Main Street, Suite 3000, Fort Worth, Texas 76102, has submitted a renewal discharge application for the Sid Richardson Gasoline Co. Jal #3 Gas Plant located in the SW/4 of Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 54,000 gallons per day of process waste with a total dissolved solids concentration of 2200 mg/l is collected and disposed of in a UIC-permitted Class II disposal well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of 90 feet with a total dissolved solids concentration ranging from 700 to 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 19th day of August 1998.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Roger A. Anderson
for LORI WROTENBERY, Director

S E A L

SID RICHARDSON GASOLINE CO.
201 MAIN STREET, SUITE 3000
FORT WORTH, TEXAS 76102

ROBERT L. GAWLIK
ENVIRONMENTAL HEALTH
& SAFETY ASSOCIATE

817/390-8600

August 5, 1998
RLG-91-98

CERTIFIED MAIL – RETURN RECEIPT
P 115 630 455

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

Re: Discharge Plan GW-010 RENEWAL
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. Anderson:

On November 21, 1998, discharge plan GW-010 as approved for our Jal #3 Gas Plant will expire. In accordance with New Mexico Water Quality Control Commission regulations, an application for the **renewal** of the referenced discharge plan is being submitted for your review. Also enclosed is a check in the amount of $50.00 for the Water Quality Management Fund.

There have been no modifications to the original discharge plan or facilities since the current plan became effective. Attached is the discharge plan application for gas plants. As discussed with Mr. W. Jack Ford, the only part of the discharge plan manual that we will resend to you will be the section(s) that required a change of any type. The "Introduction" section, from the cover sheet and "Index" to page 12, included a number of minor changes; in Section F, behind the two pages of information on chemicals stored and used at Jal #3, all information has been updated for the MSDS Index and cross-reference material. For other information pertaining to this application, please refer to the original discharge plan application and material.

If there are any questions or concerns pertaining to this renewal, please do not hesitate to call me at 817/390-8685.

Sincerely,

Robert L. Gawlik

RLG:gdw
Enclosures

c: C. P. O'Farrell/H. Harless – w/o enclosures
M. R. Roper/W. J. Farley – w/o enclosures
G. W. Washburn – w/enclosures
J. D. Payne – w/enclosures

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS, OIL REFINERIES AND GAS COMPRESSOR STATIONS

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

RECEIVED
AUG 1 0 1998
Environmental Bureau
Oil Conservation Division

I. TYPE: Natural Gas Processing

II. OPERATOR: Sid Richardson Gasoline Co.

ADDRESS: 201 Main Street, Suite 3000, Fort Worth, TX 76102

CONTACT PERSON: Herb Harless PHONE: 817/338-8386

III. LOCATION: SW 1/4 NW 1/4 NW 1/4 SW 1/4 Section 33 Township 24-S Range 37-E

Submit large scale topographic map showing exact location.

FOR ALL INFORMATION BELOW, SEE THE ORIGINAL DISCHARGE PLAN APPLICATION.

IV. Attach the name and address of the landowner(s) of the disposal facility site.

V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tank on the facility.

VI. Attach a description of sources, quantities and quality of effluent and waste solids.

VII. Attach a description of current liquid and solid waste transfer and storage procedures.

VIII. Attach a description of current liquid and solid waste disposal procedures.

IX. Attach a routine inspection and maintenance plan to ensure permit compliance.

X. Attach a contingency plan for reporting and clean-up of spills or releases.

XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will no adversely impact fresh water. Depth to and quality of ground water must be included.

XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XIII. CERTIFICATION

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

Name: Herb Harless Title: Mgr., Environmental Health & Safety

Signature: Herb Harless Date: 8-3-98

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

DISCHARGE PLAN

FOR

SID RICHARDSON GASOLINE CO.

JAL NO. 3 PLANT

LEA COUNTY, NEW MEXICO

Prepared By:

Sid Richardson Gasoline Co.

Fort Worth, Texas

July 1998

REVISIONS FOR DISCHARGE PLAN

Rev. #	Revisions	Date
0	Original Issue - Rewrite of Entire Plan	09/10/93
1	Revised Paragraph 14, Page 4 of Appendix H - "Drain Line Testing Procedure"	10/22/93
2	Revisions for Renewal Application	06/29/98

DISCHARGE PLAN INDEX

APPENDICES

A. Site Location Topographic
B. Facility Site Plans

C. Flow Schematics
   1. Water and Wastewater
   2. Waste Water Classifier
   3. "A" Plant Cooling Water Containment
   4. "B" Plant Cooling Water Containment

D. Analysis of Effluent and Well Water

E. Hauling and Disposal Contractors

F. Chemicals Used Facility
   1. List and Quantities
   2. MSDS Index of All Chemicals Used at Facility

G. Drain System Plan

H. Procedures for Testing Drain System

I. TYPE OF OPERATION

The main purpose of the Jal No. 3 Plant facility is natural gas processing. The main processes that occur at the plant are compression, sweetening, dehydration, cryogenic extraction of ethane and heavier hydrocarbons, sulfur recovery, steam generation, and power generation. A brief description of the main processes follows:

A. COMPRESSION

Plant compressors are used for inlet, refrigeration and residue recompression. The plant has fifteen engine-driven compressor units totaling 27,200 horsepower and three gas turbine-driven centrifugal compressor units totaling 22,800 horsepower. Entrained liquids are removed from the inlet gas streams with gas-liquid separators. Compressor engines in the "A" and "B" Compressor buildings and Generator engines in the Auxiliary Building use water for lubricating oil cooling and engine-jacket cooling in closed-loops systems. The gas turbine-driven centrifugal compressors use Ambitrol in their cooling systems.

B. SWEETENING

After compression of the inlet gas to approximately 600 psig, H_2S and CO_2 are removed by contacting the stream with an aqueous solution of monoethanolamine (MEA) in two contactor vessels (V-50, V-4302). The rich amine is then stripped of the H_2S and CO_2 in two MEA stills (V-56, V-4301). The lean amine is recirculated back to the two contactor vessels. Sweetened gas leaves the overhead of the amine contactors and goes to the glycol contactors. The H_2S and CO_2 leave the still overhead and go to the Sulfur Recovery Unit (SRU).

C. DEHYDRATION

Sweetened inlet gas enters two Glycol Contactors (V-5101, V-5102) for initial dehydration by contacting the stream with an aqueous solution of triethylene-glycol (TEG). The partially dehydrated gas leaves the overhead of the contactors and goes to the molecular sieve dehydration vessels (V-205A, B, C, D) in the Cryogenic Plant for final dehydration. The rich TEG solution is regenerated in the Glycol Reboiler (E-5101) and returned to the contactors. The molecular sieve is regenerated with hot inlet gas; the water-saturated regeneration gas is then cooled in the Regeneration Gas Cooler (E-209) and the water and gas are then separated in the Regeneration Gas Scrubber (V-206); removed water is sent to the closed drain system; recovered hydrocarbon liquid is sent to the Compressor Liquids Separator.

D. CRYOGENIC PLANT

The Cryogenic Plant extracts 80 to 85 percent ethane (C_2) and heavier hydrocarbons from the dehydrated gas stream. Rich gas is cooled through a series of inlet heat exchangers and finally in the Chiller (E-202, C_3 refrigeration system) to approximately -35°F at the Chiller Separator (V-201) where the majority of the butanes and heavier hydrocarbons are separated. Liquids from V-201 are fed to the bottom feed of the Demethanizer (V-203). Vapors from V-201 continue through another set of heat exchangers and are cooled to approximately -95°F at the Expander Separator (V-202). Liquids separated at V-202 are fed to the Demethanizer and the vapors go to the Turbo-Expander (EK-201). The cold vapors enter the Turbo-Expander at approximately 540 psig and go to the top of the Demethanizer at approximately 160 psig and -165°F. The Demethanizer strips the methane from the ethane and heavier hydrocarbons; the methane residue gas leaves the top of the Demethanizer at approximately -165°F and is used to cool the gas through the inlet exchangers. The residue gas is then recompressed, first by the compressor driven by the Turbo-Expander, EK-201, and finally by the Recompressors in the "A" Compressor Plant and leaves the plant in the residue gas pipeline. The ethane and heavier hydrocarbons leave the bottom of the Demethanizer at approximately 35°F, are warmed to approximately 55°F by inlet gas in the Product/Inlet Exchanger (E-292) and are pumped into the liquid product pipeline at approximately 900 psig.

E. SULFUR RECOVERY

Hydrogen Sulfide and Carbon Dioxide from the Amine Unit flow to the Sulfur Recovery Unit (SRU). The unit uses a standard Claus, three-bed process to recover 95percent of the sulfur in the inlet stream. The recovered elemental sulfur will be sold and trucked from the plant. Sulfur Dioxide, a byproduct of the Claus process, is burned in the incinerator.

F. STEAM GENERATION

Steam is generated by three gas-fired boilers and a waste heat boiler utilizing the turbine exhaust gases from the compressor in the "C" Compressor Plant. The gas-fired boilers are capable of producing 80,000 pounds per hour of steam, and the waste heat boiler can produce 85,000 pounds per hour. The waste heat boiler is the primary steam source for the facility.

G. POWER GENERATION

Electricity is generated with three 300 kW generators driven by three 449 - horsepower natural gas engines.

II. OPERATOR/LEGALLY RESPONSIBLE PARTY & LOCAL REPRESENTATIVE

A. OPERATOR/LEGALLY RESPONSIBLE PARTY

Mr. Herb Harless, Manager, Environmental Health & Safety
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102
Telephone No. - 817/338-8386

B. LOCAL REPRESENTATIVE

Mr. George W. Washburn, Plant Manager
Sid Richardson Gasoline Co.
Jal #3 Gasoline Plant
P.O. Box 1311
Jal, NM 88252
Telephone No. - 505/395-2068

III. LOCATION OF DISCHARGE/FACILITY

The plant is located 3-1/2 miles North of Jal, NM, on Hwy. #18 and 1 mile East. The plant consists of 90 acres located in Section 33, T-24-S, R-37-E, N.M.P.M., Lea County, New Mexico. See Appendix A for the Site Location Topographic Map.

IV. LANDOWNERS

A. Lea Partners, Ltd., dba Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102

B. El Paso Natural Gas Co.
P.O. Box 1492
El Paso, TX 79901

C. May Woolworth
403 West D Ave.
San Angelo, TX

V. FACILITY DESCRIPTION

See Appendix B for the facility plot plan, Drawing No. 9234-PP-201, sheets 1 through 3.

VI. SOURCES, QUANTITIES & QUALITY OF EFFLUENT & WASTE SOLIDS

A. SOURCES & QUANTITIES

1. *SEPARATORS*

Inlet, intermediate and discharge separators (scrubbers) separate gas, hydrocarbon liquid and water throughout the facility. Recovered hydrocarbon liquids average 483,500 gallons/month; produced water averages 198,300 gallons/month.

2. *BOILERS*

Steam is generated by three gas-fired boilers and a waste heat boiler utilizing the turbine exhaust gases in the "C" Compressor Plant. The boiler drums and evaporator vessels produce 108,000 gallons/month of high solids concentration blowdown water. Boiler water treatment chemicals are listed in Appendix F.

3. *ENGINE COOLING WATER*

Cooling water is used for engine jacket water and oil cooling in the engines in the "A" and "B" Compressor and the Auxiliary Building. The water is cooled in the coils of atmospheric (fin-fans) type coolers. The systems are closed loop, and evaporation accounts for almost all of the water losses. The turbine-driven compressors, "C" Compressor Plant and "A" Compressor Plant Boosters, use a closed-loop system with Ambitrol as a coolant; the systems are drained only in unusual circumstances. Cooling water additives are listed in Appendix F.

4. *COOLING TOWERS*

Two cooling towers, "A" and "B" Plant, are used to provide gas and other process cooling in the facility. "A" Plant blowdown averages 172,800 gallons/month and "B" Plant blowdown averages 293,700 gallons/month. Cooling tower water-treating chemicals are listed in Appendix F.

5. *SEWAGE*

The quantity of sewage from the rest room and kitchen facilities in the plant office, recreation hall, wash house and instrument technicians' house is very small and is not measured.

6. *WASTE LUBRICANTS AND MOTOR OILS*

Generation of used lubricants and motor oils averages 900 gallons/month. Lubricants and motor oils employed at the facility are listed in Appendix F.

7. *WASTE AND SLOP OIL*

Heavy hydrocarbons are recovered in the plant scrubbers and inlet separators; recovered heavy hydrocarbons average 19,995 gallons/month.

8. *USED FILTERS*

Used engine/compressor lube system oil filters (38/month), glycol dehydrator system sock filters (9/month), inlet scrubber sock filters (18/month), and inlet scrubber mist pads (1/month) are generated as a waste at the facility.

9. *SOLIDS AND SLUDGE*

Solids and sludge build up slowly in the inlet separators and the Classifier Tank. The quantity is very small and is not measured.

10. *CLEANING OPERATIONS USING SOLVENTS/DEGREASERS*

Parts cleaning and degreasing generate approximately 100 gallons/month of waste solvent. The types of solvents/degreasers used are listed in Appendix F.

11. *WATER TREATING*

Water-treating filter backwashing and regeneration of the Zeolite treater beds require 357,300 gallons/month. Water-treating chemicals are listed in Appendix F.

12. *FLOOR AND EQUIPMENT DRAINS*

Equipment will be washed approximately once a year, using approximately 10,000 gallons of raw water. The water may contain hydrocarbons from the lubricating oil and natural gas condensate, as well as solvents/degreasers. Heat exchanger bundles may require periodic cleaning.

B. QUALITY CHARACTERISTICS OF COMMINGLED WASTE STREAM

All wastewater flows into the plant drain system which ends at the Classifier Tank. The wastewater is then filtered and pumped into the disposal well. The quality characteristics of the commingled waste stream are shown in the laboratory analysis contained in Appendix D. Samples of the commingled waste stream will be taken at the suction of the disposal well pumps and analyzed using standard industry practices in accordance with WQCC recommendations. Material Safety Data Sheets (MSDS) for all material used or encountered at the facility are contained in Appendix F.

VII. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS

A. SUMMARY OF ON-SITE COLLECTION AND STORAGE SYSTEMS

All drains in the facility, unless indicated otherwise below, flow to the Classifier Tank (steel, 20-foot diameter, below grade). The two-compartment tank classifies incoming liquids by gravity separation. Oil rises to the surface, solids settle to the bottom and water passes through an opening in the lower section of the partition. The lighter liquids (oil and hydrocarbons) are decanted by overflowing into a below-grade Waste Oil Storage Tank. Periodically the hydrocarbons are removed by vacuum truck and sold. Classified wastewater is then pumped through a filter into a 1,500-barrel surge tank and then pumped into the disposal well. Appendices C and G contain flow schematics and plan drawing of the classifier area and drain system.

All vessels and separators are aboveground unless otherwise indicated. The below-grade tanks are protected from corrosion by a 4-coat epoxy paint system on all exterior surfaces; the classifier tank is coated internally with the same material. All below-grade piping is either plastic, coated and wrapped steel, or vitrified clay pipe. Equipment and piping are included in the plant cathodic protection system.

An epoxy-coated, 45-foot diameter by 16-foot deep, open-top steel tank with a working capacity of approximately 95,000 gallons is used as a contingency reservoir. The tank has a 1.7-day retention capacity in the event of equipment failure, well problems or other system-disabling occurrences. Wastewater is pumped back into the classifier when normal operation is resumed.

1. *SEPARATORS*

Compression Liquids from the Second- and Third-Stage Discharge Separators in the "B" and "C" Compressor Plants, the Second-Stage Discharge of Compressor #9 in the "A" Compressor Plant, the "A" Plant Amine Contactor Inlet Separator, the Inlet Separator (V-204) and Regeneration Gas Scrubber (V-206) in the Cryogenic Plant are sent to the Compression Liquids Separator. Water from the Compression Liquids Separator goes into the high-pressure drain system; recovered hydrocarbon liquids are sent to Product Storage Tanks (V-8117, V-8118) and trucked off-site. Liquids from the remainder of the separators are dumped into the high-and low-pressure drain systems.

2. *BOILERS*

Boiler blowdown water flows into the Boiler Blowdown Scrubber and then into a buried Blowdown Tank. The water then flows in an open-drain system line to the Classifier Tank. Water from the Evaporator flows directly to the Blowdown Tank.

3. *ENGINE COOLING WATER*

Normal engine maintenance requires periodic draining of the engine cooling water. The coolant is drained into a mobile holding tank. Upon completion of the maintenance, the coolant is then returned to the engine. If the coolant is not returned to the engine, it is poured into the open drain system.

4. *COOLING TOWERS*

Cooling tower blowdown water goes into a cooling tower blowdown system line and flows to the Classifier Tank.

5. *SEWAGE*

Sewage flows through a sewer line to the Classifier Tank.

6. *WASTE LUBRICANTS AND MOTOR OILS*

Used waste lubricants and motor oils are collected in a mobile tank, then transferred to an aboveground storage tank until trucked off of the facility site by a waste oil reclaimer (see Appendix E).

7. *WASTE AND SLOP OIL*

Used and slop oil flows through the high- and low-pressure, closed drain system to the Classifier Tank.

8. *USED FILTERS*

Used filters are allowed to drain for 48 hours in a skid-mounted drain system. Oil from this filter drainage system is transferred into the used oil storage tanks. Once the filters are drained, they will be transferred to a steel storage bin and await removal from the plant by an approved recycler.

9. *SOLIDS AND SLUDGE*

Solids and sludge are removed from tanks and vessels using a vacuum truck from an approved hauler (see Appendix E); no solids or sludge are stored in the facility.

10. *CLEANING OPERATIONS USING SOLVENTS/DEGREASERS*

Solvents and degreasers are drained into the low-pressure drain system.

11. *WATER TREATING*

Filter backwash water is piped to a buried collection sump, then flows into the boiler blowdown system line and the classifier.

12. *FLOOR AND EQUIPMENT DRAINS*

Wash-down water runoff flows to the floor drains and into the open drain system. Hydrocarbons and wastewater from heat exchanger bundles are contained in curbed areas that are connected to the open drain system.

B. WATER AND WASTEWATER FLOW SCHEMATICS

Flow schematics are contained in Appendix C.

C. ITS DISCHARGE POTENTIAL OF TRANSFER AND STORAGE COLLECTION UNIT

1. All tanks and separators are aboveground, unless indicated otherwise in above paragraph VII.A.
2. All machinery fluids are collected, transferred and processed as indicated in above paragraph VII.A.

D. METHODS USED TO PREVENT UNINTENTIONAL AND INADVERTENT DISCHARGES FROM REACHING THE GROUND SURFACE AND POLLUTING

1. All storage tanks within the plant which contain fluids other than fresh water have concrete containment walls around the tanks in accordance with OCD requirements.

2. Chemical and drum storage areas are paved, curbed and drained into the open drain system. Several individual storage tanks sit in fiberglass drip/spill containment basins.

3. All sumps and below-grade tanks are visually inspected annually.

4. All tanks are on gravel pads.

E. UNDERGROUND PIPELINES

The plant drain system is shown on Drawing No. 1J3-1-P69 in Appendix G. Details of existing testing procedures are contained in Appendix H.

VIII. EFFLUENT DISPOSAL

A. EXISTING ON-SITE EFFLUENT DISPOSAL FACILITIES

All wastewater is routed through the classifier to remove suspended solids and oil. The classified water is then filtered and pumped into the disposal well (Woolworth Estate - SWD No. 1E located in Unit E of Sec. 33, T-24-S, R-37-E). The average injection rate into the well is 1,662,000 gallons/month. The wastewater is injected into the San Andres Formation at a depth of approximately 4,700 feet. The well was completed in compliance with NMOCD administrative order No. SWD-231 dated November 6, 1980. The location of the well is shown on the Site Location Topographic (Appendix A) and on the Jal No. 3 Plot Plan, Dwg. No. 9234-P-300, sheets 1 and 3 (Appendix B).

B. OFF-SITE DISPOSAL

All effluents with the exception of wastewater are trucked off-site and handled in accordance with OCD and NMED regulations. Recycling and disposal contractors will be approved by the NMED or OCD, as appropriate, for the hauling and final disposition of effluents. See Appendix E for a list of hauling and disposal contractors.

IX. INSPECTION, MAINTENANCE AND REPORTING

A. INSPECTION PROCEDURES FOR COLLECTION, STORAGE AND DISPOSAL UNITS

Annually, all open-top sumps and below-grade tanks will be inspected for leaks. The plant maintains inspection records and schedules and will notify OCD in the event of any reportable leak.

B. PROCEDURES FOR CONTAINMENT OF PRECIPITATION AND RUNOFF

Areas where leaks or spills can occur are curbed to prevent precipitation from carrying contaminants out of the area; curbing and well-drained areas prevent precipitation runoff from flowing into and overflowing the drain system.

X. SPILL/LEAK PREVENTION AND REPORTING (CONTINGENCY PLANS)

The plant is manned 24 hours a day; operators and maintenance personnel are trained to be aware of spills and leaks and to take immediate action to prevent or mitigate pollution. Small spills will be adsorbed with soil and shoveled into drums. Large spills will be contained with temporary berms; free liquids will be removed with a vacuum truck and the contaminated soil shoveled into drums. Drums containing contaminated soil will be disposed off-site by an OCD-approved disposal contractor. Verbal and written notification of leaks and spills will be made to the OCD in accordance with OCD Rule 116.

XI. SITE CHARACTERISTICS

A. HYDROLOGIC FEATURES

1. *BODIES OF WATER NEAR PLANT SITE*

There are no bodies of water or groundwater discharge sites within one mile of the facility. Watercourses in the area are generally ephemeral washes. The plant gets its water from water wells located in Secs. 6 and 7, T-25-S, R-38-E (Hubb 1 through 5) and Sec. 25 and 36, T-24-S, R-37-E (Cooper 1 through 8). Other water wells in the vicinity is the Crawford Ranch well located in Sec. 31, T-24-S, R-37-E. See the Site Location Topographic in Appendix A for well locations.

2. *GROUNDWATER MOST LIKELY AFFECTED BY DISCHARGE*

The Ogallala aquifer is the principal source of potable water in the area. The depth to the aquifer is approximately 90 feet; the total dissolved solids (TDS) concentration for the groundwater most likely to be affected by the discharge is 2,208 mg/l. Samples of water from the Crawford Ranch well and the Hubb No. 2 well were taken and analyzed by an approved laboratory in accordance with OCD recommended methods. See Appendix E for complete analysis of the samples. See the Site Location Topographic in Appendix A for well locations.

3. *FLOW DIRECTION OF GROUNDWATER MOST LIKELY AFFECTED BY DISCHARGE*

The Ogallala aquifer slopes to the southeast with a hydraulic gradient of about 10-12 feet per mile and imparts an easterly or southeasterly movement to the groundwater. References: Cronin, 1969; El Paso Natural Gas Company, Discharge Plan, March 1981.

B. GEOLOGIC DESCRIPTION OF DISCHARGE SITE

Reference: El Paso Natural Gas Company, Discharge Plan, October 1983.

1. *SOIL TYPES*

The Jal No. 3 facility is located on the Berino-Cacique loamy fine sands soil association and the Pyote and Maljamar soils series.

The Pyote and Maljamar fine sands are well-drained soils with moderately rapid permeability formed in wind-deposited materials. The Pyote soil is fine sand over sandy loam subsoil to a depth of 48 to 60 inches where a fine sandy loam C-horizon is encountered. The Maljamar fine sand soil series has a sandy clay loam subsoil with an indurated caliche horizon at approximately 50 inches.

The Berino-Cacique association consists of approximately 50percent Berino loamy fine sand and 40 percent Cacique loamy fine sand. Cacique soils occur only in association with Berino soils. Both Berino and Cacique soils are moderately permeable and have very slow runoff. The Berino soil has a light sandy clay loam subsoil with caliche at depths ranging from 29 to 60 inches. Cacique loamy fine sand is a shallow soil with indurated caliche at 20 to 34 inches.

2. *NAME OF AQUIFER*

The Ogallala formation is the principal source of potable groundwater in the area.

3. *COMPOSITION OF THE AQUIFER*

The Ogallala formation is alluvial consisting of sand, gravel, silt and clay.

4. *DEPTH TO ROCK AT BASE OF ALLUVIUM*

The Ogallala overlies the relatively impermeable Chicle Formation; however, the depth is unknown.

Sid Richardson Gasoline Co.
Material Safety Data Sheet
Index and Cross-Reference

REVISED ON 2/26/98

File MSDS by: PRODUCT COMMON NAME	CHEMICAL/OTHER NAME	HMIS Information H / F / R /PPE			
ACETIC ACID	GLACIAL ACETIC ACID VINEGAR ACID	3	0	2	D
ACETONE	DIMETHYL KETONE	1	3	0	G
ACETYLENE	ETHYNE	3	4	4	I
ADAMS CHEMICAL SUPER-A-SOL HOT CLEANER	SODIUM HYDROXIDE DETERGENT	1	0	0	C
AIR LIQUIDE AMERICA CORP. COMPRESSED GAS NOS (N.F.)		1	0	0	B
AIR, BREATHING		0	0	0	A
ALCAD STAND-BY BATTERY	WET LEAD-ACID BATTERY	3	1	2	D
ALCOHOL, ISOPROPYL	ISOPROPANOL 2-PROPANOL	1	3	0	C
ALUMINA	ACTIVATED ALUMINA ALUMINA HYDRATE	2	0	1	F
ALUMINUM (MORRIS STEEL AND ALUMINUM CO.)		0	0	0	A
AMBITROL	(R) FL50 COOLANT	1	0	0	B
AMDRO FIRE ANT INSECTICIDE	AMIDINOHYDRAZONE	1	0	0	E
AMERICAN SALES F-10 DETERGENT		1	0	0	B
AMMONIUM HYDROXIDE	AMMONIA WATER AQUA AMMONIA	3	1	0	C
ANSUL HALON 1211 EXTINGUISHING AGENT	BCF	1	0	0	G
ANSUL HALON 1301 EXTINGUISHING AGENT	FREON FE 1301	1	0	0	G

Sid Richardson Gasoline Co.
Material Safety Data Sheet
Index and Cross-Reference

ANSUL PLUS 50-B DRY EXTINGUISHING AGENT		1	0	0	E
ANSUL PURPLE -K EXTINGUISHING AGENT		1	0	0	E
ANTRAFILT ANTHRACITE FILTER MEDIA		1	0	0	E
ASHLAND PERMANENT ANTIFREEZE	GLYCOL	1	0	0	C
B					
BELZONA E-METAL SOLIDIFIER		3	1	1	G
BELZONA SUPER METAL BASE		3	1	1	G
BELZONA CERAMIC S-METAL SOLIDIFIER		3	1	1	G
BELZONA CERAMIC R-METAL SOLIDIFIER		3	1	1	G
BELZONA SUPER METAL SOLIDIFIER		3	1	1	G
BETZ CONDUCTIVITY STD		0	0	0	B
BETZ CONTINUUM AEC3113	CTW CORROSION AND DEPOSIT INHIB.	1	1	0	B
BETZ CORRSHIELD NT4201	CLSD SYSTEM CORROSION INHIB.	2	1	0	B
BETZ CORTROL IS1050	SO3 OXYGEN SCAVENGER	1	0	0	B
BETZ INHIBITOR AZ8140	YELLOW METAL INHIBITOR	1	0	0	B
BETZ OPTISPERSE AP0200	PO4	1	1	0	B
BETZ SPECTRUS BD1501	SURFACTANT	1	1	0	B
BETZ SPECTRUS NX1100	BIOCIDE	3	1	0	D

Sid Richardson Gasoline Co.
Material Safety Data Sheet
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BETZ STEAMATE PAS4010	BIOLER CORRSION INHIBITOR	3	2	0	D
BIG D DEODORANT, LEMON		1	2	0	B
BIO GUARD CLC	CALCIUM HYPOCHLORITE	2	0	2	E
BLAINE HOSPITAL CONCEPT DISINFECTANT		1	0	0	B
BLAINE ORBIT CLEANER		1	1	0	B
BLEACH	CLOROX 5% SODIUM HYPOCHLORITE	1	0	0	B
BUFFER SOLUTIONS		0	0	0	A
BUNA O-RING GASKET MATERIAL (INTERNATIONAL SEAL CO., INC.)	VULCANIZED NITRILE RUBBER	0	1	0	A
BUTANE ,NORMAL	N-C4	1	4	0	B
BUTCHER'S HOT SPRING CLEANER		1	0	0	B
BUTCHER'S SPEED TRACK CLEAN & BURNISH		1	0	0	B
C					
CALGON BUROLOCK 2221	ANIONIC POLYMER	0	0	0	A
CALGON H-300	GLUTARALDEHYDE	3	0	0	D
CALGON PRETECT 97	DRY SULFITE BLEND	2	0	0	E
CALGON H-940	SODIUM BROMIDE	2	0	0	D
CANBERRA CORP. SURE STEP SEALER	FLOOR POLISH	1	0	0	B
CARBON DIOXIDE	CO2	0	0	0	A
CARROLL CO. PRETTY POTTY	ACIDIC CLEANER	1	0	1	B

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CARROLL CO. PINE ODOR DISINFECTANT		1	1	0	B
CAUSTIC SODA	SODIUM HYDROXIDE	3	0	2	F
CERTIFIED LABS SAF-SOL AEROSOL	CHLORINATED SOLVENT	3	1	0	E
CERTIFIED LABS M/M QUICK CURE	EPOXY	2	1	0	C
CERTIFIED LABS LOK-CEASE AEROSOL	ANTI-GALLING SPRAY	2	1	0	E
CERTIFIED LABS AQUA SOL 20/20		3	1	2	G
CERTIFIED LABS PREMALUBE		0	0	0	A
CHEMCO CHEM AQUA AEROSOL		0	0	0	B
CHEMCO FAST FLOW		3	0	0	X
CHEMCO CHEMSOLV	CHLORINATED SOLVENT	1	1	1	B
CHEMCO COLD KILL	CHLORINATED SOLVENT	1	0	0	B
CHEMCO DEFENDER		0	1	0	B
CHEMCO FRESH BOWL	ACIDIC CLEANER	1	0	1	B
CHEMCO DUST-ALL		1	2	0	B
CHEMCO SPARKLE		1	1	1	A
CHEMCO PRIDE HAND CLEANER		1	0	0	A
CHEMCO SNIPER	BUG SPRAY	1	2	1	A
CHEMCO: BEGONE		1	2	1	C
CHEVRON AVIATION HYDRAULIC FLUID A		3	1	0	E
CHLORINE (LIQUID)	Cl2	3	0	0	X

Sid Richardson Gasoline Co.
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CITGO GAS ENGINE OIL SUS 450-2000 (GE-S1A)		0	1	0	A
CITRIC ACID ANHYDROUS	B-HYDROXYTRICABALLYLIC ACID	3	0	2	J
CONDENSATE, NATURAL GAS	BLACK GASOLINE SCRUBBER OIL FIELD LIQUIDS	3	4	0	X
CONTINENTAL PRODUCTS CHROMINE T		3	0	0	G
COPPER (HUSSEY COPPER LTD)		0	0	0	A
CRUDE OIL		2	2	0	B
CS-301 GASKET MATERIAL (ARMSTRONG WORLD INDUSTRIES)	SYNTHESEAL OR TURBO – TORK	0	1	0	A
D					
DEG	DIETHYLENE GLYCOL	1	0	0	B
DIESEL FUEL OIL NO 2 D	#2 DIESEL	1	2	0	B
DK-153 GASKET MATERIAL (ARMSTRONG WORLD INDUSTRIES, INC.)	ACCOSEAL	0	1	0	A
DOW URETHANE INSULATION	TRYMER(R) 9501 RIDGID FOAM INSULATION	1	0	0	B
DOW CORNING 376 HEAT RESISTANT SEALANT		1	1	1	B
DOW-CORNING SILICON CAULKING		1	1	0	B
DRESSER-RAND PARTS OIL, VAN STRAATEN 4163		1	0	0	B
DRI-GAURD SPRAY LUBRICANT	MOLYBDENUM DISULFIDE	3	1	0	E

Sid Richardson Gasoline Co.
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E					
ERUSTICATOR NEUTRALIZER	POTASSIUM CARBONATE SOL.	0	0	0	A
ERUSTICATOR	HYDROFLUORIC ACID	3	0	2	H
ETHANE	N-C2	1	4	0	B
ETHYLENE GLYCOL	GLYCOL	2	1	1	B
F					
FLEX SEALS SPIROTALLIC RING GASKET	DURA – CARB I	0	0	0	A
FOAMGLASS INSULATION, PITTSBURGH CORNING	CELLULAR GLASS	0	0	0	X
FREON 12	DICHLORODIFLOURO METHANE	1	0	0	B
FREON 22	CHLODIFLOUROMETH	1	0	0	B
FULLER CO. ALUMINUM CAULKING	ELASTOLAR SEALANT	2	3	0	B
G					
GAS, DRY NATURAL, MARATHON		1	4	0	A
GAS, FIELD SALES (UNPROCESSED)		1	4	0	B
GAS, SOUR NATURAL, CONOCO		1	4	0	B
GAS, SWEET NATURAL, CONOCO	RESIDUE GAS	1	4	0	B
GAS, WELLHEAD NATURAL, CONOCO		1	4	0	B
GASOLINE, NATURAL	PRODUCT	2	3	0	B
GASOLINE, UNLEADED		2	4	0	B
GLYCERIN		1	0	0	B
GORE-TEX SHEET GASKETING		0	0	0	A

Sid Richardson Gasoline Co.
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GORE-TEX INSERTABLE GASKET		0	0	0	A
GORE-TEX GASKET TAPE		0	0	0	A
GORE-TEX VALVE STEM PACKING		0	0	0	A
GORE-TEX JOINT SEALANT		0	0	0	A
GREEN NON/ABS GASKET MATERIAL (DONIT INDUSTRIES)	DONEX STYLE OPTITE 650	0	1	0	A
GROUT, CWC 604 MACHINE BOND EPOXY RESIN COMPOUND "A"		1	1	0	G
GROUT, CWC 604 MACHINE BOND EPOXY RESIN COMPOUND "B"		2	1	1	H
GROUT, CWC 604 MACHINE BOND EPOXY RESIN COMPOUND "C"		1	0	0	G
H					
H2S	HYDROGEN SULFIDE	4	4	1	X
HELIUM		0	0	0	A
HYDRANAL CHECK SOLUTION		2	2	1	C
HYDRANAL COULOMAT A		3	2	1	H
HYDRANAL COULOMAT		3	2	1	H
HYDROCHLORIC ACID REAGENT GRADE (37%)		3	0	0	C
HYDROFLUORIC ACID (20%)	HYDROFLUORIC ACID	3	0	2	D
HYDROSEP		2	0	1	D
I					
IMPERIAL OIL GRADE 30 QUAL MP-320		1	0	0	B

Sid Richardson Gasoline Co.
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Index and Cross-Reference

INSTASORB		0	0	0	A
IODINE SOLUTION		1	0	0	B
ISOBUTANE	i-C4	1	4	0	B
J					
JET - LUBE KOPR-KOTE (LEAD FREE)	ANTI-SEIZE COMPOUND	1	1	1	B
JOE'S HAND CLEAN		0	0	0	A
K					
K & W COPPER-COAT GASKET COMPOUND	ANTI-SEIZE	2	1	0	G
K1000 GASKET MATERIAL (DONEX, INC.)		0	1	0	A
KAO-WOOL INSULATION	INSWOOL	2	0	0	E
KARL FISHER REAGENT		2	1	0	C
KEROSENE		0	2	0	B
KRYLON BATTERY PROTECTANT		2	4	0	B
KRYLON BELT DRESSING		2	4	0	B
KRYLON SPRAY PAINT		2	4	0	B
L					
LA-CO SLIC-TITE TEFLON TAPE		0	0	0	A
LAVA HAND SOAP		0	0	0	A
LAWSON ORANGE CLEANER		0	2	0	B
LEAD		2	0	0	B
LEAD ACETATE TRIHYDRATE		2	0	0	B

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LUBRIPLATE 930-AA	LUBRICATING GREASE	1	1	0	B
LUBRIPLATE NO. 105 LUBRICANT	LUBRICATING GREASE	1	1	0	B
M					
MANTEK BREAK-AWAY GASKET REMOVER		1	1	0	B
MARVEL MYSTERY OIL		1	0	0	B
MEA	MONOETHANOLAMINE	3	2	1	D
MERCURY		4	0	0	H
METHANE		1	4	0	A
METHANE-ETHANE MIXTURE		1	4	0	A
METHANOL	METHYL ALCOHOL WOOD ALCOHOL	1	3	0	C
MINERAL WOOL INSULATION		1	0	0	X
MOBIL PEGASUS 390 OIL		1	1	0	B
MOBIL PEGASUS 490 OIL		1	1	0	B
MOBIL OIL DTE HEAVY MEDIUM		0	1	0	A
MOBIL OIL RARUS 427		0	1	0	A
MOBIL OIL MOBIL GEAR 629		0	1	0	A
MOBIL OIL MOBIL DTE OIL HEAVY		0	1	0	A
MOBIL OIL MOBIL 527		0	1	0	A
MOBIL OIL RARUS 827		0	1	0	A
N					
NABS GASKET MATERIAL (VELLUMOID, INC.)	VELLUTHERM 650	0	1	0	A

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NICKLE SULFATE HEXAHYDRATE SOLUTION 5%W/V		3	1	0	C
NITROGEN		0	0	0	A
NOKORODE COLD INSULATION SEALING COMPOUND		1	0	0	B
NORTH HEALTH CARE: BUFFERED EYELERT		0	0	0	A
NORTH HEALTHCARE WASP HORNET SPRAY		2	1	0	B
NORTH HEALTHCARE BURN OINTMENT		0	0	0	A
NORTH HEALTHCARE INSECT REPELLENT		1	0	0	A
NORTH HEALTHCARE BURN SPRAY		0	3	0	A
O					
O-PHOSPHORIC ACID	WHITE PHOSPHORIC ACID	3	0	2	D
OXYGEN		0	4	2	B
P					
P 1, 10-PHENANTHROLINE IN ETHANOL	HETRCYCLIC NITROGEN	1	3	0	B
PABCO CAL-CIL	SUPER CALTEMP	1	0	0	E
PAINT (VALSPAR)		3	3	1	G
PAINT THINNER (VALSPAR)		3	3	1	G
PENNZOIL HD MOTOR OIL SAE 10W-40		1	1	0	B
PERMATEX FAST ORANGE HAND CLEANER		1	2	0	B
PERMATEX FORM-A-GASKET #2	SEALANT GASKET COMPOUND	2	2	0	B

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PHILLIPS GPA – NGL BLEND #5		1	4	0	A
PHILLIPS NATURAL GAS STANDARD	GPA - NGL BLEND NO. 1,2,3,4,5, AND 6	1	4	0	A
PINK 825 NON/ABS GASKET MATERIAL					
POLYGAURD #600 PIPE PRIMER		2	3	0	G
POLYGUARD #800 PIPE TAPE		1	1	0	B
POLYGUARD #800 PIPE PRIMER		2	3	0	G
POLYGUARD: #600 PIPE TAPE		1	1	0	B
PRIMER (VALSPAR)		3	3	1	G
PRODUCED WATER		1	0	0	B
PROPANE	LPG , N-C3	1	4	0	B
PRO-POWER		1	2	0	X
PURPLE 925 NON/ABS GASKET MATERIAL (PHELPS INDUSTRIAL PRODUCTS, INC.)	STYLE 7085,925F COMPRESSED GRAPHITE SHEET	0	1	0	A
Q					
QUEST CHEMICAL CORP. QUIKLEEN II	CHLORINATED CLEANER	3	2	1	D
R					
RECTORSEAL PIPE THREAD COMPOUND NO. 5		2	2	0	B
REICHOLD CHEMICALS,INC. SUPEROX® 712	METHYL ETHYL KETONE PEROXIDE	2	2	3	D
RESORCINOL IN 2N NaOH		3	0	1	G
RIGID DARK THREAD CUTTING OIL		1	1	0	B

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RUST-OLEUM PAINT		2	3	0	G
S					
SANTEC SLCS 2002 LENS CLEANER		0	0	0	A
SEALWELD VALVE CLEANER		2	1	0	B
SECURLINE MARKER II		1	2	0	X
SHELL TELLUS 68 OIL		1	1	0	B
SHELL TELLUS 100 OIL		1	1	0	B
SHELL TURBO 32 OIL		1	1	0	B
SHELL TURBO 46 OIL		1	1	0	B
SHELL TURBO 220 OIL		1	1	0	B
SHELL OIL TURBO(R) T OIL 150		0	1	0	A
SHELL OIL TELLUS 32		0	1	0	A
SHELL OIL MYSELLA (R) OIL 30		0	1	0	A
SHELL: CORENA K460		1	1	0	B
SHINEY BRIGHT		2	0	0	X
SILICA GEL	KEMP K3	1	0	0	E
SILITE RTV SILICONE	CLEAR, WHITE, AND HIGH TEMP. RED SEALANT	2	1	1	B
SNOOP LEAK DETECTOR		1	0	0	B
SODA ASH	SODIUM CARBONATE, ANHYDROUS	3	0	1	E
SODIUM HYDROXIDE		3	0	1	E
SODIUM THIOSULFATE SOLUTION		1	0	0	B

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SPRAY AWAY GLASS CLEANING AGENT		2	2	0	B
STAINLESS STEEL (MORRIS STEEL AND ALUMINUM COMPANY)		0	0	0	A
STEEL (BOB MARTIN COMPANY)		0	0	0	A
STEELHART (DANA CORPORATION)	CORAMIC 29	0	0	0	A
STRYPEEZE PAINT REMOVER		2	2	1	C
SULFUR, MOLTEN		1	1	0	B
SULFURIC ACID	H2SO4 , COOLING TOWER ACID	3	0	2	D
SULFURIC ACID .100N		0	0	0	A
SUMMIT SUR – CLEAN	DETERGENT	1	0	0	B
SUMMIT SUM-CLEAN	DETERGENT	1	0	0	B
SUR-PREP V93-900 RUST CONVERTER	DIETHYLENE GLYCOL, MONOETHYL ETHER	1	0	0	A
T					
TAP MAGIC ALUMINUM CUTTING FLUID		1	2	1	B
TAP MAGIC PROTAP		0	1	0	B
THERMALANE 600	SYNTHETIC HYDROCARBON	1	1	0	B
THERVO HAND CLEANER		1	0	0	A
THREE-M (3M) DUCT TAPE		0	0	0	A
THREE-M (3M) PACKING TAPE	TYPE 371, 373, AND 375	0	0	0	A
THREE-M (3M) SUPER 88 ELECTRICAL TAPE		0	0	0	A

Sid Richardson Gasoline Co.
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THREE-M (3M) SCOTCHBRITE	TYPE 7447, AND 7448	0	0	0	A
THYMOLPHTHALEN, 0.05% IN 90% ALCOHOL		1	2	0	B
TIME-SAVER LAPPING COMPOUND		2	0	1	E
TOLUENE		2	3	0	G
TRACTOR HYDRAULIC OIL		1	1	0	B
TRETOLITE CG00200A	PIPELINE CORROSION INHIBITOR	3	3	0	H
TRIBOL MOLUB ALLOY 90/220 GEAR OIL		1	1	0	B
TRIETHYLENE GLYCOL	TEG	1	1	0	B
U					
ULTRA SHIELD SILICONE GREASE AND SEALING COMPOUND		0	1	0	B
V					
VAL- TEX NO.80 & 80'S LUBRICANT		0	0	0	A
VAL-CHEM EPOXY ENAMEL	FLOOR PAINT	2	1	1	G
VAL-TEX VALVE FLUSH		0	0	0	A
VARSOL		1	2	0	B
VELVAAN-SHEEN MOP DRESSING		0	2	1	B
VITON O-RING GASKET MATERIAL (INTERNATIONAL SEAL CO., INC.)	VULCANIZED FLUOROELASTOMER	0	1	0	A
W					
WATER GEL	BURN GEL	0	0	0	A

Sid Richardson Gasoline Co.

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WD-40 SPRAY LUBRICANT		2	2	0	B
WEED KILLER, CLEAN CROP MSMA 6+		2	3	0	X
WEED KILLER, KARMEX DF HERBICIDE		2	1	0	X
WEED KILLER, KROVAR I DF HERBICIDE		1	1	0	X
WEED KILLER, VELPAR L HERBICIDE		2	3	0	X
WELDING RODS: AWS E6011 AWSE7018 JETWELD LH70,E7018 FLEETWELD 5P, 36010		2	0	0	X
WESKEM (NALCO/EXXON) EC909A (SP-448) ANTIFOAM	POLYGLYCOL DEFOAMING AGENT	1	1	0	B
X					
XEROX BLACK DRY INK		1	0	0	A
XEROX COPY CARTRIDGE		1	0	0	A
XYLENE		4	3	2	X
Y					
Z					
ZEP ZEP40 SPRAY		1	1	0	A
ZEP FORMULA 50		2	0	0	B
ZEP HEAD-TO-TOE		1	0	0	A
ZEP MAGNET		1	1	0	A
ZEP MVP	HAND LOTION	1	0	0	A
ZEP ZEPLON SPRAY		2	1	1	X

Sid Richardson Gasoline Co.
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ZEP WOOD DOCTOR		1	2	1	X
ZEP ZEP-OFF GASKET REMOVER		3	2	1	X
ZEP ZEPELEC		1	1	1	X
ZEP ZEPTOX II		2	1	1	A
ZEP METER MIST GREEN APPLE		1	3	1	A
ZEP FORMULA 158E		1	0	0	A
ZEP ZEPTEEN		1	2	0	X
ZEP ZEP 45		2	1	1	X
ZEP ZEP 30A		2	1	0	B
ZEP PROTECT-ALL		0	0	0	A
ZEP ALL AROUND		2	2	0	B
ZEP ZEPRESERVE		2	1	1	X
ZEP ZEPNAMIC COUNTRY GARDEN		2	4	1	B
ZEP ZEPELEC II		2	1	1	X
ZEP ZEPORZER - MINT		1	0	1	A
ZEP POWER SOLV		2	1	1	B
ZOK 27 AND 27 L.A.		3	2	1	H

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

June 24, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-869-982

Mr. Michael J. McConnell
Environmental Health & Safety
Sid Richardson Gasoline Co.
201 Main Street, Suite 3000
Fort Worth, TX 76102

RE: Discharge Plan GW-010 Renewal
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. McConnell:

On November 21, 1993, the groundwater discharge plan, GW-010, for the **Jal #3 Gas Plant** located in Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico, 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. **The approval will expire on November 21, 1998.**

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 Sid Richardson submits an application for renewal at least 120 days before the discharge plan expires (on or before July 24, 1998), 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.

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.(Copies of the WQCC regulations and discharge plan application form and guidelines have been provided to Sid Richardson in the past. If you require copies of these items notify the OCD at (505)-827-7152. A complete copy of the regulations is also available on OCD's website at **www.emnrd.state.nm.us/ocd.htm**.)

The discharge plan renewal application for the Jal #3 Gas Plant is subject to the WQCC Regulations 3114 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 one thousand six hundred sixty seven dollars and fifty cents ($1,667.50) for Gas Processing Plants.

The fifty ($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 W. Jack Ford at (505) 827-7156.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/wjf

cc: OCD Hobbs District Officer

Z 357 869 982

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

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PS Form 3800, April 1995

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

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

December 27, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-052

Mr. Michael McConnell
Sid Richardson Carbon & Gasoline Co.
201 Main Street
Fort Worth, TX 76102

RE: Disposal of Alumina Hydrate
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. McConnell,

The New Mexico Oil Conservation Division (OCD) has received your December 16, 1993 request to dispose of used alumina hydrate pellets on-site at Sid Richardson's Jal #3 Gas Processing Plant. This disposal is to be accomplished by mixing the pellets with cement whenever on-site construction or maintenance projects require cement.

Based on the information supplied in the request, you are authorized to dispose of the alumina hydrate as proposed. Please be advised that this authorization does not relieve Sid Richardson Carbon & Gasoline Co. of liability should their operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

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

Sincerely,

Robert L. Myers II
Petroleum Engineer Specialist

xc: OCD Hobbs Office

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

OIL CONSERVATION DIVISION
RECEIVED
'93 DE 20 AM 9 24

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

December 16, 1993
MJM-137-93
File: NM-25

CERTIFIED MAIL - RETURN RECEIPT
P 378 679 176

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Disposal of Alumina Hydrate - Jal #3 Gas Plant

Dear Mr. Anderson:

The purpose of this letter is to obtain authorization from the OCD to dispose of used alumina hydrate on-site at Sid Richardson's Jal #3 gas plant.

Pelletized alumina hydrate is used at the plant as a desiccant for instrumentation air dryers. Excess moisture is absorbed by the pellets, but extremely small amounts of lubricating oils may also be trapped during the drying process. I have attached the MSDS so that you can become more familiar with the chemical.

There are approximately eight hundred pounds of used alumina hydrate being stored at the plant. Plant personnel have proposed that disposal of the used product be accomplished by mixing the pellets with cement whenever on-site construction or maintenance projects require cement. Given the recent renewal of our Jal #3 discharge plan whereby we agreed to install numerous cement floors within containment structures surrounding tanks and vessels, this proposed method of disposing the used alumina hydrate pellets seems to be a logical and acceptable recourse.

Should you agree with this proposal, we would appreciate a letter which authorizes the aforementioned disposal method. If you have any questions or require more information, don't hesitate to contact me.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachment

cc: C. P. O'Farrell/E. F. Gunn - w/o attachment
W. J. Farley - w/o attachment
K. C. Clark/R. L. Gawlik - w/o attachment
G. W. Washburn/D. B. Coleman - w/o attachment

The C.M. Kemp Manufacturing Compa
7280 Baltimore-Annapolis E
Glen Burnie, MD 21061-2
Telephone: 1-410-761-5
Telefax: 1-410-766-9

EMERGENCY PHONE NUMBER--CALL CHEMTREC
DAY OR NIGHT 1-800-424-9300

KEMP K-25 GRADE A ALUMINA

PRODUCT IDENTIFICATION:

Trade Names and Synonyms:	Alumina Hydrate, Activated Alumina
Chemical Name:	Alumina Hydrate
Chemical Formula:	$Al_2O_3 \cdot xH_2O$
Kemp I/N:	77914 (lb.), 77912 (350 lb.)
C.A.S. Number:	Al_2O_3 (1344-28-1)
Dot Proper Shipping Name:	N/A
Dot Hazard Class/ID Number:	N/A
Dot Label:	N/A

U.S. Surface Freight Classification: N/A
Reportable Quantity under U.S. EPA Cercla/SARA Regulations: N/A

Hazardous Ingredients: This product contains aluminum oxide which is a toxic chemical subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act Of1986 and 40 CFR Part 372.

WARNING STATEMENTS:

Follow standard safety procedures

PRECAUTIONARY MEASURES:

Handle in accordance with good industrial hygiene and safety practices. These practices include avoiding unnecessary exposure and removal of material from eyes, skin and clothing.

DO NOT TAKE INTERNALLY.

KEMP

EMERGENCY AND FIRST AID PROCEDURES:

Inhalation:	Remove to fresh air. If breathing is difficult, oxygen may be administered. If breathing has stopped, administer artificial respiration.
Ingestion:	Drink large amounts of water. Material will normally pass through the body.
Eyes:	Flush immediately with water for at least 15 minutes. If irritation persists, see a doctor.
Skin:	Wash with soap and water.
NOTES TO PHYSICIAN:	No special information

OCCUPATIONAL CONTROL PROCEDURES:

Eye Protection:	Use of goggles is recommended. Do not wear contact lenses in the presence of K-25 dust. The K-25 will absorb into the contact lens and intensify irritation.
Skin Protection:	Wear long sleeves and close weave cotton gloves with tight wristlets are recommended for manual handling.
Respiratory Protection:	Use NIOSH/MSHA approved respiratory protection equipment when dusty conditions prevail.
Ventilation:	Use adequate local ventilation to prevent dusty conditions.

AIRBORNE Exposure Limits:

Product: Activated Alumina

Component	% (wt)	ACGIH TLVs (1988-89)
Al_2O_3	90-95	Nuisance Dust: Alumina
Na_2O	.3-.6	Total Fraction: 10mg/m³ (TWA)
SiO_2	.01-.2	20mg/m³ (STEL)
Fe_2O_3	.03-.1	Respirable Fraction: 5mg/m³ (TWA)
Loss on ignition (water)	4.0-7.0	

KEMP

FIRE PROTECTION INFORMATION:

Flashpoint:	Non-flammable
Ignition Temperature:	N/A
Flammable Limits:	Lower - N/A Upper - N/A
Extinguishing Media:	Product is not flammable. Use suitable media for surrounding fire.
Special Firefighting Procedures:	None
Unusual Fire and Explosion Hazards:	Not an explosion hazard

REACTIVITY DATA:

Stability:	Stable
Incompatibility:	When in contact with water, this product generates enough heat to cause burns. The product may also react with HF and strong acids or alkali to produce hydrogen gas.
Hazardous Decomposition Products:	None
Hazardous Polymerization Reaction:	Will not occur

HEALTH EFFECTS SUMMARY:

The following information presents both human experience and the results of scientific experiments used by qualified experts to assess the effects of K-25 Molecular Sieves on the health of exposed individuals and to support precautionary statements and occupational control procedures recommended in this document. Proper evaluation of this health-related data may require the assistance of individuals trained in interpretation of this type of information.

KEMP

EFFECTS OF EXPOSURE:

The primary route of exposure to Activated Alumina is expected to be inhalation of suspended solid particles (dust) in the air. This inhalation may cause irritation in the mucous membranes of the nose and throat due to the materials drying properties. It may also cause respiratory irritation. Contact with eyes and skin may cause irritation as well.

TOXICOLOGICAL DATA:

According to AIHA Hygiene Guide, alumina Toxicity by ingestion, none expected Skin & eyes not an irritant.

PHYSICAL DATA:

Appearance and Odor:	Off white, crystalline or gelatinous granules, pellets, or powder; odorless.
Boiling Point (1 atm):	N/A
Melting point (1 atm):	3722°F (2158°C)
Specific Gravity X Density X:	3.3
Vapor Density:	N/A
Vapor Pressure at 2158°C:	1 mm Hg
Solubility in H_2O, % by wt:	Insoluble; soluble in concentrated acids and alkalides
Percent Volatile by Volume:	N/A
PH:	N/A

NOTE: These physical data are typical values based on material tested but may vary from sample to sample. Typical values should not be construed as a guaranteed analysis of any specific lot or as specifications for the product.

KEMP

NOTE: These physical data are typical values based on material tested but may vary from sample to sample. Typical values should not be construed as a guaranteed analysis of any specific lot or as specifications for the product.

SPILL, LEAK AND DISPOSAL INFORMATION:

Waste Disposal:	Dispose in landfill according to local, state, and federal regulations. Cover promptly to avoid the blowing of dusts.
Spill or Leak Procedures:	Notify safety personnel of spills or leaks. Sweep or vacuum up or flush to sewer.
Containers:	Metal cans or plastic containers

ADDITIONAL COMMENTS:

Silica Gel is not known to have any adverse effect of the aquatic environment. It is insoluble and nontoxic.

DATE: July, 1993 SUPERSEDES: 3/86
MSDS NO.: 7391C (Index 138)
FOR ADDITIONAL NON-EMERGENCY INFORMATION, CONTACT

The C. M. Kemp Manufacturing Company
7280 Baltimore-Annapolis Boulevard
Glen Burnie, Maryland 21061-2796, USA
(410) 761-5100

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

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

December 21, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-051

Mr. Michael McConnell
Sid Richardson Carbon & Gasoline Co.
201 Main Street
Fort Worth, TX 76102

RE: Disposal of Filters
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. McConnell,

The New Mexico Oil Conservation Division (OCD) has received your December 13, 1993 request to dispose of used oil, amine and glycol filters from your Jal #3 Gas Processing Plant at the Quell Petroleum Services, Inc. (QPS) incineration facility located in Monahans, Texas. The proposal is to have the filters delivered to the QPS facility for disposal and recycling.

Based on the information supplied in the request, you are authorized to continue to dispose of the filters as proposed. Please be advised that this authorization does not relieve Sid Richardson Carbon & Gasoline Co. of liability should their operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

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

Sincerely,

Robert L. Myers II
Petroleum Engineer Specialist

xc: OCD Hobbs Office

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

December 13, 1993
MJM-131-93
File: NM-19

CERTIFIED MAIL - RETURN RECEIPT
P 378 679 997

Mr. Roger Anderson
Environmental Bureau Chief
NM Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Filter Recycling - Jal 3 Gas Plant
References: Letter to OCD, MJM-124-93 dated December 1, 1993
Texas Railroad Commission Permit No. 8-1282

Dear Mr. Anderson:

The referenced letter informed you that Sid Richardson was seeking a continuance of the referenced permit. The authorization to extend the permit has been provided to us by the TRRC and is attached for your review.

Sid Richardson respectfully requests that you provide concurrent authorization for filter recycling at the Jal 3 plant based on the information contained in the attached permit.

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,

Michael J. McConnell
(817) 338-8386

MJM:gad
Attachment

cc: C. P. O'Farrell/E. F. Gunn - w/o attachment
W. J. Farley - w/o attachment
K. C. Clark/R. L. Gawlik - w/o attachment
J. Sexton (NMOCD, P. O. Box 1980, Hobbs, NM 88241-1980) - w/attachment

T-77
NM-19

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

DAVID M. GARLICK
Director
R. MARK HENKHAUS, P.E.
District Director
(915) 684-5581

2509 N. BIG SPRING | P. O. BOX 51240 | MIDLAND, TEXAS 79710-1240

December 8, 1993

Sid Richardson Carbon & Gasoline Co.
Attn: Michael J. McConnell
First City Bank Tower
201 Main Street
Fort Worth TX 76102

Re: **"RULE 8"** Permit No. 8-1282
"EXTENSION"
Keystone, Halley, Chalk and Eskota Gas Plants
Districts 8, 8A and 7B
Various Counties, Texas

Pursuant to Rule 8(d)(6)(G), you are hereby authorized to transport and recycle the following material:

Oil, Amine and Glycol Filter - Various Amounts at Various Times

The authorized method of disposal will be transportation to Quell Petroleum Services, Inc. (QPS) in Monahans, Texas to be recycled. All filter material will be 100% recycled through a thermal desorption process, scrap metal recovery and the introduction of the leftover ash as a base material for cement products. Transportation will be by Quell Petroleum Services, Inc. (QPS).

The authority granted by this letter is valid from January 20, 1994 to January 20, 1995.

Mark Henkhaus, P.E.
District Director

RMH/sjb

cc: File

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

December 14, 1993
MJM-134-93
File: NM-6

CERTIFIED MAIL - RETURN RECEIPT
P 378 679 177

Mr. Robert L. Myers II
Petroleum Engineer Specialist
NM Energy, Minerals & Natural Resources Dept.
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Jal 3 Discharge Plan GW-10 Renewal Fee

Dear Mr. Myers:

In accordance with WQCC Regulation 3-114, enclosed is our check #101088 for $1,667.50 which represents the fee for renewing the subject discharge plan.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Enclosure

cc: C. P. O'Farrell/E. F. Gunn - w/o enclosure
W. J. Farley - w/o enclosure

0013

SID RICHARDSON CARBON CO. Check No. 101088

Memorandum

JAL 3 DISCHARGE PLAN RENEWAL $1,667.50

Gas Plant GW-010

NMED - WATER QUALITY MANAGEMENT
% OCD
P.O. BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

SID RICHARDSON CARBON CO.
201 Main Street, Suite 2700
Fort Worth, Texas 76102

CHEMICAL BANK
90 Presidential Plaza
Syracuse, New York 13202

50-943
213

Check No. 101088
Date: 12/10/93

PAY EXACTLY: One Thousand, Six Hundred Sixty-Seven and 50/100 Dollars

PAY TO THE ORDER OF
NMED - WATER QUALITY MANAGEMENT
% OCD
P.O. BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504

Amount $******1,667.50

SID RICHARDSON CARBON CO.
SRCG GENPAR, INC., GENERAL PARTNER

Larry R. Bass
OFFICER

⑈101088⑈ ⑆021309434⑆ 755⑈758757⑈

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time	Date
	9:00 am	Dec 14, 1993

Originating Party	Other Parties
Mike McConnell - Sid Richardson (817) 338-8386	Bobby Myers

Subject: disposal of alumina hydrate @ Jal #3 GP

Discussion:

alumina hydrate used as dessicant for instruments
- How to dispose of? Is this an oilfield waste?
- MSDS says to dispose in landfill
- not an exempt wastes, but not hazardous

Conclusions or Agreements:

will send us a letter requesting disposal of dessicant

Distribution

Signed: Robert Myers

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

December 1, 1993
MJM-124-93
File: NM-19

CERTIFIED MAIL - RETURN RECEIPT
P 452 757 044

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Energy, Minerals &
Natural Resources Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Filter Recycling, Jal #3 Gas Plant

References: 1) Texas Railroad Commission Permit No. 8-1282
2) OCD letters dated February 15, 1993 and March 4, 1993

Dear Mr. Anderson:

The referenced permit provided authorization for Sid Richardson to have used filters transported from our Texas gas plants and recycled at Quell Petroleum Services (QPS), a permitted transport and recycling company in Monahans, Texas.

Based on this permit, the referenced OCD letters were issued by the Hobbs District Office and your office respectively and provided authorization to include our Jal #3 gas plant as part of the filter recycling process.

The purpose of this letter is to inform you that we are seeking a continuance of the referenced permit for an additional year. Provided this request is granted by the TRRC, we will forward the continuance documentation to you and ask for a similar continuance of the Jal #3 filter recycling authorization.

In the meantime, should you have any questions regarding this subject, don't hesitate to call.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachments

cc: C. P. O'Farrell/E. F. Gunn - w/o atts.
W. J. Farley - w/o atts.
K. C. Clark/R. L. Gawlik - w/o atts.
J. Sexton - w/atts. (NMOCD, P. O. Box 1980, Hobbs, NM 88241-1980)

T-77

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

JAMES E. (JIM) NUGENT, Commissioner
BARRY WILLIAMSON, Commissioner

DAVID M. GARLICK
Director
R. MARK HENKHAUS, P.E.
District Director
(915) 684-5581

2509 N. BIG SPRING | P. O. BOX 51240 | MIDLAND, TEXAS 79710-1240

February 3, 1993

Sid Richardson Carbon & Gasoline Co.
Attn: Michael J. McConnell
First City Bank Tower
201 Main Street
Fort Worth TX 76102

RECEIVED
FEB 5 1993
R & D DEPARTMENT
Sid Richardson Carbon & Gasoline Co.

Re: **"RULE 8"** Permit No. 8-1282
"AMENDED"
Keystone, Halley, Chalk and Eskota Gas Plants
Districts 8, 8A and 7B
Various Counties, Texas

Pursuant to Rule 8(d)(6)(G), you are hereby authorized to transport and recycle the following material:

Oil, Amine and Glycol Filter - Various Amounts at Various Times

The authorized method of disposal will be transportation to Quell Petroleum Services, Inc. (QPS) in Monahans, Texas to be recycled. All filter material will be 100% recycled through a thermal desorption process, scrap metal recovery and the introduction of the leftover ash as a base material for cement products. Transportation will be by Quell Petroleum Services, Inc. (QPS).

The authority granted by this letter is valid from January 20, 1993 to January 20, 1994.

Mark Henkhaus, P.E.
District Director

RMH/sjb

cc: File

NM 19

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

BRUCE KING
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

February 15, 1993

Michael J. McConnell
Sid Richardson Carbon & Gasoline Co.
201 Main Street
Fort Worth, TX 76102

Dear Mr. McConnell:

Per your letter dated February 4, 1993, the Oil Conservation Division grants authorization to Sid Richardson Carbon and Gasoline Co. to transport and recycle oil, amine and glycol filter from Jal #3 Gas Plant to Quell Petroleum Services Inc. in Monahans, TX.

Very truly yours,

JERRY SEXTON
District I Supervisor

JS/sad

xc: Roger Anderson
Mark Henkhaus - Texas Railroad Commission

NM-19

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

DRUG FREE

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

March 4, 1993

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-307

Mr. Michael J. McConnell
Sid Richardson Carbon and Gasoline Co.
First City Bank Tower
201 Main St., Suite 3000
Ft. Worth, Texas 76102

RE: Disposal of Filters
Jal #3 Plant
Lea County, New Mexico

Dear Mr. McConnell:

The Oil Conservation Division (OCD) has received your request, dated January 15, 1993, for authorization to dispose of used oil, amine and glycol filters from your Jal #3 Gas Processing Plant at the Quell Petroleum Services, Inc. (QPS) incineration facility located in Monahans, Texas. The proposal is to have the filters delivered to the QPS facility for disposal/recyclamation.

Based on the information and the analytical results provided in the request, you are authorized to dispose of the filters as proposed. Please be advised that this authorization does not relieve Sid Richardson Carbon and Gasoline Co. of liability should their operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

If you have any questions please call me at (505) 827-5812.

Sincerely.

Roger C. Anderson
Environmental Bureau Chief

RCA/cee

xc: OCD Hobbs Office

STATE OF NEW MEXICO
County of Bernalillo ss

Paul D. Campbell being duly sworn declares and says that he is National Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 1 day of Oct., 1993, and the subsequent consecutive publications on ,1993

Paul D Campbell

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 1 day of Oct 1993.

Bernadette Ortiz

12-18-93

PRICE $ 31.62

Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C 81184

NOTICE OF PUBLICATION

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

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

(GW-10) - Sid Richardson Carbon & Gasoline Co., E. F. Gunn, Environmental Health and Safety Manager, 201 Main Street, Suite 3000, Fort Worth, Texas, 76102, has submitted an application for renewal of its previously approved discharge plan for their Jal #3 Gas Plant located in the SW/4, Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 54,700 gallons per day of process waste water with a total dissolved solids concentration of 2200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids conentration ranging from 700 to 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of September, 1993

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/William J. Lemay, Director

Journal: October 1, 1993

Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

Notice Of Publication

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

September 29, 19 93

and ending with the issue of

September 29, 19 93

And that the cost of publishing said notice is the sum of $ 39.60

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

Joyce Clemens

Subscribed and sworn to before me this 12th day of October, 19 93

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 94

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

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

(GW-10) - Sid Richardson Carbon & Gasoline Co., E.F. Gunn, Environmental Health and Safety Manager, 201 Main Street, Suite 3000, Fort Worth, Texas, 76102, has submitted an application for renewal of its previously approved discharge plan for their Jal #3 Gas Plant located in the SW/4, Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 54,700 gallons per day of process waste water with a total dissolved solids concentration of 2200 mg/1 will be collected and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration ranging from 700 to 1000 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of September, 1993.
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
SEAL
Published in the Lovington Daily Leader September 29, 1993.

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

October 4, 1993

Mr. William J. Lemay
Director, State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on September 27, 1993, regarding the Oil Conservation Division (OCD) discharge permit GW-10 effects on fish, shellfish, and wildlife resources in New Mexico.

The Service has determined there are no wetlands or other environmentally sensitive habitats, plants, or animals that will be adversely affected by the following discharge.

> GW-10 Sid Richardson Carbon and Gasoline Co., Jal #3 Gas Plant located in the SW/4, Section 33, T24S, R37E, Lea County, New Mexico. Approximately 54,700 gallons per day of process waste water will be collected and disposed of in a UIC-permitted Class II disposal well.

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,

Jennifer Fowler-Propst
State Supervisor

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

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

November 19, 1993
MJM-121-93
File: NM-6

CERTIFIED MAIL - RETURN RECEIPT
P 378 677 648

Mr. Robert L. Myers II
Petroleum Engineer Specialist
New Mexico Energy, Minerals &
Natural Resources Dept.
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Discharge Plan GW-10, Jal 3 Gas Plant
Reference: OCD letter dated November 2, 1993

Dear Mr. Myers:

Sid Richardson Gasoline Co. is submitting for your review and approval an action plan which addresses your request for clarifications, additional information, and commitments as noted in the referenced letter.

Sid Richardson acknowledges the importance of protecting the fresh water supplies and the environment in New Mexico. We have reviewed each of the items contained in the referenced letter and believe our plan of action in responding to these items will result in the timely accomplishment of groundwater protection efforts at the Jal 3 plant.

Should you have any questions related to this submittal or require additional information, don't hesitate to call.

Sincerely,

Michael J. McConnell
(817) 338-8386

MJM:gad
Attachment

cc: C. P. O'Farrell/E. F. Gunn - w/att.
W. J. Farley - w/att.
T. E. McElyea/C. E. Adcock/L. B. Copeland - w/att.
G. W. Washburn/D. B. Coleman - w/att.
K. C. Clark/R. L. Gawlik - w/att.

Sid Richardson Gasoline Co.
Discharge Plan - GW-10
Jal 3 Gas Plant

ACTION PLAN & SCHEDULES

1. Drain System Testing Schedule

Positive pressure testing of the plant drain system (appendix H of the Discharge Plan renewal application) has been tentatively scheduled as follows:

1) Four (4) cooling tower blowdown lines by the end of February 1994.
2) Nine (9) pressured drain lines by the end of April 1994.
3) Two (2) tile drain lines by the end of June 1994.
4) Four (4) PVC drain lines by the end of August 1994.
5) Fifteen (15) open drain lines by the end of December 1994.

Deviations to this schedule may occur due to unforeseen testing difficulties, drain lines in need of repair or other plant operation priorities requiring immediate attention. However, all thirty-four (34) drain lines will be tested by the end of July 1995.

2. Tank and Sump Integrity Test Methods

There are ten (10) sumps and six (6) underground tanks identified to be tested. Tanks and sumps with open tops will be drained, isolated and visually inspected for leaks. All closed-top vessels will be isolated, drained, filled with water and the level held for a period of one (1) hour. The testing of these underground tanks/sumps will be conducted annually. 1994 testing is scheduled to be completed by the end of July, but not later than the end of 1994 if any significant repairs are required or problems arise.

These sumps and tanks include:

Acid gas flare tank
Boiler blowdown tank
Enron tank
Classifier
Contingency tank
GE suction tank

Sump NE of Worthingtons
Sump SE of Worthingtons
Pit west of #6 Worthington
Pit west of #5 Worthington
Sump NE of NGL plant
Pit on east side of NGL plant
Pit on east of B plant
Sump NW of the boiler plant
Sump NW of machine shop
Sump north end of A plant

3. **Above-grade Tank Leaks -- Soil Infiltration Prevention -- Methods and Schedule**

In order to both satisfy OCD requirements and alleviate plant budgetary constraints, the installation of concrete floors and gravel bottom replacements at various above-grade tanks will take place over a five (5) year period. An installation/replacement schedule is as follows:

1) By the end of 1995, concrete floors will be put inside the existing containments which enclose the following tanks:

Raised varsol and gasoline tanks
V250 ambitrol and oil tanks
Centaur oil tank
Two (2) "A" plant oil tanks

A total of four (4) concrete floors in 1995.

2) By the end of 1996, concrete floors and bottoms will be installed inside the existing containments which enclose the following tanks:

Three (3) amine tanks and glycol tank (same containment)
Two (2) field drip tanks by the NE scrubber (same containment)

A total of two (2) concrete floors and two (2) replacements of gravel bottoms (drip tanks) in 1996.

3) By the end of 1997, a concrete containment and floor will be installed on the following vessels:

Waste water surge tank (a containment and concrete floor)
Waste oil tank and lean oil storage tank (same existing containment -- floor only)

A total of two (2) concrete floors and one (1) containment in 1997.

4) By the end of 1998, a concrete floor and the replacement of three (3) gravel bottoms will be completed inside existing containments around the following vessels:

GE oil tank
GE ambitrol tank
GE turbo oil tank

A total of one (1) concrete floor and three (3) gravel bottoms replacements in 1998.

4. Oil Filter Drain Sump -- Curbing Installation and Housekeeping Procedures

A containment made of 2 X 2 X 1/4 angle iron with a gasket underneath and anchored by bolts secured in the current concrete structure will be fabricated and installed by the end of 1994. Amine and glycol filters will continue to be drained at this sump and disposed by a Texas Railroad Commission permit-approved contractor, Quell Petroleum Services of Monahans, Texas. Disposal is by incineration. A raised tank with a grating top will be constructed by the end of 1994 to drain the oil from the used oil filters. The used engine oil is recycled.

5. Cooling Tower Water Leak and Spill Containment -- Method and Schedule

A visual assessment has been made of those areas around the cooling towers affected by excessive wind drift. Installation of splash boards which are wide enough to contain the drift is scheduled to take place by the end of August 1994. The boards will be secured with metal brackets at an angle to direct drift water back into the tower containment basin.

Observable leaks in the cooling tower piping system have been noted and a repair schedule is being formulated. All leaks should be repaired by the end of August 1994. Checking for cooling tower leaks and spills has been made part of the monthly inspection procedure (see #6 below).

6. Minor Equipment Leaks -- Housekeeping/Maintenance/Cleanup Procedures and Schedule

Plant operators are each assigned ongoing housekeeping responsibilities for various areas of the plant (assignment duties available upon request). Housekeeping duties include equipment leak checks. A recent memo (attached) which addresses proper procedures in preventing, reporting and remediating future equipment leaks has been distributed to all plant personnel.

Beginning in January 1994, the maintenance foreman and operations supervisor will be responsible for keeping a monthly inspection record which documents any observable equipment leaks as well as overall housekeeping efforts.

Existing equipment leaks have been reported and will be scheduled for repair at the earliest opportunity. We are in the process of cleaning any areas soiled by the leaks by raking the area and introducing fresh soil to the affected area. Periodically these areas will be re-raked to accelerate the remediation process.

SID RICHARDSON CARBON & GASOLINE COMPANY
Inter-Company Correspondence

Date: November 17, 1993

To: Plant Personnel **From:** Brian Murray

Subject: Blowdown of sightglasses & valves **File:** Misc

Please **DO NOT** blowdown sightglasses or valves onto the ground. If you need to blowdown something, find a bucket or container to catch liquids in.

After blowdown is complete, pour liquids into the drain. If any sightglass or valve is leaking fluid on the ground, please write a work order to repair the faulty equipment. It will be fixed at the first opportunity. If fluid happens onto the ground, rake fresh dirt over the spilled area.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

November 2, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-038

Mr. Michael McConnell
Sid Richardson Gasoline Co.
201 Main Street
Fort Worth, TX 76102

RE: Discharge Plan GW-10
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. McConnell,

The New Mexico Oil Conservation Division (OCD) has received the discharge plan renewal application dated September, 1993 and revised October 22, 1993 for the above referenced facility. The following requests for clarification, additional information and commitments are based on a review of the application, the previously approved discharge plan and observations during the October 27, 1993 OCD inspection of the facility:

I. Discharge Plan Renewal Application

A. Section VII.E., Underground Pipelines, and Appendix H, Procedures for Testing Drain System, outline the procedures for the testing of the plant drain system. These procedures, however, do not include a schedule of testing, as required every five years. The drain system was last tested in 1988 (while owned by El Paso Natural Gas Co.), and is thus due to be tested. Submit a schedule for the positive pressure testing of all underground piping.

II. Site Inspection

A. The Wastewater Classifier, Contingency Tank, Boiler Blowdown Tank, Frame V Drip Tank and numerous below-grade sumps were not equipped with leak detection. Submit a method for testing the integrity of these tanks and

sumps. As noted in the application, this testing is to be done annually. If any of these below-grade tanks and sumps require replacement in the future, or new ones are installed, leak detection be integrated in the design.

B. The OCD is requiring that all above-grade tanks and saddle tanks containing materials with constituents that can be harmful to fresh water and the environment have containment such as berms, concrete pad and curb, or metal/fiberglass catch trays. Several tanks, including the V-250 oil tanks, the Solar oil tanks, the Amine storage tank, the Drip tanks, the Frame V ambitrol and oil tanks, and the Varsol tanks, had curbs around them to contain spills and leaks, but had no pad to prevent infiltration into the ground. Propose a method and schedule for containment of these tanks. Also, a method and schedule for containment of the Wastewater Surge tank shall be submitted.

C. The sump into which the used oil filters are drained, located behind the NGL Cooling Tower, should have a curb around its pad to contain oil runoff. Submit a schedule for the installation of this curb, plus housekeeping procedures to ensure proper disposal of used filter oil.

D. Both facility cooling towers show signs of leaks and spills beyond the foundation boundaries. Submit a method and schedule for the containment of the cooling tower water within the system.

E. There were numerous areas observed where pumps, valves, flanges, sight glasses and drums were leaking or have leaked in the past. Submit general housekeeping procedures, including a method and schedule for the cleanup and containment of existing and future leaks.

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

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

Sincerely,

Robert L. Myers II
Petroleum Engineer Specialist

xc: OCD Hobbs Office

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

October 8, 1993
MJM-105-93
File: NM-6

CERTIFIED MAIL - RETURN RECEIPT
P 378 679 232

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Discharge Plan GW-10 - Jal 3 Plant
Reference: Letter MJM-96-93 dated September 10, 1993

Dear Mr. Anderson:

The referenced letter which accompanied the subject discharge plan renewal application package indicated that certain appendices integral to providing a complete package were delayed and would be submitted at their earliest availability. Those appendices (listed below) are now complete and are attached. Please insert each appendix into the appropriate section of the subject discharge plan renewal package.

Appendix B - Facility Site Plan Drawing
Appendix G - Drain System Plan Drawing
Appendix H - Procedures for Testing Drain System

I believe the renewal application package is now complete and ready for your thorough review. I'm sorry scheduling conflicts prevented our getting together for the Jal 3 site inspection portion of your review but look forward to coordinating a future date.

As usual, don't hesitate to contact me if you have any questions or need more information regarding this matter.

Sincerely,

Michael McConnell

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachments (2 sets)

cc: C. P. O'Farrell/E. F. Gunn - w/o attachments
W. J. Farley - w/o attachments
T. E. McElyea/C. E. Adcock/L. B. Copeland - w/o attachments
K. C. Clark - w/o attachments
G. W. Washburn - w/attachments (1 set)
OCD District Office, Hobbs, NM - w/attachments (1 set)

DISCHARGE PLAN

FOR

SID RICHARDSON GASOLINE COMPANY'S

JAL NO. 3 PLANT

LEA COUNTY, NEW MEXICO

Prepared By:

Sid Richardson Gasoline Company
Fort Worth, Texas

September 1993

Revised October 22, 1993

DISCHARGE PLAN

FOR

SID RICHARDSON GASOLINE COMPANY'S

JAL NO. 3 PLANT

LEA COUNTY, NEW MEXICO

Prepared By:

Sid Richardson Gasoline Company
Fort Worth, Texas

September 1993

DISCHARGE PLAN INDEX

APPENDICES

REVISIONS
For Dishcarge Plan

Rev.	Revisions	Date
0	Original Issue - Rewrite Of Entire Plan	09-10-93
1	Revised paragraph 14, page 4 of Appendix H "Drain Line Testing Procedure."	10-22-93

I. TYPE OF OPERATION

The main purpose of the Jal No. 3 Plant facility is natural gas processing. The main processes that occur at the plant are: compression, sweetening, dehydration, cryogenic extraction of ethane and heavier hydrocarbons, steam generation and power generation. A Sulfur Recovery Unit is being added under a permit issued by the NMED. A brief description of the main processes follows:

A. COMPRESSION

Plant compressors are used for inlet, refrigeration and residue recompression. The plant has fifteen engine driven compressor units totalling 27,200 horsepower and three gas turbine-driven centrifugal compressor units totalling 22,800 horsepower. Entrained liquids are removed from the inlet gas streams with gas-liquid separators. Compressor engines in the "A" and "B" Compressor buildings and Generator engines in the Auxiliary Building use water for lubricating oil cooling and engine jacket cooling in closed loops systems. The gas turbine-driven centrifugal compressors use Ambitrol in their cooling systems.

B. SWEETENING

After compression of the inlet gas to approximately 600 psig, H_2S and CO_2 is removed by contacting the stream with an aqueous solution of monoethanolamine (MEA) in two contactor vessels (V-50, V-4302). The rich amine is then stripped of the H_2S and CO_2 in two MEA stills (V-56, V-4301). The lean amine is recirculated back to the two contactor vessels. Sweetened gas leaves the overhead of the amine contactors and goes to the glycol contactors. The H_2S and CO_2 leave the still overhead and are currently flared but will be sent to the Sulfur Recovery Unit (SRU) when it is complete.

C. DEHYDRATION

Sweetened inlet gas enters two Glycol Contactors (V-5101,V-5102) for initial dehydration by contacting the stream with an aqueous solution of triethyleneglycol (TEG). The partially dehydrated gas leaves the overhead of the contactors and goes to the molecular sieve dehydration vessels (V-205A,B,C,D) in the Cryogenic Plant for final dehydration. The rich TEG solution is regenerated in the Glycol Reboiler (E-5101) and returned to the contactors. The molecular sieve is regenerated with hot inlet gas; the water saturated regeneration gas is then cooled in the Regeneration Gas Cooler (E-209) and the water and gas is then separated in the Regeneration Gas Scrubber (V-206); removed water is sent to the closed drain system; recovered hydrocarbon liquid is sent to the Compressor Liquids Separator.

D. CRYOGENIC PLANT

The Cryogenic Plant extracts 80 to 85 percent of the ethane (C_2) and heavier hydrocarbons from the dehydrated gas stream. Rich gas is cooled through a series of inlet heat exchangers and finally in the Chiller (E-202, C_3 refrigeration system) to approximately -35 °F at the Chiller Separator (V-201) where the majority of the butanes and heavier hydrocarbons are separated. Liquids from V-201 are fed to the bottom feed of the Demethanizer (V-203). Vapors from V-201 continue through another set of heat exchangers and are cooled to approximately -95 °F at the Expander Separator (V-202). Liquids separated at V-202 are fed to the Demethanizer and the vapors go to the Turbo-expander (EK-201). The cold vapors enter the Turbo-expander at approximately 540 psig and go to the top of the Demethanizer at approximately 160 psig and -165 °F. The Demethanizer strips the methane from the ethane and heavier hydrocarbons; the methane residue gas leaves the top of the Demethanizer at approximately -165 °F and is used to cool the gas though the inlet exchangers. The residue gas is then recompressed, first by the compressor driven by the Turbo-expander, EK-201, and finally by the Recompressors in the "A" Compressor plant and leaves the plant in the residue gas pipeline. The ethane and heavier hydrocarbons leave the bottom of the Demethanizer at approximately 35 °F, are warmed to approximately 55 °F by inlet gas in the Product/Inlet Exchanger (E-292) and are pumped into the liquid product pipeline at approximately 900 psig.

E. SULFUR RECOVERY

Hydrogen Sulfide and Carbon Dioxide from the Amine Unit will flow to the Sulfur Recover Unit (SRU). The unit will use a standard Claus, three bed process to recover 95 percent of the sulfur in the inlet stream. The recovered elemental sulfur will be sold and trucked from the plant. Sulfur Dioxide, a byproduct of the Claus process, is burned in the incinerator.

F. STEAM GENERATION

Steam is generated by three gas-fired boilers and a waste heat boiler utilizing the turbine exhaust gases from the compressor in the "C" Compressor Plant. The gas-fired boilers are capable of producing 80,000 pounds per hour of steam and the waste heat boiler can produce 85,000 pounds per hour. The waste heat boiler is the primary steam source for the facility.

G POWER GENERATION

Electricity is generated with three 300 KW generators driven by three 449 horsepower natural gas engines.

II. OPERATOR/LEGALLY RESPONSIBLE PARTY & LOCAL REPRESENTATIVE

A. OPERATOR/LEGALLY RESPONSIBLE PARTY

Mr. E.F. Gunn, Manager, Environmental Health & Safety
Sid Richardson Gasoline Co.
201 Main Street
Fort Worth, TX 76102
Telephone no. 817-390-8640

B. LOCAL REPRESENTATIVE

Mr. George W. Washburn, Plant Manager
Sid Richardson Gasoline Co.
Jal #3 Gasoline Plant
P. O. Box 1311
Jal, NM 88252
Telephone no. 505-395-2068

III. LOCATION OF DISCHARGE/FACILITY

The plant is located 3-1/2 miles North of Jal, NM on Hwy. #18 and 1 mile East. The plant consists of 90 Acres located in Section 33, T-24-S, R-37-E, N. M. P. M., Lea County, New Mexico. See Appendix A for the Site Location Topographic Map.

IV. LANDOWNERS

A. Lee Partners , Ltd. dba Sid Richardson Gasoline Co.
201 Main Street
Fort Worth, TX 76102

B. El Paso Natural Gas Co.
P. O. Box 1492
El Paso, TX 79901

C. May Woolworth
403 West D Ave.,
San Angelo, TX

V. FACILITY DESCRIPTION

See Appendix B for the facility plot plan, Drawing No. 9234-PP-201, sheets 1 through 3.

VI. SOURCES, QUANTITIES & QUALITY OF EFFLUENT & WASTE SOLIDS

A. SOURCES & QUANTITIES

1. SEPARATORS

Inlet, intermediate and discharge separators (scrubbers) separate gas, hydrocarbon liquid and water throughout the facility. Recovered hydrocarbon liquids average 483,500 gallons/month; produced water averages 198,300 gallons/month.

2. BOILERS

Steam is generated by three gas-fired boilers and a waste heat boiler utilizing the turbine exhaust gases in the "C" Compressor Plant. The boiler drums and evaporator vessels produce 108,000 gallons/month of high solids concentration blowdown water. Boiler water treatment chemicals are listed in Appendix F.

3. ENGINE COOLING WATER

Cooling water is used for engine jacket water and oil cooling in the engines in the "A" and "B" Compressor and the Auxiliary Building. The water is cooled in the coils of atmospheric (fin-fans) type coolers. The systems are closed loop and evaporation accounts for almost all of the water losses. The turbine-driven compressors, "C" Compressor Plant and "A" Compressor Plant Boosters, use a closed loop system with Ambitrol as a coolant; the systems are drained only in unusual circumstances. Cooling water additives are listed in Appendix F.

4. COOLING TOWERS

Two cooling towers, "A" and "B" Plant, are used to provide gas and other process cooling in the facility. "A" Plant blowdown averages 172,800 gallons/month and "B" Plant blowdown averages 293,700 gallons/month. Cooling tower water treating chemicals are listed in Appendix F.

5. SEWAGE

The quantity of sewage from the rest room and kitchen facilities in the plant office, recreation hall, wash house and instrument technicians house is very small and is not measured.

6. WASTE LUBRICANTS AND MOTOR OILS

Generation of used lubricants and motor oils averages 900 gallons/month. Lubricants and motor oils employed at the facility are listed in Appendix F.

7. WASTE AND SLOP OIL

Heavy hydrocarbons are recovered in the plant scrubbers and inlet separators; recovered heavy hydrocarbons average 19,995 gallons/month.

8. USED FILTERS

Used engine/compressor lube system oil filters (38/month), glycol dehydrator system sock filters (9/month), inlet scrubber sock filters (18/month) and inlet scrubber mist pads (1/month) are generated as a waste at the facility.

9. SOLIDS AND SLUDGES

Solids and sludges build up slowly in the inlet separators and the Classifier Tank. The quantity is very small and is not measured.

10. CLEANING OPERATIONS USING SOLVENTS/DEGREASERS

Parts cleaning and degreasing generates approximately 100 gallons/month of waste solvent. The types of solvents/degreasers used are listed in Appendix F.

11. WATER TREATING

Water treating filter backwashing and regeneration of the Zeolite treater beds require 357,300 gallons/month. Water treating chemicals are listed in Appendix F.

12. FLOOR AND EQUIPMENT DRAINS

Equipment will be washed approximately once a year, using approximately 10,000 gallons of raw water. The water may contain hydrocarbons from the lubricating oil and natural gas condensate as well as solvents/degreasers. Heat exchanger bundles may require periodic cleaning.

B. QUALITY CHARACTERISTICS OF COMMINGLED WASTE STREAM.

All waste water flows into the plant drain system which ends at the Classifier Tank. The waste water is then filtered and pumped into the disposal well. The quality characteristics of the commingled waste stream is shown in the laboratory analysis contained in Appendix D. Two samples of the commingled waste stream were taken at the suction of the disposal well pumps on separate days by Martin Water Laboratories, Inc. and TraceAnalysis, Inc. using standard industry practices and in accordance with WQCC recommendations. Material Safety Data Sheets (MSDS) for all material used or encountered at the facility are contained in Appendix F.

VII. TRANSFER & STORAGE OF PROCESS FLUIDS & EFFLUENTS

A. SUMMARY OF ON SITE COLLECTION AND STORAGE SYSTEMS

All drains in the facility, unless indicated otherwise below, flow to the Classifier Tank (steel, twenty foot diameter, below-grade). The two compartment tank classifies incoming liquids by gravity separation. Oil rises to the surface, solids settle to the bottom and water passes through an opening in the lower section of the partition. The lighter liquids (oil and hydrocarbons) are decanted by overflowing into a below-grade Waste Oil Storage Tank. Periodically the hydrocarbons are removed by vacuum truck and sold. Classified waste water is then pumped through a filter into a 1,500 barrel surge tank and then pumped into the disposal well. Appendices C and G contain flow schematics and plan drawing of the classifier area and drain system.

above- or below-grade

All vessels and separators are above ground unless otherwise indicated. The below-grade tanks are protected from corrosion by a four coat epoxy paint system on all exterior surfaces; the classifier tank is coated internally with the same material. All below grade piping is either plastic, coated and wrapped steel, or vitrified clay pipe. Equipment and piping are included in the plant cathodic protection system.

An epoxy-coated, forty-five foot diameter by sixteen foot deep open-top steel tank with a working capacity of approximately 95,000 gallons is used as a contingency reservoir. The tank has a 1.7 day retention capacity in the event of equipment failure, well problems or other system disabling occurrences. Waste water is pumped back into the classifier when normal operation is resumed.

1. SEPARATORS

Compression Liquids from the Second and Third Stage Discharge Separators in the "B" and "C" Compressor Plants, the second stage discharge of Compressor #9 in the "A" Compressor Plant, the "A" Plant Amine Contactor Inlet Separator, The Inlet Separator (V-204) and Regeneration Gas Scrubber (V-206) in the Cryogenic Plant are sent to the Compression Liquids Separator. Water from the Compression Liquids Separator goes into the high pressure drain system; recovered hydrocarbon liquids are sent to Product Storage Tanks (V-8117, V-8118) and trucked off-site. Liquids from the remainder of the separators are dumped into the high and low pressure drain systems.

2. BOILERS

Boiler blowdown water flows into the Boiler Blowdown Scrubber and then into a buried Blowdown Tank. The water then flows in an open drain system line to the Classifier Tank. Water from the Evaporator flows directly to the Blowdown Tank.

3. ENGINE COOLING WATER

Normal engine maintenance requires periodic draining of the engine cooling water. The coolant is drained into a mobile holding tank. Upon completion of the maintenance, the coolant is then returned to the engine. If the coolant is not returned to the engine it is poured into the open drain system.

4. COOLING TOWERS

Cooling tower blowdown water goes into a cooling tower blowdown system line and flows to the Classifier Tank.

5. SEWAGE

Sewage flows through a sewer line to the Classifier Tank.

6. WASTE LUBRICANTS AND MOTOR OILS

Used waste lubricants and motor oils are collected in a mobile tank, temporarily stored in the "A" Plant used Lube Oil Storage Tank (buried) and then trucked off the facility by a waste oil reclaimer (See Appendix E).

7. WASTE AND SLOP OIL

Used and slop oil flows through the high and low pressure closed drain system to the Classifier Tank.

8. USED FILTERS

Used filters are placed in a mobile steel storage bin. Oil from the filters is periodically drained from the bin into the open drain system. The drained filters are then removed from the plant by an approved recycler.

9. SOLIDS AND SLUDGES

Solids and sludges are removed from tanks and vessels using a vacuum truck from an approved hauler(See Appendix E); no solids or sludges are stored in the facility.

10. CLEANING OPERATIONS USING SOLVENTS/DEGREASERS

Solvents and degreasers are drained into the low pressure drain system.

11. WATER TREATING

Filter backwash water is piped to a buried collection sump and then flows into the boiler blowdown system line and the classifier.

12. FLOOR AND EQUIPMENT DRAINS

Wash-down water runoff flows to the floor drains and into the open drain system. Hydrocarbons and waste water from heat exchanger bundles are contained in curbed areas which are connected to the open drain system.

B. WATER AND WASTE-WATER FLOW SCHEMATICS

Flow schematics are contained in Appendix C.

C. DISCHARGE POTENTIAL OF TRANSFER AND STORAGE COLLECTION UNITS

1. All tanks and separators are above ground unless indicated otherwise in above paragraph VII. A.

2. All machinery fluids are collected, transferred and processed as indicated in above paragraph VII. A.

D. METHODS USED TO PREVENT UNINTENTIONAL AND INADVERTENT DISCHARGES FROM REACHING THE GROUND SURFACE AND POLLUTING

1. All storage tanks within the plant which contain fluids other than fresh water have concrete containment walls around the tanks in accordance with OCD requirements. The only exception is the above ground storage tanks (No. 29, 30, 31) where inlet liquids from the "A" Plant Booster Compressors Inlet Scrubbers are stored -- See proposed modification in Paragraph F, below.

2. Chemical and drum storage areas are paved, curbed and drain into the open drain system. Several individual storage tanks sit in fiberglass drip/spill containment basins. The only exception is the Methanol Storage Tank -- See proposed modification in Paragraph F, below.

3. All sumps and below-grade tanks are visually inspected annually.

4. All above ground tanks are on gravel pads.

E. UNDERGROUND PIPELINES

The plant drain system is shown on Drawing No. 1J3-1-P69 in Appendix G. Details of existing testing procedures are contained in Appendix H.

F. PROPOSED MODIFICATIONS

1. A berm will be constructed around Storage Tanks 29, 30 and 31 in accordance with OCD recommendations and requirements.

2. A curbed concrete pad will be constructed under the Methanol Storage Tank.

VIII. EFFLUENT DISPOSAL

A. EXISTING ON-SITE EFFLUENT DISPOSAL FACILITIES

All waste-water is routed through the classifier to remove suspended solids and oil. The classified water is then filtered and pumped into the disposal well (Woolworth Estate -SWD No. 1E located in Unit E of Sec. 33, T-24-S, R-37-E). The average injection rate into the well is 1,662,000 gallons/month. The waste-water is injected into the San Andres Formation at a depth of approximately 4,700 feet. The well was completed in compliance with NMOCD administrative order No. SWD-231 dated November 6, 1980. The

location of the well is shown on the Site Location Topographic (Appendix A)and on the Jal No. 3 Plot Plan, Dwg No. 9234-P-300, sheet 1 of 3 (Appendix B).

B. OFF-SITE DISPOSAL

All effluents with the exception of waste water are trucked off-site and handled in accordance with OCD and NMED regulations. Recycling and disposal contractors will be approved by the NMED or OCD, as appropriate, for the hauling and final disposition of effluents. See Appendix E for a list of hauling and disposal contractors.

IX. INSPECTION, MAINTENANCE AND REPORTING

A. INSPECTION PROCEDURES FOR COLLECTION, STORAGE AND DISPOSAL UNITS.

During plant shutdowns, and at least annually, all sumps and below grade tanks will be cleaned out and visually inspected for leaks. The plant maintains inspection records and schedules and will notify OCD in the event of any reportable leak.

B. PROCEDURES FOR CONTAINMENT OF PRECIPITATION AND RUNOFF.

Areas where leaks or spills can occur are curbed to prevent precipitation from carrying contaminants out of the area; curbing and well drained areas prevent precipitation runoff from flowing into and overflowing the drain system.

X. SPILL/LEAK PREVENTION & REPORTING (CONTINGENCY PLANS)

The plant is manned 24 hours a day; operators and maintenance personnel are trained to be aware of spills and leaks and to take immediate action to prevent or mitigate pollution. Small spills will be adsorbed with soil and shoveled into drums. Large spills will be contained with temporary berms; free liquids will be removed with a vacuum truck and the contaminated soil shoveled into drums. Drums containing contaminated soil will be disposed off-site by an OCD approved disposal contractor. Verbal and written notification of leaks and spills will be made to the OCD in accordance with OCD Rule 116.

XI. SITE CHARACTERISTICS

A. HYDROLOGIC FEATURES

1. BODIES OF WATER NEAR PLANT SITE

There are no bodies of water or groundwater discharge sites within one mile of the facility. Water courses in the area are generally ephemeral washes. The plant gets its' water from water wells located in Secs. 6 and 7, T-25-S, R-38-E (Hubb 1 through 5) and Secs 25 and 36, T-24-S, R-37-E (Cooper 1 through 8). Other water wells in the vicinity is the Crawford Ranch well located in Sec 31, T-24-S, R-37-E. See the Site Location Topographic in Appendix A for well locations.

2. GROUND WATER MOST LIKELY AFFECTED BY DISCHARGE.

The Ogallala aquifer is the principal source of potable water in the area. The depth to the aquifer is approximately 90 feet; the total dissolved solids (TDS) concentration for the ground water most likely to be affected by the discharge is 2,208 mg/l. A sample of well water was taken from the Crawford Ranch well and the Hubb No. 2 well in accordance with OCD recommended methods. The samples were taken and analyzed by Martin Water Laboratories, Inc. in accordance with OCD recommended procedures. See Appendix E. for complete analysis of the samples. See the Site Location Topographic in Appendix A for well locations.

3. FLOW DIRECTION OF GROUND WATER MOST LIKELY AFFECTED BY DISCHARGE

The Ogallala aquifer slopes to the southeast with a hydraulic gradient of about 10-12 feet per mile and imparts an easterly or southeasterly movement to the groundwater. References: Cronin, 1969; El Paso Natural Gas Company, Discharge Plan, March 1981.

B. GEOLOGIC DESCRIPTION OF DISCHARGE SITE

Reference: El Paso Natural Gas Company, Discharge Plan, October 1983.

1. SOIL TYPES

The Jal No. 3 facility is located on the Berino-Cacique loamy fine sands soil association and the Pyote and Maljamar soils series.

The Pyote and Maljamar fine sands are well drained soils with moderately rapid permeability formed in wind deposited materials. The Pyote soil is fine sand over sandy loam subsoil to a depth of 48 to 60 inches where a fine sandy loam C horizon is encountered. The Maljamar fine sand soil series has a sandy clay loam subsoil with an indurated chaliche horizon at approximately 50 inches.

The Berino-Cacique association consists of approximately 50% Berino loamy fine sand and 40% Cacique loamy fine sand. Cacique soils occur only in association with Berino soils. Both Berino and Cacique soils are moderately permeable and have very slow runoff. The Berino soil has a light sandy clay loam subsoil with caliche at depths ranging from 29 to 60 inches. Cacique loamy fine sand is a shallow soil with indurated caliche at 20 to 34 inches.

2. NAME OF AQUIFER

The Ogallala formation is the principal source of potable ground water in the area.

3. COMPOSITION OF THE AQUIFER

The Ogallala formation is alluvial consisting of sand, gravel, silt and clay.

4. DEPTH TO ROCK AT BASE OF ALLUVIUM

The Ogallala overlies the relatively impermeable Chicle Formation; however, the depth is unknown.

C. FLOOD PROTECTION

1. FLOODING POTENTIAL

The plant has a very low flooding potential. The plant is situated in the Pecos River Basin. The Basin in southern Lea County has no perennial streams, and only a few ephemeral streams and broad shallow drainages that may flow following thunderstorms. Most precipitation quickly soaks into the soil or evaporates. The land surface in the plant area has little relief, falling approximately 30 feet per mile.

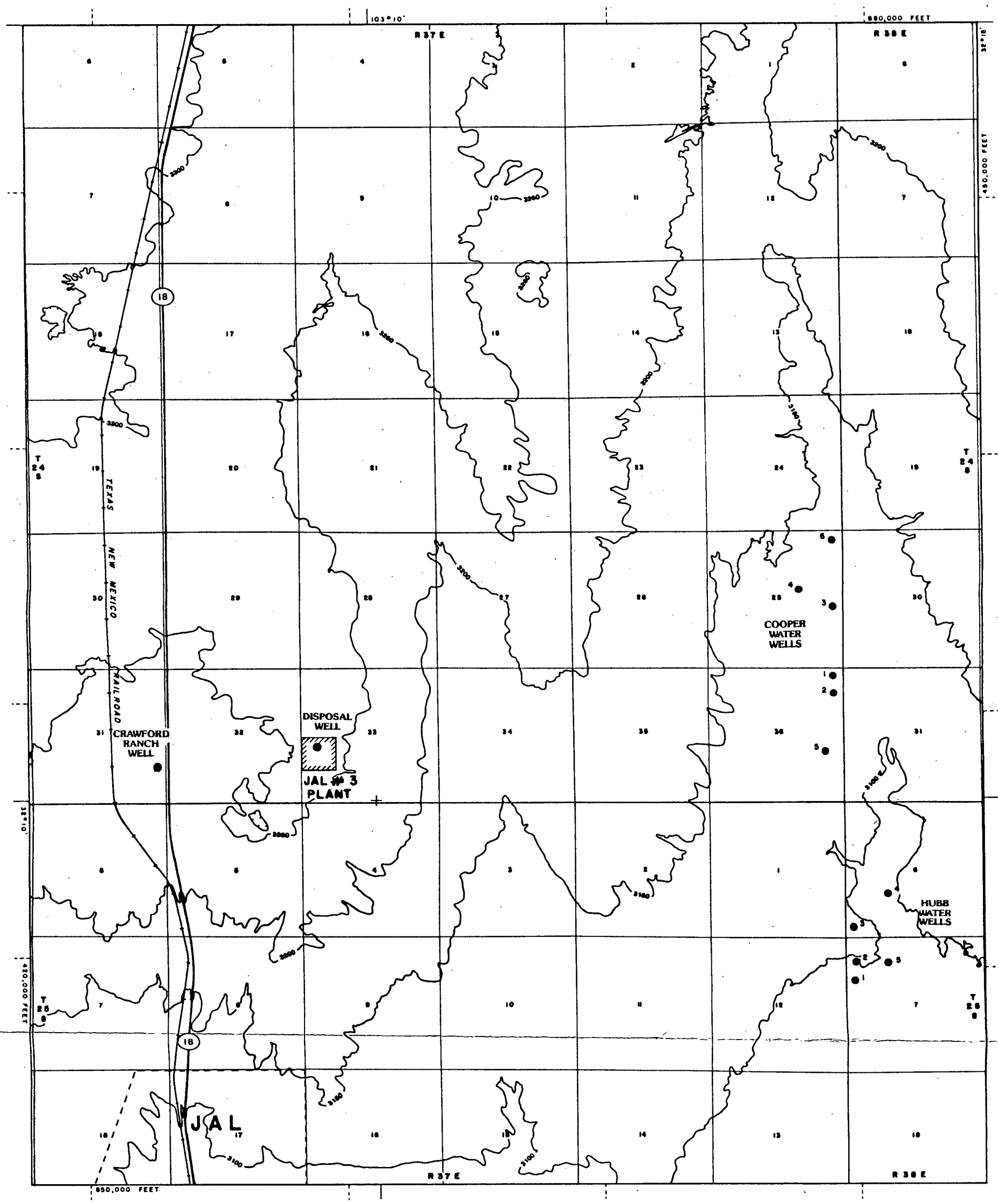
2. FLOOD PROTECTION MEASURES

The plant is bounded on the west and south by major caliche roads and a cinder block wall along the majority of the west and southwest sides. Very little surface water can run into the plant. All storage tanks containing liquids other than water are bermed to prevent surface runoff contamination from leaving the plant.

XII. REFERENCES

A. Cronin, J. G., Ground Water in the Ogallala Formation in the Southern High Plains of Texas and New Mexico, Hydrologic Investigation Atlas HA-330, U. S. Geological Survey, Washington, D. C. 1969.

B. El Paso Natural Gas Company, Discharge Plan for El Paso Natural Gas Company's Jal No. 3 Plant, Lea County, New Mexico, October 1983.



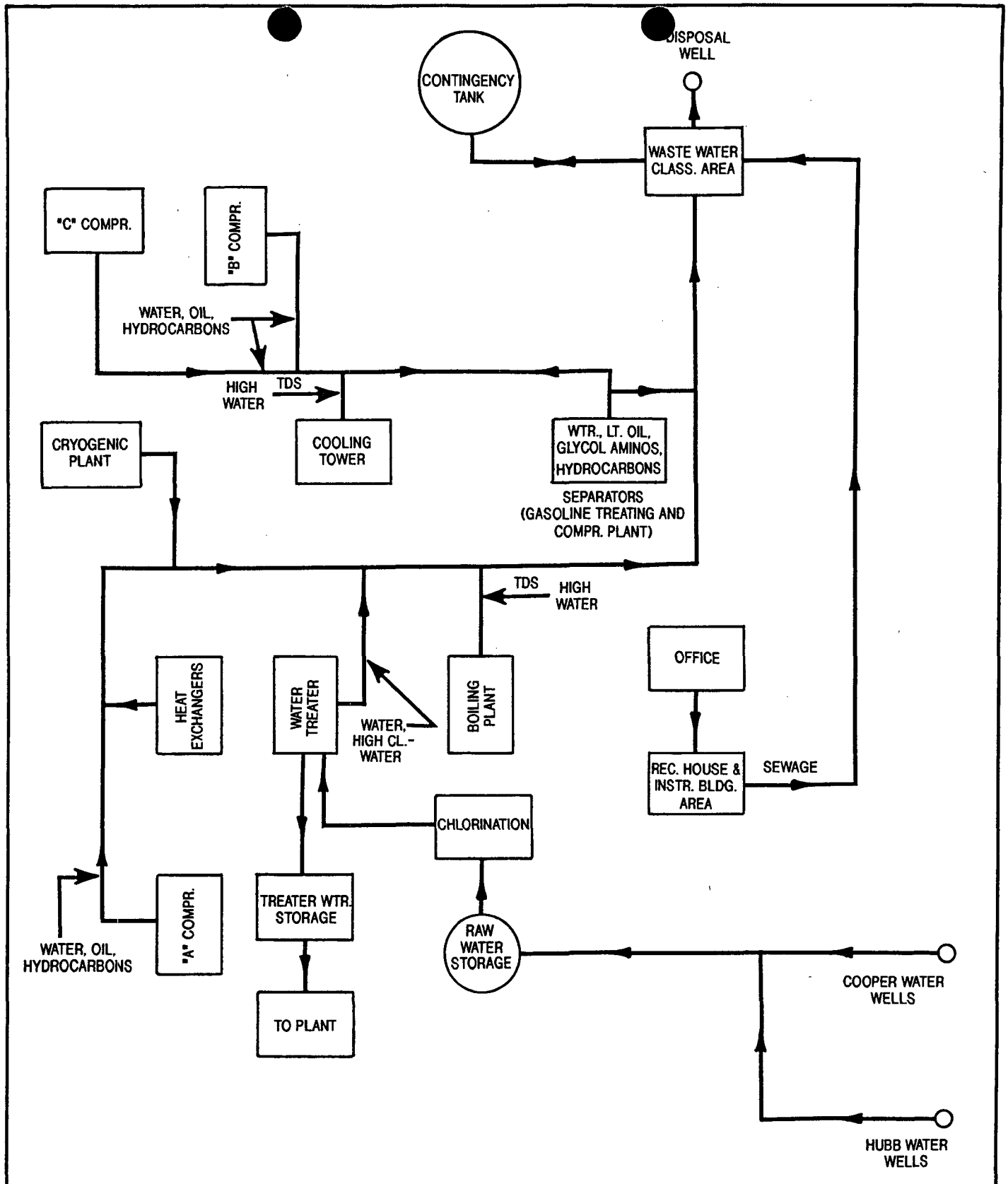
COMPILED FROM U.S.G.S. QUADRANGLES
CONTOUR INTERVAL: 50'

Sid Richardson Gasoline Co.

JAL #3 SITE LOCATION TOPOGRAPHIC

Portion of Lea County,
New Mexico

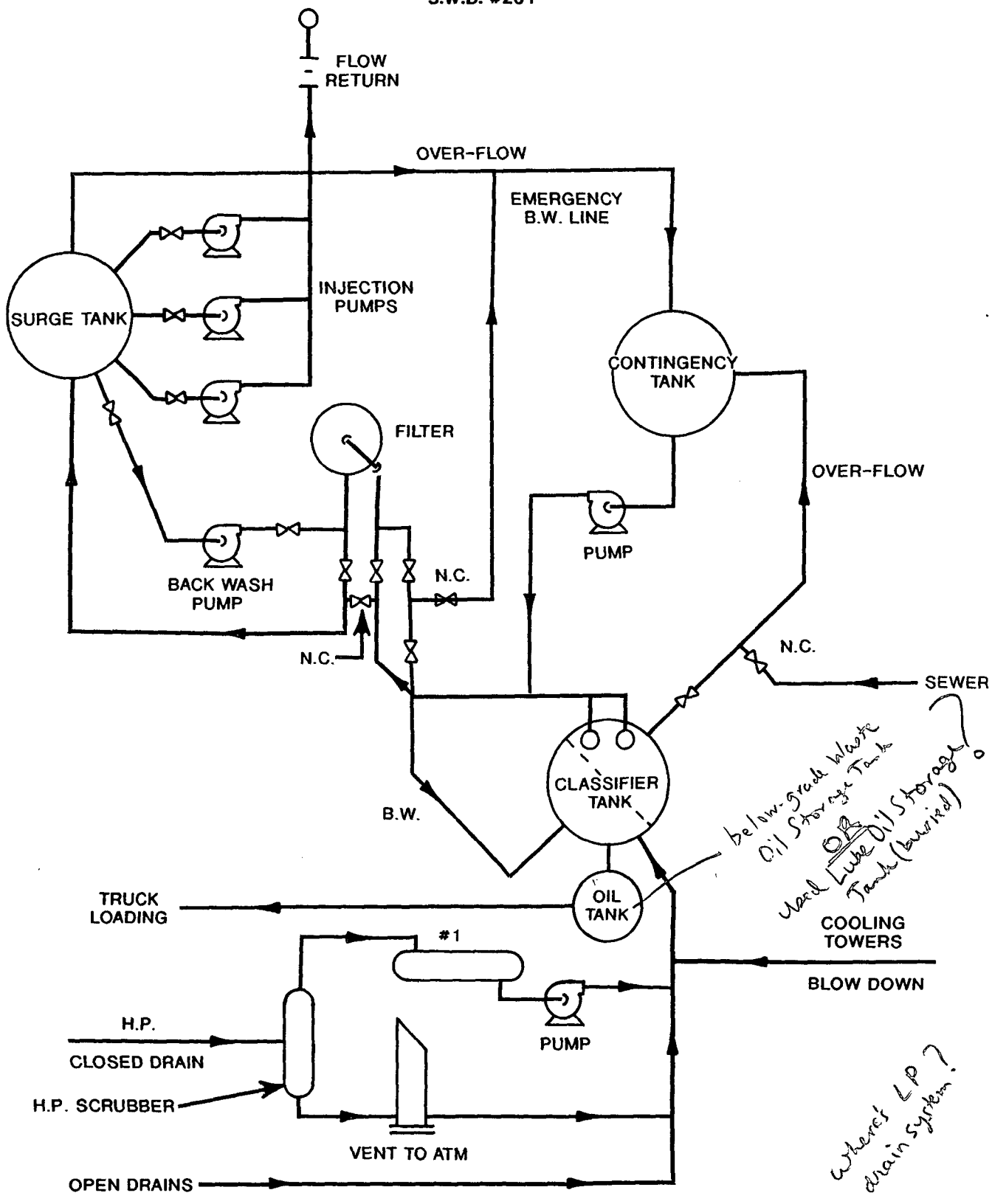
Scale: 1" = 4,000' Date: Aug. 1993 Drawn By: A.P.



Sid Richardson Gasoline Co.

JAL NO. 3 PLANT WATER & WASTE WATER FLOW SCHEMATIC

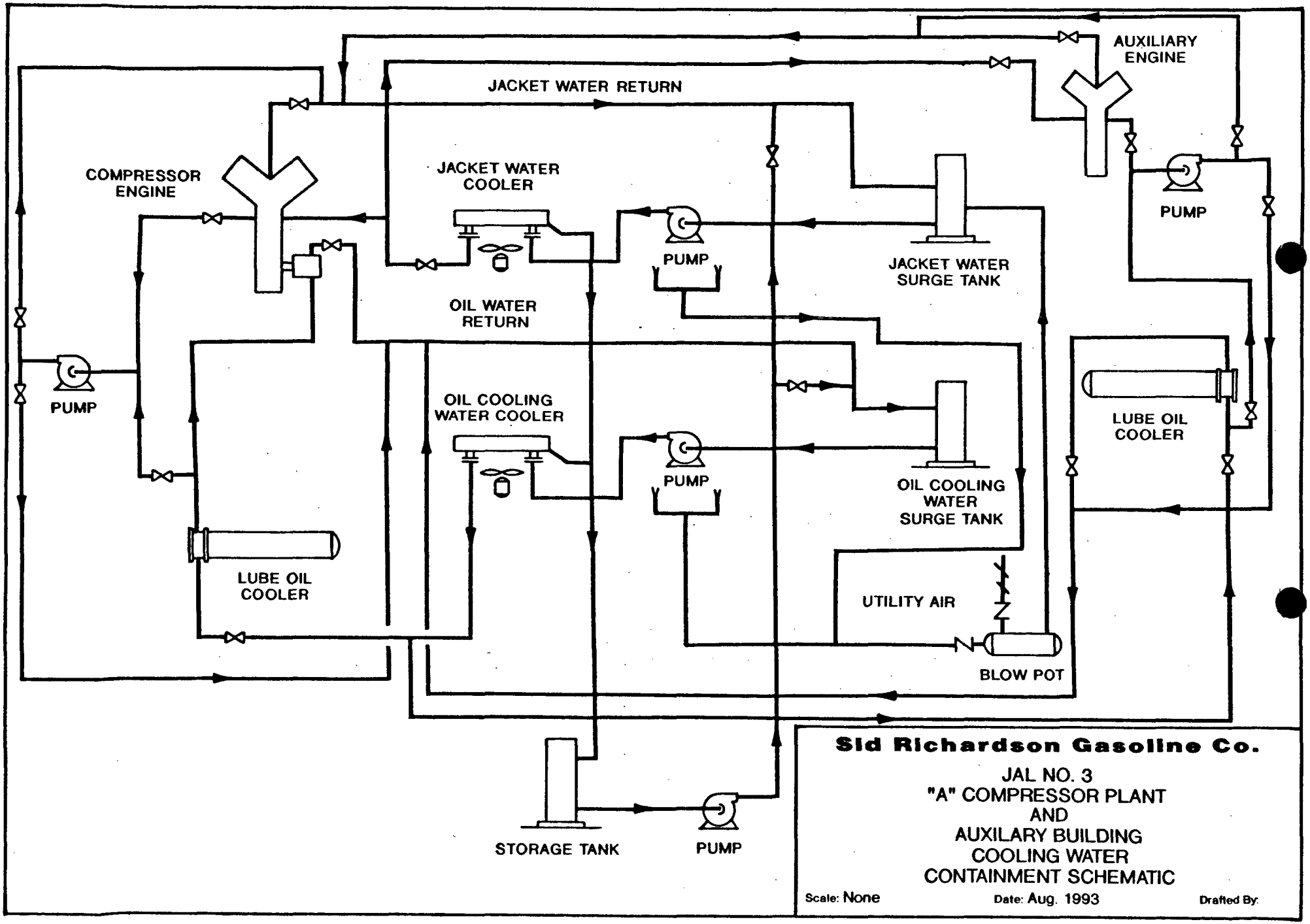
Scale: None Date: Aug. 1993 Drafted By:

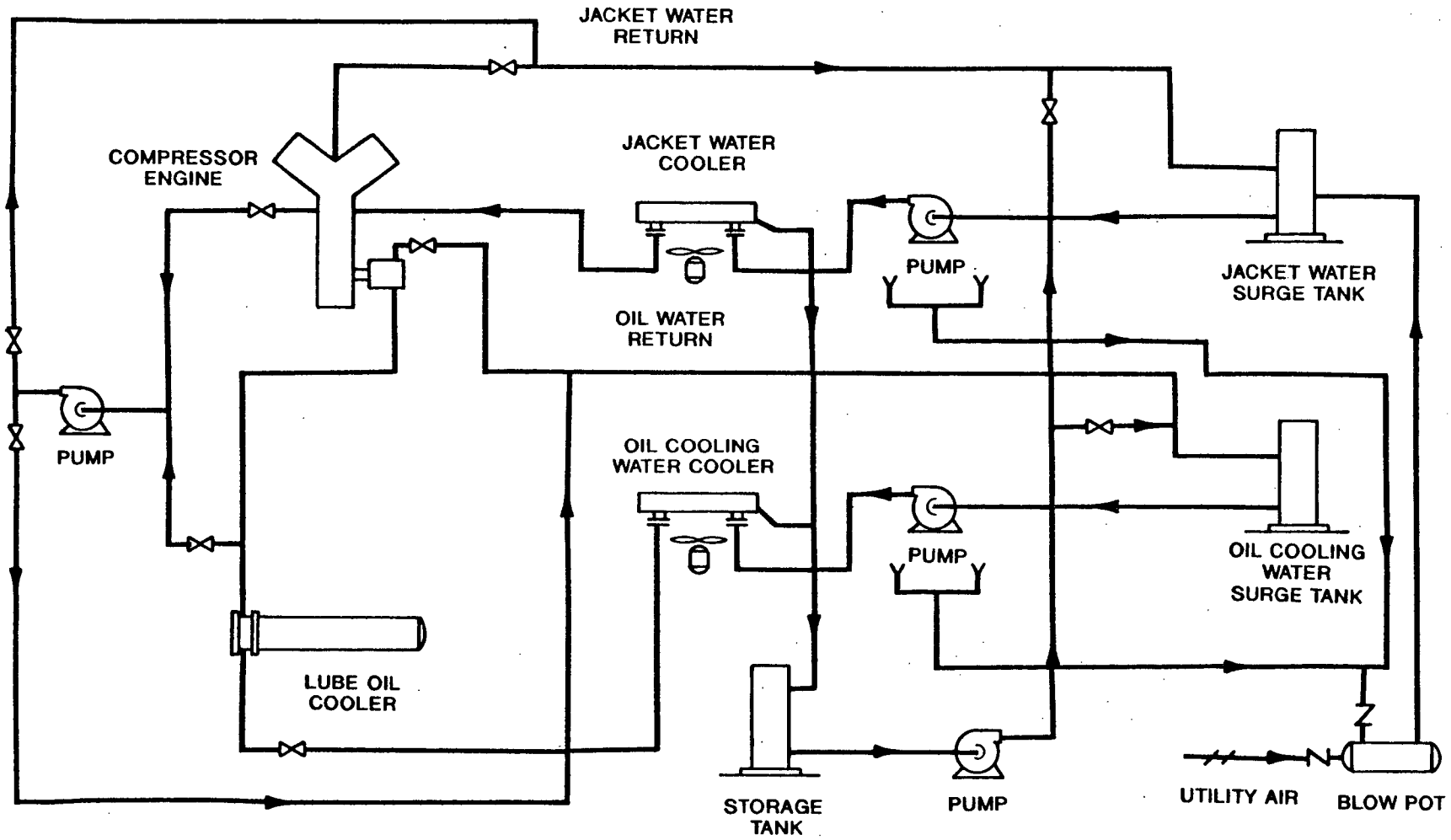


Sid Richardson Gasoline Co.

JAL NO. 3 PLANT
WASTEWATER CLASSIFIER
AREA
FLOW DIAGRAM

Scale: None Date: Aug. 1993 Drafted By:


AUXILIARY ENGINE
JACKET WATER RETURN
COMPRESSOR ENGINE
JACKET WATER COOLER
PUMP
JACKET WATER SURGE TANK
PUMP
OIL WATER RETURN
PUMP
OIL COOLING WATER COOLER
LUBE OIL COOLER
PUMP
OIL COOLING WATER SURGE TANK
LUBE OIL COOLER
UTILITY AIR
BLOW POT
STORAGE TANK
PUMP
Sid Richardson Gasoline Co.
JAL NO. 3
"A" COMPRESSOR PLANT
AND
AUXILARY BUILDING
COOLING WATER
CONTAINMENT SCHEMATIC
Scale: None
Date: Aug. 1993
Drafted By:



Sid Richardson Gasoline Co.

JAL NO.3
"B" COMPRESSER PLANT
COOLING WATER
CONTAINMENT SCHEMATIC

Scale: None Date: Aug. 1993 Drafted By:

Martin Water Laboratories, Inc.
WATER CONSULTANTS SINCE 1953
BACTERIAL AND CHEMICAL ANALYSES

P.O. BOX 1468
MONAHANS, TEXAS 79756
PH. 943-3234 or 563-1040

709 W. INDIANA
MIDLAND, TEXAS 79701
PHONE 683-4521

To: Mr. Larry Copeland
201 Main Street, Suite 3000
Fort Worth, TX 76102

Laboratory No. 89385
Sample received 8-4-93
Results reported 8-17-93

Company: Sid Richardson Gasoline Company
County: Lea, NM
Field:
Lease: Jal Plant #3

Subject: To make the determinations listed below on water samples taken by Tom Elrod, Martin Water Laboratories, on 8-4-93.

Source of sample:
#1. Raw water - taken from Crawford Ranch house water supply well. 8-4-93
#2. Raw water - taken from Hubb water supply well #2. 8-4-93
#3. Disposal water - taken from Woolworth #1-E disposal well. 8-4-93

PARAMETER, mg/l	#1	#2	#3		EPA MAXIMUM CONTAMINANT LEVEL FOR DRINKING WATER
Arsenic, as As	<0.01	0.023	<0.01	9/1 sample Trace Analysis	0.05
Chromium, as Cr	<0.03	<0.03	<0.03		0.05
Copper, as Cu	<0.01	<0.01	0.11		0.05
Lead, as Pb	<0.01	<0.01	0.008		0.05
Mercury, as Hg	<0.002	<0.002	<0.002		0.002
Benzene	<0.004	<0.004	3.03	6.40	0.005
Toluene	<0.004	<0.004	10.9	8.50	--
Ethylbenzene	<0.004	<0.004	0.46	1.69	--
Xylene	<0.004	<0.004	2.56	3.28	--

Notation: Test methods in compliance with U.S. Environmental Protection Agency Regulations (SW-846; Third Edition - Nov. 1986).

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

W. Reagan White, B.S.

P. O. BOX 1468
MONAHANS, TEXAS 79756
PH. 943-3234 OR 563-1040

Martin Water Laboratories, Inc.

709 W. INDIANA
MIDLAND, TEXAS 79701
PHONE 683-4521

RESULT OF WATER ANALYSES

LABORATORY NO. 89385
SAMPLE RECEIVED 8-4-93
RESULTS REPORTED 8-17-93

TO: Mr. Larry Copeland
201 Main Street, Suite 3000
Fort Worth, TX 76102

COMPANY Sid Richardson Gasoline Company LEASE Jal Plant #3

FIELD OR POOL

SECTION ____ BLOCK ____ SURVEY ____ COUNTY Lea STATE NM

SOURCE OF SAMPLE AND DATE TAKEN:

NO. 1 Raw water - taken from Crawford Ranch House water supply well. 8-4-93

NO. 2 Raw water - taken from Hubb water supply well #2. 8-4-93

NO. 3 Disposal water - taken from Woolworth #1-E disposal well. 8-4-93

NO. 4

REMARKS: Samples taken by Tom Elrod, Martin Water Laboratories, Inc.

CHEMICAL AND PHYSICAL PROPERTIES	NO. 1	NO. 2	NO. 3	NO. 4
Specific Gravity at 60° F.				
pH When Sampled				
pH When Received	7.08	7.14	7.12	
Bicarbonate as HCO_3	229	190	146	
Supersaturation as $CaCO_3$				
Undersaturation as $CaCO_3$				
Total Hardness as $CaCO_3$	300	390	820	
Calcium as Ca	107	104	236	
Magnesium as Mg	8	32	56	
Sodium and Potassium	78	159	393	
Sulfate as SO_4	154	325	886	
Chloride as Cl	91	179	469	
Iron as Fe				
Barium as Ba				
Turbidity, Electric				
Color as Pt				
Total Solids, Calculated	672	997	2,208	
Temperature °F.				
Carbon Dioxide, Calculated				
Dissolved Oxygen,				
Hydrogen Sulfide				
Resistivity, ohms/m at 77° F.				
Suspended Oil				
Filtrable Solids as mg/l				
Volume Filtered, ml				
Potassium, as K	5	9	22	
Carbonate, as CO_3	0	0	0	
Results Reported As Milligrams Per Liter				
Additional Determinations And Remarks				
Metaphosphate, as PO_4	0.5	0.0	0.0	
Orthophosphate, as PO_4	6.1	0.0	0.0	

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

Form No. 3

By W. Reagan White
W. Reagan White, B.S.

TRACE ANALYSIS, INC.
6701 Aberdeen Avenue Lubbock, Texas 79424 806•794•1296 FAX 806•794•1298

ANALYTICAL RESULTS FOR
SID RICHARDSON GASOLINE
Attention: Michael McConnell
201 Main Street
First City Bank Tower
Ft. Worth, TX

September 07, 1993
Receiving Date: 09/02/93
Sample Type: Water
Project No: NA
Project Location: Lea County NM

Analysis Date: 09/03/93
Sampling Date: 09/01/93
Sample Condition: Intact & Cool
Sample Received by: SC
Project Name: Jal #3 Plant

TA#	Field Code	BENZENE (ppb)	TOLUENE (ppb)	ETHYL-BENZENE (ppb)	M,P,O XYLENE (ppb)	TOTAL BTEX (ppb)
T13018	WEI-SWD	6,398	8,496	1,686	3,281	19,861
QC	Quality Control	198	201	199	596	
Detection Limit		1	1	1	1	
% Precision		100	100	100	100	
% Extraction Accuracy		121	113	115	115	
% Instrument Accuracy		99	101	100	100	

METHODS: EPA SW 846-8020.
BTEX SPIKE AND QC: Sample and Blank Spiked with 200 ppb EACH VOLATILE ORGANICS.

BS

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell

9-7-93
Date

HAULING AND DISPOSAL CONTRACTORS

Water:	Chaparral Service, Inc. P.O. Drawer 1769 Eunice, NM 88231
Liquids:	Petro Source Partners LTD 723 N. Bridge Dumas, TX 79029
	EOTT Energy Corp. P.O. Box 4666 Houston, TX 77210-4666
Oil:	EOTT Energy Corp. P.O. Box 4666 Houston, TX 77210-4666
Filters:	Q.P.S. Monahans, TX 79756 915-943-8400
Oily Rags:	Western Uniform P.O. Box 5218 Amarillo, TX 79117

MAJOR CHEMICALS & LUBRICANTS STORED AND USED AT JAL #3

Water Treating Chemicals	Components	Average Usage Per Month
Calgon Freeguard 1152	Zinc Chloride <40%	200 Gal.
Ultramine 120 (liquid)	Volatile Amines	55 Gal.
Hymol 82 (powder)	Phospho - organic complex	15 lbs.
Caustic (dry bead)	Sodium hydroxine	25 lbs.
Chlorine gas (liquid)	Chlorine	200 lbs.
Sulfuric acid (liquid) 97%	$H_2SO4 - H_2O$	300 Gal.
Lubricants		
Mobil Pegasus 485	Petroleum Motor Oil	3100 Gal.
Mobil Pegasus 490	Petroleum Motor Oil	806 Gal.
Mobil Pegasus 395	Petroleum Motor Oil	133 Gal.
Shell Turbo 32	Petroleum Motor Oil	365 Gal.
Marvel Mystery Oil	Petroleum Hydrocarbon Mixture	8 Gal.
Shell Tellus 100	Petroleum Motor Oil	15 Gal.
Tribol 890	Synthetic Motor Oil	NA
Lubricate # 105 Grease	Petroleum Lubricant	NA
Shell Mysella	30 wt. Petroleum Motor Oil	1 Gal.

Water Treating Chemicals	Components	Average Usage Per Month
Moly. Alloy Wet Gas Comp. Oil (828-40)	Petroleum Lubricant	NA
Ford hydraulic Fluid	Petroleum Lubricant	NA
Moly. Alloy 90# Gear Oil	Petroleum Lubricant	NA
Chevron RPM Aviation Hydraulic Oil	Petroleum Hydraulic Oil	NA
Shell Carnea 32	Petroleum Lubricant	NA
Shell Tellus 68	Petroleum Lubricant	NA
Shell Turbo Oil 46	Petroleum Lubricant	355 Gal.
Shell Turbo Oil 150	Petroleum Lubricant	25 Gal.
Process Fluids		
Gas Sweetening Amine	MEA (Monoethanolamine)	322 Gal.
Gas Dehydrating Glycol	DEG (Diethylene Glycol)	215 Gal.
Ambitrol Coolant	Glycols & Corrosion Inhibitors	230 Gal.

MSDS INDEX

CALGON BUROLOCK 2221
CALGON CL-10
CALGON CL-362
CALGON H-150 MICROBIOCIDE
CALGON H-300 MICROBIOCIDE
CALGON H-303 WB
CALGON H-640 MICROBIOCIDE
CALGON LSD-329
CALGON pHree GUARD + 1152
CALGON pHree GUARD 1000N
CALGON pHree GUARD+ 120
CALGON POTASSIUM PERMANGANATE REAGENT
CALGON PRE-TEST 97
CALGON SODIUM BISULFATE
CALGON ULTRAMINE 120
CALGON, LCS-20
CARROLL COMPANY PRETTY POTTY BOWL CLEAN
CAUSTIC SODA 1
CHELL TURBO 220 OIL
CHEMCO BEGONE
CHEMCO CHEMSOLV
CHEMCO DEFENDER LUBRICANT
CHEMCO ELECTRO-SPRAY
CHEMCO PRIDE HAND CLEANER
CHEMOLA 745 HAND CLEANER
CHEVRON AVIATION HYDRALIC FLUID A
CHEVRON CRUDE OIL
CHORMINE T
CLC CALCIUM HYPOCLORIC
CO2
DEVCON PLASTIC STEEL
DEVCON SILICON
DIESEL FUEL OIL NO. 2 D
DRESSER-RAND PARTS OIL
EATONS AC90 RODENTICIDE
ERUSTICATOR
FORMAGASET NO. 2 SEALANT
FREON 12
FREON 22
GASOLINE, NATURAL
GASOLINE, UNLEADED

GAS, DRY NATURAL
GAS, FIELD SALES (UNPROCESSED)
GAS, SOUR NATURAL
GLYCERIN
GORE-TEX JOINT SEALANT
HELIUM
HET-LUBE KOPR-KOTE
HTH. CALCIUM HYPOCHORITE
HYDROGEN SULFIDE
IMPERIAL OIL GRADE 30 QUAL #MP-320
JOE'S HAND CLEANER
K & W COPPER-COAT GASKET COMPOUND
KILZ SEALER
KOLOR KUT WATER FINDING PASTE
KRYLON BATTERY PROTECTANT
KRYLON BELT DRESSING
KRYLON SPRAY PAINT
LA-CO SLIC-TITE TEFLON TAPE
LAVA SOAP
LEAD ACETATE TRIHYDRATE
LIQUID CHLORINE
LSI #1650 LUBE
LSI # 3085 LUBE
LUBRIPLATE NO. 105 GREASE
MANTEK BREAK-AWAY GASKET REMOVER
MANTEK DRI-GUARD LUBRICANT
MAR-HYDE TAL-STRIP PAINT REMOVER
MARVEL MYSTERY OIL
MERCURY METHANE-ETHANE MIXTURE
MOBIL PEAGSUS 390
MOBIL PEAGSUS 490
MONOETHANOL AMINE
MYSTIK JT-6 GREASE
NITROGEN
OXYGEN P 1.10-PHENANTHROLINE N ETHANOL
PAINT THINNER
PAINT (VALSPAR)
PENNWALT ERUSTICATOR
PENNZOIL 10W-40 MOTOR OIL
PERMALUBE
PHILLIPS GPA-NGL STANDARD

POLYCEL INSULATING FOAM
POLYGUARD #600 PIPE PRIMER
PRIMER (VALSPAR)
PROPANE
RECTOR SEAL PIPE THREAD COMPOUND
RESORCINAL IN 2N NaOH
RIGID DARK THREAD CUTTING OIL
RUST-OLEUM PAINT
SEALWELD VALVE CLEANER
SHELL CORENA K460 OIL
SHELL TELLUS 68 OIL
SHELL TURBO 32 OIL
SHELL TURBO 46 OIL
SNOOP LEAK INDICATOR
SODIUM CARBONATE, ANHYDROUS
SODIUM HYDROXIDE, ION
SPRAY WAY GLASS CLEANING AGENT
STECO TAP MAGIC THREADING OIL
SULFURIC ACID
SUMMIT SUM-KOOL
TEXACO ANTI-FREEZE
THERVO HAND CLEANER
THREE-M (3M) DUCT TAPE
THREE-M (3M) SCOTCHBRITE 7447
THREE-M (3M) SUPER 88 ELECTRICAL TAPE
TOLVENE
TRIBOL MOLUB-ALLOY 90/220 GEAR OIL
TRIETHYLENE GLYCOL
VAL-CHEM EPOXY ENAMEL
VARSOL
VELVAN-SHEEN MOP DRESSING
WAGNER GERM FREE SPRAY
WATER-GEL
WD-40 SPRAY LUBE
XYLENE
ZEP 40 SPRAY LUBE
ZEP FORMULA 50
ZEP HEAD-TO-TOE
ZEP MAGNET
ZEP MVP
ZEP SEPLON SPRAY LUBRICANT

ZEPTOX II
ZEP WOOD DOCTOR
ZEP ZEP-OFF GASKET REMOVER
ZEPELER

DRAIN LINE TESTING PROCEDURE

FOR

SID RICHARDSON GASOLINE CO.

JAL NO. 3 PLANT

LEA COUNTY, NEW MEXICO

SEPTEMBER 1993

This drain line testing plan sets forth the methods and procedures which Sid Richardson Gasoline Co. proposes to use to verify the integrity of the underground drain system at Jal No. 3 Plant.

The purpose of this testing is to ensure that waste water flowing through this piping system is contained and does not contribute to the degradation of groundwater quality in the general area of Jal No. 3 Plant.

The plan has attempted to allow the flexibility of testing some smaller, low-volume sections of drain piping without a total plant shutdown. This will decrease the amount of time required for testing during shutdown.

Record keeping and reporting have been addressed in the General Instructions sections. All charts, worksheets and resulting reports will be retained for a minimum of five years.

Detailed instructions are given for testing each major section of drain line. As each section is tested all lateral (smaller drains) which flow into the main header will be subjected to the same test pressure. This will assure that all underground piping is tested.

See file copy binder for this

DRAIN LINE TESTING PROCEDURE FOR JAL NO. 3 PLANT

Introduction

The following procedures are arranged to allow testing of various sections of the drain system with the plant in operation. Some sections will require a plant shutdown to permit testing.

If the total system is to be tested during a plant shutdown, the test sequence should be arranged so that water from one section can be routed into the next section to be tested where possible. This should shorten filling time and provide more economical use of water.

Water used in testing will be raw water from the plant water system. Use of fire hydrants and hoses will be required in some locations to provide sufficient volume and pressure for filling and testing. In most cases, test pressures will be below normal line pressure in plant water mains making use of hydrostatic test pump unnecessary. Some higher pressures may require a pump.

The test pressures and duration used in this procedure exceed those specified for drainage and vent systems as set forth in the 1979 ICBO Code, Sections 1004 (a) 1 and 1005. The International Conference of Building Officials (ICBO) Plumbing Code of the Uniform Plumbing Code describe the procedures to be utilized in this testing procedure. The pressures and duration required in the ICBO Code are 4.3 psi and 15 minutes, respectively.

General Instructions

1. Before attempting to test any section of drain line, verify the sources of effluent and vapors entering the line. Any line which could contain significant amounts of Hydrogen Sulfide (H_2S) will be opened and tested observing all prescribed safety precautions and procedures.

2. Line numbers and sizes, tap numbers and locations on valves, stopple fittings and containment aprons are shown on drawing No. 1J3-1-P69 "Drain Lines". The entire test procedure is directly related to information on this drawing.

3. All drain and block valves which are lubricated plug valves, should be lubricated in the closed position to minimize possibility of leakage.

4. Before installing expandable plugs, clean the interior portion of the pipe where plug seal will contact pipe wall to assure proper sealing.

5. Use new gaskets when installing blind plates in flange unions and tighten flange bolts evenly to prevent tilting of flange faces and leakage.

6. Filling a test section should always be from the lowest tap, venting at the higher taps to displace as much air or gas from the line as possible. Air or gas in the line, especially large amounts, may cause instability in pressure readings.

7. Test pressures given for each section to be tested are 10 psi (Vitrified clay tile lines will be an exception to this procedure. Test pressure on clay tile lines will not exceed 5 psig.) above the maximum recorded pressure for that section of line. Test pressure should be applied only after system pressure is stabilized at some lower pressure. The test duration will be one (1) hour.

8. After test pressure has been applied and stabilized, the system will be isolated and test will begin. This is to be a static pressure test. Introduction of additional pressure will void the previous time interval and will require restarting test.

9. If a section will not maintain the static test pressure for the required time, provided there is no valve, fitting or flange leakage, the section of drain line will be considered faulty. At that point it may be necessary to further isolated smaller sections of the line or expose the entire line until the leaking portion can be located and replaced or repaired.

   a. It should be noted that leakage can occur around the plug of a valve unless a sealing type grease is used to lubricate the valve in the closed position.

   b. Leakage will occur around the seal of an expandable plug unless the inside pipe surfaces are thoroughly cleaned prior to inserting the plug.

   c. Improper tightening of flange unions or faulty, used, or dirty gasket will cause leakage at the blind plate installations.

   d. Other points to check for system leakage are: loose screwed fittings and valves, stem packing (or bonnet) leakage on gate or globe valve, worn seating surfaces in ball valves, unseated gate or globe valves, and faulty resilient seats in butterfly valves.

10. Test pressures will be recorded on a circular chart which will be retained as a permanent record.

11. At the end of testing interval, remove chart from recorder before unscrewing unit from pressure tap to prevent irrelevant pen markings, ink spillage, or other chart damage.

12. Each chart will have the following information recorded on the back:

    a. Date
    b. Tap number,
    c. Line number,
    d. Initials of person changing chart,
    e. Signature of person supervising testing,

These charts will be retained at the plant office for reference and inspection as required.

13. When the integrity of the drain system or a section of the system has been verified, the system, or section, will be returned to normal service.

14. All drains will be tested every 5 years and a written report sent to the West Texas Area Manager with copies to Fort Worth Engineering and file at the Plant.

15. Because the classifier tank is intended to be operated at atmospheric pressure any pressure or vacuum testing of this tank can cause damage to the tank and/or coating system. Therefore, the only possible method of testing the classifier tank will involve filling the tank with water and gauging any drop in level over an 8 hour period. This test will be performed annually.

16. For same reason specified for the classifier tank, pressure or vacuum testing of the oil tank is precluded. The tank will be filled with water and gauged to verify the maintenance of a constant level for a 4 hour period. This test will also be performed annually.

SARB Consulting Inc.
8400 Menaul Blvd. A-196
Albuquerque, New Mexico 87112
USA

Jack Ford
NMEMNRD, MMD
2040 S. Pancheco St.
Santa Fe, NM 87505

87503-3472 37

3rd Annual ENVIRONMENTAL GEOCHEMISTRY OF ORE DEPOSITS AND MINING ACTIVITIES

SHORT COURSE

21-24 October, 1998
Albuquerque, NM, USA

- **MINE-WASTE MANAGEMENT**
- **ARD PROCESSES & PREDICTION**
- **GEOCHEMICAL MODELING**
- **REMEDIATION / RECLAMATION**
- **FIELD TRIP**

PRESENTED BY:

SARB Consulting, Inc.

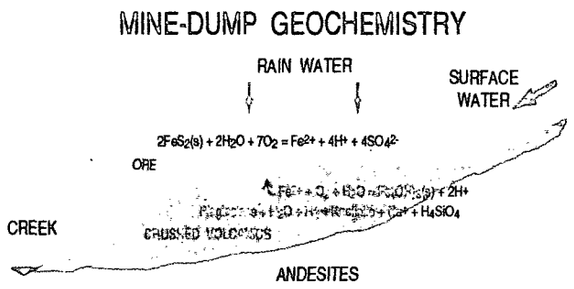
E-mail: sarb4you@aol.com
HTTP://lakshmi.cramer.nmt.edu/SARB/

ENVIRONMENTAL GEOCHEMISTRY OF ORE DEPOSITS AND MINING ACTIVITIES

OVERVIEW

A common environmental problem of old and new mining operations involving the extraction of sulfide containing materials is acid generation through sulfide oxidation. This process may occur in tailings, waste dumps, spoils, mine tunnels and pit walls. Mineral extraction and processing, especially metal mining, exposes fresh rock surfaces and produces crushed and milled waste. This material, exposed to weathering, poses a potential danger to the environment. Detailed geochemical assessments performed as part of exploration programs and during mining operations are the first step in predicting the potential of acid generation. By using this information, the affects and the rates of acid generation can be minimized.

For example, not all sulfide-containing waste materials present a threat to the environment, even though they may contain geochemically significant heavy-metal concentrations. Natural neutralization and metal attenuation processes may be taking place within the mine waste material itself or down gradient from the mine site. An understanding of these processes can be useful for developing waste management plans that will minimize or avoid potential environmental impacts.



COURSE DESCRIPTION

SARB developed the short course "Environmental Geochemistry of Ore Deposits and Mining Activities" with the mining industry's needs in mind, focusing on geochemical processes associated with ore deposits, ore processing and other mining related activities. For cost-effective waste management: storage of waste rock and processed mine material; reclamation or remediation of mine materials; and closure of open pit and underground mines, a good working knowledge of environmental geochemistry is essential.

The course is designed to familiarize professionals: exploration geologists, mine planners, mine managers, regulators, environmental engineers, and mining consultants, with geochemical processes and assessment of these processes that are likely to occur in unmined material or that are currently taking place within mined materials.

The geological, geochemical, and environmental nature of mine material will be assessed through classroom instruction, laboratory exercise, modeling and a field trip. In addition, geochemical parameters will be used to assess mine waste "hazards". Included in the assessment will be the determination of mineralogic (ore and gangue mineralogy), lithologic, and alteration characteristics of the following:

- In-Place Ore
- Wall Rocks
- Mined Material
- Tailings/Waste Dumps
- Surface Water & Groundwater

These studies will be used in evaluating mineral development and mine remediation.

COURSE OUTLINE

The following subjects will be covered:

- **Mine-Waste Management**
  - Overview
- **Primary and Secondary Mineralogy of Ore Deposits**
  - Porphyry Deposits (Cu, Mo)
  - Skarn Deposits (Pb, Zn, Cu)
  - Massive Sulfide Deposits
  - Epithermal Dep. (Au, Ag, Pb, Zn, Cu)
- **Fundamentals of Geochemistry**
  - Chemical Equilibrium
  - Reaction Rates
- **Acid Rock Drainage (ARD)**
  - Sulfide Minerals Oxidation
  - Acid Producing Minerals (sulfides, sulfates)
  - Acid Neutralizing Minerals (carbonates, oxides, silic.)
- **ARD Prediction Methods**
  - Static Tests
  - Kinetic Tests
  - Leach Tests
- **Trace Metal Mobility**
  - Precipitation, Dissolution
  - Complexation
  - Sorption
  - Phase Diagram Development
- **Mine-Water Geochemistry**
  - Pit Lakes & Underground Mines
  - Tailings Piles & Waste-Rock Dumps
  - Soils and Sediments
- **Geochemical Modeling**
  - Program Overview
  - Minteq, EQ3/EQ6, Mpath
  - Oxidation Front
- **Remediation and Reclamation**
  - Conventional Water Treatment
  - Lime/Limestone & Phosphate Treatment
  - Tailings and Dump Cover
  - In-situ Groundwater Treatment
  - Wetlands
  - Waste Mixing / Segregation
- **Field Trip - Nacimento Mine, Cuba, NM**

INSTRUCTORS

The professionals teaching this course have many years of experience in the field of geochemistry, focusing on the environmental aspects of mining activities and mining exploration.

Dr. Ingar F. Walder is Manager and Principal Geochemist of SARB Consulting, specializing in geochemistry, mining reclamation, mineral exploration, water-rock interaction, metal mobility in aqueous media, and geochemical modeling. Dr. Walder is also an Adjunct Professor at New Mexico Tech. His current research includes ARD prediction methods, geochemical remediation and metal leaching. Dr. Walder received his MS in Geology and Ph.D. in Geochemistry from the University of Oslo, Norway and New Mexico Tech, respectively.

Dr. B
ruce Thomson is a Professor in Environmental Engineering at the University of New Mexico. He specializes in soil and groundwater remediation; hazardous waste disposal; radioactive wastes; and biodegradation. He has more than 30 publications on these issues and current research includes development of permeable barriers for groundwater remediation, and microbial reduction of Uranium and selenium. Dr. Thomson received his M.S. and Ph.D. in Environmental Science and Engineering from Rice University, Houston, Texas.

Dr. William (Bill) X. Chavez, Jr. is an Associate Professor in Economic Geology at New Mexico Tech. He specializes in ore mineralogy and petrography, mineral exploration, geochemistry, Chilean porphyry copper systems, weathering related to ore deposits, and geotechnical aspects of soils. Dr. Chavez has spent the last 15 years studying sulfide mineralization processes, in particular, supergene processes of porphyry copper deposits. Dr. Chavez received his M.A. in Geology and Ph.D. in Economic Geology from the University of California, Berkeley. .

COURSE INFORMATION

Enrollment is limited, therefore, early registration is strongly advised. Please mail the attached registration form with check or purchase order. The registration form may also be faxed with payment to follow. Early registration fee is US$ 750 (received by October 1). Late registration fee is US$ 850. For student discount please contact SARB. Confirmed participants will receive an acknowledgment letter with additional course and hotel information and maps.

A one day field trip to the Nacimento Mine, Cuba, New Mexico will be arranged for the Short Course participants. The field trip includes transportation, lunch, and tour of the inactive mine (open pit copper mine and *in situ* leaching operation). Field trip registration fee is US$ 60.

The Course fee includes: course manual, lunches and coffee breaks for three days. The full fee is due following the registration. This fee is fully refundable for cancellations up to three weeks before the course, thereafter, 50% of the fee will be refunded. Substitutions may be made. The short course may be canceled with a full refund if insufficient registrations are received.

HOTEL ACCOMMODATIONS

To obtain a reduced hotel rate, you must make your own reservation by October 1, and identify yourself as being with the **SARB Short Course.**

COURSE LOCATION

Hotel La Posada de Albuquerque, New Mexico
Phone #: 505-242 9090

FOR MORE INFORMATION

Please contact SARB at:

Phone: 1-505-293-5945 Fax: 1-505-797-4359
E-mail: SARB4YOU@AOL.COM

REGISTRATION FORM

Fill out and return to:
SARB Consulting Inc.
8400 Menaul Blvd., Suite A-196
Albuquerque, NM 87112, USA
Phone 505-293-5945 Fax 505-797-4359

NAME .....

POSITION .....

COMPANY .....

ADDRESS .....

.....

CITY .....

STATE ..... ZIP CODE .....

COUNTRY .....

PHONE .....

FAX .....

E-Mail .....

SHORT COURSE

- ☐ Early registration, by October 1 ($750)
- ☐ Late registration, after October 1 ($850)
- ☐ Field Trip registration ($60)
- ☐ Check enclosed
- ☐ Send me an invoice
- ☐ Keep me informed on future Short Courses

Make check or money order payable to
SARB Consulting, Inc.

For Office Use Only
Check #..... US$ .....
Money Order # ..... Date .....

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

BRUCE KING
GOVERNOR

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

September 24 1993

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit in duplicate.
2. Statement of cost (also in duplicate.)
2. CERTIFIED invoices for prompt payment.

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than October 1, 1993.

Sincerely,

Sally E. Leichtle
Administrative Secretary

Attachment

P 111 334 251
Receipt for Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	Lovington Leader
Street and No.	P.O. Box 1717
P.O., State and ZIP Code	Lovington, NM 88260
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form 3800, June 1991

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

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

September 24 1993

ALBUQUEQUE JOURNAL
717 Silver Southwest
Albuquerque, New Mexico 87102

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. Publisher's affidavit in duplicate.
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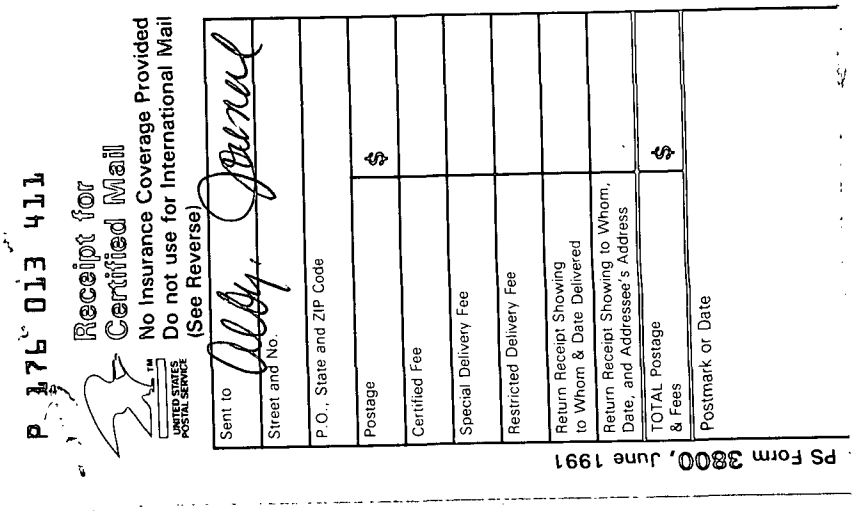
Sincerely,

Sally Leichtle
Sally E. Leichtle
Administrative Secretary

Attachment



NOTICE OF PUBLICATION

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

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

(GW-10) - Sid Richardson Carbon & Gasoline Co., E. F. Gunn, Environmental Health and Safety Manager, 201 Main Street, Suite 3000, Fort Worth, Texas, 76102, has submitted an application for renewal of its previously approved discharge plan for their Jal #3 Gas Plant located in the SW/4, Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 54,700 gallons per day of process waste water with a total dissolved solids concentration of 2200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration ranging from 700 to 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of September, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

September 10, 1993
MJM-96-93
File: NM-6

CERTIFIED MAIL - RETURN RECEIPT
P 378 677 651

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Subject: Groundwater Discharge Plan GW-10 Renewal - Jal 3 Plant

Dear Mr. Anderson:

In accordance with New Mexico Water Quality Control Emission regulations, an application for the renewal of the subject discharge plan is being submitted for your review. The attached discharge plan has been prepared in accordance with the OCD discharge plan guidelines. Plan contents have been organized in the order presented in the OCD guidelines. A $50.00 filing fee is enclosed.

Not all required information has been included in this submittal due to delays with vendors and printers regarding drawings and diagrams which required extensive updating. It was felt that the majority of the plan was complete and ready for your review. We did not wish to hold up the review, especially that involving the public notification process.

The items which still need to be included in the discharge plan application are listed as an attachment to this letter and will be sent to you under separate cover as soon as they are available.

Mr. Roger Anderson
Groundwater Discharge Plan GW-10 Renewal -
Jal 3 Plant
MJM-96-93; 09/10/93

We want to work with OCD throughout the renewal application review. Feel free to contact me any time if clarification or more information is needed. It is our desire to remain actively involved in formalizing the Jal 3 discharge plan so as to remain fully compliant by the November 21, 1993 renewal date.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachments

c: C. P. O'Farrell/E. F. Gunn - w/o attachments
W. J. Farley - w/o attachments
K. C. Clark - w/o attachments
T. E. McElyea/C. E. Adcock/L. B. Copeland - w/attachments
G. W. Washburn - w/attachments
OCD District Office, Hobbs, N.M. - w/attachment

0001 SID RICHARDSON CARP N CO. Check No. 100758

Memorandum

GROUNDWATER DISCHARGE PLAN RENEWAL
APPLICATION FILING FEE $50.00

WATER QUALITY MANAGEMENT FUND
NEW MEXICO WATER QUALITY CONTROL
COMMISSION

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

September 10, 1993
MJM-96-93
File: NM-6

CERTIFIED MAIL - RETURN RECEIPT
P 378 677 651

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

Subject: Groundwater Discharge Plan GW-10 Renewal - Jal 3 Plant

Dear Mr. Anderson:

In accordance with New Mexico Water Quality Control Emission regulations, an application for the renewal of the subject discharge plan is being submitted for your review. The attached discharge plan has been prepared in accordance with the OCD discharge plan guidelines. Plan contents have been organized in the order presented in the OCD guidelines. A $50.00 filing fee is enclosed.

Not all required information has been included in this submittal due to delays with vendors and printers regarding drawings and diagrams which required extensive updating. It was felt that the majority of the plan was complete and ready for your review. We did not wish to hold up the review, especially that involving the public notification process.

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Mr. Roger Anderson
Groundwater Discharge Plan GW-10 Renewal -
Jal 3 Plant
MJM-96-93; 09/10/93

We want to work with OCD throughout the renewal application review. Feel free to contact me any time if clarification or more information is needed. It is our desire to remain actively involved in formalizing the Jal 3 discharge plan so as to remain fully compliant by the November 21, 1993 renewal date.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachments

c: C. P. O'Farrell/E. F. Gunn - w/o attachments
W. J. Farley - w/o attachments
K. C. Clark - w/o attachments
T. E. McElyea/C. E. Adcock/L. B. Copeland - w/attachments
G. W. Washburn - w/attachments
OCD District Office, Hobbs, N.M. - w/attachment

Sid Richardson Gasoline Co.

Jal 3 DISCHARGE PLAN

RENEWAL APPLICATION

Items To Be Sent Under Separate Cover	Anticipated Submittal Date
Section V - Appendix B Facility Site Plan Drawings	September 27, 1993
Section VII - Appendix G Drain System Plan Drawing	September 27, 1993
Section VII - Appendix H Procedures for Testing Drain System	September 27, 1993

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS, OIL REFINERIES AND GAS COMPRESSOR STATIONS

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

I. TYPE: Natural Gas Processing

II. OPERATOR: Sid Richardson Gasoline Co.

ADDRESS: 201 Main Street, Suite 3000 Fort Worth, TX 76102

CONTACT PERSON: E. F. Gunn (Local contact info attached) PHONE: 817-390-8640

III. LOCATION: SW 1/4 NW 1/4 NW 1/4 SW 1/4 Section 33 Township 24-S Range 37-E
Submit large scale topographic map showing exact location.

IV. Attach the name and address of the landowner(s) of the disposal facility site.

V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

(VI.) Attach a description of sources, quantities and quality of effluent and waste solids.

VII. Attach a description of current liquid and solid waste transfer and storage procedures.

VIII. Attach a description of current liquid and solid waste disposal procedures.

IX. Attach a routine inspection and maintenance plan to ensure permit compliance.

X. Attach a contingency plan for reporting and clean-up of spills or releases.

(XI.) Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.

XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XIII. CERTIFICATION

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

Name: E. F. Gunn Title: Mgr., Environmental Health & Safety

Signature: M McConnell for E. F. Gunn Date: 9/10/93

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

NOTICE OF PUBLICATION

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

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

(GW-10) - Sid Richardson Carbon & Gasoline Co., E. F. Gunn, Environmental Health and Safety Manager, 201 Main Street, Suite 3000, Fort Worth, Texas, 76102, has submitted an application for renewal of its previously approved discharge plan for their Jal #3 Gas Plant located in the SW/4, Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 54,700 gallons per day of process waste water with a total dissolved solids concentration of 2200 mg/l will be collected and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration ranging from 700 to 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 24th day of September, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

June 29, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-220

Mr. Michael J. McConnell
Sid Richardson Gasoline, ~~Ltd.~~ Co.
First City Bank Tower
201 Main St., Suite 3000
Ft. Worth, Texas 76102

RE: Discharge Plan GW-10 Jal #3 Plant
Discharge Plan GW-107 Jal #4 Compressor Station
Lea County, New Mexico

Dear Mr. McConnell:

Pursuant your letter dated June 10, 1993, this letter aknowledges and approves your request to change the operator name for both the discharge plans associated with the above mentioned facilities. A copy of this letter and your request will be placed in our discharge plan files. The operator name will now be "Sid Richardson Gasoline, Ltd." per your request.

The Oil Conservation Division will continue to address all correspondence to you on all environmental matters until you tell us otherwise.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA.cee
xc: OCD Hobbs Office

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

June 10, 1993
MJM-73-93

File: NM-6

CERTIFIED MAIL - RETURN RECEIPT
P 078 226 219

Mr. Roger Anderson
New Mexico Energy, Minerals &
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Subject: Jal No. 3 and Jal No. 4 Water Discharge Plans
Injection Well Permit - Administrative Order SWD-231

Dear Mr. Anderson:

Sid Richardson Gasoline, Ltd. is requesting an administrative modification to the subject water discharge plans which are in effect at our Jal No. 3 and Jal No. 4 gas processing plants. This modification will change the company name from that which is currently on file.

A recent organizational restructuring of the Company segregated our carbon black operations from our natural gas processing operations. In order to accurately reflect this change, we are updating all legal documents which include operating permits and related regulatory documents. No other changes to plant operations, facilities or processes are involved. Ownership is not changing. Only the company name is being revised. The Sid Richardson Jal No. 3 and Jal No. 4 gas plants will continue to adhere to all subject discharge plan requirements as they currently exist.

Please revise the company name on each discharge plan as follows:

Sid Richardson Gasoline, Ltd.
d/b/a Sid Richardson Gasoline Co.

It would be greatly appreciated if you could send an acknowledgment and an approval letter to this request at your earliest convenience. Also, are we correct in our assessment that the subject Administrative Order, by virtue of its inclusion in the Jal No. 3 Discharge Plan as Appendix F, does not require a separate request for a company name revision? Please advise. If you require any additional information or have any questions, please do not hesitate to call.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad

cc: C. P. O'Farrell/E. F. Gunn
W. J. Farley
K. C. Clark/R. L. Gawlik
G. W. Washburn

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

June 29, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-219

Mr. Michael J. McConnell
Sid Richardson Carbon and Gasoline Co.
First City Bank Tower
201 Main St., Suite 3000
Ft. Worth, Texas 76102

RE: Discharge Plan GW-10
Jal #3 Plant
Lea County, New Mexico

Dear Mr. McConnell:

On November 21, 1983, the original groundwater discharge plan , GW-10 for the Jal #3 Plant located in the SW/4 NW/4 NW/4 of Section 33, Township 24 South, Range 37 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The discharge plan was renewed November 21, 1988. The approval will expire on November 21, 1993.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operations, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, please include these modifications in your application for renewal.
Current WQCC Regulations do not allow for an expired discharge plan to receive an extension. Therefore you should submit the renewal application in ample time before the expiration date to allow the review process to be complete prior to expiration to avoid operating out of compliance (without an approved discharge plan).

Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA.cee

xc: OCD Hobbs Office

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

March 4, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-307

Mr. Michael J. McConnell
Sid Richardson Carbon and Gasoline Co.
First City Bank Tower
201 Main St., Suite 3000
Ft. Worth, Texas 76102

RE: Disposal of Filters
Jal #3 Plant
Lea County, New Mexico

Dear Mr. McConnell:

The Oil Conservation Division (OCD) has received your request, dated January 15, 1993, for authorization to dispose of used oil, amine and glycol filters from your Jal #3 Gas Processing Plant at the Quell Petroleum Services, Inc. (QPS) incineration facility located in Monahans, Texas. The proposal is to have the filters delivered to the QPS facility for disposal/recyclamation.

Based on the information and the analytical results provided in the request, you are authorized to dispose of the filters as proposed. Please be advised that this authorization does not relieve Sid Richardson Carbon and Gasoline Co. of liability should their operation result in actual pollution of surface or ground waters or the environment actionable under other laws and/or regulations.

If you have any questions please call me at (505) 827-5812.

Sincerely.

Roger C. Anderson
Environmental Bureau Chief

RCA/cee

xc: OCD Hobbs Office

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

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal	Time	Date
	1045 AM	MARCH 3, 1993

Originating Party	Other Parties
C. EUSTICE	MIKE McCONNELL SID RICHARDSON - COMPL MG.

Subject

REQUEST TO TAKE USED OIL, AMINE & GLYCOL FILTERS TO RECYCLER IN MONAHANS, TX

Discussion

THE OCD FEELS THIS IS AN ACCEPTABLE PRACTICE THAT WILL BE INCORPORATED INTO THE EXISTING DISCHARGE PLAN

Conclusions or Agreements

WILL WRITE LETTE CONFIRMING CONVERSATION

Distribution

Signed C. Eustice

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

OIL CONSERVATION DIVISION
RECEIVED
'93 JAN 19 AM 9 49

January 15, 1993
MJM-07-93
File: NM-19

CERTIFIED MAIL - RETURN RECEIPT
P 378 678 254
Mr. Roger C. Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Subject: Filter Recycling/Disposal

Reference: Sid Richardson Company Correspondence (Gawlik to McConnell) Dated January 11, 1993

Dear Mr. Anderson:

The purpose of this letter is to inform you of Sid Richardson Carbon & Gasoline Co.'s intent to have all used oil, amine and glycol filters removed from our Jal, New Mexico gas processing plant for recycling and disposal.

We are in the process of contracting with Quell Petroleum Services, Inc. (QPS) in Monahans, Texas to provide the services as described in the attached referenced memo. QPS is permitted by the TACB for filter incineration and the TRRC for transportation of non-hazardous waste.

We have had an analysis performed by Trace Analysis, Inc. of Lubbock, Texas to confirm the non-hazardous nature of the filters. The positive results of TCLP for benzene and reactive sulfides are attached for your review.

Alright added to ... recycling matters consist w/ OCD policy w/ waste ...

We were informed by your office that no permits were required. Please notify us at your earliest convenience whether or not this letter and attachments contain sufficient information to warrant your approval for commencing filter recycling and disposal activities as described above. We look forward to your reply.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachments

cc: C. P. O'Farrell/E. F. Gunn - w/o atts.
R. L. Gawlik - w/o atts.
K. C. Clark - w/o atts.
W. J. Farley - w/o atts.
Jerry Sexton - w/atts. (NMOCD, P. O. Box 1980, Hobbs, NM 88240)

T-77
NM-19

SID RICHARDSON CARBON & GASOLINE CO.

INTER-COMPANY CORRESPONDENCE

Date January 11, 1993

To Mike McConnell From Robert Gawlik

Subject Proposed Filter Disposal

It is proposed that we contract with QPS (Quell Petroleum Services, Inc.) to come to our locations to remove all oil, amine and glycol filters. Shipment dates for filters will be determined by each facility manager.

QPS will load all filters and deliver to their site at Penwell, Texas for disposal/recyclamation. Filter will be disposed of in a thermal desorption process with 100% recycling of all metals and ash. Recyclable scrap metals will be retained by QPS and all ash will be used as a base in cement products. There will be no other by-products from the QPS system.

A certificate of disposal (recycling) will be issued to SRC&G upon completion of each separate job.

Attached are the analytical results of amine and glycol filters in use at our plants.

QPS
P. O. Box 1552
Monahans, Texas 79756
(915) 943 8400
David Cutbirth

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
SID RICHARDSON CARBON COMPANY
Attention: Robert Gawlik
5030 E. University, Suite C-104
Odessa, TX 79762

January 12, 1993
Receiving Date: 01/05/93
Sample Type: Filters
Project No: NA
Project Location: NA

Analysis Date: 01/11/93
Sampling Date: 01/04/93
Sample Condition: Intact & Cool
Sample Received by: JC
Project Name: NA

TA#	FIELD CODE	TCLP BENZENE (ppm)	CORRECTED SAMPLE (ppm)	REACTIVE SULFIDES (ppm)
T04254	Glycol Filter	<0.002	<0.002	<25
QC	Quality Control	0.195	---	---
% Precision		100		100
% Extraction Accuracy		104		---
% Instrument Accuracy		97		---

METHODS: EPA SW 846-1311, 8020.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghighi-Podeh

1/12/93
DATE

6701 Aberdeen Avenue
Lubbock, Texas 79424
806•794•1296
FAX 806•794•1298

ANALYTICAL RESULTS FOR
SID RICHARDSON CARBON COMPANY
Attention: Robert Gawlik
5030 E. University, Suite C-104
Odessa, TX 79762

January 12, 1993
Receiving Date: 01/05/93
Sample Type: Filters
Project No: NA
Project Location: NA

Analysis Date: 01/11/93
Sampling Date: 01/04/93
Sample Condition: Intact & Cool
Sample Received by: JC
Project Name: NA

TA#	FIELD CODE	TCLP BENZENE (ppm)	CORRECTED SAMPLE (ppm)	REACTIVE SULFIDES (ppm)
T04255	Amine Filter	<0.002	<0.002	<25
QC	Quality Control	0.195	---	---
% Precision		100		100
% Extraction Accuracy		105		---
% Instrument Accuracy		97		---

METHODS: EPA SW 846-1311, 8020.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghighi-Podeh

1/12/93
DATE

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Attention: Robert Gawlik
5030 E. University, Suite C-104
Odessa, TX 79762

January 12, 1993
Receiving Date: 01/05/93
Sample Type: Filters
Project No: NA
Project Location: NA

Analysis Date: 01/11/93
Sampling Date: 01/04/93
Sample Condition: Intact & Cool
Sample Received by: JC
Project Name: NA

TA#	FIELD CODE	TCLP BENZENE (ppm)	CORRECTED SAMPLE (ppm)	REACTIVE SULFIDES (ppm)
T04256	Amine Filter	<0.002	<0.002	<25
QC	Quality Control	0.195	---	---
% Precision		100		100
% Extraction Accuracy		103		---
% Instrument Accuracy		97		---

METHODS: EPA SW 846-1311, 8020.

Director, Dr. Blair Leftwich
Director, Dr. Bruce McDonell
Asst. Dir., Dr. Mohammad Haghighi-Podeh

1/12/93
DATE

CHAIN-OF-CUSTODY

Project Number/Name: _____ Sampler: Robert Graulik Affiliation Safety Mgr. WOTA

Sample #	Sample Desrciption	Number of Containers	Date Sampled	Time Sampled	BTEX-AHS	BTEX-8020	BTEX-8260	TPH	E.P. Tox metals	Volatile organics	Ext. organics	Analyses Requested Other
J3-Gly	Glycol Filter	1	1-4-93									Benzene & Reactive Sulfide
✓ K-Ami	Amine Filter	1	1-4-93	4255								Benzene & Reactive Sulfide
✓ Σ-Ami	Amine Filter	1	1-4-93	5?								Benzene & Reactive Sulfide

Special billing instructions YES NO

Sample Relinquished By		Sample Recieved By		Date	
Name	Affiliation	Name	Affiliation		
[illegible]	SEC & G Co.			1-5-93	
				1-5-93	

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
HOBBS DISTRICT OFFICE

BRUCE KING
GOVERNOR

POST OFFICE BOX 1980
HOBBS, NEW MEXICO 88241-1980
(505) 393-6161

February 15, 1993

Michael J. McConnell
Sid Richardson Carbon & Gasoline Co.
201 Main Street
Fort Worth, TX 76102

Dear Mr. McConnell:

Per your letter dated February 4, 1993, the Oil Conservation Division grants authorization to Sid Richardson Carbon and Gasoline Co. to transport and recycle oil, amine and glycol filter from Jal #3 Gas Plant to Quell Petroleum Services Inc. in Monahans, TX.

Very truly yours,

JERRY SEXTON
District I Supervisor

JS/sad

xc: Roger Anderson
Mark Henkhaus - Texas Railroad Commission

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

817/390-8600

February 4, 1993
MJM-20-93
File: NM-19

CERTIFIED MAIL - RETURN RECEIPT
P 378 678 263

Mr. Jerry Sexton
District Supervisor
New Mexico Oil Conservation Division
P. O. Box 1980
Hobbs, New Mexico 88240

Subject: Transportation of Used Oil, Amine and Glycol Filter from Jal 3 Gas Plant

Dear Mr. Sexton:

Per your request during our recent telephone conversation, I have attached a copy of our Texas Railroad Commission's "Rule 8" Permit No. 8-1282 dated February 3, 1993. This permit authorizes Sid Richardson's Texas gas plants to have the subject used filters removed from the plant sites and transported to a recycling facility in Monahans, Texas.

You indicated during our conversation that the NMOCD would most likely grant similar approval for removal of the same type filters from our Jal 3 plant provided TRRC authorization was received.

Please review the attached permit and determine if the same NMOCD approval can be extended for the Jal 3 facility.

Don't hesitate to call if you have any questions. We look forward to your reply.

Yours very truly,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad
Attachment

cc: C. P. O'Farrell/E. F. Gunn - w/att.
K. C. Clark/R. L. Gawlik - w/att.
W. J. Farley - w/att.

T-77

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION

JAMES E. (JIM) NUGENT, Commissioner
BARRY WILLIAMSON, Commissioner

DAVID M. GARLICK
Director
R. MARK HENKHAUS, P.E.
District Director
(915) 684-5581

2509 N. BIG SPRING | P. O. BOX 51240 | MIDLAND, TEXAS 79710-1240

February 3, 1993

Sid Richardson Carbon & Gasoline Co.
Attn: Michael J. McConnell
First City Bank Tower
201 Main Street
Fort Worth TX 76102

Re: "RULE 8" Permit No. 8-1282
"AMENDED"
Keystone, Halley, Chalk and Eskota Gas Plants
Districts 8, 8A and 7B
Various Counties, Texas

Pursuant to Rule 8(d)(6)(G), you are hereby authorized to transport and recycle the following material:

Oil, Amine and Glycol Filter - Various Amounts at Various Times

The authorized method of disposal will be transportation to Quell Petroleum Services, Inc. (QPS) in Monahans, Texas to be recycled. All filter material will be 100% recycled through a thermal desorption process, scrap metal recovery and the introduction of the leftover ash as a base material for cement products. Transportation will be by Quell Petroleum Services, Inc. (QPS).

The authority granted by this letter is valid from January 20, 1993 to January 20, 1994.

Mark Henkhaus, P.E.
District Director

RMH/sjb

cc: File

SID RICHARDSON CARBON & GASOLINE CO.
FIRST CITY BANK TOWER
201 MAIN STREET
FORT WORTH, TEXAS 76102

MICHAEL J. McCONNELL
COMPLIANCE COORDINATOR
ENVIRONMENTAL HEALTH & SAFETY

January 21, 1993
MJM-13-93
File: NM-9

817/390-8600

Mr. Bill Olson
New Mexico Energy, Minerals and
Natural Resources Dept.
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Subject: Diethylene Glycol Disposal

Dear Mr. Olson:

Confirming our teleconference on January 20, 1993 and in accordance with Sid Richardson Carbon & Gasoline Co.'s solid waste discharge plan on file with the State of New Mexico, it is my understanding that disposal of diethylene glycol (identified as a RCRA exempt, nonhazardous oil and gas production waste) is allowed so long as disposal is made into a Class II underground injection well.

Please contact me if I have misstated or misunderstood our conversation.

Thank you for your assistance in this matter.

Sincerely,

Michael J. McConnell
Compliance Coordinator
Environmental Health & Safety
(817) 338-8386

MJM:gad

cc: C. P. O'Farrell/E. F. Gunn
W. J. Farley
K. C. Clark
G. W. Washburn

El Paso Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

May 4, 1990

Sid Richardson Carbon & Gasoline Co.
Attn: Mr. E. F. Gunn
201 Main St.
Ft. Worth, TX 76102

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Re: Discharge Plan for the Jal No. 3 Plant.

Dear Mr. Gunn:

The New Mexico Oil Conservation Division (OCD) administers through delegation, all New Mexico Water Quality Control Commission (WQCC) regulations pertaining to surface and groundwater at natural gas processing plants.

Section 3-111 of the WQCC regulations states that with respect to the transfer of a discharge plan, "... the transferor shall notify the transferee in writing of the existence of the discharge plan, and shall deliver or send by certified mail to the director a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee. Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge plan, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the division's file or files concerning such discharge plan."

Please consider this letter to be written notification of the existence of a discharge plant for the Jal No. 3 Plant. A copy of the discharge plan will be sent to you under separate cover. If you have any questions concerning this matter, please feel free to contact me at 915/541-2323.

Sincerely,

Philip L. Baca

Philip L. Baca, P.E.
Sr. Compliance Engineer

PLB:dac

c: Mr. William J. LeMay
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87504-2088

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

July 18, 1989

William J. LeMay,
Director
State of New Mexico
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Re: Discharge Plan - Jal No. 3 Plant

Dear Mr. LeMay:

In response to your letter of June 6, 1989, El Paso completed the design of the berming on May 17, 1989. The construction of the berms began on May 31, 1989 and was completed on July 13, 1989. The survey for additional curbing at the process and storage areas was completed in late April. I have attached a drawing showing the results of that survey. It is El Paso's contention that the process and storage areas which do not have curbs on pavement do not pose a danger to groundwater because the fluid transported is natural gas. This contention was stated previously in the letter dated April 17, 1989 to Roger C. Anderson from D. N. Bigbie.

With the submission of the timetables and explanation, El Paso understands that the discharge plan for Jal No. 3 Plant has been approved and will not expire until November 21, 1993.

If you have any questions concerning this timetable or explanation, please contact me at (915) 541-5399.

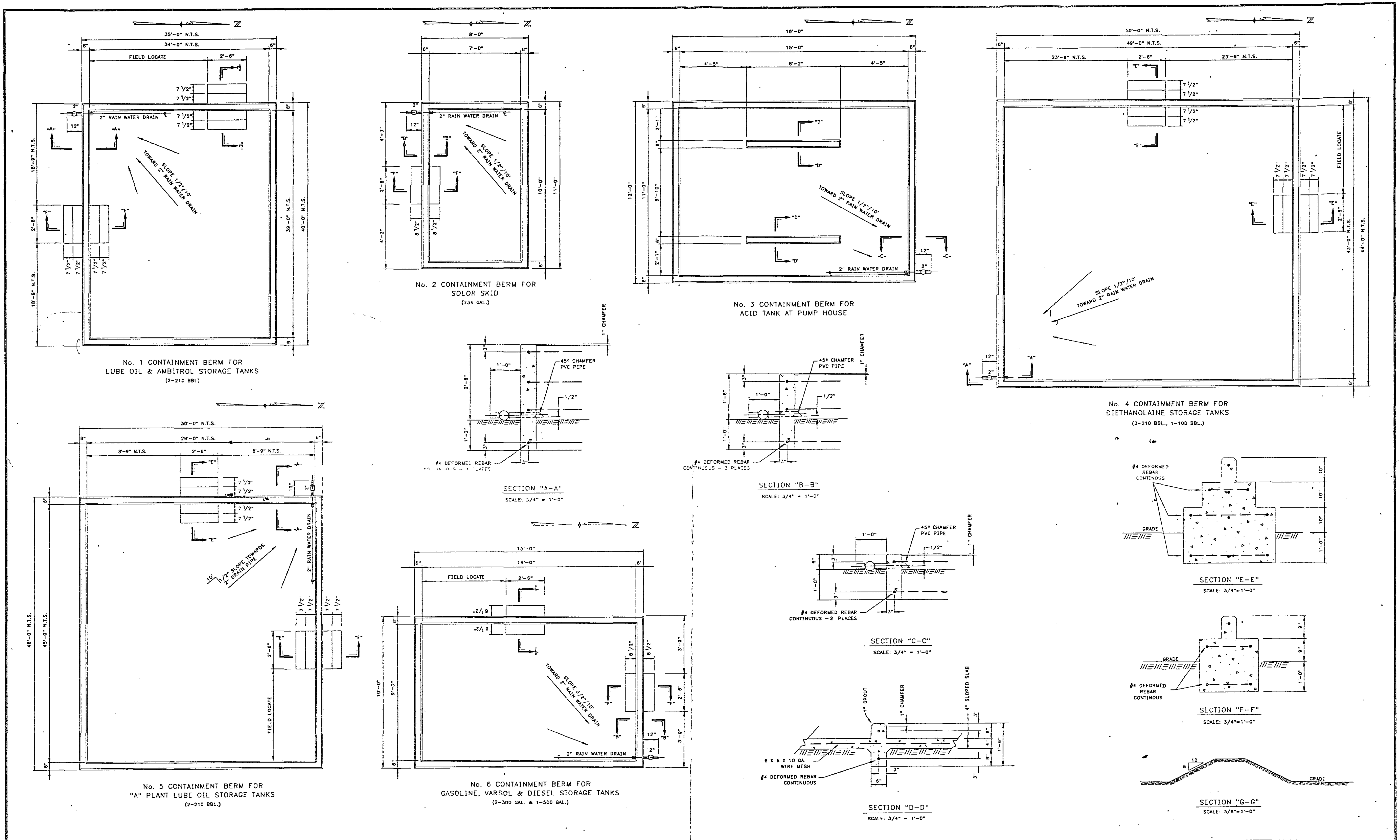
Very truly yours,

Donald R. Payne

Donald R. Payne, P.E.
Manager, Compliance Engineering

mts
Attachment

c: K.E. Beasley
D.N. Bigbie
J. Hill
W.A. Johnson
J.R. Midkiff
J.W. Somerhalder
H. Van
J.P. Wheeler
File: 5003 (W/W)



1J3-1-M44	MISC.CONC. CONT. BERMS- PLANS
1J3-1-M42	PLOT PLAN
DWG. NO.	TITLE

REFERENCE DRAWINGS

LEGEND

NO.	DATE	BY	DESCRIPTION	W.O.	APP.

REVISIONS

PRT. SEP.	DATE	TO	W.O.

PRINT RECORD

ENG. RECORD		DATE
DRAFTING DESIGN	GPF	5/4/89
COMPUTER GRAPHICS	LG	5/17/89
CHECKED		
PROJECT APPROVAL	JFW	5/..../..
DESIGN APPROVAL		
COMPUTER SAVE NAME	JAL126	

El Paso NATURAL GAS COMPANY

JAL No. 3 COMPRESSOR STATION
CONTAINMENT FACILITIES
CONCRETE CONTAINMENT BERMS
PLANS - SECTIONS & DETAILS

SCALE: 3/8"=1'-0" | W.O.: K-5383 | DWG. NO. 1J3-1-M43 | REV.

05/08/89

JAL NO. 3 CONTAINMENT BERMS W.O. K5393

NO.	TANKS	BERMS L	W	H	
1	V 250 ENGINE OIL & AMBTROL	40'	55'	2.5'	
2	SOLAR SKID	11'	8'	1.5'	
3	"A" PLANT ACID TANK	12'	16'	0.5'	CONC BOTTOM
4	DEA STORAGE	50'	44'	2.5'	
5	"A" PLANT OIL	46'	50'	2.5'	
6	GASOLINE, VARSOL & DIESEL	15'	10'	1.5'	
7	SCRUBBER SLOP CASING HDR OIL	40'	35'	2.5'	
8	ACID TANK "B" & "C" PLT	12'	16'	0.5'	CONC BOTTOM
9	MINERAL SEAL OIL	38'	42'	2.5'	
10	"B" PLANT COMPR OIL	46'	30'	2.5'	
11	"C" PLANT OIL & AMBTROL	70'	27'	2.5'	
12	"B" PLANT VARSOL	9'	7'	1.5'	
13	GAT PLANT VARSOL	11'	5'	1.5'	
14	OIL DRIP	22'	22'	1.5'	DIRT
15	BARREL RACK	62.5'	6'	0.5'	

NOTE: FOR CONTAINMENT BERM DETAILS SEE DWGS. 1J3-1-M43 & 1J3-1-M44

W.O. K-5393

CLASS LOCATION DATA

LINE NO.	O.D.	LINE DESIGNATION	BEGIN	END	CL. LOC.	METER NO.	LINE NO.	O.D.	LINE DESIGNATION	BEGIN	END	CL. LOC.	METER NO.	LINE NO.	O.D.	LINE DESIGNATION	BEGIN	END	CL. LOC.	METER NO.

REVISIONS

NO.	DATE	BY	DESCRIPTION

ENGINEERING RECORD

DRAWN BY	Aero-Graphics
TRACED BY	
CHECKED BY	
APPROVED	JFW
DATE	
PHOTO DATE	
PHOTO RE-CHECK	

SCALE IN FEET: 0 100 200 300

El Paso NATURAL GAS COMPANY
PIPELINE SERVICES DIVISION
EL PASO, TEXAS

JAL No. 3 COMPRESSOR STATION
CONTAINMENT FACILITIES
LOCATION PLAN

DWG. NO. 1J3-1-M42

REV

El Paso
Natural Gas Company

DONALD N. BIGBIE VICE PRESIDENT

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-5215

April 17, 1989

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
310 Old Santa Fe Trail
Santa Fe, NM 87504

Reference: **Discharge Plan GW-10**
Jal #3 Gas Plant
Lea County, New Mexico

Dear Mr. Anderson:

In reference to your letter of December 8, 1988, the following are the responses to your comments and the additional information you requested. The comments and the additional information are listed per section as indicated in your letter.

Section 3. Effluent Sources

Question:

1. Section 3.2.6 states "Table 2 (p20) of the 1983 Discharge Plan contains the waste water analyses for each stream." Table 2 (p21) of the OCD 1983 Discharge Plan copy contains the general characteristics of each stream not a detailed analyses. If a detailed analyses of each stream exists, please supply a copy for inclusion in the plan.

Answer:

A detailed analysis of each stream has not been conducted. However, enclosed in Tab 1 are the laboratory reports for the classifier effluent from 1983 through 1988.

Question:

2. Section 3.3. Is there an SPCC plan in effect at this facility? If so, please provide a copy.

Answer:

There is no SPCC plan in effect at this facility.

Question:

3. Table 3-1 lists the chemicals used at the plant. The following is a list of the chemicals for which there is no MSD sheet on file either in the 1988 plan or the renewal application.

   1) DeOx21
   2) Hymol-82
   3) Marvel Seal Oil
   4) Molylube #828-4
   5) Shell Tellus 32
   6) Shell Turbo 32

Answer:

The following MSD sheets appear in our copy of the October 1983 discharge plan in Appendix G:

1) DeOx 21
2) Hymol-82
3) Marvel Mystery Oil (for seals)

However, we have included copies of the above and the following MSD sheets in Tab 2:

4) Molub-Alloy 828-40
5) Shell Tellus 32
6) Shell Turbo 32

Section 4. Effluent Disposal

Question:

1. Section 4.1 describes the classifier. This is the below grade tank described on page 33 of the 1983 plan. Is this tank equipped with leak detection? If not, what method is used to inspect it for possible leaks and at what frequency? This is the tank that showed spillage or pump leakage at the surface during the March site visit. Have the spills and leaks been corrected? How are you planning to prevent any spills and leaks in the future?

Answer:

The classifier is not equipped with a leak detection system. However, every two years EPNG will empty the classifier and inspect for leaks. The spill on the surface of the classifier has been cleaned. This spill was caused by a leaking pump, and the pump has been repaired. This type of leak will be prevented by periodic inspection of the pumps. If a leak is detected, immediate corrective action will be taken to correct the problem.

Question:

2. Section 4.2 discusses disposal of liquids only. Where do you dispose of all solid wastes (i.e., filter media, sludges, trash, filter elements, etc.)?

Answer:

All solid waste is hauled to and disposed of in the City of Hobbs, New Mexico, landfill.

Section 6. Monitoring and Reporting

Question:

1. This section discusses the drain line testing. The copies of the diagrams of the lines tested are extremely hard to read; however, a comparison of the test result diagrams in Appendix B with the drain lines schematic (DWG NO JJ3-1-P2) in the 1983 plan indicated there may be two lines that were not tested.

    1. PDL 4"-L5 from the LO chiller (N 15+25: W6+5) to the propane condensing fin fan (N 14+00: W8+00).
    2. 4" LP ODL-4"-L4 from ODL-6"-L3 (N 17+00: W5+25) to F/76 (N 19+00: W4+25).

Answer:

Enclosed in a map pocket in Tab 3 is a marked blue line drawing (IJ3-1-P69) with the drain lines tested for this facility. The above lines were not tested because they are no longer used.

Question:

2. It is stated that annual sampling and analysis of the classifier effluent will be conducted. Has this been done in the past? Please supply OCD with copies of the results. Also, supply this office with any future results for inclusion in the file.

Answer:

Yes, analysis of the classifier effluent has been done. Enclosed in Tab 1 are copies of the analytical results from 1983 through 1988. In the future, annual analytical results of the classifier effluent will be sent to OCD.

Question:

3. An analysis of the cooling tower basin and classifier sludge shall be supplied to the OCD with a request for approval of the proposed method of disposal.

Answer:

A copy of the analytical results of the cooling tower basin and classifier sludge will be supplied to OCD with a request for approval of the proposed method of disposal.

Miscellaneous

Questions:

1. Are there any below grade or underground tanks other than the classifier?

2. Are all above grade tanks bermed to contain one third more than the tank volumes?

3. Are there any tile drainage conduits still in use? How old are they? How are they tested? What areas do they drain and to where?

4. Are all process and storage areas bermed and/or curbed? Are the bermed and/or curbed areas also paved to prevent spilled liquid infiltration?

5. Do any of the process or storage areas at the facility drain to a location other than the classifier?

Answers:

1. There are no below grade or underground tanks other than the classifier.

2. Above grade tanks are not bermed. However, EPNG's engineering is presently working on the design and construction of berms for all above grade tanks which contain liquids that may pose a potential danger for groundwater contamination. The berms will be constructed to contain one third more than the tank volumes.

3. Of the existing tile drainage conduits, the 12" and 15" tile line (TDL 15 LI) from the high pressure scrubbers and the gasoline plant which leads to an open sump that eventually ends up in the classifier has been tested. A five pound pressure test method was employed by (1) closing both ends of the pipe, (2) filling the pipe with water, and (3) checking the head pressure for leaks.

   Two gravity sewer drain lines have not been tested: a four inch line from the wash house to the septic tank and an eight inch line from B Plant Compressor Building bathroom to an eight inch line going to the classifier.

4. Enclosed in a map pocket in Tab 4 is a marked blue line drawing (IJ3-1-P1) of the existing curbs, concrete pads and sidewalks. A survey is being conducted to establish the extent of the berming and curbing needed at this facility. Upon completion, a drawing will be submitted

showing the curbs and paved areas in the process and storage areas. The areas which will not show curbs or pavement do not pose a danger to groundwater because the fluid transported in lines is natural gas.

5. Process and storage areas only drain to the classifier.

If you have questions, please contact Dr. Henry Van at 915/541-2832 or Mr. Don R. Payne at 915/541-5399.

Very truly yours,

Donald N. Bigbie

Donald N. Bigbie
Vice President
South Region

DNB:HV:cds

Enclosures

cc: D. R. Payne (w/ encl)
H. Van (w/ encl)

El Paso NATURAL GAS COMPANY — CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received	Lab No.	SL… r code No.
4-8-88	P88600	

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP: ☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS: ☐ Complete Secondary ☐ Organic ☐ Radiological

Water Supply System Name	Water Supply System Code No.	City or Location	County	Check one:
Jal No. 3 Plant				☒ Waste WATER ☐ RAW WATER

Collection Date	Collection Time	Collection Point	Collector's remarks	Report to
4-8-88		Classifier		

Collected By	Owner	Address
J. Tuten	EPNG	

TYPE of SYSTEM (Check one): ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other (specify)

LAT. ° ' ''

LONG ° ' ''

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL	mg/l	HEAVY METALS	mg/l	PARAMETER		ORGANIC	mg/l
00930 Sodium (as Na)		00940 Chloride (as Cl)		70300 Total Filterable Residue		01000 Arsenic	0.029	Chromium Hexavalent		39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)		38260 Foaming Agents (as Las)		01005 Barium	0.23			39732 Lindane	
00900 Tot.Hardness (as $CaCO_3$)		00620 Nitrate (as N)		00095 Conductance Micromhos 25°C		01025 Cadmium	< 0.001			38270 Methoxychlor	
00915 Calcium (as Ca)		00430 Alkalinity (as $CaCO_3$)		00400 pH		01030 Chromium	0.023	RADIOLOGICAL pCi/l 01501 Gross Alpha		39400 Toxaphene	
00925 Magnesium (as Mg)		00440 Bicarbonate (as HCO_3)		01330 Odor		01049 Lead	0.002	03501 Gross Beta	pCi/l	39730 2, 4-D	
01045 Iron-Total (as Fe)		00445 Carbonate (as CO_3)		00080 Color	mg/l	07180 Mercury	0.004	09501 Radium-226	pCi/l	39740 2, 4, 5-TP (Silvex)	
01056 Manganese (as Mn)		00945 Sulfate (as SO_4)		00070 Turbidity		01145 Selenium	0.008	11501 Radium-228	pCi/l	COD (ppm)	1530
						01075 Silver	< 0.01				

LABORATORY REMARKS:

Reviewed by

Date reported

DISTRIBUTION: White - Water Supply Regulation, SF • Canary - WS System • Pink - EIA Regional Office • Goldenrod - SLD Lab

El Paso NATURAL GAS COMPANY

CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received	Lab No.	SLD code No.
6-16-87	P87554	

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP ☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS ☐ Complete Secondary ☐ Organic ☐ Radiological

Water Supply System Name	Water Supply System Code No.	City or Location	County	Check one:
Jal No. 3 Plant				☒ Waste WATER ☐ RAW WATER

Collection Date	Collection Time	Collection Point	Collector's remarks	Report to
6-15-16-87		Classifier		Address

Collected By	Owner
J. Tuten	EPNG

TYPE of SYSTEM *(Check one)* ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other *(specify)*

LAT. ° ' ''

LONG ° ' ''

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l	PARAMETER		ORGANIC	mg/l
00930 Sodium (as Na)		00940 Chloride (as Cl)		70300 Total Filterable Residue	mg/l	01000 Arsenic	0.006	Chromium Hexavalent		39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)	2.90	38260 Foaming Agents (as Las)		01005 Barium	1.49			39732 Lindane	
00900 Tot. Hardness (as $CaCO_3$)		00620 Nitrate (as N) <	0.10	00095 Conductance Micromhos 25°C		01025 Cadmium	0.039			38270 Methoxychlor	
00915 Calcium (as Ca)		00430 Alkalinity (as $CaCO_3$)		00400 pH		01030 Chromium	0.037	RADIOLOGICAL pCi/l 01501 Gross Alpha		39400 Toxaphene	
00925 Magnesium (as Mg)		00440 Bicarbonate (as HCO_3)		01330 Odor		01049 Lead	0.16	03501 Gross Beta	pCi/l	39730 2, 4-D	
01045 Iron-Total (as Fe)		00445 Carbonate (as CO_3)		00080 Color	mg/l	07180 Mercury	0.007	09501 Radium-226	pCi/l	39740 2, 4, 5-TP (Silvex)	
01056 Manganese (as Mn)		00945 Sulfate (as SO_4)		00070 Turbidity		01145 Selenium <	0.001	11501 Radium-228	pCi/l	COD (ppm)	1780
						01075 Silver	0.087				

LABORATORY REMARKS:

Reviewed by

Date reported

DISTRIBUTION: White - Water Supply Regulation, SF • Canary - WS System • Pink - EIA Regional Office • Goldenrod - SLD Lab

El Paso NATURAL GAS COMPANY — CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received	Lab No.	Sampler code No
9-29-86	P86501	

CONSULT SLD Lab Annex L for proper presentation of sample(s) TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP ☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS ☐ Complete Secondary ☐ Organic ☐ Radiological

Water Supply System Name	Water Supply System Code No.	City or Location	County	Check one:
Jal No. 3 Waste Water				☒ Waste WATER ☐ RAW WATER

Collection Date	Collection Time	Collection Point	Collector's remarks	Report to
9-25-86				Address

Collected By	Owner
Joe Tuten	EPNG

TYPE of SYSTEM *(Check one)* ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other *(specify)*

LAT. ° ' ''

LONG ° ' ''

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l	PARAMETER		ORGANIC	mg/l
00930 Sodium (as Na)	1526	00940 Chloride (as Cl)	2798	70300 Total Filterable Residue	mg/l	01000 Arsenic	0.039	Chromium Hexavalent	0.055	39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)	4.10	38260 Foaming Agents (as Las)		01005 Barium	0.20	Copper		39732 Lindane	
00900 Tot. Hardness (as $CaCO_3$)	1270	00620 Nitrate (as N)	0.99	00095 Conductance Micromhos 25°C	12560	01025 Cadmium	0.003	Zinc		38270 Methoxychlor	
00915 Calcium (as Ca)	1968	00430 Alkalinity (as $CaCO_3$)	122	00400 pH	7.51	01030 Chromium	0.055	RADIOLOGICAL pCi/l 01501 Gross Alpha		39400 Toxaphene	
00925 Magnesium (as Mg)	1867	00440 Bicarbonate (as HCO_3)	1488	01330 Odor		01049 Lead	0.003	03501 Gross Beta	pCi/l	39730 2, 4-D	
01045 Iron-Total (as Fe)	1.02	00445 Carbonate (as CO_3)	0	00080 Color	mg/l	07180 Mercury	0.0058	09501 Radium-226	pCi/l	39740 2, 4, 5-TP (Silvex)	
01056 Manganese (as Mn)		00945 Sulfate (as SO_4)	504	00070 Turbidity	3.60	01145 Selenium	0.005	11501 Radium-228	pCi/l		
Boron (ppmB)	0.75	Silica (ppmSi)	12.25	TDS		01075 Silver	0.003			COD (ppm)	1410

LABORATORY REMARKS:

Reviewed by

Date reported

Paso NATURAL GAS COMPANY — CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLE

Date received	Lab No.	SLD user code No
6-5-85	P85199	

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP: ☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS: ☐ Complete Secondary ☐ Organic ☐ Radiological

Water Supply System Name	Water Supply System Code No.	City or Location	County	Check one:
Jal No. 3		Jal	Lea	☒ Waste WATER ☐ RAW WATER

Collection Date	Collection Time	Collection Point	Collector's remarks	Report to
6/4/5/85	24 hr. comp	Classifier		Address

Collected By	Owner
Joe Tuten	EPNG

TYPE of SYSTEM (Check one): ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other (specify)

LAT. ° ' "

LONG ° ' "

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l
00930 Sodium (as Na)	1532	00940 Chloride (as Cl)	2381	70300 Total Filterable Residue	mg/l	01000 Arsenic	< 0.002
00935 Potassium (as K)		00950 Fluoride (as F)	6.8	38260 Foaming Agents (as Las)		01005 Barium	0.8
00900 Tot. Hardness (as $CaCO_3$)	700	00620 Nitrate (as N)	0.07	00095 Conductance Micromhos 25°C	8000	01025 Cadmium	< 0.005
00915 Calcium (as Ca)	1160	00430 Alkalinity (as $CaCO_3$)	130	00400 pH	6.6	01030 Chromium	0.04
00925 Magnesium (as Mg)	984	00440 Bicarbonate (as HCO_3)	1586	01330 Odor		01049 Lead	< 0.001
01045 Iron-Total (as Fe)	1.2	00445 Carbonate (as CO_3)	0.0	00080 Color	mg/l	07180 Mercury	0.005
01056 Manganese (as Mn)	0.05	00945 Sulfate (as SO_4)	5242	00070 Turbidity	1.9.0	01145 Selenium	0.003
Boron (ppmB)	0.82	Silica (ppmSi)	123	TDS	5530	01075 Silver	< 0.001

PARAMETER		ORGANIC	mg/l
Chromium Hexavalent	0.01	39390 Endrin	
Copper	< 0.01	39732 Lindane	
Zinc	0.03	38270 Methoxychlor	
RADIOLOGICAL pCi/l		39400 Toxaphene	
01501 Gross Alpha			
03501 Gross Beta	pCi/l	39730 2, 4-D	
09501 Radium-226	pCi/l	39740 2, 4, 5-TP (Silvex)	
11501 Radium-228	pCi/l		

LABORATORY REMARKS:

Reviewed by

Date reported

El Paso Natural Gas Company

CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received	Lab No.	SLD user code No
	J-84-388	

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis (Mark appropriate box(es))*

INTERIM PRIMARY PARAMETER GROUP ☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS ☐ Complete Secondary ☐ Organic ☐ Radiological

Water Supply System Name	Water Supply System Code No.	City or Location	County	Check one:
JAL #3 PLANT		JAL, N.M.	LEA	☒ Waste WATER ☐ RAW WATER

Collection Date	Collection Time	Collection Point	Collector's remarks	Report to
8/9-10/84	24hr. Comp.	Classifier Tank		
Collected By		**Owner**		**Address**
J. TUTEN		EPNG		

TYPE of SYSTEM *(Check one)* ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other *(specify)*

LAT. ° ' "

LONG ° ' "

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l	PARAMETER		ORGANIC	mg/l
00930 Sodium (as Na)	910	00940 Chloride (as Cl)	1065	70300 Total Filterable Residue	mg/l	01000 Arsenic	.01	Chromium Hexavalent	406	39390 Endrin	
00935 Potassium (as K)		00950 Fluoride (as F)	.480	38260 Foaming Agents (as Las)		01005 Barium	<.5			39732 Lindane	
00900 Tot. Hardness (as $CaCO_3$)	244	00620 Nitrate (as N)	.16	00095 Conductance Micromhos 25°C	3900	01025 Cadmium	<.01			38270 Methoxychlor	
00915 Calcium (as Ca)	56	00430 Alkalinity (as $CaCO_3$)		00400 pH	7.1	01030 Chromium	.	RADIOLOGICAL pCi/l 01501 Gross Alpha		39400 Toxaphene	
00925 Magnesium (as Mg)	25	00440 Bicarbonate (as HCO_3)	132	01330 Odor		01049 Lead	<.02	03501 Gross Beta	pCi/l	39730 2, 4-D	
01045 Iron-Total (as Fe)	.41	00445 Carbonate (as CO_3)	0	00080 Color	mg/l	07180 Mercury	<.005	09501 Radium-226	pCi/l	39740 2, 4, 5-TP (Silvex)	
01056 Manganese (as Mn)	.	00945 Sulfate (as SO_4)	566	00070 Turbidity	60	01145 Selenium	.02	11501 Radium-228	pCi/l		
COD	821		.			01075 Silver	<.02				

LABORATORY REMARKS:

Reviewed by

Date reported

El Paso NATURAL GAS COMPANY

CHEMICAL and PHYSICAL ANALYSES for WATER SAMPLES

Date received	Lab No.	User code No.
	83-148	

CONSULT SLD Lab Annex L for proper presentation of sample(s). TYPE or PRINT with Ball Point Pen

CHEMICAL ANALYSES: *Check individual items for analysis [Mark appropriate box(es)]*

INTERIM PRIMARY PARAMETER GROUP ☐ 1 ☐ 2 ☐ 3

TYPE of CHEMICAL ANALYSIS ☐ Complete Secondary ☐ Organic ☐ Radiological

Water Supply System Name	Water Supply System Code No.	City or Location	County	Check one:
JAL #3 PLANT Waste Water		JAL	LEA	☒ Waste WATER ☐ RAW WATER

Collection Date	Collection Time	Collection Point	Collector's remarks	Report to
11/27, 11/28/83				Address

Collected By	Owner
S. Meadows	EPNG

TYPE of SYSTEM *(Check one)* ☐ PRIVATE PUBLIC: ☐ Community ☐ Non-community

SOURCE: ☐ Spring ☐ Lake ☐ Well-Depth ☐ Drain ☐ Stream ☐ Pool ☐ Other *(specify)*

LAT. ° ' "

LONG ° ' "

CATIONS	mg/l	ANIONS	mg/l	PHYSICAL		HEAVY METALS	mg/l
00930 Sodium (as Na)		00940 Chloride (as Cl)		70300 Total Filterable Residue	mg/l	01000 Arsenic	<0.30
00935 Potassium (as K)		00950 Fluoride (as F)	0.6	38260 Foaming Agents (as Las)		01005 Barium	<0.5
00900 Tot. Hardness (as $CaCO_3$)		00620 Nitrate (as N)	1.7	00095 Conductance Micromhos 25°C		01025 Cadmium	<0.04
00915 Calcium (as Ca)		00430 Alkalinity (as $CaCO_3$)		00400 pH		01030 Chromium	<0.02
00925 Magnesium (as Mg)		00440 Bicarbonate (as HCO_3)		01330 Odor		01049 Lead	<0.02
01045 Iron-Total (as Fe)		00445 Carbonate (as CO_3)		00080 Color	mg/l	07180 Mercury	<0.002
01056 Manganese (as Mn)		00945 Sulfate (as SO_4)		00070 Turbidity		01145 Selenium	<0.21
						01075 Silver	<0.02

PARAMETER		ORGANIC	mg/l
Chromium Hexavalent	<0.02	39390 Endrin	
		39732 Lindane	
		38270 Methoxychlor	
RADIOLOGICAL pCi/l		39400 Toxaphene	
01501 Gross Alpha			
03501 Gross Beta	pCi/l	39730 2, 4-D	
09501 Radium-226	pCi/l	39740 2, 4, 5-TP (Silvex)	
11501 Radium-228	pCi/l		

LABORATORY REMARKS:

Reviewed by

Date reported

MATERIAL SAFETY DATA SHEET

97367 (4-85)

MSDS NUMBER ▶ 60,200-5 PAGE 1

24 HOUR EMERGENCY ASSISTANCE	GENERAL MSDS ASSISTANCE
SHELL: 713-473-9461 CHEMTREC: 800-424-9300	SHELL: 713-241-4819

ACUTE HEALTH *	FIRE	REACTIVITY	HAZARD RATING ▶
0	1	0	LEAST - 0 SLIGHT - 1 MODERATE - 2 HIGH - 3 EXTREME - 4

*For acute and chronic health effects refer to the discussion in Section III

BE SAFE
READ OUR PRODUCT SAFETY INFORMATION ... AND PASS IT ON
(PRODUCT LIABILITY LAW REQUIRES IT)

SECTION I	NAME
PRODUCT ▶	SHELL TURBO(R) T OIL 32
CHEMICAL NAME ▶	MIXTURE (SEE SECTION II-A)
CHEMICAL FAMILY ▶	PETROLEUM HYDROCARBON; TURBINE OIL
SHELL CODE ▶	65602

SECTION II-A PRODUCT/INGREDIENT

NO.	COMPOSITION	CAS NUMBER	PERCENT
P	SHELL TURBO T OIL 32	MIXTURE	100
1	SOL. REF., HYDROTREATED HEAVY PARAFFINIC DIST.	64742-54-7	99
2	MINOR ADDITIVES	MIXTURE	<1

BASED UPON DATA AVAILABLE TO SHELL, COMPONENT 2 IN THIS PRODUCT IS NOT HAZARDOUS UNDER OSHA HAZARD COMMUNICATION (29 CFR 1910.1200).

SECTION II-B ACUTE TOXICITY DATA

NO.	ACUTE ORAL LD50	ACUTE DERMAL LD50	ACUTE INHALATION LC50
P	>5.0 G/KG, RAT*	>2.0 G/KG, RABBIT*	NOT AVAILABLE

*BASED ON ESSENTIALLY SIMILAR PRODUCT TESTING.

SECTION III HEALTH INFORMATION

THE HEALTH EFFECTS NOTED BELOW ARE CONSISTENT WITH REQUIREMENTS UNDER THE OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200).

EYE CONTACT
BASED ON ESSENTIALLY SIMILAR PRODUCT TESTING, PRODUCT IS PRESUMED TO BE NON-IRRITATING TO THE EYES.

SKIN CONTACT
BASED ON ESSENTIALLY SIMILAR PRODUCT TESTING, RODUCT IS PRESUMED TO BE NON-IRRITATING TO THE SKIN. PROLONGED AND REPEATED CONTACT MAY RESULT IN SKIN DISORDERS SUCH AS DERMATITIS, OIL ACNE OR FOLLICULITIS. ACCIDENTAL RELEASE UNDER HIGH PRESSURE APPLICATIONS MAY RESULT IN INJECTION OF OIL INTO THE SKIN CAUSING LOCAL NECROSIS.

INHALATION
THE INHALATION OF VAPORS (GENERATED AT HIGH TEMPERATURES ONLY) OR OIL MIST MAY CAUSE A MILD IRRITATION OF THE UPPER RESPIRATORY TRACT.

INGESTION
BASED ON ESSENTIALLY SIMILAR PRODUCT TESTING, PRODUCT IS PRESUMED TO BE NO MORE THAN SLIGHTLY TOXIC IF INGESTED.

SIGNS AND SYMPTOMS
IRRITATION AS NOTED ABOVE. NECROSIS MAY BE EVIDENCED BY DELAYED ONSET OF PAIN AND TISSUE DAMAGE A FEW HOURS FOLLOWING HIGH PRESSURE INJECTION.

AGGRAVATED MEDICAL CONDITIONS
PREEXISTING SKIN AND RESPIRATORY DISORDERS MAY BE AGGRAVATED BY EXPOSURE TO THIS PRODUCT.

SECTION IV OCCUPATIONAL EXPOSURE LIMITS

	OSHA		ACGIH		OTHER
NO.	PEL/TWA	PEL/CEILING	TLV/TWA	TLV/STEL	
P	5 MG/M3*	NONE	5 MG/M3*	10 MG/M3*	NONE

*OIL MIST, MINERAL

SECTION V EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT
FLUSH EYES WITH WATER. IF IRRITATION OCCURS, GET MEDICAL ATTENTION.

SKIN CONTACT
REMOVE CONTAMINATED CLOTHING AND WIPE EXCESS OFF. WASH WITH SOAP AND WATER OR A WATERLESS HAND CLEANER FOLLOWED BY SOAP AND WATER. IF IRRITATION OCCURS, GET MEDICAL ATTENTION. IF MATERIAL IS INJECTED UNDER THE SKIN, GET MEDICAL ATTENTION PROMPTLY TO PREVENT SERIOUS DAMAGE; DO NOT WAIT FOR SYMPTOMS TO DEVELOP.

INHALATION
REMOVE VICTIM TO FRESH AIR AND PROVIDE OXYGEN IF BREATHING IS DIFFICULT. GET MEDICAL ATTENTION.

INGESTION
DO NOT INDUCE VOMITING. IN GENERAL, NO TREATMENT IS NECESSARY UNLESS LARGE QUANTITIES OF PRODUCT ARE INGESTED. HOWEVER, GET MEDICAL ADVICE.

NOTE TO PHYSICIAN
IN GENERAL, EMESIS INDUCTION IS UNNECESSARY IN HIGH VISCOSITY, LOW VOLATILITY PRODUCTS, I.E., MOST OILS AND GREASES.

SECTION VI SUPPLEMENTAL HEALTH INFORMATION

NONE IDENTIFIED.

SECTION VII PHYSICAL DATA

BOILING POINT: NOT AVAILABLE (DEG F)	SPECIFIC GRAVITY: 0.8681 (H2O=1)	VAPOR PRESSURE: NOT AVAILABLE (MM HG)
MELTING POINT: 15 (POUR POINT) (DEG F)	SOLUBILITY: NEGLIGIBLE (IN WATER)	VAPOR DENSITY: NOT AVAILABLE (AIR=1)

EVAPORATION RATE (N-BUTYL ACETATE = 1): NOT AVAILABLE

VIS, CS (40 DEG C.) = 31

APPEARANCE AND ODOR: PALE YELLOW OIL. SLIGHT HYDROCARBON ODOR.

SECTION VIII FIRE AND EXPLOSION HAZARDS

FLASH POINT AND METHOD:
385 DEG F. (PMCC)

FLAMMABLE LIMITS /% VOLUME IN AIR
LOWER: N/AV UPPER: N/AV

EXTINGUISHING MEDIA
USE WATER FOG, FOAM, DRY CHEMICAL OR CO2. DO NOT USE A DIRECT STREAM OF WATER. PRODUCT WILL FLOAT AND CAN BE REIGNITED ON SURFACE OF WATER.

SPECIAL FIRE FIGHTING PROCEDURES AND PRECAUTIONS
MATERIALS WILL NOT BURN UNLESS PREHEATED. DO NOT ENTER CONFINED FIRE SPACE WITHOUT FULL BUNKER GEAR (HELMET WITH FACE SHIELD, BUNKER COATS, GLOVES AND RUBBER BOOTS), INCLUDING A POSITIVE PRESSURE NIOSH APPROVED SELF-CONTAINED BREATHING APPARATUS. COOL FIRE EXPOSED CONTAINERS WITH WATER.

SECTION IX REACTIVITY

STABILITY: STABLE

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

CONDITIONS AND MATERIALS TO AVOID:
AVOID HEAT, OPEN FLAMES, AND OXIDIZING MATERIALS.

HAZARDOUS DECOMPOSITION PRODUCTS
THERMAL DECOMPOSITION PRODUCTS ARE HIGHLY DEPENDENT ON THE COMBUSTION CONDITIONS. A COMPLEX MIXTURE OF AIRBORNE SOLID, LIQUID, PARTICULATES AND GASES WILL EVOLVE WHEN THIS MATERIAL UNDERGOES PYROLYSIS OR COMBUSTION. CARBON MONOXIDE AND OTHER UNIDENTIFIED ORGANIC COMPOUNDS MAY BE FORMED UPON COMBUSTION.

SECTION X EMPLOYEE PROTECTION

RESPIRATORY PROTECTION
IF EXPOSURE MAY OR DOES EXCEED OCCUPATIONAL EXPOSURE LIMITS (SEC. IV) USE A NIOSH-APPROVED RESPIRATOR TO PREVENT OVEREXPOSURE. IN ACCORD WITH 29 CFR 1910.134 USE EITHER AN ATMOSPHERE-SUPPLYING RESPIRATOR OR AN AIR-PURIFYING RESPIRATOR FOR ORGANIC VAPORS AND PARTICULATES.

PROTECTIVE CLOTHING
WEAR CHEMICAL-RESISTANT GLOVES AND OTHER PROTECTIVE CLOTHING AS REQUIRED TO MINIMIZE PROLONGED SKIN CONTACT. NO SPECIAL EYE PROTECTION IS ROUTINELY NECESSARY. TEST DATA FROM PUBLISHED LITERATURE AND/OR GLOVE AND CLOTHING MANUFACTURERS INDICATE THE BEST PROTECTION IS PROVIDED BY NITRILE GLOVES.

SECTION XI ENVIRONMENTAL PROTECTION

SPILL OR LEAK PROCEDURES
MAY BURN ALTHOUGH NOT READILY IGNITABLE. USE CAUTIOUS JUDGMENT WHEN CLEANING UP LARGE SPILLS. *** LARGE SPILLS *** WEAR RESPIRATOR AND PROTECTIVE CLOTHING AS APPROPRIATE. SHUT OFF SOURCE OF LEAK IF SAFE TO DO SO. DIKE AND CONTAIN. REMOVE WITH VACUUM TRUCKS OR PUMP TO STORAGE/SALVAGE VESSELS. SOAK UP RESIDUE WITH AN ABSORBENT SUCH AS CLAY, SAND OR OTHER SUITABLE MATERIAL; DISPOSE OF PROPERLY. FLUSH AREA WITH WATER TO REMOVE TRACE RESIDUE. *** SMALL SPILLS *** TAKE UP WITH AN ABSORBENT MATERIAL AND DISPOSE OF PROPERLY.

WASTE DISPOSAL
PLACE IN AN APPROPRIATE DISPOSAL FACILITY IN COMPLIANCE WITH LOCAL REGULATIONS.

ENVIRONMENTAL HAZARDS
THIS PRODUCT IS CLASSIFIED AS AN OIL UNDER SECTION 311 OF THE CLEAN WATER ACT. SPILLS ENTERING (A) SURFACE WATERS OR (B) ANY WATERCOURSES OR SEWERS ENTERING/LEADING TO SURFACE WATERS THAT CAUSE A

SHEEN MUST BE REPORTED TO THE NATIONAL RESPONSE CENTER, 800-424-8802.

SECTION XII SPECIAL PRECAUTIONS

MINIMIZE PROLONGED SKIN CONTACT. WASH WITH SOAP AND WATER BEFORE EATING, DRINKING, SMOKING OR USING TOILET FACILITIES. LAUNDER CONTAMINATED CLOTHING BEFORE REUSE. PROPERLY DISPOSE OF CONTAMINATED LEATHER ARTICLES, INCLUDING SHOES, THAT CANNOT BE DECONTAMINATED.STORE IN A COOL, DRY PLACE WITH ADEQUATE VENTILATION. KEEP AWAY FROM OPEN FLAMES AND HIGH TEMPERATURES.

SECTION XIII TRANSPORTATION REQUIREMENTS

DEPARTMENT OF TRANSPORTATION CLASSIFICATION: NOT HAZARDOUS BY D.O.T. REGULATIONS

SECTION XIV OTHER REGULATORY CONTROLS

THE COMPONENTS OF THIS PRODUCT ARE LISTED ON THE EPA/TSCA INVENTORY OF CHEMICAL SUBSTANCES.

THE INFORMATION CONTAINED HEREIN IS BASED ON THE DATA AVAILABLE TO US AND IS BELIEVED TO BE CORRECT. HOWEVER, SHELL MAKES NO WARRANTY, EXPRESSED OR IMPLIED REGARDING THE ACCURACY OF THESE DATA OR THE RESULTS TO BE OBTAINED FROM THE USE THEREOF. SHELL ASSUMES NO RESPONSIBILITY FOR INJURY FROM THE USE OF THE PRODUCT DESCRIBED HEREIN.

DATE PREPARED: MARCH 06, 1987

JOHN P. SEPESI

BE SAFE

READ OUR PRODUCT
SAFETY INFORMATION ...AND PASS IT ON
(PRODUCT LIABILITY LAW
REQUIRES IT)

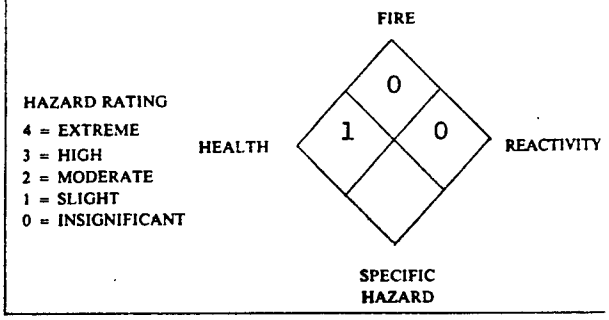
SHELL OIL COMPANY
PRODUCT SAFETY AND COMPLIANCE
P. O. BOX 4320
HOUSTON, TX 77210

Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760
Telephone No. (915) 337-4681

DeOx-21
QUICK IDENTIFIER

NFPA Designation 704



MATERIAL SAFETY DATA SHEET

SECTION 1 - IDENTITY

Common Name: (used on label) (Trade Name & Synonyms) DeOx-21

Chemical Name: Sodium Sulfite — Formula: Na_2SO_3

Chemical Family: Sulfur

Cas No.

SECTION 2 - HAZARDOUS INGREDIENTS

Hazardous Component(s)	%	Threshold Limit Value (units)
Sulfurous Acid		1 ppm 0.1 mg/m^3
Sodium Sulfite	99%	
Cobalt Sulfate	1%	

SECTION 3 - PHYSICIAL & CHEMICAL CHARACTERISTICS (Fire & Explosive Data)

Boiling Point: NA

Specific Gravity (H_2O = 1): 2.63

Vapor Pressure (mm Hg): NA

Percent Volatile by Volume (%): NA

Vapor Density (Air = 1): NA

Evaporation Rate (_____ = 1): NA

Solubility in Water: 100%

Reactivity in Water: NA

Appearance and Odor: White powder - odorless

Flash Point: None COC

Flammable Limits in Air % by Volume: NA

Lower Upper

Extinguisher Media: NA

Auto-Ignition Temperature: NA

Special Fire Fighting Procedures: NA

Unusual Fire and Explosion Hazards: Will emit sulfur dioxide fumes when heated dry above 500°F.

SECTION 4 - PHYSICAL HAZARDS

Stability
STABLE [x] UNSTABLE [ ]

CONDITIONS TO AVOID: NA

INCOMPATABILITY (MATERIALS TO AVOID): NA

HAZARDOUS DECOMPOSITION PRODUCTS: NA

Hazardous Polymerization

CONDITIONS TO AVOID: NA

MAY OCCUR [ ] WILL NOT OCCUR [x]

SECTION 5 - HEALTH HAZARDS

Threshold Limit Value: 0.1 mg/m^3 (NIOSH)

Signs and Symptoms of Exposure

1. Acute Overexposure: May irritate eyes and skin

2. Chronic Overexposure: NA

Medical Conditions Generally Aggravated by Exposure: UN

Chemical Listed as Carcinogen or Potential Carcinogen: UN

National Toxicology Program Yes [ ] No [X]

I.A.R.C. Monographs Yes [ ] No. [X]

OSHA Yes [ ] No. [X]

OSHA Permissible Exposure Limit: 1 ppm

ACGIH Threshold Limit Value: 0.1 mg/m^3

Other Exposure Limit Used: NA

Emergency and First Aid Procedures

1. Inhalation: Can irritate nose, throat and lungs. Get to fresh air if overexposed

2. Eyes: Flush with water

3. Skin: Wash off

4. Ingestion: Do not induce vomiting, drink plenty of liquids

SECTION 6 - SPECIAL PROTECTION INFORMATION

Respiratory Protection (Specify Type): NA

Ventilation — Local Exhaust: Yes — Mechanical (General): Yes — Special: — Other:

Protective Gloves: Rubberized Gloves

Eye Protection: Safety Glasses

Other Protective Clothing or Equipment: None

SECTION 7 - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be Taken in Handling and Storage: Avoid excess heat - over 250°F

Steps to be Taken in Case Material is Released or Spilled: Sweep or wash with water

Waste Disposal Methods: Dispose of according to State and Federal Regulations

Date Issued: 11/16/85

Abbreviations Used
NA Not Applicable
ND Not Determined
UN Unknown

Continental Products of Texas

Prepared by Eric Klim

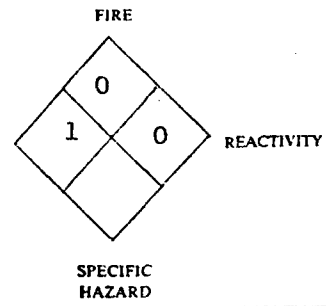
Eric Klim

Continental Products of Texas

100 Industrial • P.O. Box 3627 • Odessa, Texas 79760
Telephone No. (915) 337-4681

HYMOL 82
QUICK IDENTIFIER

NFPA Designation 704



HAZARD RATING
4 = EXTREME
3 = HIGH
2 = MODERATE
1 = SLIGHT
0 = INSIGNIFICANT

MATERIAL SAFETY DATA SHEET

SECTION 1 - IDENTITY

Common Name: (used on label)
(Trade Name & Synonyms) HYMOL 82

Chemical Name: Sodium Tripolyphosphate

Formula: $(Na)x(PO_3)x$

Chemical Family: Inorganic Phosphate

Cas No.

SECTION 2 - HAZARDOUS INGREDIENTS

Hazardous Component(s)	%	Threshold Limit Value (units)
Ingredients determined non-hazardous, per 29 CFR 1910.1200		

SECTION 3 - PHYSICIAL & CHEMICAL CHARACTERISTICS (Fire & Explosive Data)

Boiling Point: 220°F

Specific Gravity (H_2O = 1): 1.2

Vapor Pressure (mm Hg): 760

Percent Volatile by Volume (%): NA

Vapor Density (Air = 1): 1

Evaporation Rate (_____ = 1): 1

Solubility in Water: 100%

Reactivity in Water:

Appearance and Odor: Dark amber liquid, odorless

Flash Point: None COC

Flammable Limits in Air % by Volume
Lower Upper

Extinguisher Media: Water, CO_2, Dry chemical

Auto-Ignition Temperature:

Special Fire Fighting Procedures: NA

Unusual Fire and Explosion Hazards: NA

SECTION 4 - PHYSICAL HAZARDS

Stability
STABLE [x] UNSTABLE [ ]

CONDITIONS TO AVOID: None

INCOMPATABILITY (MATERIALS TO AVOID): NA

HAZARDOUS DECOMPOSITION PRODUCTS: NA

Hazardous Polymerization

CONDITIONS TO AVOID: None

MAY OCCUR [ ] WILL NOT OCCUR [x]

SECTION 5 - HEALTH HAZARDS

Threshold Limit Value: NA

Signs and Symptoms of Exposure

1. Acute Overexposure: May irritate eyes, skin slightly

2. Chronic Overexposure: NA

Medical Conditions Generally Aggravated by Exposure: NA

Chemical Listed as Carcinogen or Potential Carcinogen: NA

National Toxicology Program Yes [ ] No [X]

I.A.R.C. Monographs Yes [ ] No. [X]

OSHA Yes [ ] No. [X]

OSHA Permissible Exposure Limit: NA

ACGIH Threshold Limit Value: NA

Other Exposure Limit Used: NA

Emergency and First Aid Procedures

1. Inhalation: Slight irritant, remove from exposure

2. Eyes: May burn, flush with water for 15 minutes

3. Skin: Wash with water

4. Ingestion: Drink plenty of liquids

SECTION 6 - SPECIAL PROTECTION INFORMATION

Respiratory Protection (Specify Type)

Ventilation — Local Exhaust: Yes — Mechanical (General): Yes — Special — Other

Protective Gloves: Rubber gloves

Eye Protection: Safety Glasses

Other Protective Clothing or Equipment: NA

SECTION 7 - SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

Precautions to be Taken in Handling and Storage: NA

Steps to be Taken in Case Material is Released or Spilled: Wash area with water

Waste Disposal Methods: Dispose of according to State and Federal Regulations

NO WARRANTY, EXPRESS OF IMPLIED OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE IS MADE. BUYER ASSUMES ALL RISK OF USE, STORAGE AND HANDLING, CONTINENTAL PRODUCTS OF TEXAS SHALL NOT BE LIABLE FOR ANY INCIDENTAL OR CONSEQUENTIAL DAMAGES ARISING DIRECTLY OR INDIRECTLY IN CONNECTION WITH THE PURCHASE, USE, STORAGE OR HANDLING OF THIS PRODUCT.

Date Issued: 11/16/85

Abbreviations Used
NA Not Applicable
ND Not Determined
UN Unknown

Continental Products of Texas

Prepared by Eric Klim

Eric Klim

Form Approved
Budget Bureau No. 44-R1387
Approval Expires April 30, 1971

Form No. LSB-005 4
May 1969

U.S. DEPARTMENT OF LABOR

WORKPLACE STANDARDS ADMINISTRATION

Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

MANUFACTURER'S NAME: Marvel Oil Company, Inc.	EMERGENCY TELEPHONE NO.: 914-937-4000
ADDRESS (Number, Street, City, State, and ZIP Code): 331 N. Main St., Port Chester, N.Y. 10573	
CHEMICAL NAME AND SYNONYMS: Not applicable	TRADE NAME AND SYNONYMS: Marvel Mystery Oil
CHEMICAL FAMILY: Petroleum Hydrocarbon	FORMULA: Mixture of Petroleum Products

SECTION II HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS	30		FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)

SECTION III PHYSICAL DATA

BOILING POINT (°F.)	313	SPECIFIC GRAVITY (H_2O=1)	.9
VAPOR PRESSURE (mm Hg.)	2 mm Hg. @ 68°	PERCENT VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)		EVAPORATION RATE (_____=1)	
SOLUBILITY IN WATER	negligible		
APPEARANCE AND ODOR			

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used): 140° F.	FLAMMABLE LIMITS	Lel	Uel
EXTINGUISHING MEDIA: Water spray - foam dry chemical - CO_2			
SPECIAL FIRE FIGHTING PROCEDURES: None			
UNUSUAL FIRE AND EXPLOSION HAZARDS: Do not store or mix with strong oxidants.			

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE

EFFECTS OF OVEREXPOSURE

Mild irritation to skin and eyes.

EMERGENCY AND FIRST AID PROCEDURES

In case of skin contact wash with soap and water.
If splashed in eyes flush with clear water until irritation subsides.

SECTION VI REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	

INCOMPATIBILITY *(Materials to avoid)*

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Recover free liquid. Add absorbent to spill area.

WASTE DISPOSAL METHOD

Incinerate absorbed material under safe conditions.

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)* Normally not needed.

VENTILATION	LOCAL EXHAUST	Not needed	SPECIAL
	MECHANICAL *(General)*	Not needed	OTHER

PROTECTIVE GLOVES: Normally not needed	EYE PROTECTION: Normally not needed

OTHER PROTECTIVE EQUIPMENT

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Keep away from heat and open flame.

OTHER PRECAUTIONS

Contains refined petroleum distillates. If swallowed, do not induce vomiting.

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44R1387

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing, Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
IMPERIAL OIL & GREASE COMPANY	213 478-3577

ADDRESS (Number, Street, City, State, and ZIP Code)
10960 Wilshire Blvd., Los Angeles, California 90024

CHEMICAL NAME AND SYNONYMS	TRADE NAME AND SYNONYMS
N/A	MOLUB-ALLOY 828-40
CHEMICAL FAMILY: N/A	FORMULA: N/A

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
This is a petroleum base lubricating oil which has no		
TLV under normal use, but if steadily misted or		
sprayed into workplace atmosphere, TLV is 5 mg/cubic meter.		

SECTION III - PHYSICAL DATA

BOILING POINT (°F.) Above	600°F	SPECIFIC GRAVITY (H_2O=1)	0.917
VAPOR PRESSURE (mm Hg.) Less than	0.05	PERCENT, VOLATILE BY VOLUME (%)	Trace
VAPOR DENSITY (AIR=1)	N/A	EVAPORATION RATE (_____ =1)	N/A except at
SOLUBILITY IN WATER	Slight	temperatures above 600° F	
APPEARANCE AND ODOR	Dark, opaque liquid, slight chemical odor.		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel
ASTM D 92 - 400° F		N/A	N/A

EXTINGUISHING MEDIA: Foam, CO_2

SPECIAL FIRE FIGHTING PROCEDURES: Same as for petroleum fires

UNUSUAL FIRE AND EXPLOSION HAZARDS: None

(Continued on reverse side)

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: N/A

EFFECTS OF OVEREXPOSURE: N/A

EMERGENCY AND FIRST AID PROCEDURES: Rinse material from eyes with warm water; treat eyes with proprietary eye wash solution. Toxic potential if ingested, do not induce vomiting.

SECTION VI - REACTIVITY DATA

STABILITY			CONDITIONS TO AVOID
	UNSTABLE		
	STABLE	X	Exposure to metallic red heat & open flame

INCOMPATABILITY (*Materials to avoid*): Strong oxidizing agents

HAZARDOUS DECOMPOSITION PRODUCTS: None in normal use

HAZARDOUS POLYMERIZATION			CONDITIONS TO AVOID
	MAY OCCUR		
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Clean up promptly with proprietary oil- drying compound

WASTE DISPOSAL METHOD: Mixing with No. 5 or No. 6 fuel oil, use as road oil, dust and weed control

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (*Specify type*): N/A

VENTILATION			
	LOCAL EXHAUST	N/A	SPECIAL
	MECHANICAL (*General*)		OTHER

PROTECTIVE GLOVES	EYE PROTECTION
For highly sensitive skin only	Only if oil is being sprayed

OTHER PROTECTIVE EQUIPMENT: None

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Maintain storage arrangement so that any leakage of containers will be readily detected.

OTHER PRECAUTIONS: Keep container dry and clean when handling in order to minimize slippage and possible injuries.

Received 5-27-88

9/20/86

MATERIAL SAFETY DATA SHEET

MSDS NUMBER ▶ 60,050-4 PAGE 1

24 HOUR EMERGENCY ASSISTANCE	GENERAL MSDS ASSISTANCE
SHELL: 713-473-9461 CHEMTREC: 800-424-9300	SHELL: 713-241-4819

ACUTE HEALTH * 1 | FIRE 1 | REACTIVITY 0 | HAZARD RATING ▶ LEAST - 0 SLIGHT - 1 MODERATE - 2 HIGH - 3 EXTREME - 4

*For acute and chronic health effects refer to the discussion in Section III

BE SAFE
READ OUR PRODUCT SAFETY INFORMATION AND PASS IT ON

SECTION I	NAME
PRODUCT ▶	SHELL TELLUS(R) OIL 32
CHEMICAL NAME ▶	MIXTURE (SEE SEC. IIA)
CHEMICAL FAMILY ▶	PETROLEUM HYDROCARBON; HYDRAULIC OIL
SHELL CODE ▶	65208

SECTION II-A PRODUCT/INGREDIENT

NO.	COMPOSITION	CAS NUMBER	PERCENT
P	SHELL TELLUS OIL 32	MIXTURE	100
*	SOLVENT REFINED, HYDROTREATED HEAVY, PARAFFINIC DISTILLATE	64742-54-7	97-98
2	MINOR ADDITIVES	MIXTURE	<3

SECTION II-B ACUTE TOXICITY DATA

NO.	ACUTE ORAL LD50	ACUTE DERMAL LD50	ACUTE INHALATION LC50
P	NOT AVAILABLE		

BASED UPON DATA AVAILABLE TO SHELL, COMPONENT 2 IN THIS PRODUCT IS NOT HAZARDOUS UNDER OSHA HAZARD COMMUNICATION (29 CFR 1910.1200).

SECTION III HEALTH INFORMATION

THE HEALTH EFFECTS NOTED BELOW ARE CONSISTENT WITH REQUIREMENTS UNDER THE OSHA HAZARD COMMUNICATION STANDARD (29 CFR 1910.1200).

EYE CONTACT
BASED ON COMPONENT INFORMATION, PRODUCT IS PRESUMED TO BE PRACTICALLY NON-IRRITATING TO THE EYES.

SKIN CONTACT
BASED ON COMPONENT INFORMATION, PRODUCT IS PRESUMED TO BE PRACTICALLY NON-IRRITATING TO THE SKIN. PROLONGED AND REPEATED CONTACT MAY RESULT IN SKIN DISORDERS SUCH AS DERMATITIS, OIL ACNE OR FOLLICULITIS. ACCIDENTAL RELEASE UNDER HIGH PRESSURE APPLICATIONS MAY RESULT IN INJECTION OF OIL INTO THE SKIN CAUSING LOCAL NECROSIS.

INHALATION
THE INHALATION OF VAPORS (GENERATED AT HIGH TEMPERATURES ONLY) OR OIL MIST MAY CAUSE A MILD IRRITATION OF THE MUCOUS MEMBRANES OF THE UPPER RESPIRATORY TRACT.

INGESTION
BASED ON COMPONENT INFORMATION, PRODUCT IS NO MORE THAN SLIGHTLY TOXIC IF SWALLOWED.

SIGNS AND SYMPTOMS
IRRITATION AS NOTED ABOVE. NECROSIS MAY BE EVIDENCED BY DELAYED ONSET OF PAIN AND TISSUE DAMAGE A FEW HOURS FOLLOWING HIGH PRESSURE INJECTION.

AGGRAVATED MEDICAL CONDITIONS
PREEXISTING SKIN AND RESPIRATORY DISORDERS MAY BE AGGRAVATED BY EXPOSURE TO THIS PRODUCT.

SECTION IV OCCUPATIONAL EXPOSURE LIMITS

NO.	OSHA PEL/TWA	OSHA PEL/CEILING	ACGIH TLV/TWA	ACGIH TLV/STEL	OTHER
P	*5 MG/M3	NONE	*5 MG/M3	*10 MG/M3	NONE

*OIL MIST, MINERAL

SECTION V EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT
FLUSH EYES WITH WATER. IF IRRITATION OCCURS, GET MEDICAL ATTENTION.

SKIN CONTACT
REMOVE CONTAMINATED CLOTHING/SHOES WIPE EXCESS FROM SKIN. FLUSH SKIN WITH WATER. FOLLOW BY WASHING WITH SOAP AND WATER. IF IRRITATION OCCURS, GET MEDICAL ATTENTION. IF MATERIAL IS INJECTED UNDER THE SKIN, GET MEDICAL ATTENTION PROMPTLY TO PREVENT SERIOUS DAMAGE; DO NOT WAIT FOR SYMPTOMS TO DEVELOP.

INHALATION
REMOVE VICTIM TO FRESH AIR AND PROVIDE OXYGEN IF BREATHING IS DIFFICULT GET MEDICAL ATTENTION.

INGESTION
DO NOT INDUCE VOMITING. IN GENERAL, NO TREATMENT IS NECESSARY UNLESS LARGE QUANTITIES OF PRODUCT ARE INGESTED. HOWEVER, GET MEDICAL ADVICE.

NOTE TO PHYSICIAN
IN GENERAL, EMESIS INDUCTION IS UNNECESSARY IN HIGH VISCOSITY, LOW VOLATILITY PRODUCTS, I.E., MOST OILS AND GREASES.

SECTION VI SUPPLEMENTAL HEALTH INFORMATION

NONE IDENTIFIED.

SECTION VII PHYSICAL DATA

BOILING POINT: NOT AVAILABLE (DEG F)

SPECIFIC GRAVITY: 0.8718 (H2O=1)

VAPOR PRESSURE: NOT AVAILABLE (MM HG)

MELTING POINT: -25 (POUR POINT) (DEG F)

SOLUBILITY: NEGLIGIBLE (IN WATER)

VAPOR DENSITY: NOT AVAILABLE (AIR=1)

EVAPORATION RATE (N-BUTYL ACETATE = 1): NOT AVAILABLE

VIS, CS = 30-32 @ 40 DEG C

9/26/86

APPEARANCE AND ODOR: CREAM WHITE LIQUID. SLIGHT HYDROCARBON ODOR.

SECTION VIII FIRE AND EXPLOSION HAZARDS

FLASH POINT AND METHOD:
380 DEG F. (PMCC)

FLAMMABLE LIMITS /% VOLUME IN AIR
LOWER: N/AV UPPER: N/AV

EXTINGUISHING MEDIA
USE WATER FOG, FOAM, DRY CHEMICAL OR CO2. DO NOT USE A DIRECT STREAM OF WATER. PRODUCT WILL FLOAT AND CAN BE REIGNITED ON SURFACE OF WATER.

SPECIAL FIRE FIGHTING PROCEDURES AND PRECAUTIONS
MATERIALS WILL NOT BURN UNLESS PREHEATED. DO NOT ENTER CONFINED FIRE SPACE WITHOUT FULL BUNKER GEAR (HELMET WITH FACE SHIELD, BUNKER COATS, GLOVES AND RUBBER BOOTS), INCLUDING A POSITIVE PRESSURE NIOSH APPROVED SELF-CONTAINED BREATHING APPARATUS. COOL FIRE EXPOSED CONTAINERS WITH WATER.

SECTION IX REACTIVITY

STABILITY: STABLE

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

CONDITIONS AND MATERIALS TO AVOID:
AVOID HEAT, OPEN FLAMES, AND OXIDIZING MATERIALS.

HAZARDOUS DECOMPOSITION PRODUCTS
THERMAL DECOMPOSITION PRODUCTS ARE HIGHLY DEPENDENT ON THE COMBUSTION CONDITIONS. A COMPLEX MIXTURE OF AIRBORNE SOLID, LIQUID, PARTICULATES AND GASES WILL EVOLVE WHEN THIS MATERIAL UNDERGOES PYROLYSIS OR COMBUSTION. CARBON MONOXIDE AND OTHER UNIDENTIFIED ORGANIC COMPOUNDS MAY BE FORMED UPON COMBUSTION.

SECTION X EMPLOYEE PROTECTION

RESPIRATORY PROTECTION
IF EXPOSURE MAY OR DOES EXCEED OCCUPATIONAL EXPOSURE LIMITS (SEC. IV) USE A NIOSH-APPROVED RESPIRATOR TO PREVENT OVEREXPOSURE IN ACCORD WITH 29 CFR 1910 134 USE EITHER AN ATMOSPHERE-SUPPLYING RESPIRATOR OR AN AIR-PURIFYING RESPIRATOR FOR ORGANIC VAPORS AND PARTICULATES.

PROTECTIVE CLOTHING
WEAR CHEMICAL RESISTANT GLOVES AND OTHER PROTECTIVE CLOTHING AS REQUIRED TO MINIMIZE SKIN CONTACT. NO SPECIAL EYE PROTECTION IS ROUTINELY NECESSARY. TEST DATA FROM PUBLISHED LITERATURE AND/OR GLOVE AND CLOTHING MANUFACTURERS INDICATE THE BEST PROTECTION IS PROVIDED BY NITRILE GLOVES.

SECTION XI ENVIRONMENTAL PROTECTION

SPILL OR LEAK PROCEDURES
MAY BURN ALTHOUGH NOT READILY IGNITABLE. USE CAUTIOUS JUDGMENT WHEN CLEANING UP LARGE SPILLS. *** LARGE SPILLS *** WEAR RESPIRATOR AND PROTECTIVE CLOTHING AS APPROPRIATE. SHUT OFF SOURCE OF LEAK IF SAFE TO DO SO. DIKE AND CONTAIN. REMOVE WITH VACUUM TRUCKS OR PUMP TO STORAGE/SALVAGE VESSELS. SOAK UP RESIDUE WITH AN ABSORBENT SUCH AS CLAY, SAND OR OTHER SUITABLE MATERIAL; DISPOSE OF PROPERLY. FLUSH AREA WITH WATER TO REMOVE TRACE RESIDUE. *** SMALL SPILLS *** TAKE UP WITH AN ABSORBENT MATERIAL AND DISPOSE OF PROPERLY.

WASTE DISPOSAL
PLACE IN AN APPROPRIATE DISPOSAL FACILITY IN COMPLIANCE WITH LOCAL REGULATIONS.

ENVIRONMENTAL HAZARDS
THIS PRODUCT IS CLASSIFIED AS AN OIL UNDER SECTION 311 OF THE CLEAN WATER ACT. SPILLS ENTERING (A) SURFACE WATERS OR (B) ANY WATERCOURSES OR SEWERS ENTERING/LEADING TO SURFACE WATERS THAT CAUSE A SHEEN MUST BE REPORTED TO THE NATIONAL RESPONSE CENTER, 800-424-8802.

SECTION XII SPECIAL PRECAUTIONS

MINIMIZE SKIN CONTACT. WASH WITH SOAP AND WATER BEFORE EATING, DRINKING, SMOKING OR USING TOILET FACILITIES. LAUNDER CONTAMINATED CLOTHING BEFORE REUSE. PROPERLY DISPOSE OF CONTAMINATED LEATHER ARTICLES, INCLUDING SHOES, THAT CANNOT BE DECONTAMINATED. STORE IN A COOL, DRY PLACE WITH ADEQUATE VENTILATION. KEEP AWAY FROM OPEN FLAMES AND HIGH TEMPERATURES.

SECTION XIII TRANSPORTATION REQUIREMENTS

DEPARTMENT OF TRANSPORTATION CLASSIFICATION: NOT HAZARDOUS BY D.O.T. REGULATIONS

SECTION XIV OTHER REGULATORY CONTROLS

THE COMPONENTS OF THIS PRODUCT ARE LISTED ON THE EPA/TSCA INVENTORY OF CHEMICAL SUBSTANCES

DATE PREPARED: AUGUST 28, 1985

JOHN P. SEPESI

BE SAFE

READ OUR PRODUCT
SAFETY INFORMATION ...AND PASS IT ON
(PRODUCT LIABILITY LAW
REQUIRES IT)

SHELL OIL COMPANY
PRODUCT SAFETY AND COMPLIANCE
P. O. BOX 4320
HOUSTON, TX 77210