GW - 54

GENERAL CORRESPONDENCE

YEAR(S):

2005-2001

ConocoPhillips

Wingate Plant
P.O. Box 119
Rehoboth, NM 87322
phone 505.863.1045

Beverly J. Cox
Compliance Coordinator
505-863-1023; Fax 505-863-1047
beverly.j.cox@conocophillips.com

February 21, 2005

854

2006 FEB 22 PM 1 17

Mr. Wayne Price
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Brine Pit Closure; Wingate Fractionator

Dear Mr. Price:

This letter is to inform you that the brine pit and associated equipment has been remove/closed as per the approved closure plan. The pit closure was completed on January 13, 2006. There were no issues that arose during the closing process.

Should you have questions please do not hesitate to call me at 505-863-1023.

Sincerely,

Beverly J. Cox

Beverly J. Cox

cc: Neal Goates
Houston Office
TN 5044

Byron Chandler
Houston Office
WL3 6003

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, November 18, 2005 3:29 PM
To: 'Cox, Beverly J.'
Subject: RE: Waste Stream Disposal Request

Approved for a one time basis. The waste shall be RCRA Non-hazardous before entering the ponds. This approval will expire within 60 days.

From: Cox, Beverly J. [mailto:Beverly.J.Cox@conocophillips.com]
Sent: Thursday, November 10, 2005 12:27 PM
To: Price, Wayne, EMNRD
Cc: Cox, Beverly J.
Subject: Waste Stream Disposal Request
Importance: High

Mr. Price

The Wingate Facility has a Wet Air Surface Cooler (WASC) that will require internal surface treatment. The normal blowdown stream from this unit goes to the evaporation ponds. We are seeking permission to empty the water basins in the WASC to the evaporation ponds during the treatment process. This is a one time usage of this chemical and is currently not listed in the Wingate waste stream. Should this treatment work, we will seek a modification to our waste steam profile to allow for future applications.

The treatment process will take approximately 3000 gallons of water mixed with a 6% Inhibited Dry Acid Descaler (180 gallons). Upon the completion of the treatment cycle, it has been determined that only .05% of ethylene glycol will remain in the water stream. The other constituents of the descaler will be neutralized.

Attached you will find the Fact Sheet on the descaler and the MSDS sheet.

Thanks,

Beverly

Beverly J. Cox
Wingate Fractionator
505.863.1023 Fax 505.863.1047
Cell 505.870.9839

ConocoPhillips

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, November 18, 2005 9:30 AM
To: Price, Wayne, EMNRD; 'Cox, Beverly J.'
Cc: Neal Goates (n.goates@conocophillips.com)
Subject: RE: Brine Pit Closure - Wingate Fractionator

This morning Neal and I looked over the last monitor well plot plan. It appears from this map the brine pit is not causing any groundwater contamination at this time. Therefore OCD approves of Conoco's plan to close in place and not install a MW at the pit. There is sufficient controls all around the old pit.

Please provide photo and report after the pit is closed.

From: Price, Wayne, EMNRD
Sent: Thursday, November 17, 2005 2:08 PM
To: 'Cox, Beverly J.'
Subject: RE: Brine Pit Closure - Wingate Fractionator

For some time OCD and Conoco has pondered over where the salt contamination is coming from. I think we should at least put one monitor well or boring next the the pit on the down gradient side.

From: Cox, Beverly J. [mailto:Beverly.J.Cox@conocophillips.com]
Sent: Wednesday, November 16, 2005 6:34 AM
To: Price, Wayne, EMNRD
Cc: Cox, Beverly J.
Subject: Brine Pit Closure - Wingate Fractionator

Mr. Price

In response to your November 2, 2005 approval email on the Wingate brine pit closure, we are seeking approval to abandon in place the brine pit without additional sampling. The brine pit is of cement construction with an internal epoxy coating. We pulled the wood top off the entire pit and took photo's that show the integrity of the pit. There are monitoring wells within the facility boundaries that are sampled annually and show no increase in chlorides.

Should you have additional questions or would like to inspect the brine pit, please call.

Respectfully,

Beverly

Beverly J. Cox
Wingate Fractionator
505.863.1023 Fax 505.863.1047
Cell 505.870.9839
ConocoPhillips

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD **Sent:** Wed 11/2/2005 1:39 PM
To: Cox, Beverly J.
Cc: Henderson, Daniel H.; Driver, Jeffery W.
Subject: RE: Brine Pit - Abandon In Place Project
Attachments:

OCD hereby approves of the closure work plan with the following conditions:

1. At least one soil sample shall be collected three feet under the pit. The sample shall be collected and analyzed for Chlorides using EPA methods. If the sample indicated that the brine pit was leaking then Conoco shall investigate extent of the contamination.

2. If groundwater was impacted then Conoco shall notify OCD pursuant to Rule 116.

2. A final report shall be submitted by June 15, 2006.

Wayne Price-Senior Environmental Engr.
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3487
Fax: 505-4763462

From: Cox, Beverly J. [mailto:Beverly.J.Cox@conocophillips.com]
Sent: Fri 10/28/2005 10:08 AM
To: Price, Wayne, EMNRD
Cc: Cox, Beverly J.; Henderson, Daniel H.; Driver, Jeffery W.
Subject: Brine Pit - Abandon In Place Project

Mr. Price,

As discussed in this morning phone conversation, I am forwarding you several attachments that represent the brine pit closure project.

1. Plot plan that shows the location of the brine pit. This plot plan has the monitoring well locations and land contours. I have hand drawn (in red) the location of the brine pit which is approximately in the center of the plant.
2. Proposed method to abandon in place the brine pit and brine pumping trough.
3. Several photos of the existing pit and trough.

This project is proposed for spring or early summer of 2006. Please call should you have questions.

Thanks,

Beverly Cox

Beverly J. Cox

Wingate Fractionator

505.863.1023 Fax 505.863.1047

Cell 505.870.9839

ConocoPhillips

ConocoPhillips

Wingate Fractionator

Brine Pit and Sump Abandonment

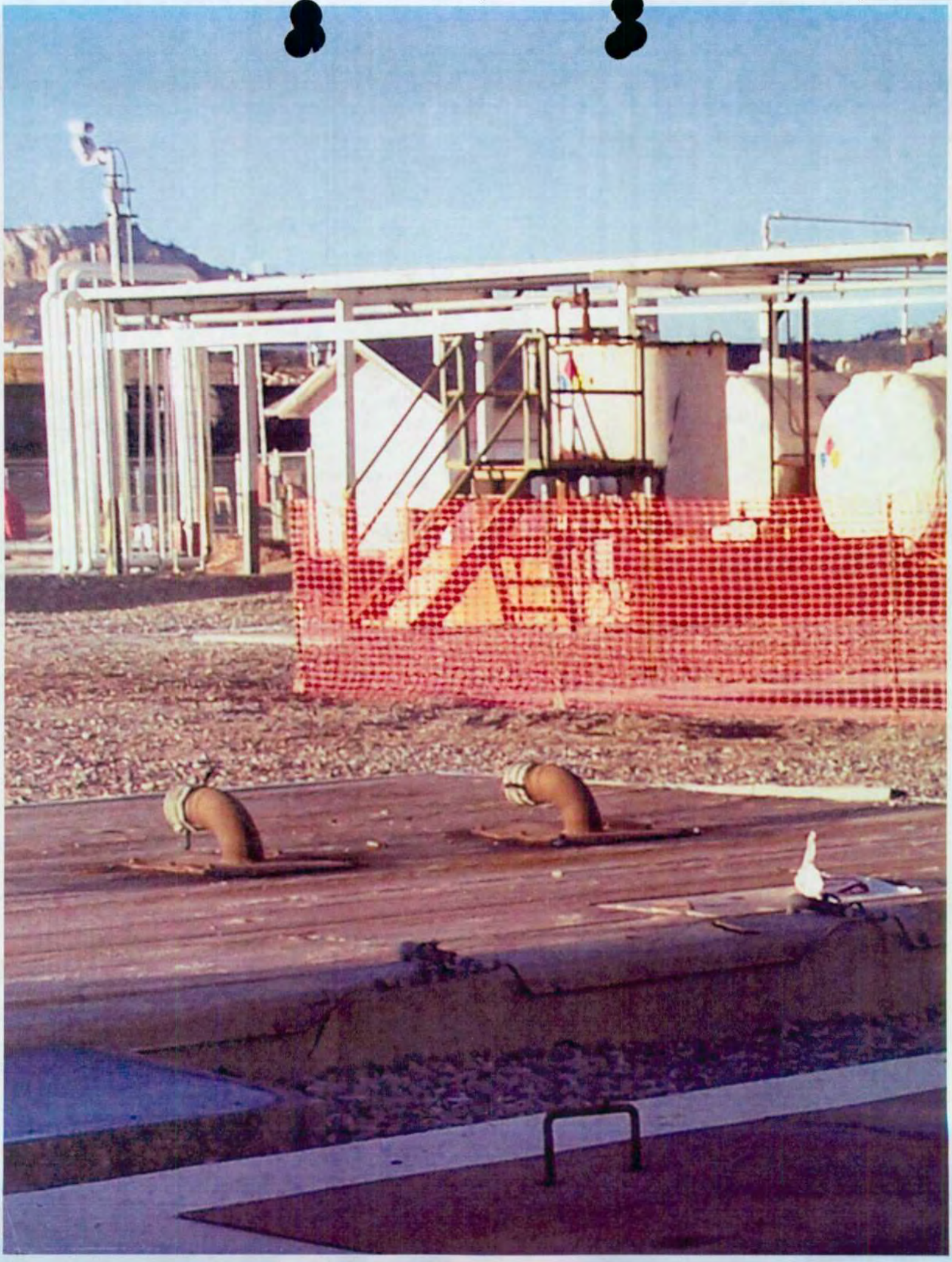
ConocoPhillips (COP) Wingate Fractionator located in McKinley County, Gallup, New Mexico is proposing to abandon in place the old in-ground brine pit and pumping trough. Both devices are of cement construction. The brine pit and pumping trough was taken out of service in April 2004. This system has been replaced by a nano-filtration water treatment system.

The two in-ground devices were inspected as required by the GWDP in June 2004 and 2005. There have been no integrity problems identified during these inspections.

It is COP's intent to abandon these two devices in place by the following method.

- Currently the pits / trough have been drained and washed with fresh water and there are no active sources supplied to them.
- Flush, drain and permanently disconnect the discharge lines from the brine pit and pumping trough.
- Fill the pit and pump trough with soil or sand ¾ full and pack.
- Fill the pit and pump trough to ground level with flowable fill cement.
- Remove above ground cement walls to ground level.
- Cover with rock.

This project is proposed for spring or early summer of 2006.



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Wayne Price-Senior Environmental Engr.
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
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Cc: Cox, Beverly J.; Henderson, Daniel H.; Driver, Jeffery W.
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3. Several photos of the existing pit and trough.

This project is proposed for spring or early summer of 2006. Please call should you have questions.

Thanks,

Beverly Cox

Beverly J. Cox

Wingate Fractionator

You replied on 11/2/2005 1:24 PM.
This message was sent with high importance.
Attachments can contain viruses that may harm your computer. Attachments may not display correctly.
The sender of this message has requested a read receipt. Click here to send a receipt.

Price, Wayne, EMNRD

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To: Price, Wayne, EMNRD
Cc: Cox, Beverly J.; Henderson, Daniel H.; Driver, Jeffery W.
Subject: Brine Pit - Abandon In Place Project
Attachments: Plot Plan Color.pdf(1MB) Brine Pit and Sump Abandonment Plan.doc(52KB) 100_0456.JPG(1MB) 100_0465.JPG(1MB)

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Beverly Cox

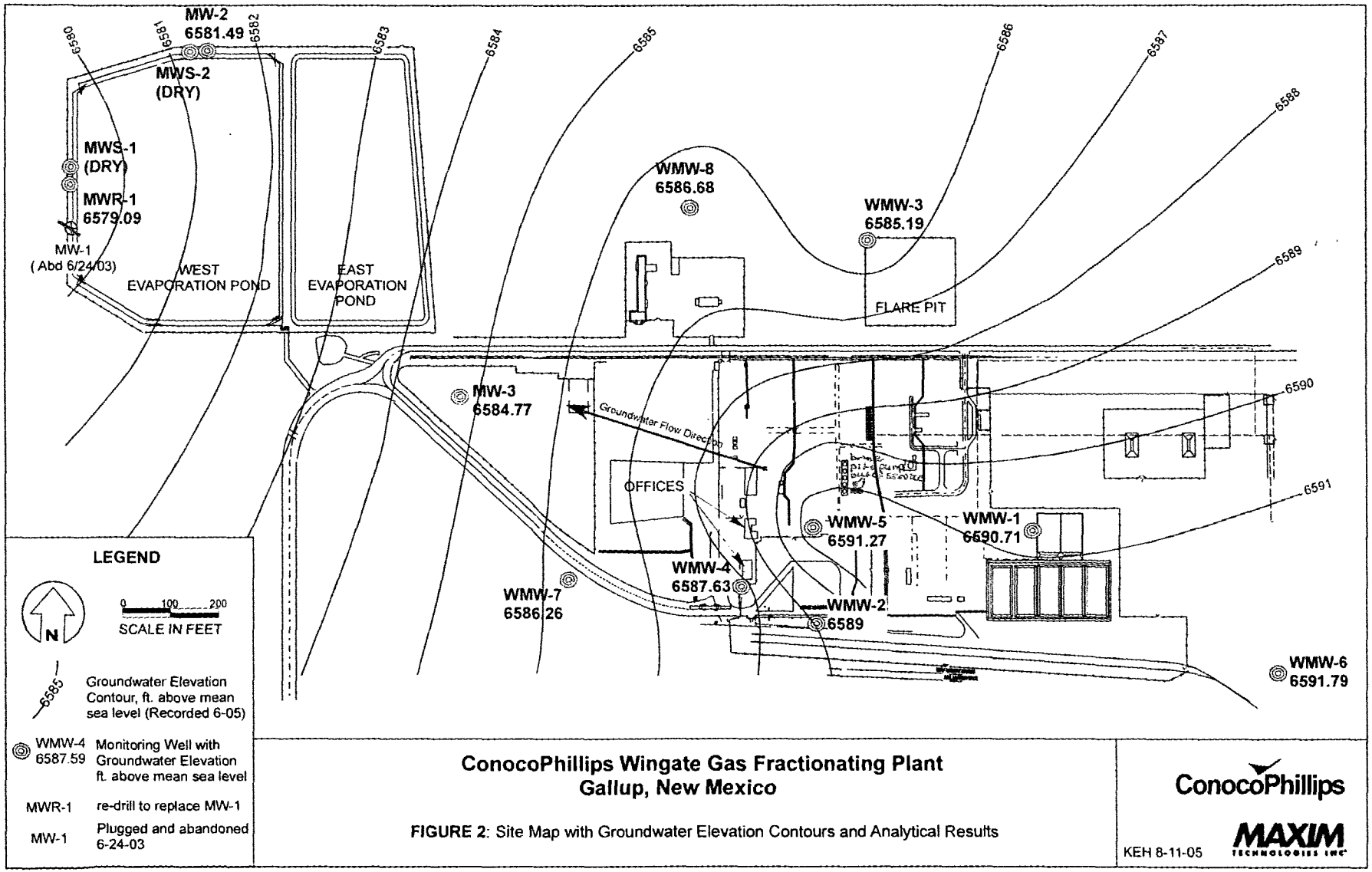
Beverly J. Cox

Wingate Fractionator

505.863.1023 Fax 505.863.1047

Cell 505.870.9839

ConocoPhillips



ConocoPhillips Wingate Gas Fractionating Plant
Gallup, New Mexico

FIGURE 2: Site Map with Groundwater Elevation Contours and Analytical Results

ConocoPhillips

KEH 8-11-05

MAXIM TECHNOLOGIES INC

ConocoPhillips

Wingate Fractionator

Brine Pit and Sump Abandonment

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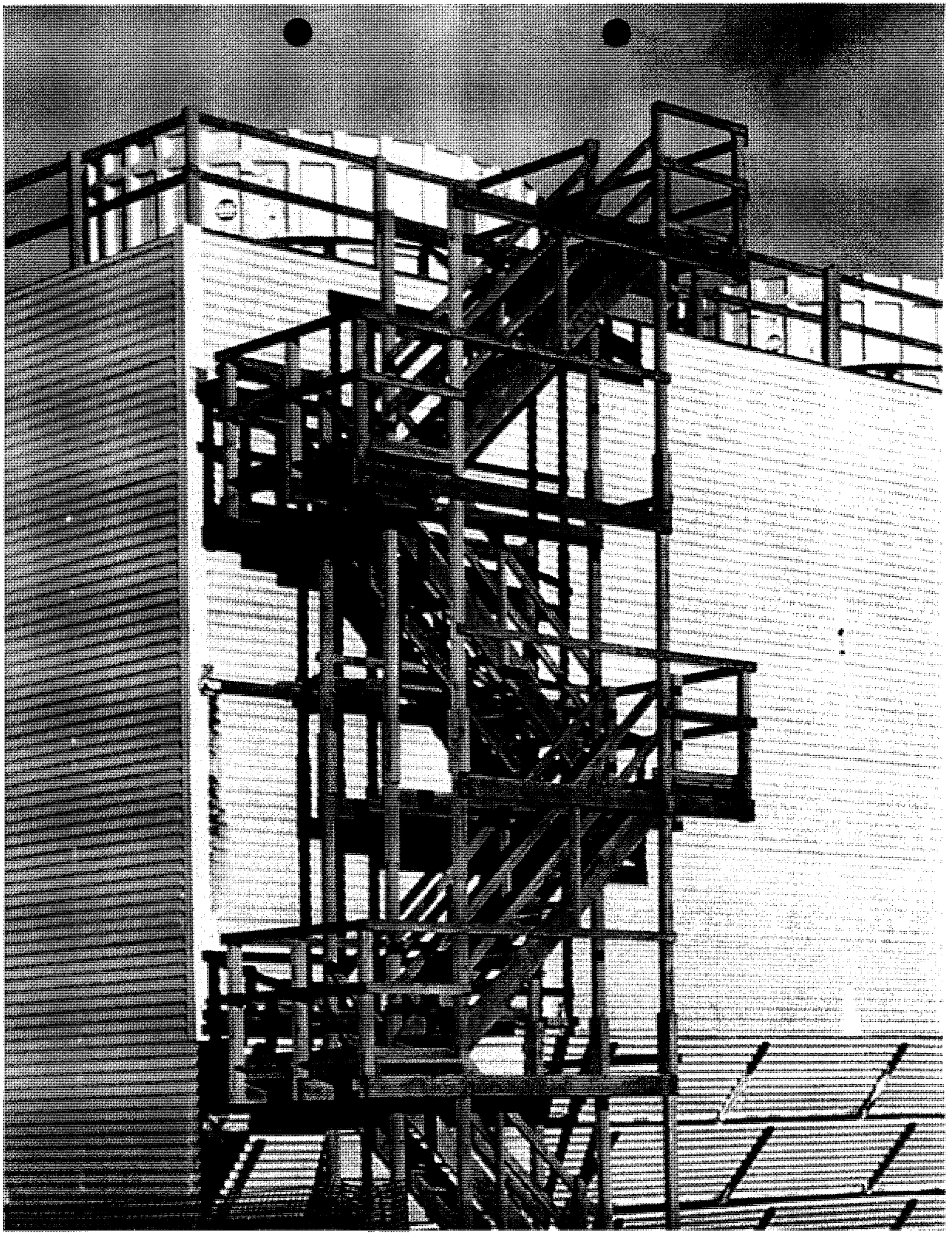
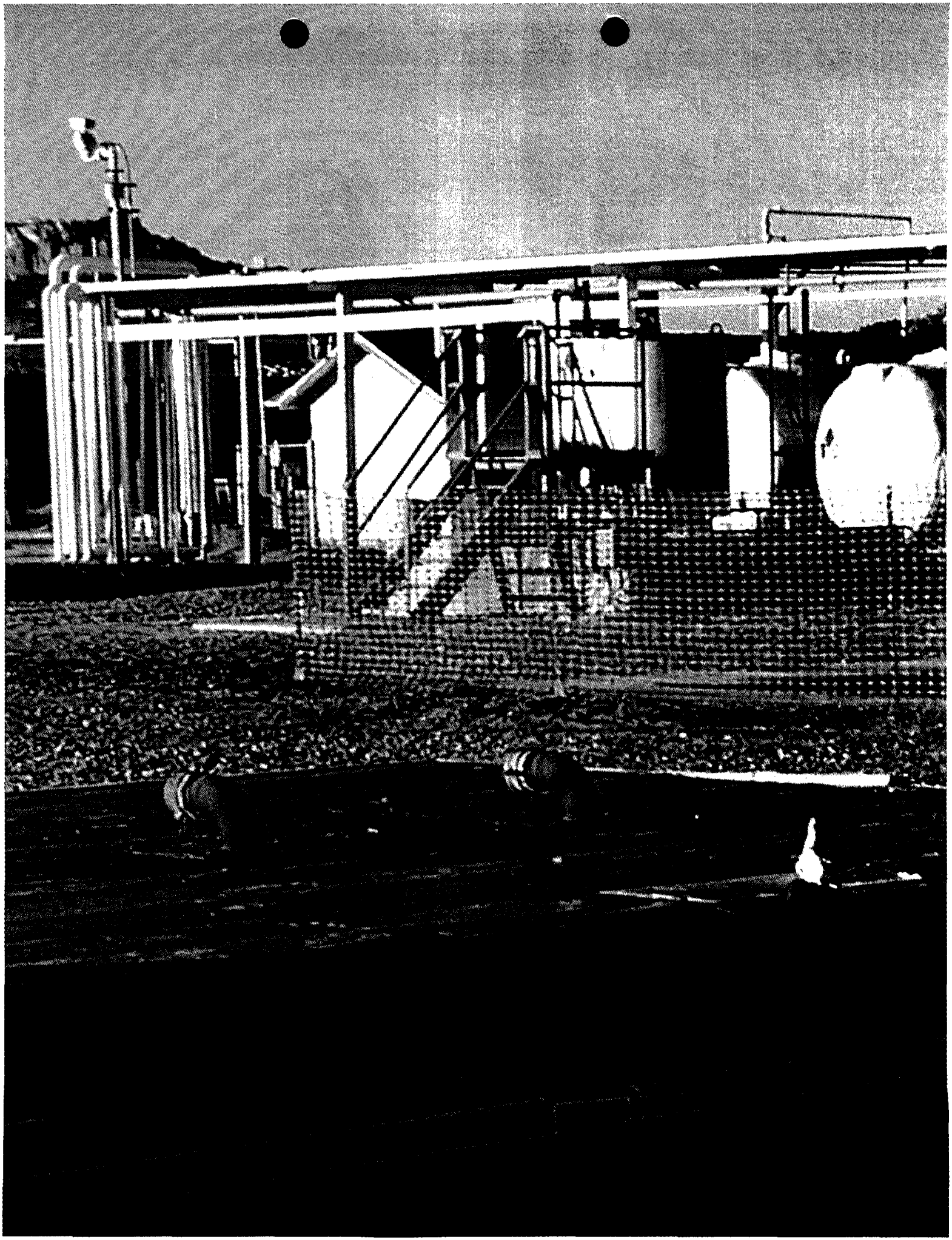




MAXIM
TECHNOLOGIES INC®
A TETRA TECH COMPANY

10601 Lomas Blvd. NE, Suite 106
Albuquerque, NM 87106
Office 505.237.8440
Fax 505.237.8650

November 19, 2004

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Subject: Delivery of Annual Groundwater Monitoring Report
Groundwater Discharge Plan No. GW-054
ConocoPhillips Wingate Fractionating Plant
Gallup, New Mexico

Dear Mr. Price,

Maxim Technologies (Maxim) is pleased to deliver the enclosed Annual Groundwater Monitoring Report per the requirements of the Groundwater Discharge Plan GW-054.

Should you have any questions, please contact Beverly Cox at the Wingate plant, (505) 863-1023.

Sincerely,

R M Sengebush

Robert M. Sengebush
Senior Project Manager

Enclosures (1)

Cc: Beverly Cox, ConocoPhillips
Neil Goates, ConocoPhillips

Duke Energy®
Field Services

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

303 595 3331

October 7, 2004

UPS Next Day Air *(Tracking Number1Z F46 915 23 1002 044 3)*

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

Subject: Val Verde Gas Processing Plant
Discharge Plan GW-051
San Juan County, New Mexico

Dear Mr. Price:

Duke Energy Field Services, LP (DEFS) received the New Mexico Oil Conservation Division's (OCD) second request for information dated August 9, 2004 for the Val Verde Gas Processing Plant's discharge plan renewal application dated May 26, 2004.

As stated in the May 26, 2004 application, the facility does not have or intend to have a discharge or discharges onto or below the surface of the ground that may move directly or indirectly into groundwater. DEFS' responses to OCD's specific requests are provided in the attachment and demonstrate that the facility does not have a discharge or discharges onto or below the surface of the ground that may move directly or indirectly into groundwater. Therefore, DEFS hereby withdraws its application for renewal and requests cancellation of Discharge Plan GW-051.

With the cancellation of Discharge Plan GW-051, DEFS understands that it is subject to, and agrees to comply with, 19.15.2.50 NMAC and has submitted to OCD on September 30, 2004 a "Pit or Below-Grade Tank Registration or Closure" C-144 Form for all applicable below-grade tanks located at the facility.

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

Sincerely,

Duke Energy Field Services, LP
Karin Kimura
Senior Environmental Specialist

Attachments

cc: NMOCD District 3 Office *(UPS Next Day Air Tracking Number1Z F46 915 23 1003 036 3)*
1000 Rio Brazos Road
Aztec, New Mexico 87410

DEFS' Responses to OCD's request for information are provided below. OCD's requests are in *italic text* with DEFS' responses below each request.

1. *Item #5 Facility Description. The plan does not properly describe the on site activities. OCD understands that gas is actually treated on-site. Please provide a site map, process flow diagram and a brief description of each process unit.*

   A description of the on-site activities at the facility is provided below. Process flow diagrams are provided as indicated in the description below. A site map was previously submitted with the discharge plan renewal application dated May 28, 2004 and is included with this submittal for your convenience.

   Process Description

   Dehydrated coal seam natural gas enters the facility via pipeline from individual gas production facilities located throughout the northwest New Mexico and southwest Colorado. The natural gas entering the plant is essentially methane and carbon dioxide (CO_2). The CO_2 laden natural gas stream is sent to one of eight process trains for CO_2 removal.

   Chemicals used in each process train include a methyldiethanolamine based solvent (MDEA) to remove CO_2 and triethylene glycol (TEG) to remove water entrained in the natural gas stream during CO_2 stripping.

   The natural gas stream in each process train is contacted in vertical trayed countercurrent absorber vessels with a 50% water and 50% MDEA solution.

   The rich MDEA solvent leaving the absorber vessels is regenerated in a typical MDEA regeneration system consisting of the following equipment (Figure 3c) for Trains 4, 5, and 6:

   - Rich MDEA Flash Tanks
   - Lean/Rich Cross Exchanger
   - Direct Fired Reboiler
   - Lean MDEA Surge Tank
   - Hot Oil Surge Tank
   - Stripping Column
   - Stripper Reflux Condenser (Fan Cooled)
   - Lean MDEA Cooler (Fan Cooled)
   - Reflux Condenser Cooler

   Train 7 and 8 MDEA regeneration system utilizes the same equipment as Trains 4, 5, and 6 with the addition of a Hot Water Surge Tank and Still Side Reboilers to accommodate an indirect fired heater rather than a direct fired boiler.

   CO_2 removed from the MDEA solution from Trains 4, 5, and 6 is piped to a common 20-inch vent line, through a 10-foot by 25-foot seam-to-seam, carbon steel, horizontal, vent scrubber. Condensed water vapor collected in the vent scrubber is pumped back into the regeneration units.

   Trains 4 and 8 each have a gas treating capacity of 117 MMSCF/d per train.

   The dehydration process for the facility includes individual contactors for each of Trains 3 through 8. Train groups 4 through 8 (Figure 4b) each has its own TEG regeneration system.

A TEG regeneration system includes the following equipment:

- TEG Flash Tank
- Lean/Rich TEG Cross Exchangers
- Direct Fired TEG Reboiler with packed stripping column
- Lean TEG Surge Tank
- Lean TEC Cooler (Fan Cooled)

Water System

Process water is supplied to the facility by a set of raw water storage tanks to the east of the plant location. The water is passed through an ion exchange system prior to distribution throughout the plant. The ion exchange system is a portable truck mounted system that is self contained and regenerated at an off-site location.

Process water is used for make-up and cooling water in the amine regeneration process. Make-up water for the regeneration units amounts to approximately 45,000 gpd. Reject water from the regeneration system is collected in a waste water drain line system (WWD) and stored in an aboveground welded steel storage tank.

The cooling water from the regeneration system is drained into the WWD system's sumps and pumped into storage tanks. Trains 4 through 6 share a common sump and Trains 7 and 8 share a common sump. Both sump systems are enclosed systems. The sumps are single-walled steel tanks located within circular concrete cisterns with leak detection and wastewater collected in these sumps is transferred via piping to an aboveground tank to be trucked off site for disposal.

Figures 5 and 6 contain the Process and Instrumentation Diagrams (P&IDs) for Train 5 and 8 respectively. The P&ID for Train 5 are representative for the process fluids and wastewater collection systems in Trains 4 through 6. Train 8 P&IDs are representative of the process fluids and wastewater collection systems for Train 7 and 8.

2. *Item #6 Material Stored or Used. The plan submitted did not list any materials stored on site or how they are stored. Please provide this information.*

Material Stored/Used	Method of Storage
Wastewater	Aboveground storage tanks within secondary containment
Diesel	Aboveground storage tank within secondary containment
Unleaded Gasoline	Aboveground storage tank within secondary containment
Kerosene	Aboveground storage tank within secondary containment
Used Oil	Aboveground trailer mounted storage tank within secondary containment
Antifoam	Aboveground storage tanks within secondary containment
Dowtherm J	Aboveground storage tank within secondary containment
Produced Water	Aboveground storage tank within secondary containment
Transformer Oil	Contained in active transformers with secondary containment
Amine	Aboveground storage tanks within secondary containment

Material Stored/Used	Method of Storage
Triethylene Glycol (TEG)	Aboveground storage tanks within secondary containment
CS+	Aboveground storage tanks within secondary containment
Deionized Water	Aboveground storage tank within secondary containment
Used CS+	Aboveground storage tanks within secondary containment
Used TEG	Aboveground storage tank within secondary containment
Make-up Water	Aboveground storage tank within secondary containment
Hot Wastewater Rundown	Aboveground storage tanks within secondary containment
CS+ Rundown	Aboveground storage tanks within secondary containment

3. *Item #7 Sources and Quantities of Effluent and Waste Solids. The plan listed a number of sources but failed to list quantities. Please provide this information.*

There are no effluents or waste solids discharged on site onto or below the surface of the ground so that they may move directly or indirectly into groundwater. All effluent and waste solids generated at the facility are removed from the facility for off-site disposal in accordance with applicable NMOCD, NMED, and EPA regulations. Approximate quantities are provided in the table in the following response to Item #8.

Separators/Scrubbers
Effluent generated from the inlet separator is not discharged on site; wastewater from the inlet separator is routed via piping to an aboveground storage tank within secondary containment and trucked off site for disposal.

Boilers and Cooling Towers/Fans
There are no boilers or cooling towers/fans at the facility.

Process and Storage Equipment Wash Down
Effluent or waste solids generated from process and storage equipment wash down are not discharged on site; wastewater from process and storage equipment wash down is generated within process containment pads or a wash down containment pad, routed via sumps to aboveground storage tanks within secondary containment and trucked off site disposal.

Solvents/Degreasers
Solvent or degreasers are not discharged on site. Solvent from the facility's parts washer is removed routinely from the parts washer by a contractor for off-site recycling/disposal.

Spent Acids/Caustics
Spent acids or caustics are not generated at the facility.

Used Engine Coolants
Engine coolants are not used at the facility.

Waste Lubrication and Motor Oils
Lubricating and motor oils are not discharged on site. Used oil is stored in aboveground storage tanks within secondary containment and transported by a contractor off site for recycling.

Used Oil Filters
Used oil filters generated at the facility are drained and stored in aboveground roll-offs and removed by a contractor for off-site recycling.

Solids and Sludges
Solids and sludges are not discharged on site. Any solids or sludges generated on site are collected and stored in aboveground storage tanks within secondary containment for off-site disposal.

Painting Wastes
Painting wastes are not discharged on site. All painting wastes generated on site are managed in aboveground containers and disposed off site in accordance with applicable Federal, State, and local regulations.

Sewage
Domestic discharges are made through one septic tank (1,500 gal capacity) and leach line system which is subject to the Environmental Improvement Board's Liquid Waste Disposal Regulations, 20.7.3 NMAC. The warehouse building, control rooms, shop building, and the office building discharge into the septic tank. The septic system is shown on the facility plot plan.

Lab Wastes
Lab wastes generated at the facility for testing amine are returned to the amine recycling system and are not discharged on site. MDEA test samples are collected once every day to determine MDEA strength and lean loading. Total sample volume collected per day is 1,750 ml which is pumped back into the facility process. Included in this sample volume are small amounts of the following test reagents:

- Distilled Water
- Methyl Red Indicator
- N Sulfuric Acid
- Methyl Alcohol
- Thymophthalen Indicator 0.05%
- Normal Potassium Hydroxide

Other Liquids and Solid Wastes
There are no other liquids or solid wastes are discharged on site.

Spent MDEA and TEG that cannot undergo a recycling process are characterized as unrecyclable process fluids, collected in aboveground storage tanks within secondary containment, and disposed of in accordance with all applicable Federal, State and local regulations.

The facility also recycles used MDEA and TEG generated at that facility, as well as used MDEA from other non-DEFS gas facilities. The non-DEFS gas facilities use the facility's recycling program as an alternative to disposal and the facility reuses the regenerated MDEA. The recycling equipment and process is a self-contained system that generates minor amounts of residual by-product as a result of the regeneration process. These by-products from the regeneration process are considered RCRA exempt waste and are managed in aboveground storage tanks within secondary containment on site and later disposed at a Class II disposal well.

4. *Item #8 Liquids and Solid Waste Collection/Storage/Disposal. The plan failed to identify the liquid and solid waste collected and stored on-site before disposal. In addition, the plan failed to list where the waste is disposed of. Please provide this information.*

Collection/Storage
All liquid and solid wastes, except domestic sewage, are collected and stored in containers for off-site disposal. Domestic waste is collected and stored in the on-site septic tank and leach field subject to Liquid Waste Disposal Regulations.

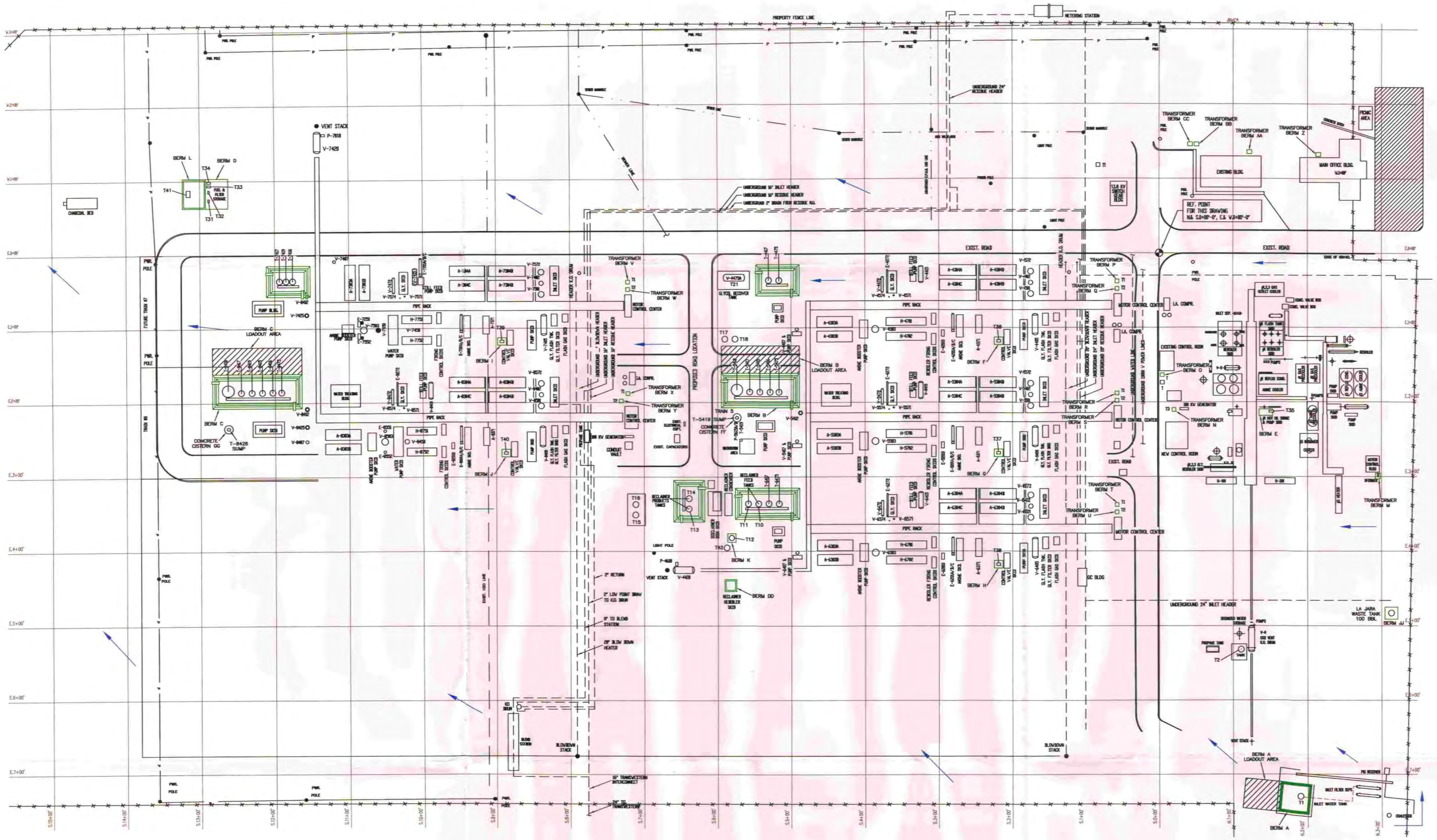
On-site Disposal
There is no on-site disposal at the facility, except for the disposal of domestic sewage. Domestic sewage is disposed of in the on-site septic tank and leach field subject to the Liquid Waste Disposal Regulations.

Off-site Disposal
All liquid and solid wastes, except for domestic sewage, are disposed off site.

The following table provides information regarding wastes collected and stored for off-site disposal and/or recycling.

Waste	Collection/Storage Method	Quantity Generated	Final Disposition	Receiving Facility
Wastewater (process equipment washdown, inlet separator wastewater)	Aboveground storage tanks within secondary containment	40 bbls Per week	Off-site Class II Injection Well	Key Energy Services, Inc. Sunco WDW #1 Injection Well
Produced Water	Aboveground storage tank within secondary containment	40 bbls per week	Off-site Class II Injection Well	Key Energy Services, Inc. Sunco WDW #1 Injection Well
Unrecycled Process Fluids	Aboveground storage tank within secondary containment	5 bbls per week	Off-site Class II Injection Well	Key Energy Services, Inc. Sunco WDW #1 Injection Well
Used Oil	Aboveground storage tank within secondary containment	400 gallons per year	Recycled	Thermo Fluids, Inc.
Heat Transfer Oil	Aboveground storage tank within secondary containment	55 gallons per year	Recycled	Thermo Fluids, Inc.
Amine Filters	Roll-off bin	20 yards per year	Recycled	Thermo Fluids, Inc.
Bag Filter	Roll-off bin	5 yards per year	Recycled	Thermo Fluids, Inc.
Horizontal Inlet Filter	Roll-off bin	20 yards per year	Recycled	Thermo Fluids, Inc.
Coalescer Inlet Filter	Roll-off bin	20 yards per year	Recycled	Thermo Fluids, Inc.
Hot Oil Filter	Roll-off bin	Out of service	Recycled	Thermo Fluids, Inc.
TEG Filter	Roll-off bin	5 yards per year	Recycled	Thermo Fluids, Inc.
Charcoal Filter Media	Not collected or stored on site. Removed from filter by a contractor vacuum truck and hauled off site.	70 yards per year	Soil Remediation Landfarm	Tierra Landfarm
Spent Solvent	Parts Washer	50 gallons per year	Recycled	Safety Kleen
Laboratory Waste	Aboveground storage tank within secondary containment	~1,750 ml/day	Pumped back into process	N/A

SITE MAP



Oil Storage Containers

AMS Name	Field Name	Contents Description	Capacity
None	T1	Wastewater	210 bbl
T-5418	T-5418	Wastewater	500 bbl
T-8418	T-8418	Wastewater	500 bbl
None	T31	Diesel	317 gal
None	T32	Unleaded Gasoline	303 gal
None	T33	Kerosene	499 gal
None	T34	Used Oil	528 gal
None	T35	Antifoam	500 gal
None	T36	Antifoam	500 gal
None	T37	Antifoam	500 gal
None	T38	Antifoam	500 gal
None	T39	Antifoam	500 gal
None	T40	Antifoam	500 gal
None	T12	Dowtherm J	25 bbl
None	T41 (Trailer-mounted)	Used Oil	529 gal
None	Drum Storage Area	Various 55-gallon drums	NA
None	La Jara Sys. Waste Tank	Produced Water	100 bbl

Process Equipment Containing Oils

AMS Name	Field Name	Contents Description	Capacity
None	Amine Reclaimer Reboiler	Hot Oil	550 gal
T-5419	T-5419 (Sump)	Used Oil, Wastewater	588 gal
T-8426	T-8426 (Sump)	Used oil, Wastewater	588 gal
None	Inlet Filter Separator	Produced Water	58 bbl
None	Amine Reclaimer Hot Oil Surge Tank	Hot Oil	100 bbl

Oil Containing Equipment

AMS Name	Field Name	Contents Description	Capacity
None	Train 3	Transformer Oil	481gal
None	Control Room	Transformer Oil	240 gal
None	Train 1&2	Transformer Oil	500 gal
None	Train 4 West	Transformer Oil	360 gal
None	Train 4 East	Transformer Oil	360 gal
None	Train 5 West	Transformer Oil	360 gal
None	Train 5 East	Transformer Oil	360 gal
None	Train 6 West	Transformer Oil	360 gal
None	Train 6 East	Transformer Oil	360 gal
None	Train 7 West	Transformer Oil	360 gal
None	Train 7 East	Transformer Oil	360 gal
None	Train 8 West	Transformer Oil	360 gal
None	Train 8 East	Transformer Oil	360 gal
None	Office Building	Transformer Oil	150 gal
None	Spare Transformer North	Transformer Oil	360 gal
None	Spare Transformer South	Transformer Oil	355 gal

Non-Oil Storage Containers

AMS Name	Field Name	Contents Description
None	T2	Amine
T-5475	T-5475	Glycol
T-5416	T-5416	CS+
T-5415	T-5415	DI Water
T5417	T5417	CS+ Rundown
T-6475	T-6475	Glycol
T-6417	T-6417	CS+ Rundown
None	T10	Gas Spec CS+
None	T11	Gas Spec CS+
None	T13	Used CS+
None	T14	Used CS+
None	T15	Used CS+
None	T16	Used CS+
T-4475	T-4475	Glycol
T-4417	T-4417	CS+ Rundown
None	T21	Used TEG
T-7416	T-7416	Glycol
T-7419	T-7419	CS+ Rundown
T-7417	T-7417	Hot Wastewater Rundown
T-8475	T-8475	Glycol
T-8416	T-8416	CS+
T-8415	T-8415	Makeup Water
T-8419	T-8419	Hot Wastewater Rundown
T-8417	T-8417	CS+ Rundown

LEGEND:

Symbol	Meaning
——X——	FENCE
— - - —	APPROXIMATE PROPERTY BOUNDARY
— — —	OIL CONTAINING PIPE
◄——	SURFACE WATER DRAINAGE DIRECTION
□	SECONDARY CONTAINMENT BERM

NOT TO SCALE

Note: This drawing is based on a field sketch and depicts the location and contents of each oil containing container, equipment, and piping (as required by 40 CFR 112.7(3)). This drawing should only be used for Spill Prevention Control and Countermeasure Plan(SPCC) purposes. As drawing is not to scale, actual containers, equipment, or piping may vary in size and position from those represented here.

SPCC PLOT PLAN

REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.	REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.
0	09/06/03	DRAWN FROM MERIDIAN DRAWING AND FIELD NOTES	P.M.W.	B.R.									

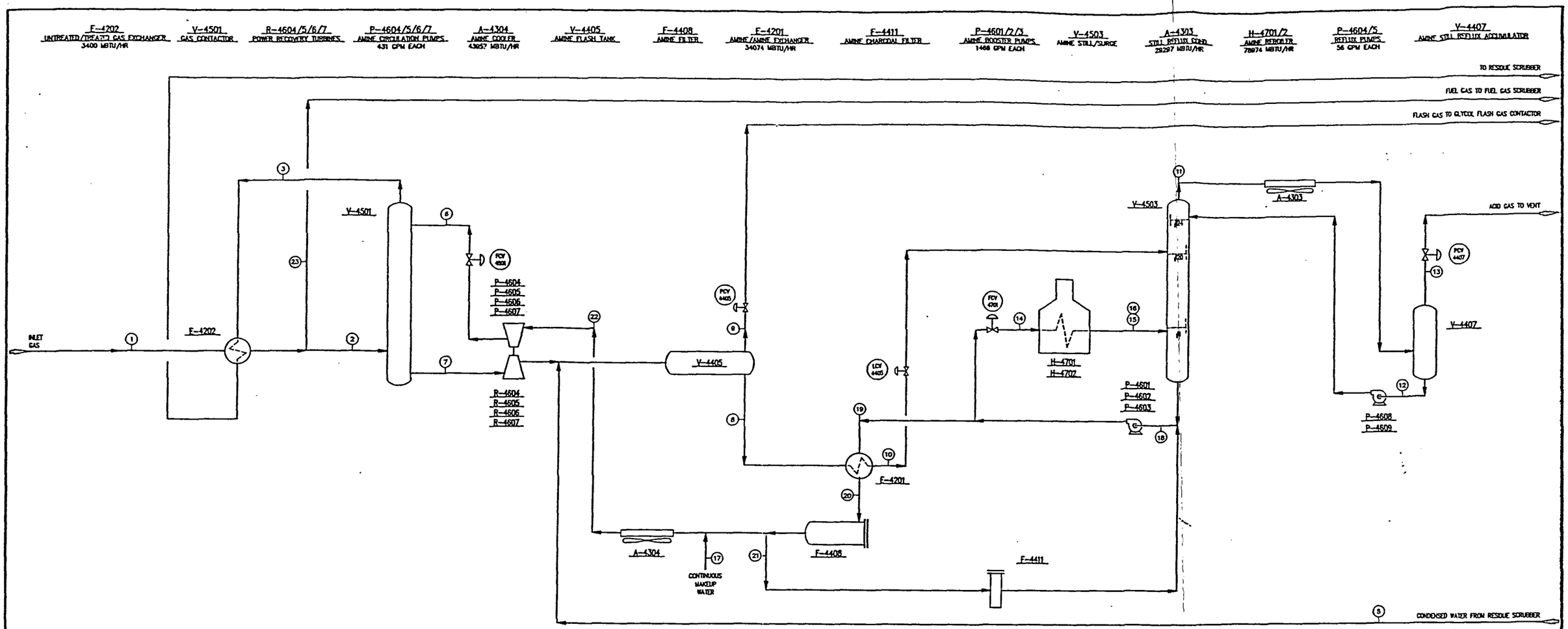
Duke Energy®
Field Services

VAL VERDE PLANT
VAL VERDE GATHERING SYSTEM

San Juan County
NEW MEXICO

DWG. NAME: Val Verde Plant_SPCC_Plan.dwg

FIGURES



STREAM NUMBER	1	2	3	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	STREAM NUMBER
DESCRIPTION	INLET GAS	GAS TO AMINE CONTACTOR	AMINE CONTACTOR OHD	LEAN AMINE TO CONTACTOR	RICH AMINE FROM CONTACTOR	RICH AMINE FROM FLASH TANK	FLASH TANK VAPORS	RICH AMINE FROM AMINE EXCHANGER	AMINE STILL OHD VAPOR	AMINE STILL REFLUX LIQUID	ACID GAS TO VENT	AMINE TO REBOILER	AMINE VAPOR FROM REBOILER	LIQUID FROM REBOILER	MAKE-UP WATER	LEAN AMINE FROM SURGE	LEAN AMINE TO AMINE EXCHANGER	LEAN AMINE FROM AMINE EXCHANGER	LEAN AMINE TO CHARCOAL FILTER	LEAN AMINE TO COOLER	FUEL GAS	DESCRIPTION
TEMPERATURE (T.)	80.00	108.6	130.00	115.00	170.12	168.71	168.71	213.00	206.07	120.00	120.00	239.83	241.95	241.95		239.83	239.83	189.23	189.23	189.23	108.6	TEMPERATURE (T.)
PRESSURE (PSIA)	700.00	695	695.00	700.00	695.00	75.00	75.00	70.00	21.80	18.80	18.80	53.80	23.80	23.80		53.80	53.80	43.80	43.80	43.80	695	PRESSURE (PSIA)
MASS FLOW (LB/HR)	244809	238380	185789.44	666714	720229	718257	1972.76	718257	79756	25434	54323	750072	82741	667331		1510900	760836	760836	94122	666714	5428	MASS FLOW (LB/HR)
MMCFD (14.7 PSIA & 60°F.)	117.58	114.98	103.96				0.528		24.69		11.86		41.50								2.607	MMCFD (14.7 PSIA & 60°F.)
LIQ. VOL. FLOW (GPM, 60°F.)				1294	1425	1419				50.9		1456		1290	4.82	2932	1476	1476	182.6	1294		LIQ. VOL. FLOW (GPM, 60°F.)
DENSITY (LB/CF)	2.29	2.16	1.79	65.23	68.59	68.59	0.38	15.49 ◆	0.09	65.72	0.13	65.23	0.06	65.53		65.23	65.23	65.23	65.23	65.23	2.16	DENSITY (LB/CF)
MOL WT.	18.94	18.94	16.26	25.41	26.24	26.22	33.98	26.22	29.38	18.03	41.66	25.41	18.13	26.74		25.41	25.41	25.41	25.41	25.41	18.94	MOL WT.
CO2 (MOLS/HR)	1318.23	1288.98	65.10	45.85	1266.16	1229.25	36.91	1229.25	1186.64	0.60	1185.04	51.58	18.61	32.97	0	103.90	52.32	52.32	6.47	45.85	29.25	CO2 (MOLS/HR)
DEA (MOLS/HR)	0.00	0.00	0.00	2212.71	2212.65	2212.65	0.00	2212.65	0.07	0.07	0.00	2488.36	0.53	2488.83	0	5014.44	2525.08	2525.08	312.37	2212.71	0.00	DEA (MOLS/HR)
TEG (MOLS/HR)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	TEG (MOLS/HR)
H20 (MOLS/HR)	3.46	3.39	42.00	23978.91	23953.01	23948.79	4.22	23948.79	1527.08	1409.70	117.38	26976.96	4543.57	22433.39	133.87	54341.05	27364.09	27364.09	3385.18	23978.91	.07	H20 (MOLS/HR)
C1 (MOLS/HR)	11566.79	11310.31	11284.08	0.00	17.51	0.82	16.89	0.62	0.62	0.00	0.62	0.00	0.00	0.00	0	0.00	0.00	0.01	0.00	0.00	256.48	C1 (MOLS/HR)
C2 (MOLS/HR)	38.77	37.82	37.82	0.00	0.06	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00	0.00	0.01	0.00	0.00	.85	C2 (MOLS/HR)
TOTAL	12927.24	12640.59	11429.00	28237.47	27449.38	27391.31	58.06	27391.31	2714.41	1410.37	1304.04	29.517.89	4562.71	24955.16	133.87	59459.38	29941.49	29941.49	3704.02	28237.47	286.65	TOTAL

◆ = TWO PHASE

FIGURE 3c:

PLOT DATE: 03-20-90
DWG. FILE: 427\WM4221.DWG

PRINT DISTRIBUTION RECORD

REV.	DATE	P	FA	A	SHOP	FIELD	CUST.	VEND.	FILE	PUNCH

REVISIONS

REV	DESCRIPTION

MERIDIAN OIL

VAL VERDE PLANT
TRAIN 4

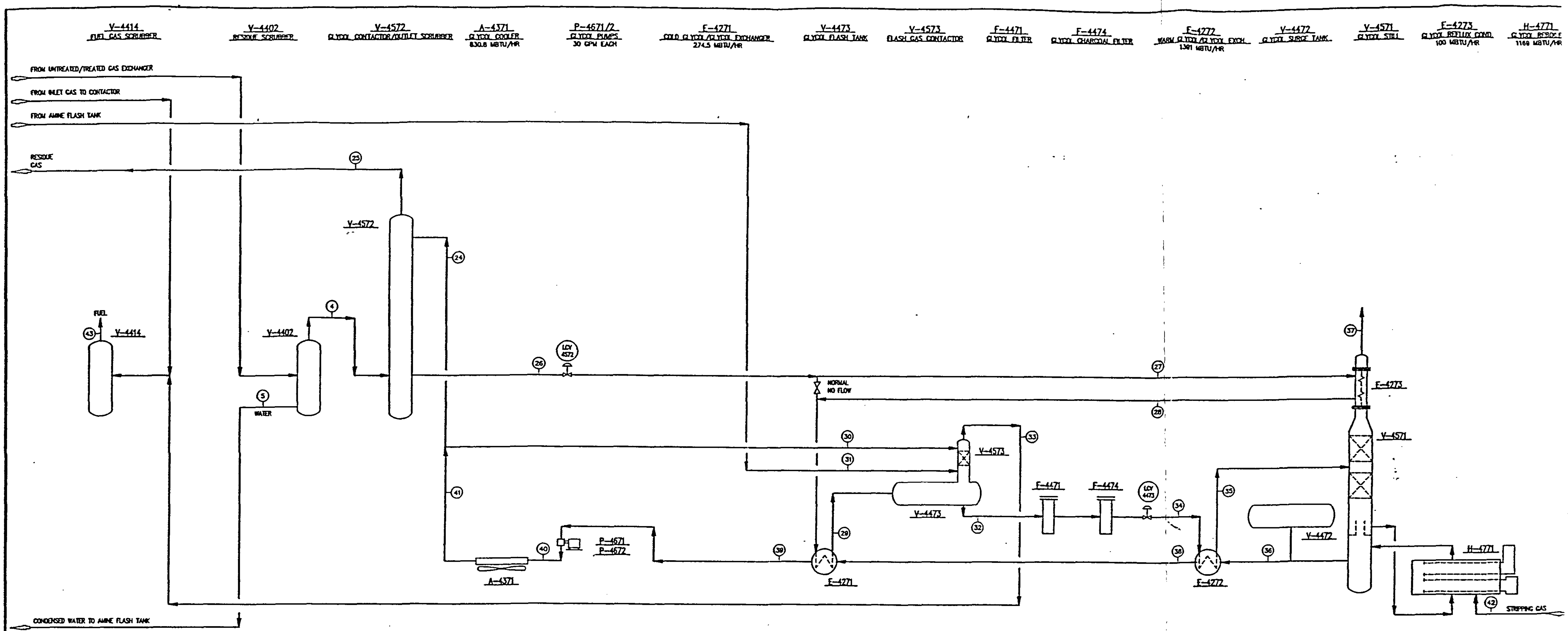
PROCESS FLOW DIAGRAM
AMINE - SUMMER CONDITIONS

A

ENGINEERS	DATE	REVISED BY	DATE
		ASHMORE	03-03-90

FILE NO.
W-1-M4221

DRAFTED BY
T.H. RUSSELL CO.
TULSA, OK.



STREAM NUMBER	4	5	24	25	26	27	28
DESCRIPTION	TEG CONTACTOR INLET	CONDENSED WATER	LEAN TEG TO CONTACTOR	CONTACTOR OHD	RICH TEG FROM CONTACTOR	RICH TEG TO REFLUX CONDENSER	RICH TEG FROM REFLUX CONDENSER
TEMPERATURE (F.)	102.02	102.02	115	105.55	104.82	112.12	127.2
PRESSURE (PSIA)	690	690	685	685	690	75	70
MASS FLOW (LB/HR)	185392	398	15115	185016	15467	15467	15467
MMCFD (14.7 PSIA & 60F.)	103.76			103.57			
LIQ. VOL. FLOW (GPM, 60F.)		0.8	26.8		27.7		
DENSITY (LB/CF)	1.86	62.22	69.25	1.89	69.05	40.38 ◆	38.36 ◆
MOL. WT.	16.25	18.02	141.09	16.25	121.07	122.15	122.15
CO2 (MOLS/HR)	65.09	0	0	64.83	0.16	0.16	0.16
DEA (MOLS/HR)	0	0	0	0	0	0	0
TEG (MOLS/HR)	0	0	99.77	0.01	99.77	99.77	99.77
H2O (MOLS/HR)	19.85	22.05	7.36	1.48	24.50	24.50	24.50
C1 (MOLS/HR)	11284.05	0.02	0	11231.69	2.16	2.16	2.16
C2 (MOLS/HR)	37.82	0	0	37.80	0.02	0.02	0.02
TOTAL	11406.92	22.07	107.13	11386.11	126.62	126.62	126.62

STREAM NUMBER	29	30	31	32	33	34	35	36
DESCRIPTION	RICH TEG FROM COLD GLYCOL EXCH.	LEAN TEG TO FLASH CONTACTOR	AMINE FLASH VAPOR	RICH TEG FROM FLASH TANK	FLASH CONTACTOR OHD	RICH TEG TO WARM GLYCOL EXCH.	RICH TEG FROM WARM GLYCOL EXCH.	LEAN TEG FROM REBOILER
TEMPERATURE (F.)	167	115	168.71	173.27	150.02	171.97	310	400
PRESSURE (PSIA)	65	685	70	66	65	20	15	14.8
MASS FLOW (LB/HR)	15467	2011	1973	17658	1791	17658	17658	17125
MMCFD (14.7 PSIA & 60F.)			0.528		0.482			
LIQ. VOL. FLOW (GPM, 60F.)		3.56		31.5				30.3
DENSITY (LB/CF)	35.16 ◆	69.25	0.35	67	0.34	17.2 ◆	2.49 ◆	59.67
MOL. WT.	122.15	141.10	33.97	121	33.8	121	121	141.09
CO2 (MOLS/HR)	0.16	0	36.91	3.48	33.59	3.48	3.48	0
DEA (MOLS/HR)	0	0	0	0	0	0	0	0
TEG (MOLS/HR)	99.77	0.98	0	113.04	0	113.04	113.04	113.04
H2O (MOLS/HR)	24.50	13.27	4.22	29.3	0.38	29.3	29.3	8.33
C1 (MOLS/HR)	2.16	0	16.89	0.09	18.85	0.09	0.09	0
C2 (MOLS/HR)	0.02	0	0.05	0.01	0.06	0.01	0.01	0
TOTAL	126.62	14.25	58.06	145.93	52.98	145.93	145.93	121.37

STREAM NUMBER	37	38	39	40	41	42	43	STREAM NUMBER
DESCRIPTION	TEG STILL OHD	LEAN TEG FROM WARM GLYCOL EXCH.	LEAN TEG FROM COLD GLYCOL EXCH.	LEAN TEG TO COOLER	LEAN TEG FROM COOLER	GLYCOL REBOILER STRIPPING GAS	TOTAL FUEL GAS	DESCRIPTION
TEMPERATURE (F.)	204.15	255.16	222.89	203.6	115	105	115	TEMPERATURE (F.)
PRESSURE (PSIA)	14.7	14.8	14.55	690	685	15.3	65	PRESSURE (PSIA)
MASS FLOW (LB/HR)	533	17125	17125	17125	17125		6366	MASS FLOW (LB/HR)
MMCFD (14.7 PSIA & 60F.)	0.223						3.072	MMCFD (14.7 PSIA & 60F.)
LIQ. VOL. FLOW (GPM, 60F.)		30.3	30.3	30.3	30.3			LIQ. VOL. FLOW (GPM, 60F.)
DENSITY (LB/CF)	0.04	64.73	65.69	66.86	69.25	.022	2.24	DENSITY (LB/CF)
MOL. WT.	21.69	141.09	141.09	142.87	141.09	16.24	20.2	MOL. WT.
CO2 (MOLS/HR)	3.48	0	0	0	0	64.92	62.84	CO2 (MOLS/HR)
DEA (MOLS/HR)	0	0	0	0	0	0	0	DEA (MOLS/HR)
TEG (MOLS/HR)	0	113.04	113.04	113.04	113.04	0	0	TEG (MOLS/HR)
H2O (MOLS/HR)	20.97	8.33	8.33	8.33	8.33	1.48	.45	H2O (MOLS/HR)
C1 (MOLS/HR)	0.09	0	0	0	0	11281.89	275.43	C1 (MOLS/HR)
C2 (MOLS/HR)	0.01	0	0	0	0	37.8	.91	C2 (MOLS/HR)
TOTAL	24.56	121.37	121.37	121.37	121.37	11386.1	339.64	TOTAL

◆ = TWO PHASE

FIGURE 4b:

PRINT DISTRIBUTION RECORD

REVISIONS

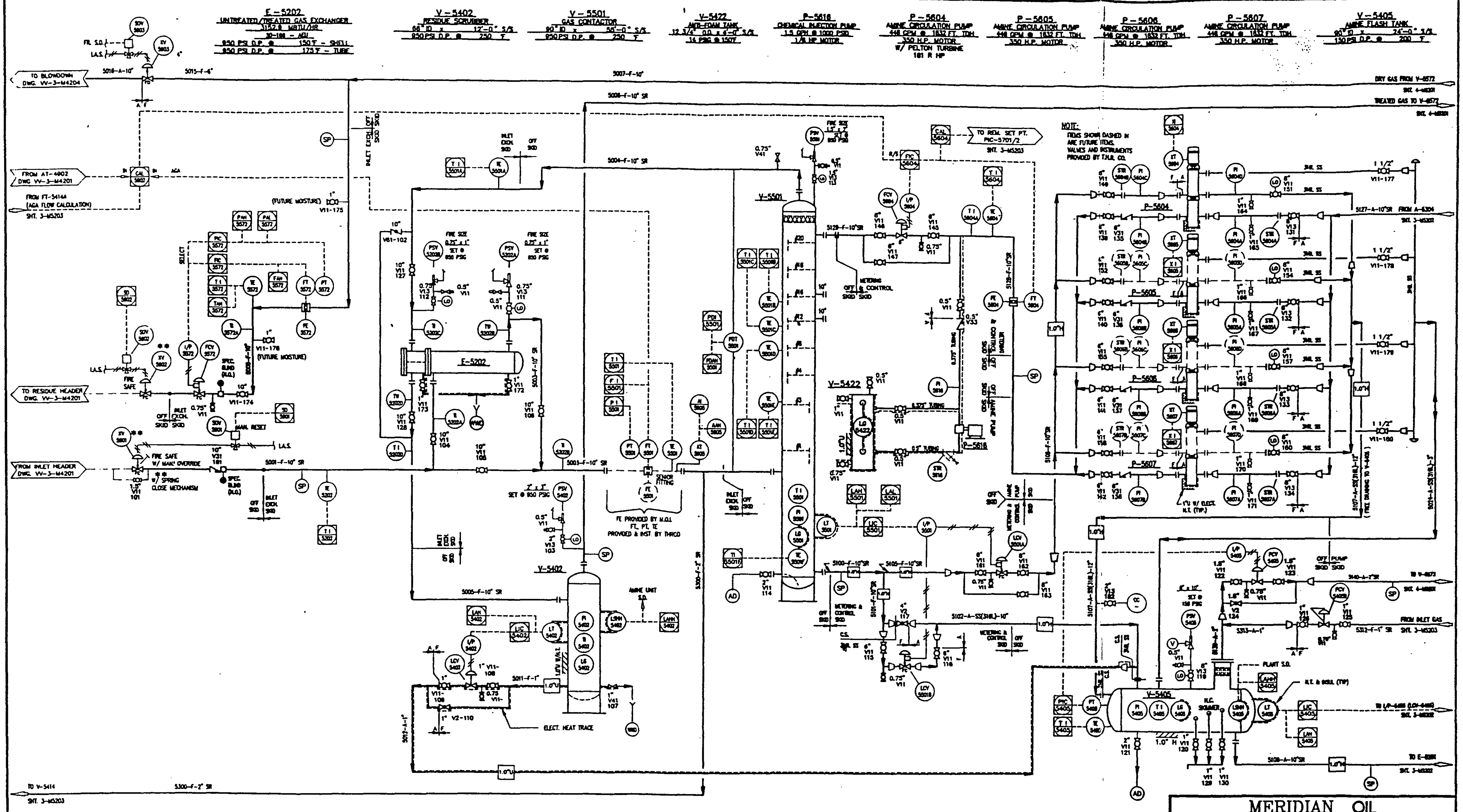
PLOT DATE: 03-20-90
DWG. FILE: 427\VVM4221.DWG

MERIDIAN OIL
VAL VERDE PLANT
TRAIN 4
PROCESS FLOW DIAGRAM
GLYCOL - SUMMER CONDITIONS

W-1-M4222
T.H. RUSSELL CO. TULSA OK.

PROCESS & INSTRUMENTATION DIAGRAMS

Train 5



TYPICAL ALL SHEETS

(AD) AMINE DRAIN (SEE SHT. 8-M5201)	DISTRIBUTIVE CONTROL SYSTEM
WASTE WATER DRAIN (SEE SHT. 8-M5201)	PRESSURE POINT, 3/4"V11 W/ PLUG
(V) VENT HEADER (SEE DWG. VV-3-M4204)	SAMPLE POINT, 1"V11 W/ PLUG
(GD) GLYCOL DRAIN (SEE SHT. 8-M5201)	CORROSION COUPON, 2" NPT W/VALVE
(LO) LOCK OPEN	

* ITEMS PROVIDED AND INSTALLED BY MERIDIAN OIL CO.

** ITEMS PROVIDED AND INSTALLED BY MERIDIAN OIL CO., SPECIFIED BY T.H.R. CO.

T.H. RUSSELL CO. JOB NO. 433

PRINT DISTRIBUTION RECORD

REV.	DATE	P	P.A.	A	SHOP	FIELD	CUST.	VEND.	FILE	PURCH.	PE			
0	1/28					1	3	3	1					JL
1	2/5			✓	3	2	3	3	1		1			GL

REVISIONS

REV	DESCRIPTION
0	AFC
1	ADDED 316L NOTES TO AMINE CIRC. PUMP LINES
2	GENERAL REVISION

MERIDIAN OIL

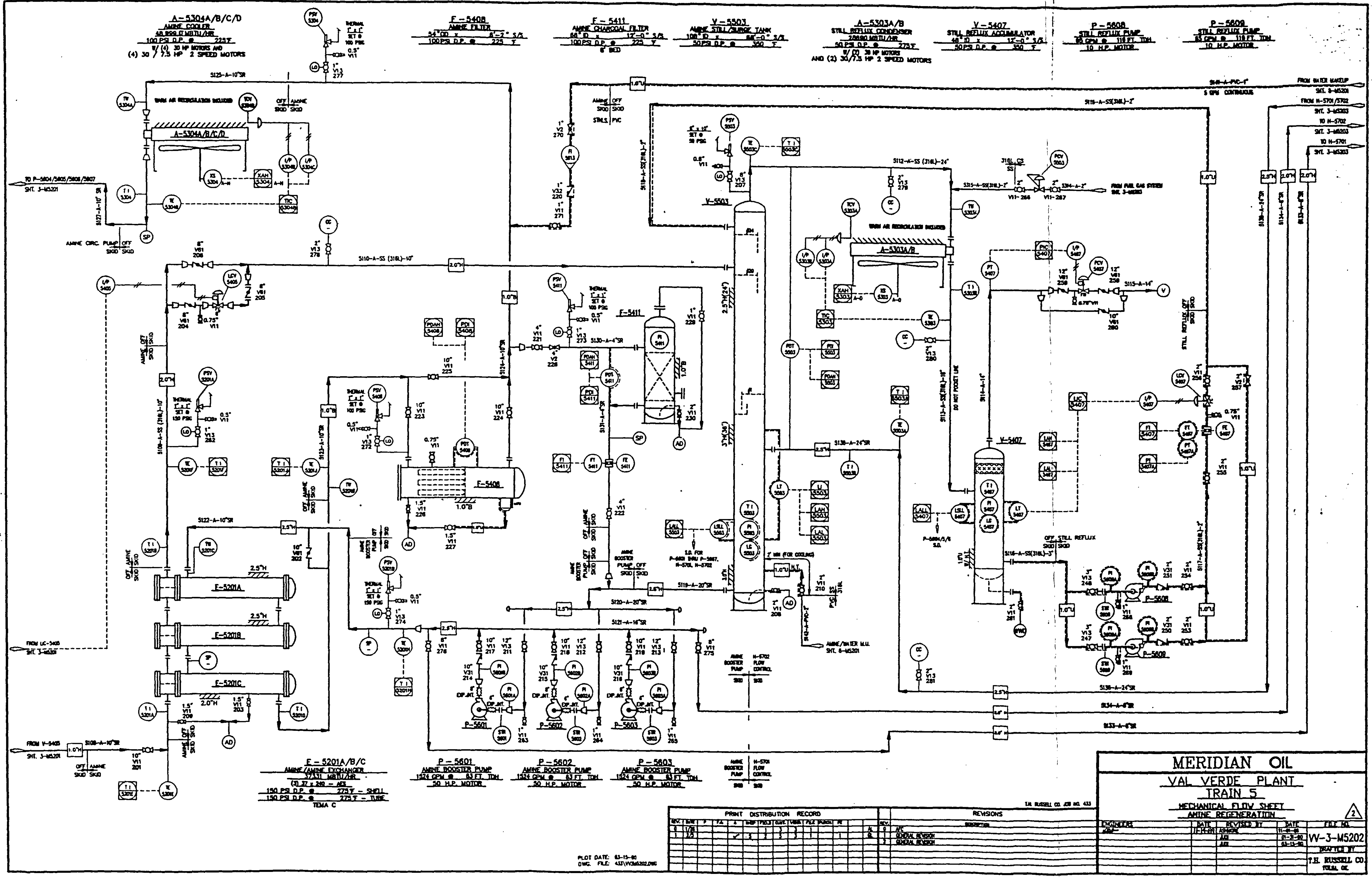
VAL VERDE PLANT
TRAIN 5

MECHANICAL FLOW SHEET
AMINE CONTACTOR

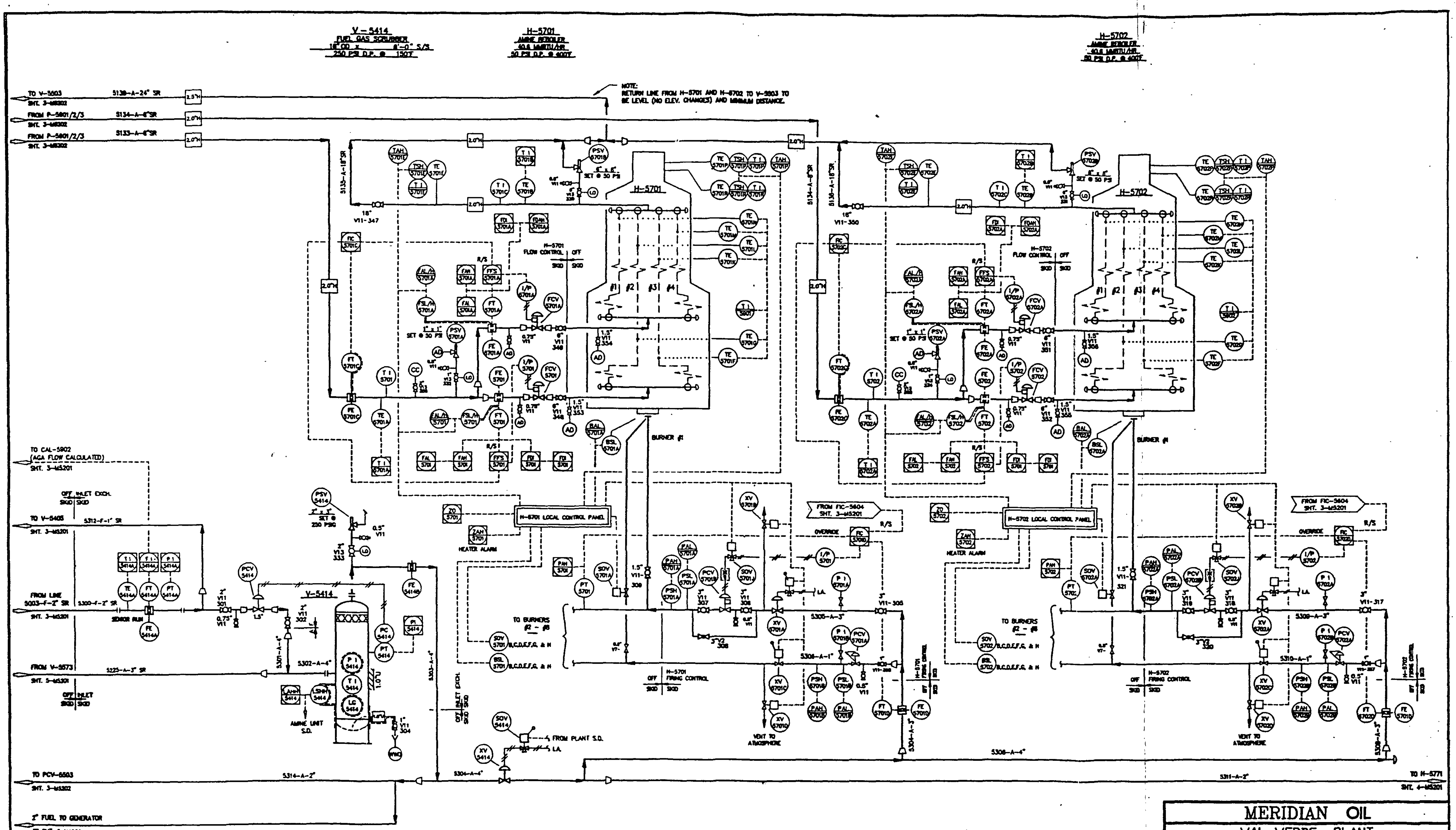
ENGINEERS	DATE	REVISED BY	DATE
		ASHMORE	10-31-89
		JJJ	01-31-90
		JJJ	03-15-90

FILE NO. W-3-M5201

DRAFTED BY: T.H. RUSSELL CO. TULSA, OK.



A-5304A/B/C/D
AMINE COOLER
F-5408
AMINE FILTER
F-5411
AMINE CHARCOAL FILTER
V-5503
AMINE STILL/SURGE TANK
A-5303A/B
STILL REFLUX CONDENSER
V-5407
STILL REFLUX ACCUMULATOR
P-5608
STILL REFLUX PUMP
P-5609
STILL REFLUX PUMP
E-5201A/B/C
AMINE/AMINE EXCHANGER
TEMA C
P-5601
AMINE BOOSTER PUMP
P-5602
AMINE BOOSTER PUMP
P-5603
AMINE BOOSTER PUMP
E-5201A
E-5201B
E-5201C
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 5
MECHANICAL FLOW SHEET
AMINE REGENERATION
W-3-M5202
PRINT DISTRIBUTION RECORD
REVISIONS
GENERAL REVISION
T.H. RUSSELL CO.
TULSA, OK.



V-5414
FUEL GAS SCRUBBER
18" OD x 8'-0" S/S
250 PSI D.P. @ 150°F
H-5701
AMINE REBOILER
40.6 MMBTU/HR
50 PSI D.P. @ 400°F
H-5702
AMINE REBOILER
40.6 MMBTU/HR
50 PSI D.P. @ 400°F
NOTE:
RETURN LINE FROM H-5701 AND H-5702 TO V-5503 TO BE LEVEL (NO ELEV. CHANGES) AND MINIMUM DISTANCE.
TO V-5503
SHT. 3-M5202
FROM P-5601/2/3
SHT. 3-M5202
FROM P-5601/2/3
SHT. 3-M5202
TO CAL-5902
(AGA FLOW CALCULATED)
SHT. 3-M5201
TO V-5405
SHT. 3-M5201
FROM LINE 5003-F-2" SR
SHT. 3-M5201
FROM V-5573
SHT. 5-M5301
TO PCV-5503
SHT. 3-M5202
2" FUEL TO GENERATOR
TO SHT. 3-M4204
H-5701 LOCAL CONTROL PANEL
H-5702 LOCAL CONTROL PANEL
HEATER ALARM
TO BURNERS #2 - #8
BURNER #1
FROM FIC-5604
SHT. 3-M5201
OVERRIDE
VENT TO ATMOSPHERE
AMINE UNIT S.D.
FROM PLANT S.D.
5308-A-4"
5311-A-2"
5314-A-2"
5304-A-4"
TO H-5771
SHT. 4-M5201

T.H. RUSSELL CO. JOB NO. 433

PLOT DATE: 03-15-90
DWG. FILE: 433\W3M5203.DWG

MERIDIAN OIL

VAL VERDE PLANT
TRAIN 5

MECHANICAL FLOW SHEET
AMINE REBOILERS

PRINT DISTRIBUTION RECORD

REV.	DATE												
0	1/29					1	3	3	1				AL
1	2/A			✓	5	2	5	3	1		1		GL

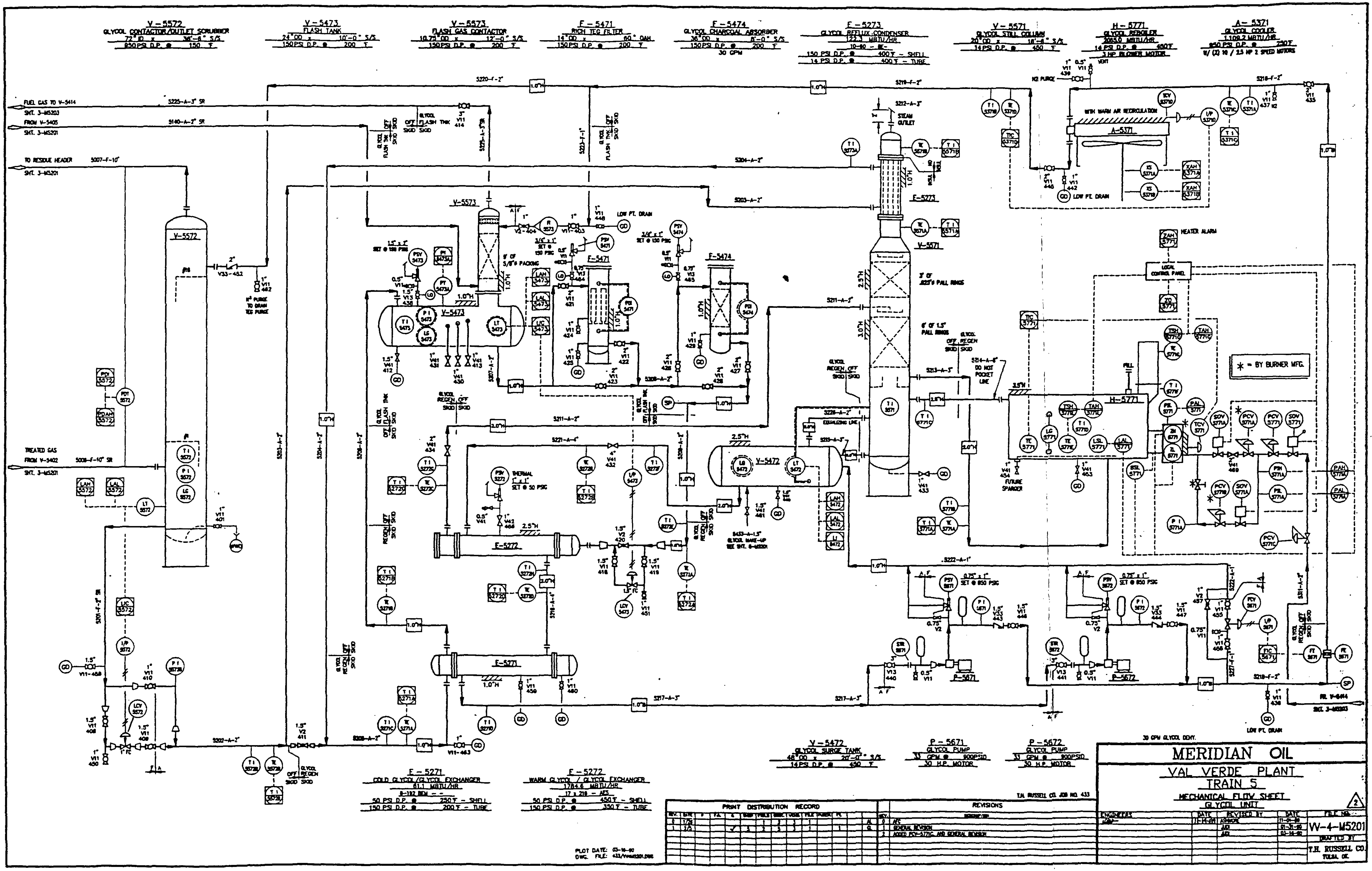
REVISIONS

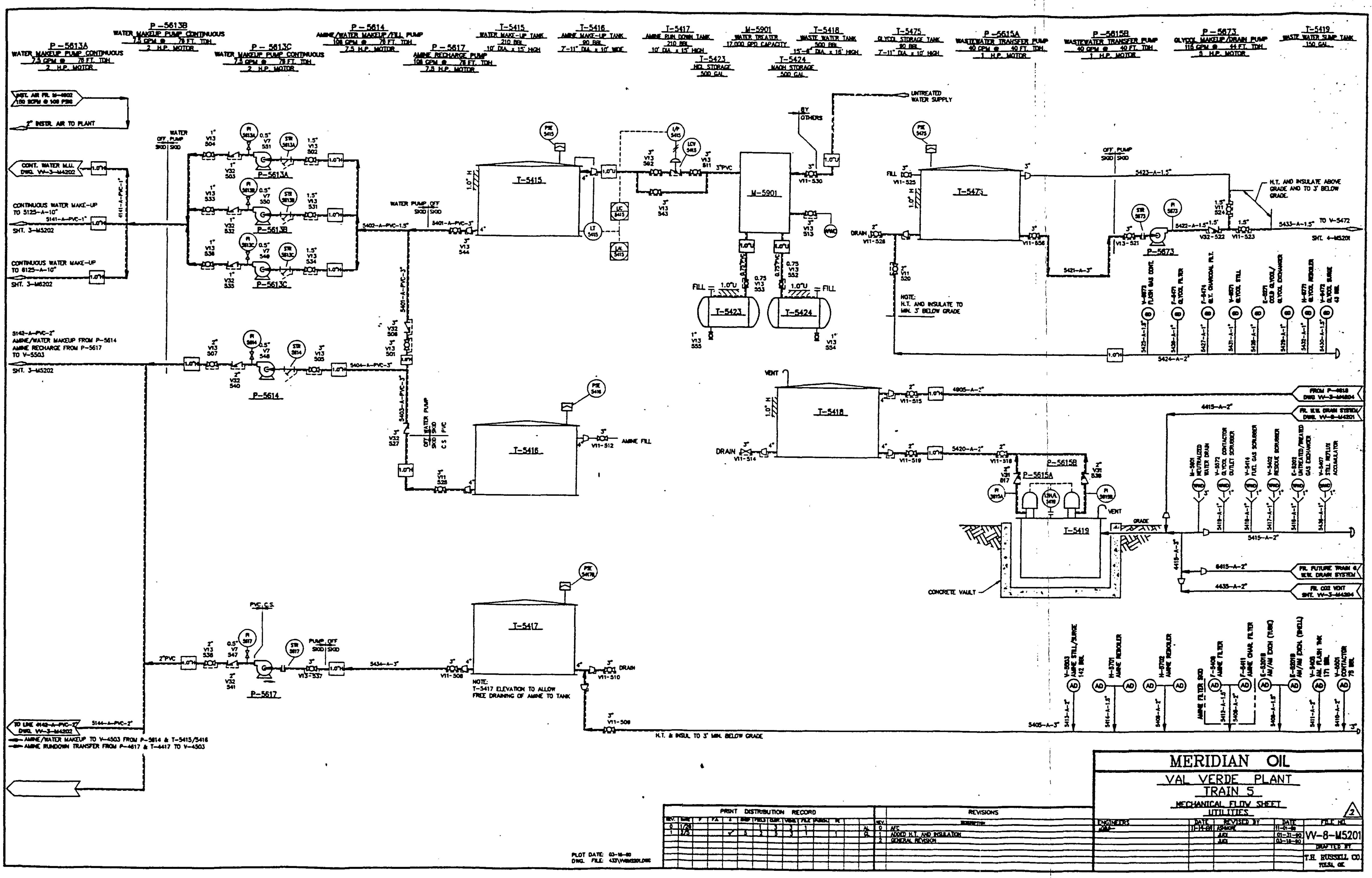
REV.	DESCRIPTION
0	AFC
1	GENERAL REVISION
2	GENERAL REVISION

ENGINEERS	DATE	REVISED BY	DATE
	11-14-89		11-01-89
			01-31-90
			03-15-90

FILE NO. W-3-M5203

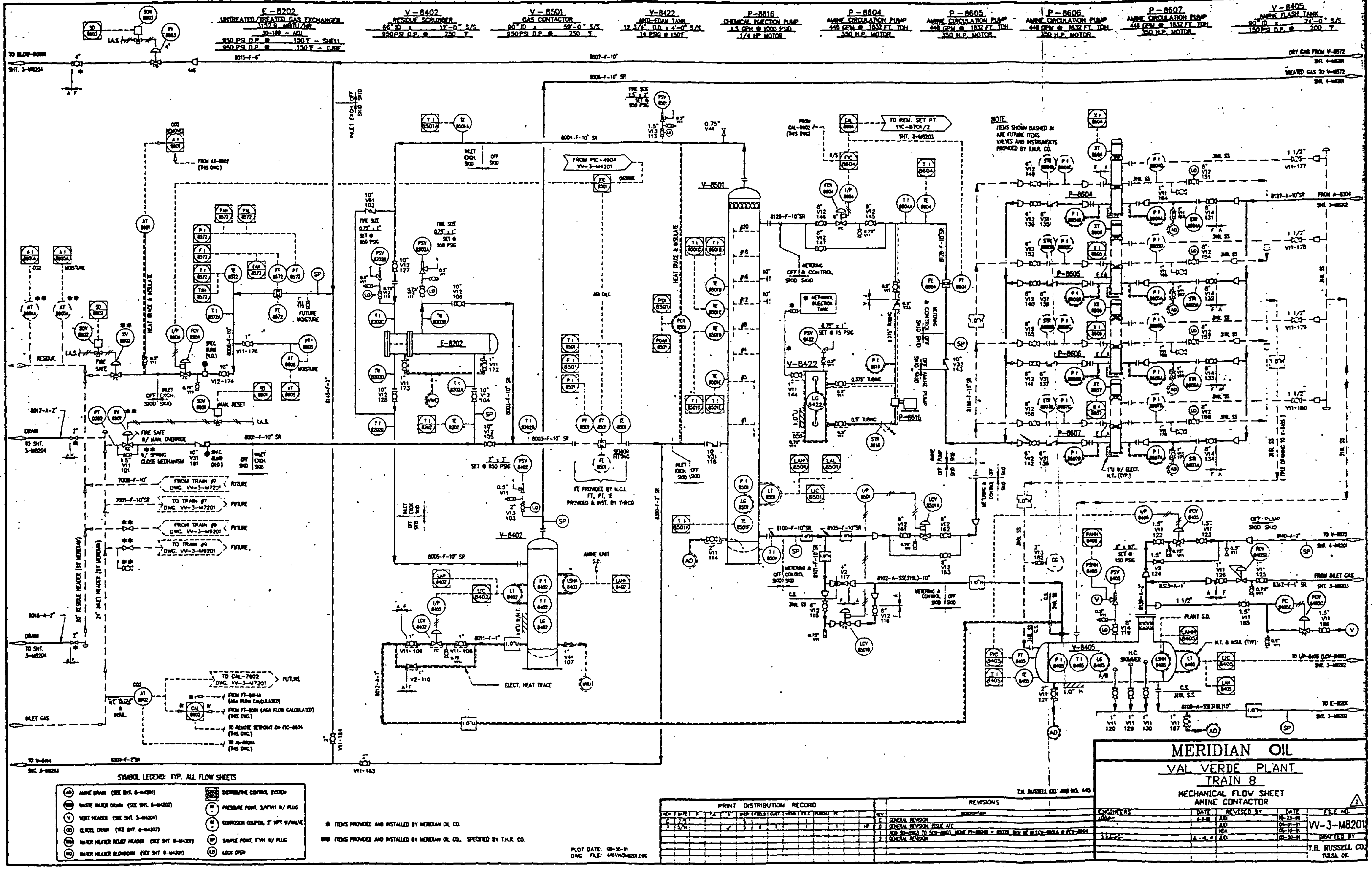
DRAFTED BY T.H. RUSSELL CO. TULSA, OK


V-5572
GLYCOL CONTACTOR/OUTLET SCRUBBER
72" ID x 36'-6" S/S
850 PSI D.P. @ 150 °F
V-5473
FLASH TANK
24" OD x 10'-0" S/S
150 PSI D.P. @ 200 °F
V-5573
FLASH GAS CONTACTOR
10.75" OD x 12'-0" S/S
150 PSI D.P. @ 200 °F
F-5471
RICH TEG FILTER
14" OD x 60" OAH
150 PSI D.P. @ 200 °F
F-5474
GLYCOL CHARCOAL ABSORBER
36" OD x 8'-0" S/S
150 PSI D.P. @ 200 °F
30 GPM
E-5273
GLYCOL REFLUX CONDENSER
122.3 MBTU/HR
150 PSI D.P. @ 400 °F - SHELL
14 PSI D.P. @ 400 °F - TUBE
V-5571
GLYCOL STILL COLUMN
20" OD x 18'-6" S/S
14 PSI D.P. @ 450 °F
H-5771
GLYCOL REBOILER
2065.0 MBTU/HR
14 PSI D.P. @ 450 °F
3 HP BLOWER MOTOR
A-5371
GLYCOL COOLER
1,109.2 MBTU/HR
850 PSI D.P. @ 250 °F
E-5271
COLD GLYCOL/GLYCOL EXCHANGER
61.1 MBTU/HR
50 PSI D.P. @ 250 °F - SHELL
150 PSI D.P. @ 200 °F - TUBE
E-5272
WARM GLYCOL / GLYCOL EXCHANGER
1784.6 MBTU/HR
17 x 216 - AES
50 PSI D.P. @ 450 °F - SHELL
150 PSI D.P. @ 350 °F - TUBE
V-5472
GLYCOL SURGE TANK
48" OD x 20'-0" S/S
14 PSI D.P. @ 450 °F
P-5671
GLYCOL PUMP
33 GPM @ 900 PSID
30 H.P. MOTOR
P-5672
GLYCOL PUMP
33 GPM @ 900 PSID
30 H.P. MOTOR
FUEL GAS TO V-5414
TO RESIDUE HEADER
TREATED GAS
LOW PT. DRAIN
HEATER ALARM
LOCAL CONTROL PANEL
* = BY BURNER MFG.
WITH WARM AIR RECIRCULATION
STEAM OUTLET
N2 PURGE
VENT
FUTURE SPARGER
GLYCOL MAKE-UP
30 GPM GLYCOL DEHY.
T.H. RUSSELL CO. JOB NO. 433
PRINT DISTRIBUTION RECORD
REVISIONS
0 AFC
1 GENERAL REVISION
2 ADDED PCV-5771C AND GENERAL REVISION
PLOT DATE: 03-16-90
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 5
MECHANICAL FLOW SHEET
GLYCOL UNIT
ENGINEERS
DATE
REVISED BY
DATE
FILE NO.
W-4-M5201
DRAFTED BY
T.H. RUSSELL CO.
TULSA, OK.

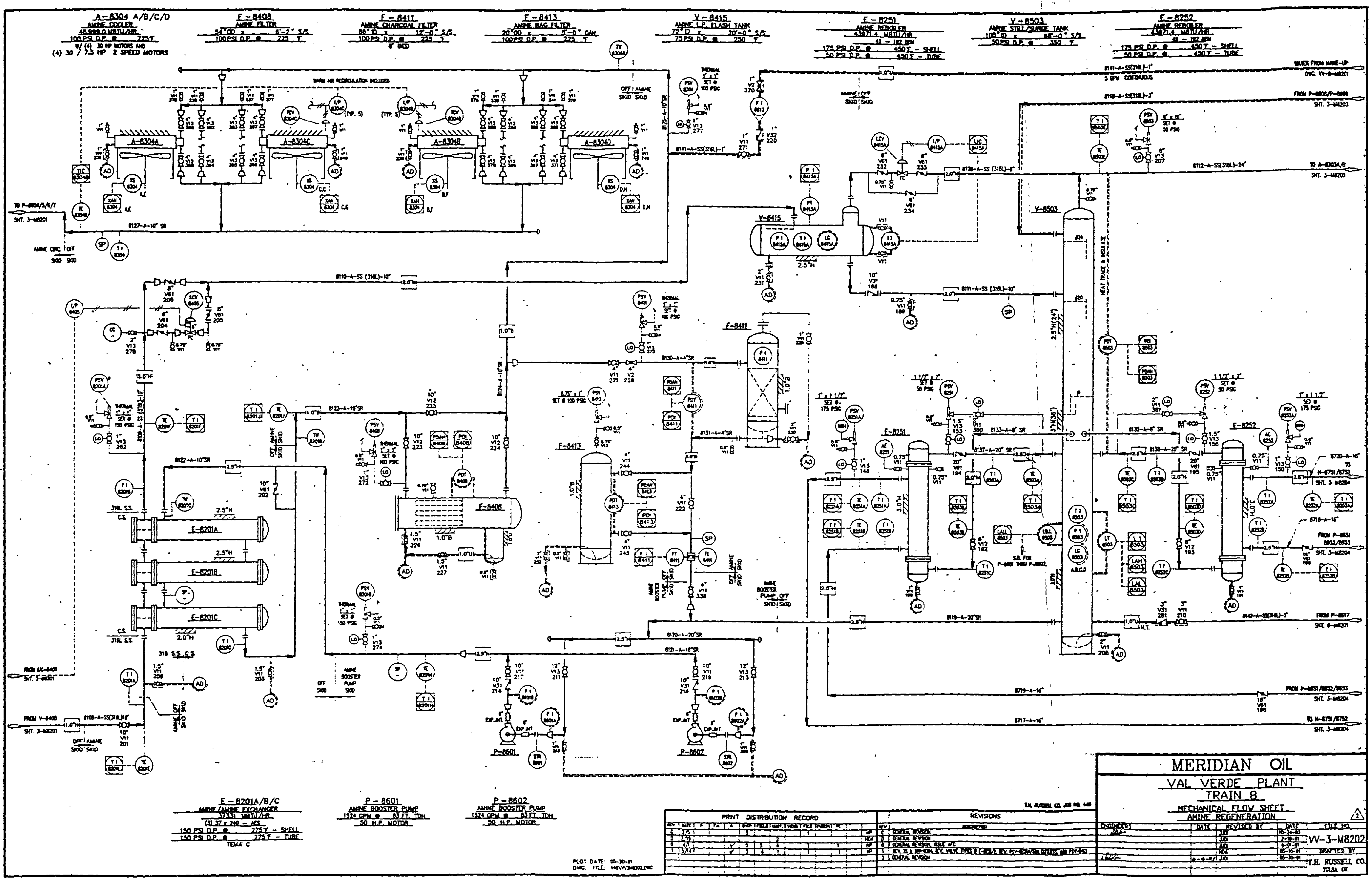

P-5613A
WATER MAKEUP PUMP CONTINUOUS
7.5 GPM @ 78 FT. TDH
2 H.P. MOTOR
P-5613B
WATER MAKEUP PUMP CONTINUOUS
7.5 GPM @ 78 FT. TDH
2 H.P. MOTOR
P-5613C
WATER MAKEUP PUMP CONTINUOUS
7.5 GPM @ 78 FT. TDH
2 H.P. MOTOR
P-5614
AMINE/WATER MAKEUP/FILL PUMP
108 GPM @ 78 FT. TDH
7.5 H.P. MOTOR
P-5617
AMINE RECHARGE PUMP
108 GPM @ 78 FT. TDH
7.5 H.P. MOTOR
T-5415
WATER MAKE-UP TANK
210 BBL
10' DIA. x 15' HIGH
T-5416
AMINE MAKE-UP TANK
90 BBL
7'-11" DIA. x 10' WIDE
T-5417
AMINE RUN DOWN TANK
210 BBL
10' DIA. x 15' HIGH
T-5423
HCL STORAGE
500 GAL
M-5901
WATER TREATER
17,000 GPD CAPACITY
T-5424
NAOH STORAGE
500 GAL
T-5418
WASTE WATER TANK
500 BBL
15'-6" DIA. x 16' HIGH
T-5475
GLYCOL STORAGE TANK
90 BBL
7'-11" DIA. x 10' HIGH
P-5615A
WASTEWATER TRANSFER PUMP
40 GPM @ 40 FT. TDH
1 H.P. MOTOR
P-5615B
WASTEWATER TRANSFER PUMP
40 GPM @ 40 FT. TDH
1 H.P. MOTOR
P-5673
GLYCOL MAKEUP/DRAIN PUMP
116 GPM @ 44 FT. TDH
5 H.P. MOTOR
T-5419
WASTE WATER SUMP TANK
150 GAL
2" INSTR. AIR TO PLANT
CONT. WATER M.U. DWG. VV-3-M4202
CONTINUOUS WATER MAKE-UP TO 5125-A-10"
SHT. 3-M5202
UNTREATED WATER SUPPLY
BY OTHERS
NOTE: H.T. AND INSULATE TO MIN. 3' BELOW GRADE
H.T. AND INSULATE ABOVE GRADE AND TO 3' BELOW GRADE
AMINE FILL
DRAIN
VENT
CONCRETE VAULT
GRADE
NOTE: T-5417 ELEVATION TO ALLOW FREE DRAINING OF AMINE TO TANK
H.T. & INSUL. TO 3' MIN. BELOW GRADE
AMINE/WATER MAKEUP TO V-4503 FROM P-5614 & T-5415/5416
AMINE RUNDOWN TRANSFER FROM P-4617 & T-4417 TO V-4503
PLOT DATE: 03-16-90
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 5
MECHANICAL FLOW SHEET
UTILITIES
PRINT DISTRIBUTION RECORD
REVISIONS
0 AFC
1 ADDED H.T. AND INSULATION
2 GENERAL REVISION
ENGINEERS
DATE
REVISED BY
FILE NO.
VV-8-M5201
DRAFTED BY
T.H. RUSSELL CO.
TULSA, OK

PROCESS & INSTRUMENTATION DIAGRAMS

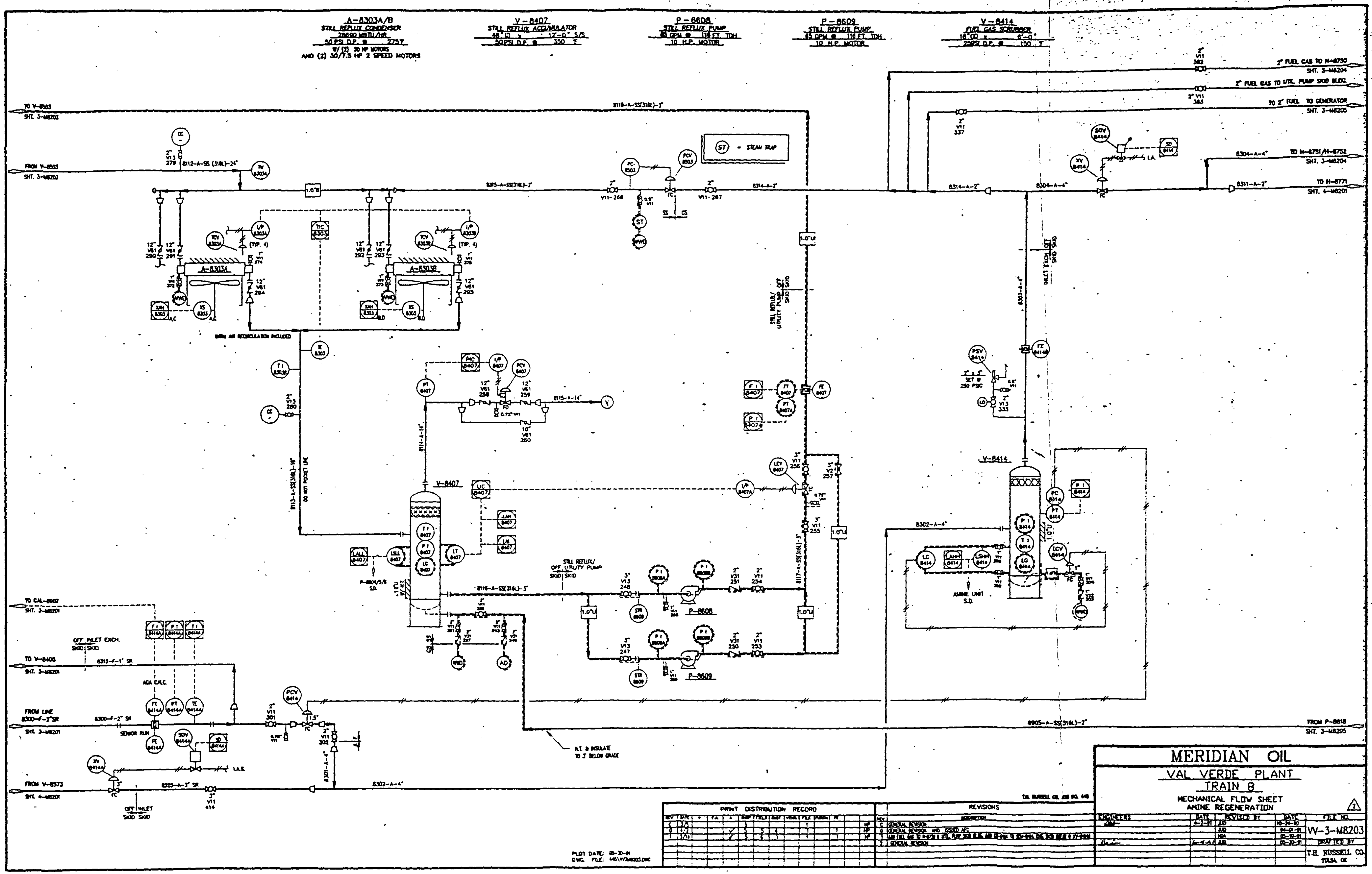
Train 8



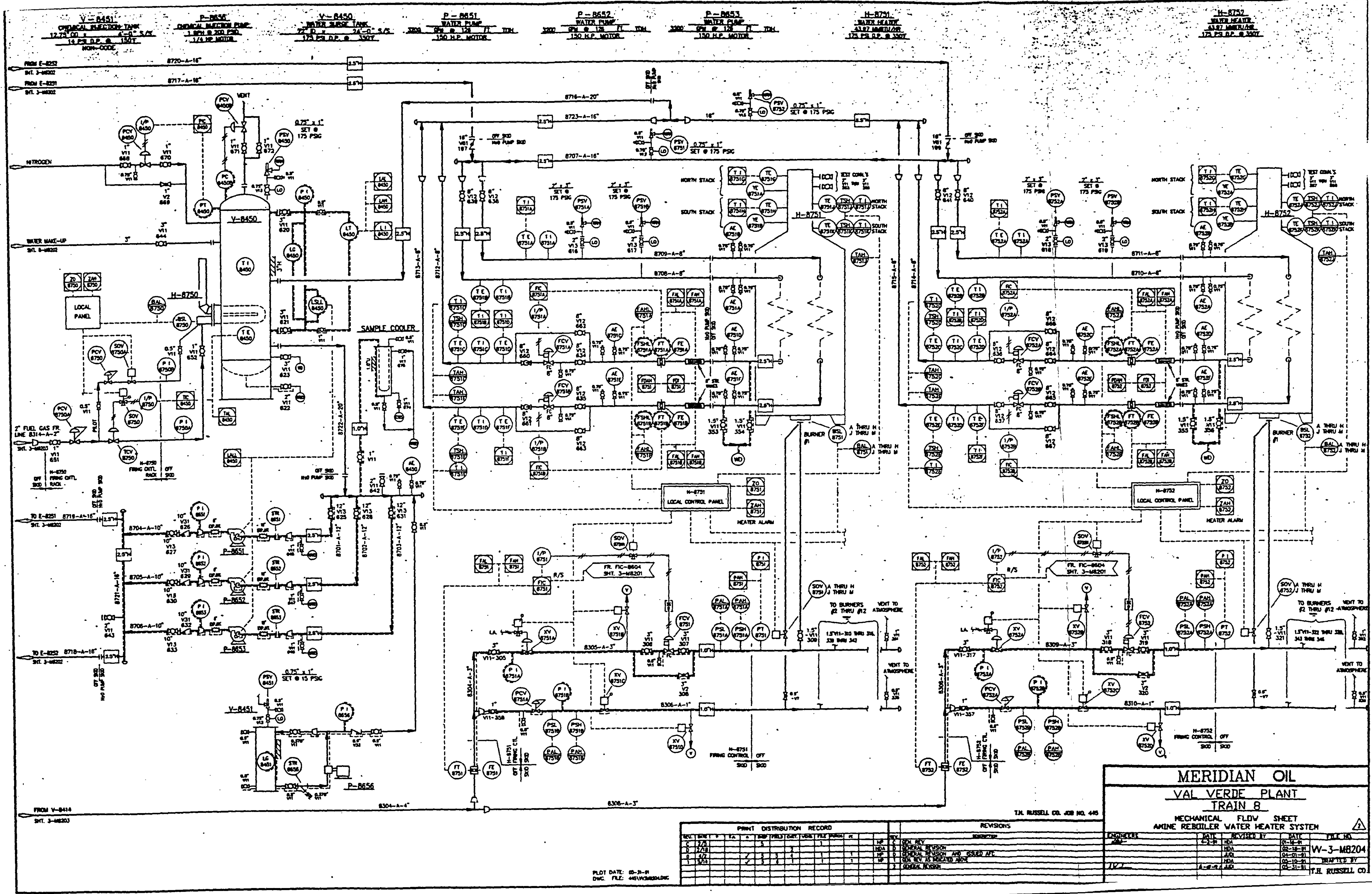
E-8202
UNTREATED/TREATED GAS EXCHANGER
V-8402
RESIDUE SCRUBBER
V-8501
GAS CONTACTOR
V-8422
ANTI-FOAM TANK
P-8616
CHEMICAL INJECTION PUMP
P-8604
AMINE CIRCULATION PUMP
P-8605
AMINE CIRCULATION PUMP
P-8606
AMINE CIRCULATION PUMP
P-8607
AMINE CIRCULATION PUMP
V-8405
AMINE FLASH TANK
NOTE:
ITEMS SHOWN DASHED IN ARE FUTURE ITEMS. VALVES AND INSTRUMENTS PROVIDED BY T.H.R. CO.
SYMBOL LEGEND: TYP. ALL FLOW SHEETS
* ITEMS PROVIDED AND INSTALLED BY MERIDIAN OIL CO.
** ITEMS PROVIDED AND INSTALLED BY MERIDIAN OIL CO., SPECIFIED BY T.H.R. CO.
PRINT DISTRIBUTION RECORD
REVISIONS
T.H. RUSSELL CO. JOB NO. 445
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
AMINE CONTACTOR
W-3-M8201
T.H. RUSSELL CO.
TULSA, OK.



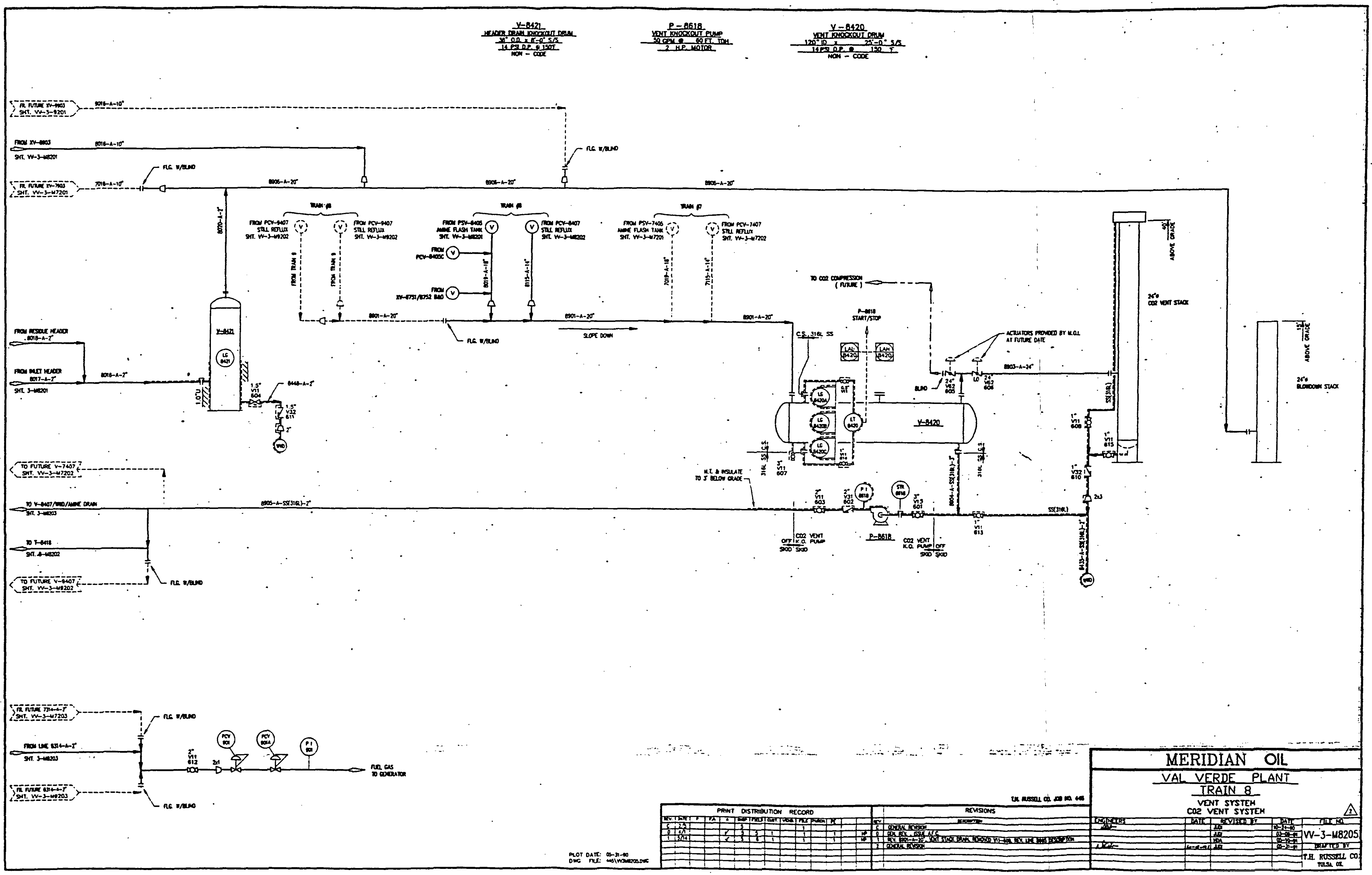
A-8304 A/B/C/D
AMINE COOLER
F-8408
AMINE FILTER
F-8411
AMINE CHARCOAL FILTER
F-8413
AMINE BAG FILTER
V-8415
AMINE L.P. FLASH TANK
E-8251
AMINE REBOILER
V-8503
AMINE STILL/SURGE TANK
E-8252
AMINE REBOILER
E-8201A/B/C
AMINE/AMINE EXCHANGER
P-8601
AMINE BOOSTER PUMP
1524 GPM @ 83 FT. TDH
50 H.P. MOTOR
P-8602
AMINE BOOSTER PUMP
1524 GPM @ 83 FT. TDH
50 H.P. MOTOR
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
AMINE REGENERATION
W-3-M8202
PRINT DISTRIBUTION RECORD
REVISIONS
T.H. RUSSELL CO.
TULSA, OK.

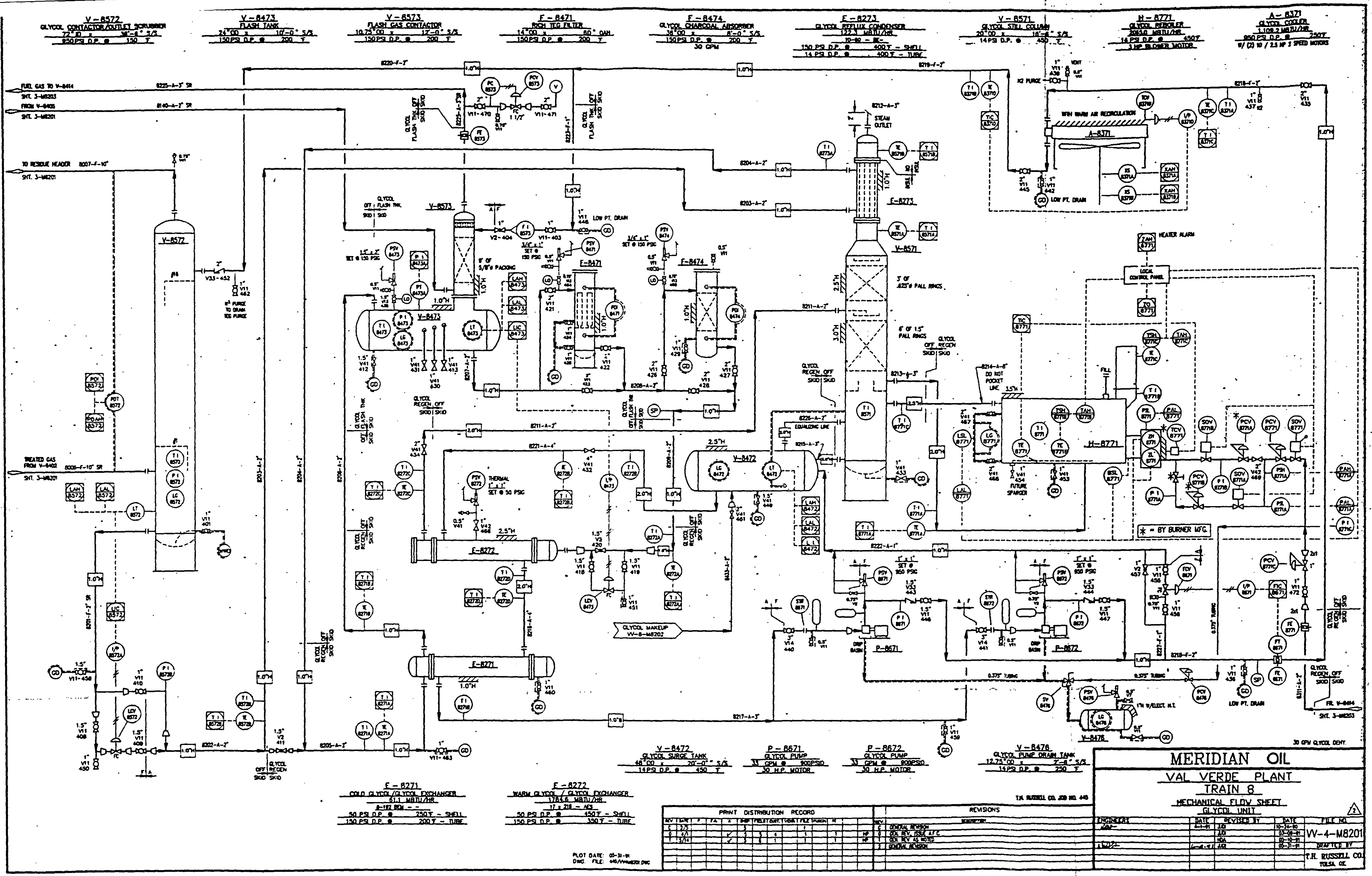


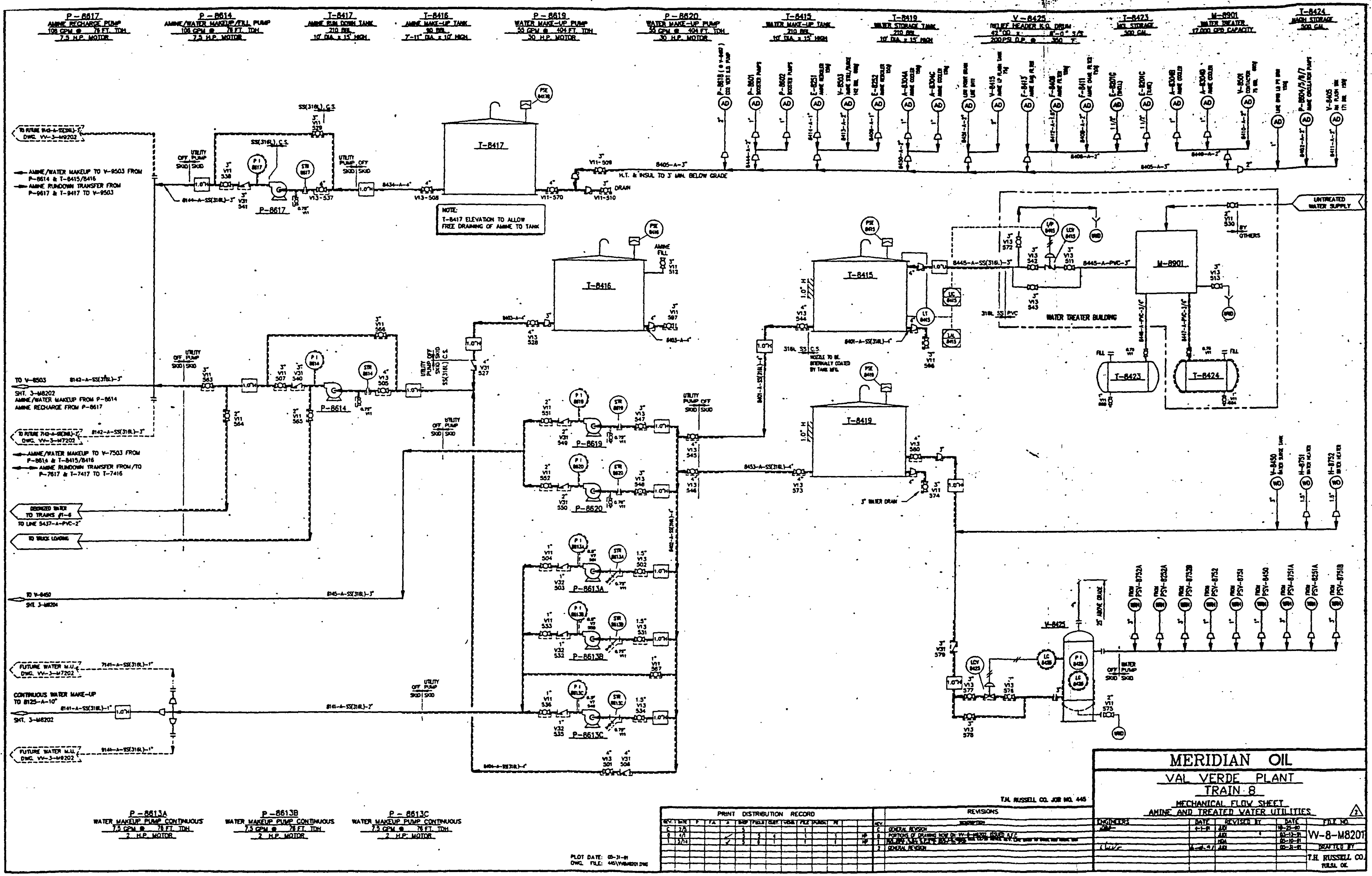
A-8303A/B
STILL REFLUX CONDENSER
V-8407
STILL REFLUX ACCUMULATOR
P-8608
STILL REFLUX PUMP
P-8609
STILL REFLUX PUMP
V-8414
FUEL GAS SCRUBBER
2" FUEL GAS TO H-8750
2" FUEL GAS TO UTIL. PUMP SKID BLDG.
TO 2" FUEL TO GENERATOR
ST = STEAM TRAP
WARM AIR RECIRCULATION INCLUDED
DO NOT POCKET LINE
STILL REFLUX/ UTILITY PUMP SKID
AMINE UNIT S.D.
H.T. & INSULATE TO 3' BELOW GRADE
FROM P-8618
SHT. 3-M8205
PRINT DISTRIBUTION RECORD
REVISIONS
GENERAL REVISION
PLOT DATE: 10-30-91
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
AMINE REGENERATION
FILE NO.
W-3-M8203
DRAFTED BY
T.H. RUSSELL CO.
TULSA OK



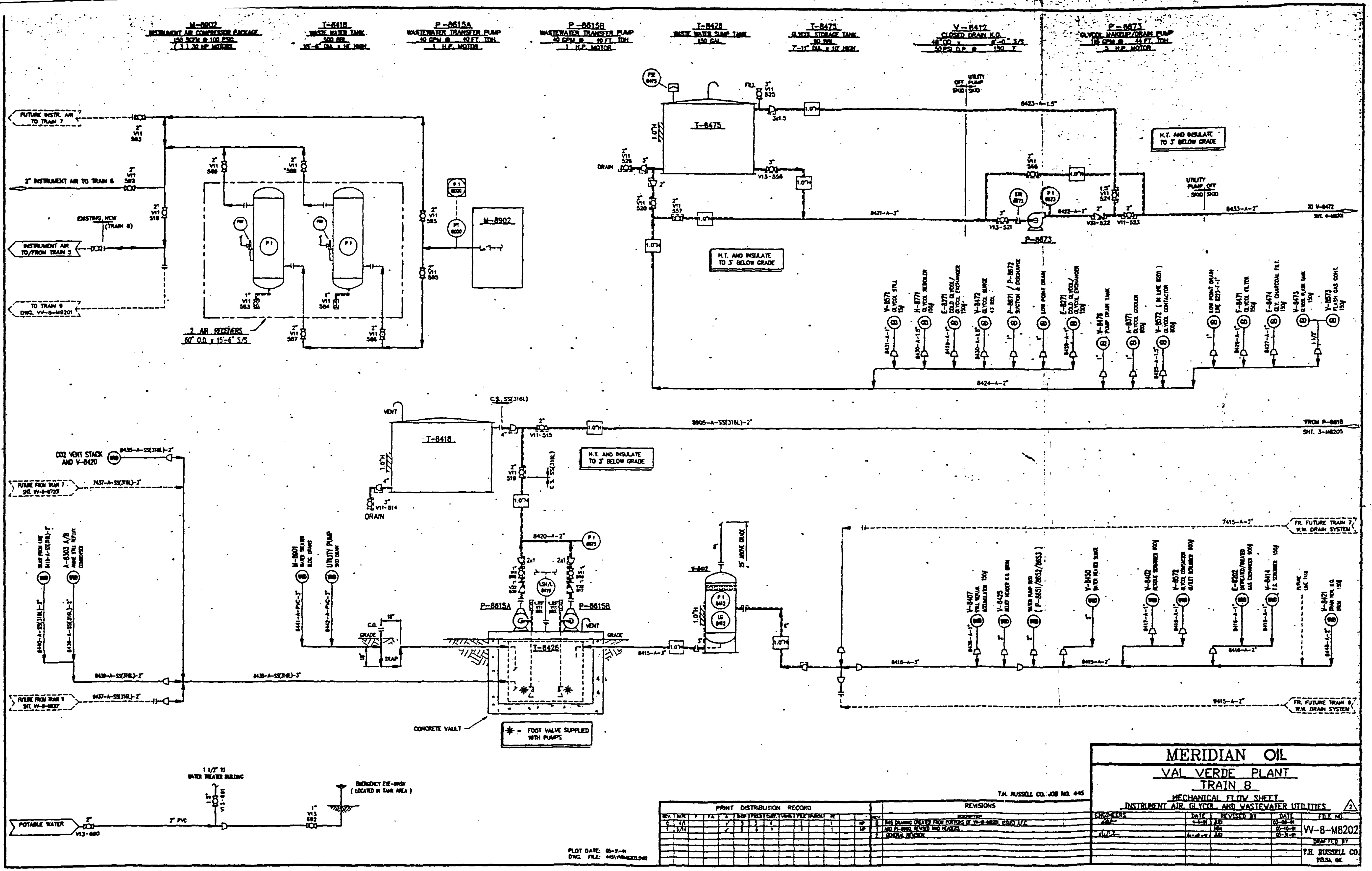
V-8451
CHEMICAL INJECTION TANK
P-8656
CHEMICAL INJECTION PUMP
V-8450
WATER SURGE TANK
P-8651
WATER PUMP
150 H.P. MOTOR
P-8652
WATER PUMP
150 H.P. MOTOR
P-8653
WATER PUMP
150 H.P. MOTOR
H-8751
WATER HEATER
H-8752
WATER HEATER
NITROGEN
WATER MAKE-UP
SAMPLE COOLER
NORTH STACK
SOUTH STACK
H-8751 LOCAL CONTROL PANEL
H-8752 LOCAL CONTROL PANEL
HEATER ALARM
LOCAL PANEL
TO BURNERS
VENT TO ATMOSPHERE
FROM V-8414
T.H. RUSSELL CO. JOB NO. 445
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
AMINE REBOILER WATER HEATER SYSTEM
PRINT DISTRIBUTION RECORD
REVISIONS
GEN. REV.
GENERAL REVISION
GENERAL REVISION AND ISSUED AFC
GENERAL REVISION
W-3-M8204
DRAFTED BY
T.H. RUSSELL CO.


V-8421
HEADER DRAIN KNOCKOUT DRUM
36" O.D. x 8'-0" S/S
14 PSI D.P. @ 150°F
NON - CODE
P-8618
VENT KNOCKOUT PUMP
50 GPM @ 60 FT. TDH
2 H.P. MOTOR
V-8420
VENT KNOCKOUT DRUM
120" ID x 25'-0" S/S
14 PSI D.P. @ 150 °F
NON - CODE
FLG. W/BLIND
TRAIN #8
TRAIN #7
FROM RESIDUE HEADER
FROM INLET HEADER
TO CO2 COMPRESSION (FUTURE)
P-8618 START/STOP
ACTUATORS PROVIDED BY M.O.I. AT FUTURE DATE
24"Ø CO2 VENT STACK
24"Ø BLOWDOWN STACK
ABOVE GRADE
SLOPE DOWN
H.T. & INSULATE TO 3' BELOW GRADE
CO2 VENT K.O. PUMP
FUEL GAS TO GENERATOR
PLOT DATE: 05-31-90
T.H. RUSSELL CO. JOB NO. 445
PRINT DISTRIBUTION RECORD
REVISIONS
C GENERAL REVISION
0 GEN. REV., ISSUE A.F.C.
2 GENERAL REVISION
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
VENT SYSTEM
CO2 VENT SYSTEM
ENGINEERS
DATE
REVISED BY
FILE NO.
W-3-M8205
DRAFTED BY
T.H. RUSSELL CO.
TULSA OK


V-8572
GLYCOL CONTACTOR/OUTLET SCRUBBER
72" ID x 38'-6" S/S
850 PSI D.P. @ 150 °F
V-8473
FLASH TANK
24" OD x 10'-0" S/S
150 PSI D.P. @ 200 °F
V-8573
FLASH GAS CONTACTOR
10.75" OD x 12'-0" S/S
150 PSI D.P. @ 200 °F
F-8471
RICH TEG FILTER
14" OD x 80" OAH
150 PSI D.P. @ 200 °F
F-8474
GLYCOL CHARCOAL ABSORBER
36" OD x 8'-0" S/S
150 PSI D.P. @ 200 °F
30 GPM
E-8273
GLYCOL REFLUX CONDENSER
122.3 MBTU/HR
150 PSI D.P. @ 400 °F - SHELL
14 PSI D.P. @ 400 °F - TUBE
V-8571
GLYCOL STILL COLUMN
20" OD x 16'-6" S/S
14 PSI D.P. @ 450 °F
H-8771
GLYCOL REBOILER
2065.0 MBTU/HR
14 PSI D.P. @ 450 °F
3 HP BLOWER MOTOR
A-8371
GLYCOL COOLER
1,109.2 MBTU/HR
950 PSI D.P. @ 250 °F
W/ (2) 10 / 2.5 HP 2 SPEED MOTORS
FUEL GAS TO V-8414
SHT. 3-M8203
FROM V-8405
SHT. 3-M8201
TO RESIDUE HEADER
TREATED GAS FROM V-8402
30 GPM GLYCOL DEHY.
V-8472
GLYCOL SURGE TANK
48" OD x 20'-0" S/S
14 PSI D.P. @ 450 °F
P-8671
GLYCOL PUMP
33 GPM @ 900 PSID
30 H.P. MOTOR
P-8672
GLYCOL PUMP
33 GPM @ 900 PSID
30 H.P. MOTOR
V-8476
GLYCOL PUMP DRAIN TANK
12.75" OD x 2'-6" S/S
14 PSI D.P. @ 250 °F
E-8271
COLD GLYCOL/GLYCOL EXCHANGER
61.1 MBTU/HR
50 PSI D.P. @ 250 °F - SHELL
150 PSI D.P. @ 200 °F - TUBE
E-8272
WARM GLYCOL/GLYCOL EXCHANGER
1784.6 MBTU/HR
50 PSI D.P. @ 450 °F - SHELL
150 PSI D.P. @ 350 °F - TUBE
* = BY BURNER MFG.
T.H. RUSSELL CO. JOB NO. 445
PRINT DISTRIBUTION RECORD
REVISIONS
PLOT DATE: 05-31-01
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
GLYCOL UNIT
ENGINEERS
DATE
REVISED BY
DATE
FILE NO.
W-4-M8201
DRAFTED BY
T.H. RUSSELL CO.
TULSA, OK.



P-8617 AMINE RECHARGE PUMP 105 GPM @ 78 FT. TDH 7.5 H.P. MOTOR
P-8614 AMINE/WATER MAKEUP/FILL PUMP 105 GPM @ 78 FT. TDH 7.5 H.P. MOTOR
T-8417 AMINE RUN DOWN TANK 210 BBL 10' DIA. x 15' HIGH
T-8416 AMINE MAKE-UP TANK 90 BBL 7'-11" DIA. x 10' HIGH
P-8619 WATER MAKE-UP PUMP 55 GPM @ 404 FT. TDH 30 H.P. MOTOR
P-8620 WATER MAKE-UP PUMP 55 GPM @ 404 FT. TDH 30 H.P. MOTOR
T-8415 WATER MAKE-UP TANK 210 BBL 10' DIA. x 15' HIGH
T-8419 WATER STORAGE TANK 210 BBL 10' DIA. x 15' HIGH
V-8425 RELIEF HEADER K.O. DRUM
T-8423 HCL STORAGE 500 GAL
M-8901 WATER TREATER 17,000 GPD CAPACITY
T-8424 WASH STORAGE 500 GAL
NOTE: T-8417 ELEVATION TO ALLOW FREE DRAINING OF AMINE TO TANK
H.T. & INSUL TO 3' MIN. BELOW GRADE
UNTREATED WATER SUPPLY
WATER TREATER BUILDING
TO V-8503 SHT. 3-M8202
TO TRUCK LOADING
TO V-8450 SHT. 3-M8204
CONTINUOUS WATER MAKE-UP TO 8125-A-10" SHT. 3-M8202
P-8613A WATER MAKEUP PUMP CONTINUOUS 7.5 GPM @ 78 FT. TDH 2 H.P. MOTOR
P-8613B WATER MAKEUP PUMP CONTINUOUS 7.5 GPM @ 78 FT. TDH 2 H.P. MOTOR
P-8613C WATER MAKEUP PUMP CONTINUOUS 7.5 GPM @ 78 FT. TDH 2 H.P. MOTOR
T.H. RUSSELL CO. JOB NO. 445
PRINT DISTRIBUTION RECORD
REVISIONS
C GENERAL REVISION
0 PORTIONS OF DRAWING NOW ON W-8-M8202. ISSUED A.F.C.
2 GENERAL REVISION
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
AMINE AND TREATED WATER UTILITIES
FILE NO. W-8-M8201
T.H. RUSSELL CO. TULSA OK


M-8902
INSTRUMENT AIR COMPRESSOR PACKAGE
150 SCFM @ 100 PSIG
(3) 30 HP MOTORS
T-8418
WASTE WATER TANK
500 BBL
15'-6" DIA. x 16' HIGH
P-8615A
WASTEWATER TRANSFER PUMP
40 GPM @ 40 FT. TDH
1 H.P. MOTOR
P-8615B
WASTEWATER TRANSFER PUMP
40 GPM @ 40 FT. TDH
1 H.P. MOTOR
T-8426
WASTE WATER SUMP TANK
150 GAL
T-8475
GLYCOL STORAGE TANK
50 BBL
7'-11" DIA. x 10' HIGH
V-8412
CLOSED DRAIN K.O.
P-8873
GLYCOL MAKEUP/DRAIN PUMP
5 H.P. MOTOR
FUTURE INSTR. AIR TO TRAIN 7
2" INSTRUMENT AIR TO TRAIN 6
INSTRUMENT AIR TO/FROM TRAIN 5
TO TRAIN 8
2 AIR RECEIVERS
H.T. AND INSULATE TO 3' BELOW GRADE
TO V-8472
FROM P-8816
CO2 VENT STACK AND V-8420
CONCRETE VAULT
FOOT VALVE SUPPLIED WITH PUMPS
FR. FUTURE TRAIN 7 W.W. DRAIN SYSTEM
FR. FUTURE TRAIN 9 W.W. DRAIN SYSTEM
POTABLE WATER
EMERGENCY EYE-WASH (LOCATED IN TANK AREA)
T.H. RUSSELL CO. JOB NO. 445
PRINT DISTRIBUTION RECORD
REVISIONS
MERIDIAN OIL
VAL VERDE PLANT
TRAIN 8
MECHANICAL FLOW SHEET
INSTRUMENT AIR, GLYCOL, AND WASTEWATER UTILITIES
W-8-M8202
T.H. RUSSELL CO.
TULSA, OK.

ConocoPhillips

Wingate Plant
P.O. Box 119
Rehoboth, NM 87322
phone 505.863.1045

Beverly J. Cox
Compliance Coordinator
505-863-1023, Fax 505-863-1047
beverly.j.cox@conocophillips.com

April 13, 2004

Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Operations Manager Change
ConocoPhillips Wingate Fractionator, Gallup, New Mexico

Dear Mr. Price,

This letter serves as notification of a change in the Wingate Fractionator Operations Manager position. Mr. Chuck White has retired from ConocoPhillips. In the interim, Mr. Daniel Henderson is assuming the role of Operations Manager for the Wingate Fractionator.

Should you have any questions, please do not hesitate to call me at 505-863-1023 or Mr. Daniel Henderson at 505-863-1007.

Sincerely,

Beverly J. Cox
Compliance Coordinator

cc: Denny Foust
1000 Rio Brazos Rd
Aztec, NM 87401

Henry Platt
ConocoPhillips
Westlake Building III
Houston, TX

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor

Joanna Prukop
Cabinet Secretary
Acting Director
Oil Conservation Division

March 24, 2004

Ms. Beverly Cox
ConocoPhillips
Wingate Gas Fractionating Plant
PO Box 119
Rehoboth, NM 87322

Subject: Approval for Wingate Monitoring Well Location on El Paso Property

Dear Ms. Cox:

The New Mexico Oil Conservation Division (OCD) understands that ConocoPhillips Company (COPC) proposes to install a new groundwater monitoring well on a parcel belonging to El Paso Natural Gas. The parcel is located north-northwest of the central Wingate facility area. The purpose of this well is to monitor groundwater quality in compliance with the Wingate Gas Fractionating Plant Groundwater Discharge Plan GW-054. **This location is hereby approved by the OCD.**

Please be advised that NMOCD approval of this plan does not relieve ConocoPhillips of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (ConocoPhillips) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at 505-476-3487 or e-mail WPRICE@state.nm.us.

Sincerely;

Wayne Price-Pet. Engr. Spec.

cc: OCD Aztec Office

MAXIM
TECHNOLOGIES INC
A TETRA TECH COMPANY

10601 Lomas Blvd. NE, Suite 106
Albuquerque, NM 87112
(505) 237-8440
fax (505) 237-8656

February 5, 2004

Mr. Wayne Price
Environmental Bureau
Energy, Minerals and Natural Resource Department
Oil Conservation Division (OCD)
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: **Response to Draft #2 Attachment to the Discharge Plan GW-054 Approval, Dated January 7, 2004, Amended Discharge Plan Approval Conditions**
ConocoPhillips Wingate Gas Fractionating Plant,
Gallup, New Mexico
Maxim Project No. 4690019

Dear Mr. Price:

This document is the response to the above-referenced "Draft #2 Attachment" regarding the ConocoPhillips (CoP) Wingate Gas Fractionating Plant.

1. CoP concurs with Items 1 through 14 of the Draft #2 Attachment.

2. Item 15 Storm Water Plan: OCD has eliminated the Storm Water Plan because of the implementation of an SPCC plan and the Integrated Contingency Plan for the Wingate facility.

3. Item 16 Waste Water Evaporation Ponds:

   A. *Pond Inspections:* CoP concurs.

   B. CoP concurs with annual monitoring of MWR-1, MW-2, and MW-3 (MW-3 was omitted from the Attachment but has historically been sampled as part of the evaporation pond monitoring program so we are placing it back in the program for consistency).

      MWS-1 and MWS-2, the shallow wells that monitor potential pond leakage, will be inspected quarterly for the presence of fluids. If fluids are present in volumes sufficient for sampling, these fluids will be analyzed. We agree upon a sampling schedule for these wells that is based on the analytical results of the initial samples. If results of initial sampling suggest pond leakage (based on chemical similarities to pond water), then CoP will consider quarterly sampling of these two wells. If the results of initial sampling suggest that the fluids contained in the wells are the result of infiltration by surface water (from precipitation), then

CoP proposes sampling and analysis on an annual schedule or once per year when inspections indicate fluids are present in the wells.

Sample analysis: CoP concurs with the analytical suite requested by OCD except for fecal coliform bacteria. The fecal coliform bacteria analysis requires a short holding time that is difficult to meet, given the location of the Wingate facility with respect to the nearest analytical laboratory. CoP has discussed this with OCD, and because historically no fecal coliform has been found in the evaporation ponds, OCD has agreed that total coliform bacteria analysis will be sufficient.

4. Item 17 Vadose Zone and Water Pollution

B Flare Pit area: OCD has requested that a new groundwater monitoring well be installed down gradient from WMW-3 to ensure that contamination is not leaving the CoP property.

CoP is willing to consider installing a new well. However, there are logistical issues that must be resolved. WMW-3 is located on the north side of the facility, in the northwest corner of the flare pit area, which is enclosed by a fence. Beyond the fence is Navajo reservation land. A new well directly downgradient from WMW-3, according to groundwater flow interpreted as of September 2003, would be located on reservation land. CoP estimates that receiving permission to install a monitoring well on the reservation might take as much as a year or more.

An alternative would be to position the new well within the area currently occupied by El Paso Natural Gas, also located on the north side of the Wingate facility. The proposed location is shown on Figure 1. This location is downgradient but is also sidegradient from WMW-3. This proposed location is, however, directly downgradient of the center of the Wingate facility and may, in fact, be a better location to monitor potential contaminant migration from the center of the plant. CoP believes that permission to drill and sample a well in this alternative location could be obtained in a timely manner from El Paso Natural Gas. In addition, obtaining permission from El Paso Natural Gas for annual sampling access is also considered by CoP to be more likely than obtaining such access from the Navajo Nation. This conclusion is based on past experience with both the Navajos and El Paso Natural Gas. CoP agrees to install the new well on the El Paso Natural Gas site pending resolution of access and Right-of-Way issues.

Thus, CoP requests concurrence from OCD for locating the new well as shown in Figure 1.

5. *17C Railroad Rack Area 1:* OCD requests a new monitoring well be installed west of existing monitoring well WMW-2.

CoP proposes to install a new monitoring well west of WMW-2 in the location shown on Figure 1.

CoP concurs that groundwater remediation of the railroad rack area shall be addressed upon closure of the facility, or at any time upon discovery that the contamination begins to migrate away from this area. At such a time, CoP will submit a corrective plan to OCD for approval.

D. Plant area groundwater salt contamination: ConocoPhillips shall submit an investigation plan for OCD approval to determine the source of the salt contamination.

CoP is currently taking a proactive approach to solving the problem of groundwater salt contamination. This plan has two parts, as follows:

1. Install a nano-filtration water treatment system. This ion exchange system requires a brine solution for regeneration. ConocoPhillips has approved capital and is currently (January 2004) constructing this system designed to replace the current water softening system. The new filtration system will not require the brine pits that are currently in operation, and thus the pits will be out of service once the new system is up and running. The new system is a different technology and will drastically reduce the use of salt in the facility.

2. Discontinue use of the belowground concrete brine pits that have been used historically as part of the facility water treatment system. Water in the brine pits will be removed along with any residual solid salt. The pits will be covered and will remain functional but inactive until the new nano-filtration system is fully operational. Decommissioning the brine pits is expected to reduce the potential for additional salt impact to groundwater within the central area of the plant. With the elimination of the potential source, salt concentrations in groundwater will eventually decrease through natural attenuation. Groundwater monitoring in the existing wells and the two proposed wells will verify the effects of the natural attenuation processes.

6. *ConocoPhillips* concurs with annual sampling of wells WMW-1, WMW-2, WMW-3, WMW-4, WMW-5 and WMW-6, and the two new WMW wells (as requested by OCD). Samples will be analyzed for Volatile Organics (Method 8260), semi-volatiles (Method 8270), New Mexico Water Quality Control Commission (WQCC) metals, and General Chemistry including cations and anions.

Additional Requirements

CoP acknowledges that OCD has requested that CoP notify the OCD Santa Fe office and the local district office at least two weeks in advance of all scheduled activities such that the ODC has the opportunity to witness the events and split samples. For large facilities (i.e., gas processing plants) an annual notification will suffice.

7. *18 Annual Report, C: Correction:* first sentence, "An annual water table potentiometric elevation map using the water table elevation of the ground water in all refinery monitor wells." Please replace the word "refinery" with the word "facility."

8. Item 19 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." CoP suggests that notifying OCD prior to facility ownership transfer may not always be possible. Compliance with this request could impact CoP's corporate business objectives as well as facility operational requirements. CoP proposes that the OCD will be notified of any transfer of ownership as soon as possible after the completion of such a transfer.

CoP looks forward to the OCD's review and approval of this response to the Draft #2 Attachment. Should you have any questions, please contact Ms. Beverly Cox, Wingate Gas Fractionating Plant Environmental Coordinator, at (505) 863-1023.

Sincerely,

Maxim Technologies, Inc.

RM Sengebush

Robert M. Sengebush, R.G.
Senior Project Manager

Attachment: Figure 1 - Site Map with proposed monitoring well locations

Cc: Beverly Cox, ConocoPhillips
Joyce Miley, ConocoPhillips
Neal Goates, ConocoPhillips

Conditions Accepted by: **ConocoPhillips**

Chuck White
Company Representative (print name)

Chuck White Date: 2-6-04
Company Representative (signature)

Title: Operations Manager

MW-2
6582.43

MWS-2
(DRY)

MWS-1
(DRY)

MWR-1
6578.25

MW-1
(Abd 6/24/03)

WEST
EVAPORATION POND

EAST
EVAPORATION
POND

6580

6581

6582

6583

6584

6585

6586

6587

6588

6589

6590

6591

WMW-8

WMW-3
6586.49

FLARE PIT

MW-3
6584.31

OFFICES

WMW-5
6590.98

WMW-1
6591.2

WMW-4
6587.59

WMW-2
6589.83

WMW-7

WMW-6
6592.34

LEGEND

N

0 100 200
SCALE IN FEET

6585 — Groundwater Elevation Contour, ft. above mean sea level, Sept. 2003

WMW-4 6587.59 — Monitoring Well with Groundwater Elevation ft. above mean sea level

WMW-7, WMW-8 — Proposed new Monitoring Well locations

MWR-1 — re-drill to replace MW-1

MW-1 — Plugged and abandoned 6-24-03

ConocoPhillips Wingate Gas Fractionating Plant
Gallup, New Mexico

FIGURE 1: Site Map with Monitoring Wells and Groundwater Elevation Contours

ConocoPhillips

AMC 2-04-04

MAXIM TECHNOLOGIES INC

DRAFT #2

January 07, 2004

CERTIFIED MAIL
RETURN RECEIPT NO. 7923 4313

Mr. Chuck White
ConocoPhillips (CP)
P.O. Box 119
Rehoboth, New Mexico 87322

Re: Renewal of Discharge Plan GW-054
Wingate Gas Fractionating Plant

Dear Mr. White:

The groundwater discharge plan GW-054 for the ConocoPhillips, Wingate Gas Fractionating Plant, located in the portions of Section 9,10,15,16 and 17, Township 15 North, Range 17 West, NMPM, McKinely County, New Mexico, **is hereby approved** under the amended conditions contained in the enclosed attachment. Enclosed are two copies of the amended conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan was approved on August 17, 1992. The discharge plan renewal application dated April 18, 2002, including attachments, and an addendum dated June 06, 2002, October 28, 2002 (E-mail) was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations which included all earlier applications and all conditions later placed on those approvals was approved with conditions on October 30, 2002.

On December 02, 2002 ConocoPhillips acknowledge receipt of the discharge plan approval and submitted the required fees and noted the approval conditions will be signed and forwarded to OCD when all comments have been addressed in their letter. As a result of ConocoPhillips request, OCD began negotiations concerning the issues listed. After several meetings, site visit, additional file search, and additional investigation work performed by ConocoPhillips, the OCD has amended the approval conditions to reflect the current conditions. The supporting documentation is as follows:

CP December 02, 2002 "Renewal of Ground Water Discharge Plan GW-054 Reply and Comments from Wingate Fractionating Plant"; CP-Maxim March 13, 2003 "Environmental Monitoring and Closure Plan" ; CP-Maxim April 03, 2003 "addendum regarding Flare Pit and Fire Training Pit Closure"; OCD April 18, 2003 "E-mail Draft permit"; CP April 30, 2003 "Reply to Draft Amended Discharge Approval Conditions"; CP-Maxim June 27, 2003 Railroad Rack Vadose Zone and Groundwater Contamination and Flare"; CP-Maxim September 11, 2003 "Outcome and Monitoring as of September 08, 2003"; CP November 07, 2003 "pond sampling results".

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve ConocoPhillips of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve ConocoPhillips of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., ConocoPhillips is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire August 17, 2007** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the ConocoPhillips, Wingate Gas Fractionating Plant, is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $100.00 plus a flat fee of $4000.00 for gas processing plants. The OCD has received the $100 filing fee and $4000.00 flat fee.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail WPRICE@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachment-1
Xc: OCD Aztec Office

DRAFT #2

ATTACHMENT TO THE DISCHARGE PLAN GW-054 APPROVAL
ConocoPhillips, Wingate Gas Fractionating Plant
Amended DISCHARGE PLAN APPROVAL CONDITIONS
January 07, 2004

1. Payment of Discharge Plan Fees: The $100.00 filing fee and required flat fee of $4000.00 for gas processing plants has been received by the OCD.

2. Commitments: ConocoPhillips will abide by all commitments submitted in the discharge plan renewal application dated April 18, 2002, including attachments, and addendums dated June 06, 2002, October 28, 2002 (E-mail), April 03, 2003, all subsequent submittals and these amended conditions for approval.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. 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 below grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as 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.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders 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.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. 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. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspections will be retained on site for a period of five years.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203.

13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712 disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge plan, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections or the annual report.

15. Storm Water Plan: Stormwater runoff controls shall be maintained. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off, then immediate actions shall be taken to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal stormwater run-off containment plan and submit for OCD approval within 15 days.

16. Waste Water Evaporation Ponds: A minimum freeboard of 3 feet will be maintained in the ponds so that no over topping of wastewater occurs. All waste entering the ponds or the plant wastewater collection system shall be RCRA non-hazardous as defined by EPA 40 CFR Part 261. Any repairs or modifications to the pond, wastewater collection system and/or monitoring systems must receive prior OCD approval. Leaks, releases from the ponds, or any contaminant found in any monitoring device or groundwater that exceeds the New Mexico Ground Water (WQCC) standards shall be reported pursuant to Item 12. (Spill Reporting) of these conditions.

A. Pond Inspections: Evaporation ponds shall be inspected monthly and after any major storm event. Records shall be maintained for fluid levels, freeboard, seepage, flow channels, pipes, valves and dike integrity.

B. Evaporation Pond(s) and Pond Monitor Well(s): MWR-1 and MW-2 monitor wells shall be purged and sampled annually. MWS-1 and MWS-2 shall be inspected for fluids quarterly. If fluids are discovered in MWS-1 and MWS-2 they shall be sampled upon discovery and semi-annually thereafter. Composite pond samples shall be collected and analyzed annually.

All Samples collected shall be analyzed for Volatile Organics (Method 8260), semi-volatiles organics (Method 8270), New Mexico Water Quality Control Commission (WQCC) metals, and General Chemistry including cations and anions. Due to the raw untreated sewage going into the ponds OCD will require that general requirements found in WQCC regulations 20.6.2.2101 (BOD, COD, Fecal Coliform Bacteria, and PH) be part of the sampling program. Sampling and analytical work shall be pursuant to EPA approved methods and quality assurance/quality control (QA/QC) procedures.

C. Migratory Bird Protection: ConocoPhillips will not be required to net the evaporation ponds as long as the ponds are rendered nonhazardous to wildlife including migratory birds. ConocoPhillips will be responsible for monitoring, recording, and reporting any significant event that provides evidence that the ponds are hazardous to any wildlife including migratory birds.

17. Vadose Zone and Water Pollution: The previously submitted investigation(s) and remediation plans that were submitted pursuant to the discharge plan and all future discoveries of contamination will be addressed through the discharge plan process.

A. Fire Training Pit area is considered closed and no further action required at this time.

B. Flare Pit area soil remediation is considered closed with continued groundwater monitoring in the area. In addition, OCD will require a new monitor well to be installed down gradient from WMW-3 to ensure that contamination is not leaving ConocoPhillip's property.

C. Railroad Rack area is still active. At the request of ConocoPhillips, OCD will allow long term monitoring in this area and forgo any active remediation requirement as long the follow is adhered to:

1. a new monitor well shall be installed west of existing monitoring well WMW-2.

2. The remediation of the groundwater and vadose zone contamination shall be addressed upon closure of the facility, or at any time upon discovery the contamination begins to migrate away from this area, then a corrective plan shall be submitted for OCD approval.

D. Plant area groundwater salt contamination: ConocoPhillips shall submit an investigation plan for OCD approval to determine the source of the salt contamination.

E. Monitor wells WMW-1,WMW-2,WMW-3, WMW-4, WMW-5 and WMW-6 shall be purged and sampled annually. All Samples collected shall be analyzed for Volatile Organics (Method 8260), semi-volatiles organics (Method 8270), New Mexico Water Quality Control Commission (WQCC) metals, and General Chemistry including cations and anions. Sampling and analytical work shall be pursuant to EPA approved methods and quality assurance/quality control (QA/QC) procedures.

Additional Requirements:

1. ConocoPhillips shall notify the OCD Santa Fe and local district office at least 2 weeks in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples. For large facilities, i.e. gas processing plants, an annual notification will suffice.

2. ConocoPhillips shall notify the NMOCD within 15 days of the discovery of separated-phase hydrocarbons or the exceedance of a WQCC standard in any down gradient monitor well where separate-phase hydrocarbons were not present or where contaminant concentrations did not exceed WQCC standards during the preceding monitoring event.

18. ANNUAL REPORT: An annual report will be submitted to the OCD by September 15 of each year. The annual report will contain:

A. A description of the monitoring and remediation activities that occurred during the year including conclusions and recommendations.

B. Summary tables listing laboratory analytic results, of all water quality sampling for each monitoring point and plots of concentration vs. time for contaminants of concern from each monitoring point. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report. Copies of the most recent years laboratory analytical data sheets will also be submitted.

C. An annual water table potentiometric elevation map using the water table elevation of the ground water in all refinery monitor wells. A corrected water table elevation shall be determined for all wells containing phase-separated hydrocarbons. This map shall show well locations, pertinent site features, and the direction and magnitude of the hydraulic gradient.

D. Plots of water table elevation vs. time for each ground water monitoring point.

E. An annual product thickness map based on the thickness of free phase product on ground water in all refinery recovery wells. This map shall include isopleth lines for products and contaminants of concern.

F. Electronic filing: OCD would like to encourage ConocoPhillips to file this report in an acceptable electronic format.

19. 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.

20. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

21. Certification: **ConocoPhillips** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **ConocoPhillips** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **ConocoPhillips**

_____
Company Representative- print name

_____Date_____
Company Representative- Sign

Title_____

ConocoPhillips

Wingate Plant
P.O. Box 119
Rehoboth, NM 87322
phone 505.863.1045

Beverly J. Cox
Compliance Coordinator
505-863-1023
Fax 505-863-1040

November 7, 2003

Mr. Wayne Price
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Discharge Plan GW-054 Compliance
Wingate Fractionating Plant
McKinley County, New Mexico

Dear Mr. Price:

Please find attached the results from the annual evaporation pond sampling event at ConocoPhillips Wingate Fractionator facility, located in Gallup, New Mexico.

The ponds were sampled on October 9, 2003 pursuant to Discharge Plan GW-054 Approval Condition #16 (October 30, 2002) and analyzed by Hall Environmental Laboratories, Albuquerque, New Mexico. Maxim Technologies Inc. submitted the monitoring well results on September 11, 2003.

Should you have questions or require additional information, please contact Beverly Cox at 505-863-1023.

Sincerely,

Beverly J. Cox

Attachments

Cc: Joyce Miley
Houston Office
PO 2014

Price, Wayne

From: Price, Wayne
Sent: Wednesday, October 01, 2003 10:04 AM
To: 'Cox, Beverly J.'
Subject: RE: Wingate GWDP Pond Sampling Requirement

Approved!

-----Original Message-----
From: Cox, Beverly J. [mailto:Beverly.J.Cox@conocophillips.com]
Sent: Wednesday, October 01, 2003 9:29 AM
To: wprice@state.nm.us
Cc: Cox, Beverly J.; Miley, Joyce M.
Subject: Wingate GWDP Pond Sampling Requirement

Mr. Price,

The Wingate Fractionating Plant, located in Gallup, New Mexico collects the annual water samples from the evaporation ponds in October. The latest GWDP (GW-54), condition 16 -Waste Water Evaporation Ponds, states the analysis required for the evaporation ponds. There are some concerns in the analysis process for the Fecal Coliform Bacteria test. The Fecal Coloiform sample has to be collected, return to a lab and analyzed within 8 hours. The nearest lab available is in Albuquerque.

Can a Total Fecal Coliform Bacteria test be conducted in lieu of the Fecal Coliform Bacteria test?

Your help in resolving this matter is greatly appreciated.

Many thanks,

BJ

Beverly J. Cox
Wingate Fractionator
505-863-1023

MAXIM
TECHNOLOGIES INC
A TETRA TECH COMPANY

Albuquerque, NM 87112
(505) 237-8440
Fax (505) 237-8656

June 27, 2003

Mr. Wayne Price
Environmental Bureau
Energy, Minerals and Natural Resource Department
Oil Conservation Division (OCD)
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Railroad Rack Vadose Zone and Groundwater Contamination and Flare Pit Groundwater Contamination Investigation Plan
Response to April 18, 2003, OCD Draft Attachment to the Groundwater Discharge Plan GW-054
Amended Discharge Plan Approval Conditions April 18, 2003
Environmental Monitoring and Closure Plan
ConocoPhillips Wingate Gas Fractionating Plant, Gallup, New Mexico
Maxim Project No. 3690050

Dear Mr. Price:

On behalf of ConocoPhillips Company (ConocoPhillips), Maxim Technologies, Inc. (Maxim) is submitting this Investigation Plan in response to your request of April 18, 2003:

> *"16. Vadose Zone and Water Pollution: Provide an investigation plan for OCD approval for the railroad rack vadose zone and groundwater contamination area and the flare pit groundwater contamination area by June 15, 2003. Due to the salt contamination found in various Monitor wells OCD requires an up-gradient well to be included in the plan."*

This document presents the plan to investigate and monitor the presence of environmental impacts in the railroad rack and flare pit areas. Part of the investigation has already taken place by way of a full round of groundwater sampling, conducted the week of May 12, 2003. Analytical results of that sampling are presented in Table 1. Please refer to Figure 1, Site Map with Analytical Results, for well locations and related analytical results.

Railroad Rack Vadose Zone and Groundwater Contamination Area

- OCD has requested an investigation of the railroad rack area vadose zone. At present, the railroad rack area is used for loading railroad cars with petroleum products. The current procedure is automated and carefully monitored. There is no apparent evidence of recent leaks or spills in the area. Based on the available ConocoPhillips records, soil sampling has not been conducted in this area, so the condition of the subsurface soil is not known. A soil

sampling program would create a significant impact to the facility operations with, in ConocoPhillips' opinion, little to gain from the information obtained (groundwater in this area is already known to be impacted with benzene). Thus, given the active nature of the area and lack of known impact, ConocoPhillips proposes no action on the vadose zone at this time.

- May 2003 groundwater analyses show elevated benzene in WMW-2. These benzene concentrations are consistent with prior analyses. The benzene concentrations appear to be stable over time.

- May 2003 groundwater analyses from WMW-4 show no detectable benzene, toluene, ethyl benzene or total xylenes (BTEX). WMW-4 is downgradient from WMW-2, based on the interpreted groundwater flow direction determined from groundwater elevations in May 2003. Thus it appears that the elevated benzene concentrations are not migrating downgradient but rather are stable in and around WMW-2. Please note: due to problems with the contract analytical laboratory, BTEX analyses from WMW-4 and WMW-5 were out of holding time. These wells will be resampled and the samples will be analyzed again for BTEX. ConocoPhillips will notify OCD immediately if the results of resampling require any change to this interpretation.

- Low concentration of sulfate (8.2 milligrams per liter) in WMW-2 demonstrates clearly that chemical reduction of sulfate is taking place in this well. This is further supported by black silt in purge water from this well which suggests reduction of iron oxides to iron sulfides. Benzene concentrations in WMW-2 have been recorded in the range of 26,800 micrograms per liter (µg/L) in 1991 to 30,000 µg/L 1998. The benzene concentration from sampling in May 2003 was 29,000 µg/L. Further, the impacted groundwater seems to not be moving, as demonstrated by the consistent absence of benzene or other hydrocarbon compounds in WMW-4, located approximately 400 feet downgradient of WMW-2. This evidence suggests that the benzene "plume" has attained chemical and biological equilibrium within a limited area around the railroad rack area.

- Therefore, ConocoPhillips proposes annual sampling of WMW-2 and WMW-4 with analyses for BTEX but no active remediation of the benzene at this time.

Flare Pit Groundwater Contamination Area

- May 2003 groundwater analyses show no detectable hydrocarbon in WMW-3. Groundwater contamination referred to by OCD in the April 18, 2003, letter is for chloride, sulfate and total dissolved solids (TDS).

- May 2003 analyses indicate elevated concentrations of chloride, sulfate and TDS in WMW-3 as well as in WMW-1, WMW- 2, and WMW-5. Please refer to the Site Map (Figure 1) with Analytical Results. Concentrations of these constituents are not elevated in WMW-4.

- It is not known at this time whether or not these concentrations are representative of the background groundwater quality or are a result of impact from the Wingate plant activities. A new monitoring well (WMW-6) will be installed in an upgradient location (the southeast corner of the Wingate facility) the week of June 23, 2003, and sampled to determine background concentrations of chloride, sulfate and TDS.

Summary

Railroad rack area vadose zone: No investigation is planned at this time for the railroad rack vadose zone.

Railroad rack area groundwater: Elevated benzene concentrations are present in WMW-2. The concentrations have been stable since sampling began in 1991. The areal extent of the elevated benzene concentrations also appears to be stable in that no benzene was detected in WMW-4 in 2003. WMW-4 is downgradient from WMW-2.

ConocoPhillips proposes annual monitoring of WMW-2 and WMW-4 to verify the stability of the elevated benzene concentrations.

Flare pit area groundwater contamination: The groundwater impact referred to is elevated concentrations of chloride, sulfate and TDS. Per request of OCD, ConocoPhillips has installed a monitoring well (WMW-6) in an upgradient location and will collect samples from that well to compare to analyses from the wells in the facility area (WMW-1, WMW-2, WMW-3, WMW-4 and WMW-5).

Should you have any questions regarding the information contained here, please contact Ms. Beverly Cox, Compliance Coordinator, ConocoPhillips Wingate Gas Fractionating Plant, at (505) 863-1023 or me at (505) 237-8440.

Sincerely,

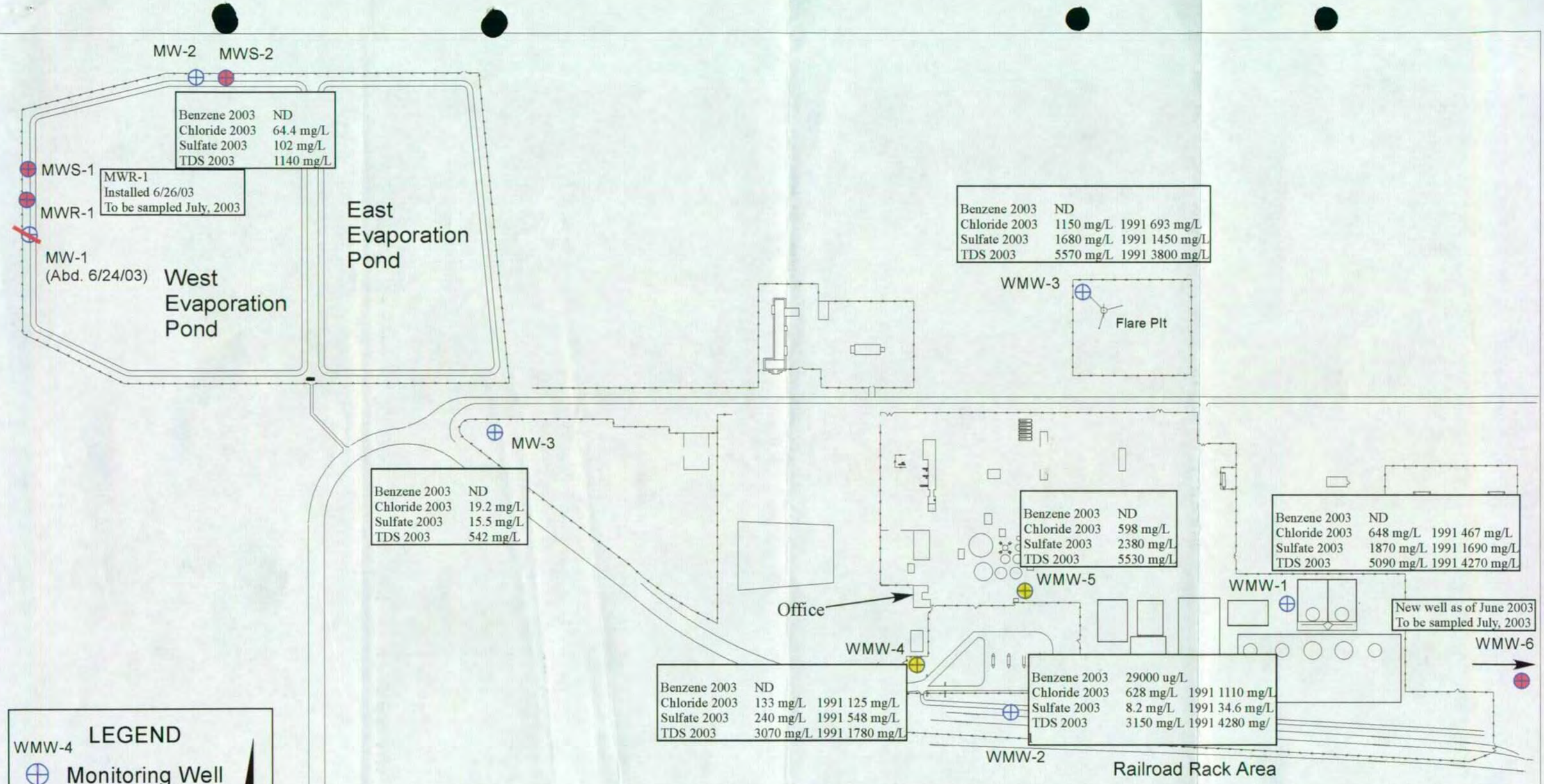
MAXIM TECHNOLOGIES, INC.

RM Sengebush

Robert M. Sengebush, R.G.
Senior Project Manager

Attachment

Cc: Beverly Cox, ConocoPhillips
Neal Goates, ConocoPhillips
Joyce Miley, ConocoPhillips



CONOCOPHILLIPS WINGATE GAS FRACTIONATING PLANT
GALLUP, NEW MEXICO

Figure 1
Site Map with Analytical Results

New Wells as of June, 2003

MWR-1, MWS-1, MWS-2, WMW-6

ConocoPhillips

RMS 6/20/03 MAXIM TECHNOLOGIES INC

TABLE 1
Wingate Gas Fractionating Plant
Groundwater Analytical Results Summary

Sample Location	Date Sampled	Wingate Gas Fractionating Plant, Gallup, New Mexico ANALYSES FROM GW SAMPLING, MAY, 2003																
		SW846 8260B Micrograms per Liter (ug/L)				SW846 6010B Milligrams per Liter (mg/L)								MCAWW 300.0A			MCAWW 310.1	MCAWW 160.1
		Benzene	Toluene	Ethylbenzene	Xylenes	Arsenic	Barium	Calcium	Cadmium	Chromium	Magnesium	Sodium	Lead	Chloride	Nitrate	Sulfate	Alkalinity	TDS
MWR-1	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MWS-1	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-2	05/14/03	<1.0	<1.0	<1.0	<2.0	<0.01	0.21	14.7	<0.002	<0.005	7.9	418	<0.003	64.4	<0.5	102	770	1140
MWS-2	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW-3	05/14/03	<1.0	<1.0	<1.0	<2.0	<0.01	<0.2	28.7	<0.002	<0.005	13.5	149	<0.003	19.2	<0.5	15.5	428	542
WMW-1	05/14/03	<1.0	<1.0	<1.0	<2.0	<0.01	<0.2	258	<0.002	<0.005	69.7	1410	<0.003	648	<0.5	1870	1050	5090
WMW-2	05/14/03	29000	<500	<500	<1000	0.016	0.42	47.3	0.0081	0.0095	27.4	1140	0.0180	628	0.6	8.2	1710	3150
Duplicate	05/14/03	30000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
WMW-3	05/14/03	<1.0	<1.0	<1.0	<2.0	0.014	0.62	186	<0.002	0.19	88.5	1860	0.042	1150	1.5	1680	1090	5570
WMW-4	05/14/03	<1.0 **	<1.0	<1.0	<2.0	<0.01	0.28	37.3	<0.002	0.006	16.8	550	16.8	133	<0.5	240	783	3070
WMW-5	05/14/03	<1.0 **	<1.0	<1.0	<2.0	<0.01	<0.2	332	<0.002	<0.005	98	1310	<0.003	598	<0.5	2380	895	5530
WMS-6	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
NMWQCC Groundwater Standards for Human Health		10	750	750	620	0.1	1.0	NE	0.01	0.05	NE	NE	0.05	250	44*	600	NE	1000

MW Monitoring Well MWS = Shallow MWR = Redrill
SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, Movember 1986 and its updates
MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions
NMWQCC New Mexico Water Quality Control Commission
NA Not Analyzed
NE Not established by NMWQCC
TDS Total Dissolved Solids
NS Not Sampled as of 6/23/03
* Converted from 10 mg/L to 44 mg/L for Nitrate as NO3
** will be resampled July 2003

Sample Location	Date	EPA 405.1 BOD	EPA 410.1 COD	SM 9222D Fecal Coliform
MWR-1	NS	NS	NS	NS
MWS-1	NS	NS	NS	NS
MW-2	05/14/03	<4 mg.L	17.1 mg/L	ND
MWS-2	NS	NS	NS	NS
MW-3	05/14/03	<4 mg.L	ND	ND

ConocoPhillips

Wingate Plant
P.O. Box 119
Rehoboth, NM 87322
phone 505.863.1045

Beverly J. Cox
Compliance Coordinator
P. O. Box 119
Rehoboth, NM 87322
505-863-1023, Fax 505-863-1040

April 30, 2003

Mr. Wayne Price
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa FE, NM 87505

RE: Reply to Draft Amended Discharge Plan Approval Conditions
ConocoPhillips Wingate Fractionator GWDP-54

Dear Mr. Price,

This letter is in response to the electronic DRAFT Amended Discharge Plan Approval Conditions that Mr. Rob Sengebush received on April 18, 2003.

In recapping previous correspondence, we feel the following have been adequately addressed:

1. In the cover letter, it is stated, "all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered non-hazardous to wildlife including migratory birds." March 27, 2002, written communication was sent to the OCD requesting an exemption from this requirement. We have not heard back from the OCD on granting this exemption. A history of pond water analysis show that the pond water is safe to wildlife therefore our request should be approved. Should you require another copy of the written request, one will be provided.

2. Item number 9 Investigation Plan Required: comments state that it was unclear if any of the drain lines were leaking. These lines are non-hydrocarbon bearing lines. Research into the test event and observations during line replacement indicate that there was not a "leak" of product from the drain system. The old drain system was designed to move liquids from a number of different sources by gravity flow not as liquid under pressure. When trying to test this line in a pressure situation during December of 1999, an air leak was detected. This

pressurized air leak is believed to be from the fact that not all entry sources could be blocked in for the test so a decision was made to replace the existing line to allow us to achieve a testable system. The new drain lines are also designed as gravity drainage lines for waste water that goes to the evaporation ponds but we believe we can continue to isolate these lines for the required test.

3. Item number 14, OCD Inspections:

   A. "Submit a plan to investigate the brine water sump and waste water line going to the ponds. The plan should include investigating soils beneath this sump and line for salt contamination." The brine water sump and pit was part of our annual inspections performed during turnaround in June 2002. The results of these inspections were sent to the OCD on July 11, 2002. There were no cracks or leakage from the pit in question. Please let me know if you need the documents resent.

Item number 16, Additional Monitoring Devices Required: OCD's request to install two shallow monitoring wells located in close proximity to MW-1 and MW-2 will be conducted. Maxim Technologies Inc. will conduct this work. Once the wells have been drilled and MW-1 has been re-completed, a full report will be sent to your office.

Pond and Monitoring Well Sampling: The pond and monitoring well sampling will continue on an annual basis and the pond samples will be analyzed as outlined in the draft document.

Regarding the second item number 16, Vadose Zone and Water Pollution: "Provide an investigation plan for OCD approval for the railroad rack vadose zone and groundwater contamination area and the flare pit groundwater contamination area." Maxim Technologies Inc. services have been retained to perform an evaluation of the railroad rack and flare pit area. Maxim will address this prior to the June 15, 2003 deadline.

Just a reminder that on December 30, 2002 a letter was sent to Mr. Roger Anderson, Environmental Bureau Chief, regarding the Conoco Inc. name change. The Wingate Fractionator Plant is now owned and operated as a ConocoPhillips company. All correspondence should reflect the ConocoPhillips name.

Should you have any questions, please do not hesitate to call me at 505-863-1023.

Sincerely,

Beverly J. Cox
Compliance Coordinator

cc: Denny Foust
1000 Rio Brazos Rd
Aztec, NM 87401

Joyce Miley
ConocoPhillips
PO 2014
Houston, TX

Neal Goats
ConocoPhillips
5044 TN
Houston, TX

Price, Wayne

From: Price, Wayne
Sent: Friday, April 18, 2003 10:33 AM
To: Neal Goates (E-mail)
Cc: Clyde Yancey (E-mail); Rob Sengebush (E-mail)
Subject: Conoco Wingate Plant GW-054 Amended Conditions of Approval

Please find enclosed a copy of the permit and the draft amended conditions of approval. Please respond with comments within 10 days.

DPAPP_amended.DOC

Sincerely:

Wayne Price
New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505
505-476-3487
fax: 505-476-3462
E-mail: WPRICE@state.nm.us

October 30, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 9536

Mr. Chuck White
Conoco Inc.
P.O. Box 119
Rehoboth, New Mexico 87322

Re: Renewal of Discharge Plan GW-054
Wingate Gas Fractionating Plant

Dear Mr. White:

The groundwater discharge plan GW-054 for the Conoco Inc., Wingate Gas Fractionating Plant, located in the portions of Section 9,10,15,16 and 17, Township 15 North, Range 17 West, NMPM, McKinely County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter.**

The original discharge plan was approved on August 17, 1992. The discharge plan renewal application dated April 18, 2002, including attachments, and an addendum dated June 06, 2002 and October 28, 2002 (E-mail) submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Conoco Inc. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Conoco Inc. of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Conoco Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire August 17, 2007** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the Conoco Inc., Wingate Gas Fractionating Plant, is subject to the WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $100.00 plus a flat fee of $4000.00 for gas processing plants. The OCD has not received the $4000.00 flat fee. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval and subsequent installments due on this date of each calendar year.

Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505.

If you have any questions, please contact Wayne Price of my staff at (505-476-3487) or E-mail WPRICE@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachment-2
Xc: OCD Aztec Office

DRAFT

ATTACHMENT TO THE DISCHARGE PLAN GW-054 APPROVAL
Conoco Inc., Wingate Gas Fractionating Plant
Amended DISCHARGE PLAN APPROVAL CONDITIONS
April 18, 2003

1. Payment of Discharge Plan Fees: The $100.00 filing fee and required flat fee of $4000.00 for gas processing plants has been received by the OCD.

2. Commitments: Conoco Inc. will abide by all commitments submitted in the discharge plan renewal application dated April 18, 2002, including attachments, and addendums dated June 06, 2002, October 28, 2002 (E-mail), April 03, 2003 and these amended conditions for approval.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. 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 below grade tanks and sumps must be tested annually. Results of such tests shall be

maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as 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.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders 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.

   Investigation Plan Required: As a result of the failed pressure tests conducted during the fall of 1999 it was unclear if any of these lines were actually leaking, If so please provide a plan for investigation of these areas. Please send plan or explanation concerning this issue by June 15, 2003.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. 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. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspections will be retained on site for a period of five years.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203.

13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712 disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge plan, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections. As a result of the inspection conducted on May 30, 2002 (copy of report attached) the OCD requires the following actions to be taken by June 15, 2003.

    A. Submit a plan to investigate the brine water sump and waste water line going to the ponds. The plan should include investigating soils beneath this sump and line for salt contamination.

15. Storm Water Plan: Stormwater runoff controls shall be maintained. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off, then immediate actions shall be taken to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal stormwater run-off containment plan and submit for OCD approval within 15 days.

16. Waste Water Evaporation Ponds: A minimum freeboard of 3 feet will be maintained in the ponds so that no over topping of wastewater occurs. All waste entering the ponds or the plant wastewater collection system shall be RCRA non-hazardous as defined by EPA 40 CFR Part 261. Any repairs or modifications to the pond, wastewater collection system and/or monitoring systems must receive prior OCD approval. Leaks, releases from the ponds, or any contaminant found in any monitoring device or groundwater that exceeds the New Mexico Ground Water (WQCC) standards shall be reported pursuant to Item 12. (Spill Reporting) of these conditions.

    Additional Monitoring Devices Required: OCD's inspection revealed the fact that it is uncertain whether the ponds are lined or unlined. After reviewing the pond monitor well construction diagrams it appears that the down gradient monitor wells MW#1 and MW#2 may not be screened in the shallow zone. Therefore, please install a minimum of two shallow monitor wells located in close proximity to MW-1 and MW-2. MW-1 shall also be re-completed. The shallow wells shall be completed between the upper and lower impermeable layers noted on Conoco's Schematic Cross Section Fig #2 submitted on March 13, 2003.

    Pond and Monitor Well Sampling: All pond monitor wells (MW#1-3) and any new shallow wells with fluids and pond composite samples must be sampled annually. OCD bases this decision on the fact the ponds may not have liners and monitoring of the shallow zone has not taken place. All Samples collected shall be

analyzed for Volatile Organics (Method 8260), semi-volatiles organics (Method 8270), New Mexico Water Quality Control Commission (WQCC) metals, and General Chemistry including cations and anions. Due to the raw untreated sewage going into the ponds OCD will require that general requirements found in WQCC regulations 20.6.2.2101 (BOD, COD, Fecal Coliform Bacteria, and PH) be part of the sampling program. Sampling and analytical work shall be pursuant to EPA approved methods and quality assurance/quality control (QA/QC) procedures.

16. Vadose Zone and Water Pollution: Provide an investigation plan for OCD approval for the railroad rack vadose zone and groundwater contamination area and the flare pit groundwater contamination area by June 15, 2003. Due to the salt contamination found in various Monitor wells OCD requires an up-gradient well to be included in the plan.

17. Annual Report: Provide a summary of all groundwater investigation results and sample results required pursuant to this permit. This information may be sent in a compatible electronic format. The annual report shall be due on or before September 15 of each year. OCD recommends this information be submitted electronically.

18. 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.

19. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

20. Certification: **Conoco Inc.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Conoco Inc.** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **Conoco Inc.**

_____
Company Representative- print name

_____Date_____
Company Representative- Sign

Title_____

ConocoPhillips

Wingate Plant
P.O. Box 119
Rehoboth, NM 87322
phone 505.863.1045

Beverly J. Cox
Compliance Coordinator
P. O. Box 119
Rehoboth, NM 87322
505-863-1023, Fax 505-863-1040

December 2, 2002

New Mexico Energy, Minerals and Natural Resources Department
c/o Oil Conservation Division
Wayne Price
1220 South St. Francis Drive
Santa FE, NM 87505

RE: Renewal of Ground Water Discharge Plan GW-054
Reply and Comments from Wingate Fractionating Plant

Mr. Price,

On Monday, November 4, 2002 the ConocoPhillips Wingate Fractionating Plant received the Renewal for the Ground Water Discharge Plan GW-054. Enclosed you will find the final check of $4000 for the renewal fees. The modified approval conditions sheet will be signed and forwarded when all comments have been addressed.

All documents have been reviewed and we are submitting comments either for clarification from the Oil Conservation Division (OCD) or changes in our operations.

1. In the cover letter, it is stated, "all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered non-hazardous to wildlife including migratory birds." March 27, 2002, written communication was sent to the OCD requesting an exemption from this requirement. We have not heard back from the OCD on granting this exemption. A history of pond water analysis show that the pond water is safe to wildlife therefore our request should be approved. Should you require another copy of the written request, one will be provided.

2. Item number 9 "Investigation Plan Required:" comments state that it was unclear if any of the drain lines were leaking. These lines are non-hydrocarbon bearing lines. Research into the test event and observations during line replacement indicate that there was not a "leak" of product from the drain system. The old drain system was designed to move liquids from a number of different sources by gravity flow not as liquid under pressure. When trying to test this line in a pressure situation during December of 1999, an air leak was detected. This

pressurized air leak is believed to be from the fact that not all entry sources could be blocked in for the test so a decision was made to replace the existing line to allow us to achieve a testable system. The new drain lines are also designed as gravity drainage lines for waste water that goes to the evaporation ponds but we believe we can continue to isolate these lines for the required test.

3. Item number 14, "OCD Inspections:"

   A. "Investigate the brine water sump for mechanical integrity." The brine water sump was part of our pit and sump inspections performed during turnaround in June 2002. The results of these inspections were sent to the OCD on July 11, 2002. There were no crack or leakage from the pit in question. Please let me know if you need the documents resent.

   B. "The out of service "C" cooling tower sulfuric acid tank and secondary containment requires closure. The secondary containment was noted to contain acid waste residue and the containment has possible lost integrity." The two acid tanks have been removed from the containment area in question. They have been EPA cleaned and are stored in our junkyard. The containment area also has been cleaned and re-evaluated. A new cement floor will be poured and the containment area will be put back in service utilizing a small sulfuric acid tank that was located just north of this area during your inspection.

   C. "A NGL line was noted to be leaking located approximately between tanks 215 and 102." The leak detected was from the valve stem packing. Maintenance was performed immediately and the leak was stopped, we believe no further action is required.

4. Item number 16 "Waste Water Evaporation Ponds:" The ponds are set up so that total flow goes in to the east pond and overflows to the west pond. The overflow line is set approximately 3 feet below the levee. The west pond is dry most of the year. Overflow to the west pond occurs when the butamer unit is running which is usually during the summer months. The evaporation rate is quite high during the summer months; therefore the west pond usually does not reach its full potential. Both ponds maintain a minimum of three feet freeboard area on the outer levees.

5. Item number 16 "Additional Monitoring Devices Required:" ConocoPhillips will construct a plan to add additional monitoring wells that will adequately monitor the shallow zone. This plan will be submitted by your request date of March 15, 2003.

6. Item number 16 "Pond and Monitor Well Sampling:" New monitoring wells will be drilled in the spring to ensure accurate monitoring of the shallow zone. These

wells will be tested on a quarterly basis until records show that the ponds are not leaking to the shallow zone. Once non impacted shallow zone data is collected we will request a modification of this condition to reflect an appropriate sampling frequency.

Past history of the existing monitoring well test data does not show any leakage or migration of pond water into the lower zone. Additionally, the original monitoring wells were approved for annual testing by the OCD in February 1999. We request to keep sampling the existing monitoring wells on an annual basis.

The OCD has also requested to perform a pond composite sample semi-annually. Annual sampling was approved by the OCD in the November 1997 renewal. A review of the analysis history was conducted and the pond water has been well below RCRA standards and WQCC standards, therefore we request to continue annual sampling of the evaporation pond water.

7. Item number 17 "Vadose Zone and Water Pollution:" A final closure plan for the railroad rack vadose zone and groundwater contamination area, the fire training land farm area, and the flare pit groundwater contamination area will be submitted before March 15, 2003.

Should you have any questions, please do not hesitate to call me at 505-863-1023.

Sincerely,

Beverly J. Cox

Beverly J. Cox

Cc: Denny Foust
1000 Rio Brazos Rd
Aztec, NM 87401

Joyce Miley
ConocoPhillips
PO 2014
Houston, TX

Neal Goates
ConocoPhillips
5044 TN
Houston, TX

Conoco Gas & Power
Expanding Your Options

conoco

CONOCO INC.
WINGATE FRACTIONATING PLANT

Ground Water Discharge Plan Renewal
GW-054

April 2002

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised January 24, 2001

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: _____Gas Plant_____
2. Operator: _____Conoco Inc., Wingate Fractionator_____

   Address: _____P. O. Box 119, Rehoboth, NM 87322_____

   Contact Person: Chuck White, Plant Manager_____Phone: __505-863-1001_____
3. Location: Lat: 35°32'36", Long: 108°38'3"; Section _16 & 17__Township ___15N_____Range ___17W_____
   9, 10, 15,
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: _____Chuck White_____ Title: _____ Plant Manager _____

Signature: Chuck White Date: 4-18-02

TABLE OF CONTENTS

TABLE OF CONTENTS
(Continued)

Ground Water Discharge Plan – Conoco Wingate Fractionating Plant

1.0 Wingate Facility Type

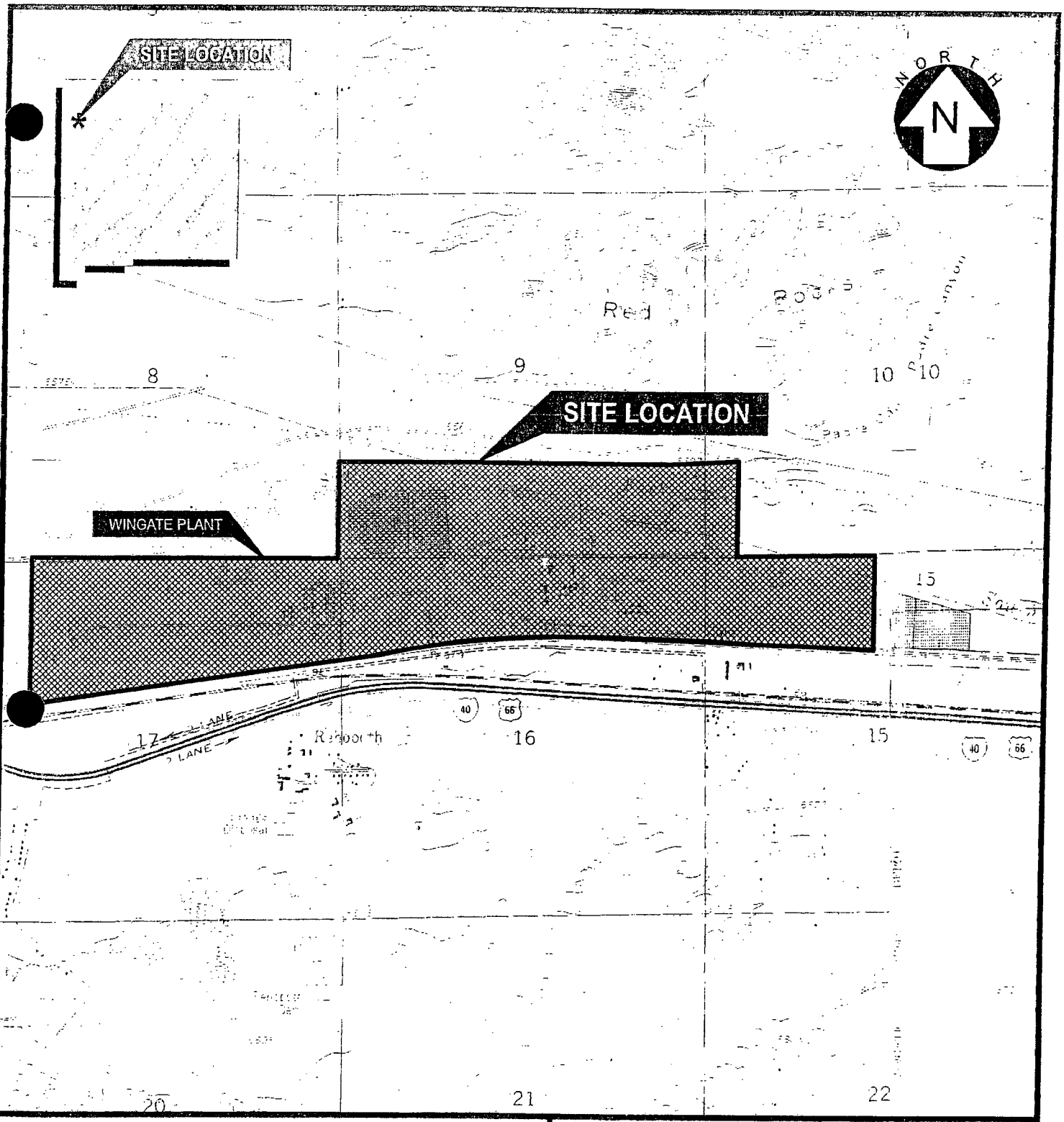
The Conoco Wingate Facility is a gas fractionating plant.

2.0 Operator

The Wingate Plant is currently owned and operated by Conoco Inc. (Conoco). The Wingate Plant was previously owned and operated by El Paso Natural Gas Company (EPNG) until October 1990 and by Meridian Oil, Inc. (Meridian) from October 1990 to April 1996. The facility was placed in service in October 1953.

3.0 LOCATION OF THE DISCHARGE PLAN FACILITY

Conoco Wingate Plant is located approximately one mile east of Gallup, New Mexico on U.S. Highway No. 66. It includes portions of Sections 9, 10, 15, 16 and 17, Township 15 North, Range 17 West lying north of BNSF Railroad in McKinley County, New Mexico. The exact location of the plant is at latitude 35.32'36" north and longitude 108.38'3"west. The elevation is 6593 feet above mean seal level (msl). The facility location is show on Figure 1.



2000 0 2000

SCALE: 1" = 2000'

NOTE:
BASE MAP TAKEN FROM U.S.G.S. 7.5 MINUTE TOPOGRAPHIC MAPS, "GALLUP EAST, N. MEX.", DATED 1963, AND "CHURCH ROCK, N. MEX." DATED 1963, PHOTOREVISED 1979 AT A SCALE OF 1:24,000.

CONOCO INC.
GALLUP, NEW MEXICO

DISCHARGE PLAN

SITE LOCATION MAP

McKINLEY COUNTY

C-K ASSOCIATES · INC
BATON ROUGE, LOUISIANA

Drawn:	TPL/FH/PC
Checked:	BC
Approved:	BC
Date:	4/10/97A
Dwg. No.:	A15-586-01

FIGURE 1

IMAGE: 15586S1

4.0 LANDOWNER

Conoco is the landowner of record.

The facility physical address is:

Conoco Inc.
Wingate Fractionator
#68 El Paso Circle
Gallup, NM 87301
505-863-3900

The Wingate Plant mailing address is:

Conoco Inc,
P. O. Box 119
Rehoboth, NM 87322

Wingate Facility Contacts are:

Chuck White, Plant Manager – 505-863-1001
Beverly Cox, Local Representative – 505-863-1023

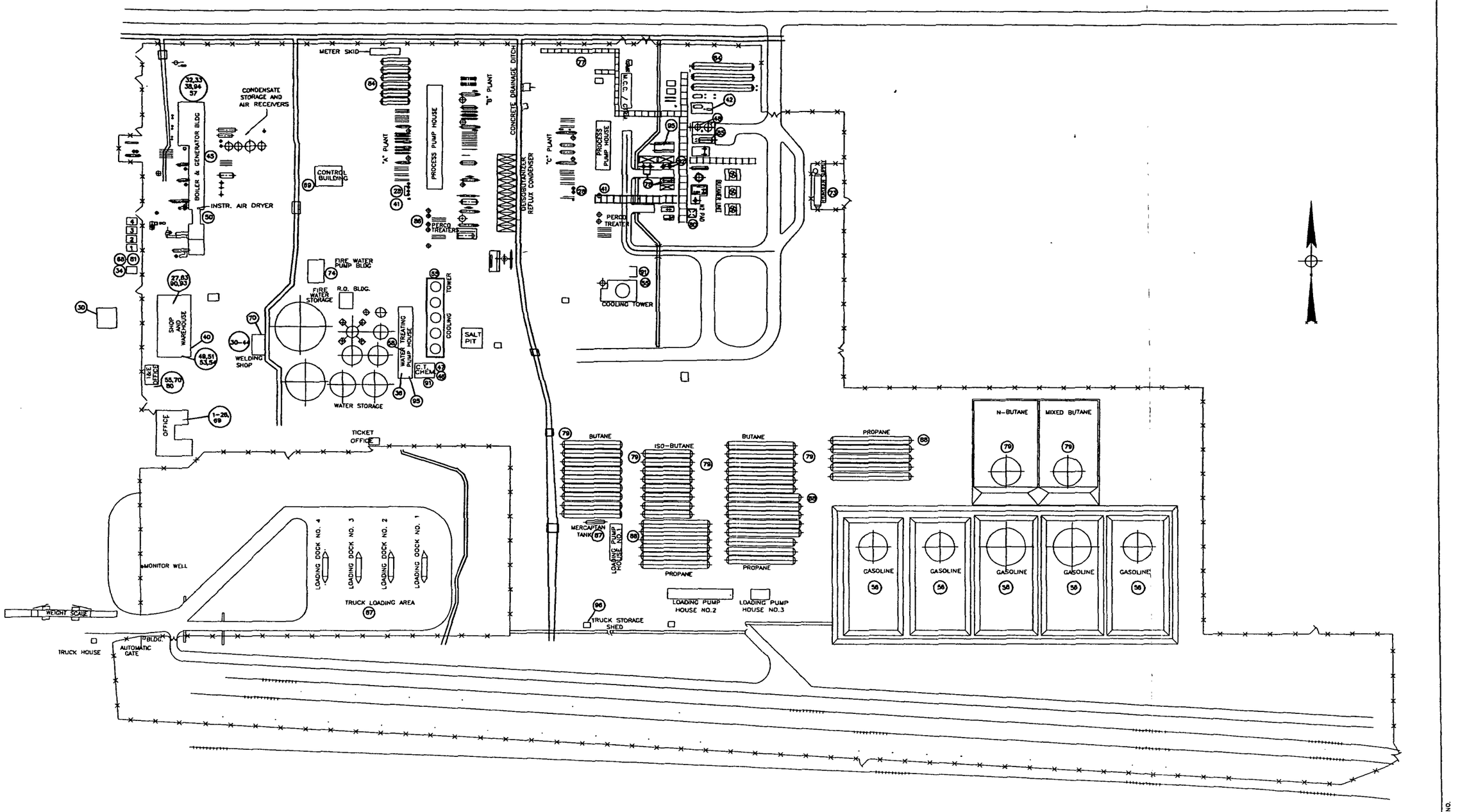
Portions of Section 9, 10 and 15 are leased from the Navajo Tribe. Their address is as follows:

The Navajo Tribal Council
P. O. Box 701
Window Rock, Arizona 86515

5.0 FACILITY DESCRIPTION

The Conoco Wingate Facility is a processing plant, which fractionates natural gas liquids into usable products. The products of the facility are propane, normal butane, isobutane, natural gas liquid (light gasoline), and mixed butane. Its feedstock is received via pipelines from three natural gas facilities.

Finished product is stored in a large tank farm. Spherical tanks are used for natural gas liquid (light gasoline) and part of the normal butane storage. These have containment dikes surrounding them. Other products, which are gaseous under atmospheric pressure, are stored in undiked horizontal tanks. There is no underground product storage. Product leaves the facility by trucks, train rail cars and/or pipeline. (See the Wingate Chemical Inventory Attachment for facility layout).



DRAWING ISSUED
- ☐ PRELIMINARY
- ☐ FOR CHECKING
- ☐ FOR DESIGN
- ☐ REVISED
- ☐ FOR CONSTRUCTION
- ☐ FOR APPROVAL
- ☒ FOR INFORMATION

JOB 745 DIST. CONOCO INC.
DATE BY

PETROFAC LLC
TYLER, TEXAS

DWG NO.

REFERENCE DRAWINGS:

NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
4	02/14/02	ISSUED FOR SARA TITLE III REPORTS	Coff	WCB	WCB	WCB

NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
3	02/13/01	UPDATED FOR SARA TITLE III REPORTS	Coff	WCB	WCB	WCB
2	2/11/00	UPDATED FOR SARA TITLE III REPORTS	VAC	WCB	WCB	WCB
1	12/98	Chemical Inventory	TDR		ADH	
0	6/98	ISSUED FOR CONSTRUCTION	WRG			

CONOCO INC.
NATURAL GAS & GAS PRODUCTS DEPARTMENT

GALLUP, NEW MEXICO

WINGATE FRACTIONATING PLANT CHEMICAL INVENTORY

SCALE: 1" = 100'
PLOT SCALE: 1=1200
AFE:
LOCATION: GALLUP, NEW MEXICO
DWG. NO: NG&GP-WG-20007A
REV. 4

S:\Drafting\ROCKY\WINGATE\WG\PLANS\Wg20007a.dwg, 02/22/2002 09:11:41 AM, coffmca

ITEM	CHEMICAL INVENTORY	QUANTITY
1	Acetone	1 gal
2	Amino Acid Reagent	2 lbs
3	Buffer Solution, Conc. PH 4.0, 1 + 4 Dilution	10 gal
4	Buffer Solution, PH 10.0 Concentrate	10 gal
5	Buffer Solution, PH 7.2, for Giemsa Stain	
6	Conductivity Std., 4600 MHOS Code 245 2gal	2gal
7	Doctor Solution	1 gal
8	DPD 2 Free Chlorine	2 lbs
9	Gallic Acid Code 276	1 gal
10	Hardness Buffer	1 gal
11	Hardness Indicator Code 290	1 gal
12	Hardness Titrating Solution	1 gal
13	MB Dil. Water Sterile 99ML	1 gal
14	Methyl Orange Indicator Code 211	1 gal
15	Methyl Purple Indicator	1 gal
16	Molybdate Reagent for PO4 Code 2044	2 lbs
17	Molyver 1, Molybdenum Reagent	2 lbs
18	Molyver 2, Molybdenum Reagent	2 lbs
19	Molyver 3, Molybdenum Reagent	2 lbs
20	Phenolphthalein Indicator	2 lbs
21	Phenolphthalein Solutions	2 lbs
22	Potassium Iodide-Iodate	2 lbs
23	Sulfite Indicator Plus	2 lbs
24	Sulfur	5 lbs
25	Sulfuric Acid N/50	1 lbs
26	Sulfuric Acid Solution, 10N	1 lbs
27	Acetylene, Dissolved	58 lbs
28	Activated Alumina	
29	Activated Carbon	
30	Empty Drums and 500 gallons Waste Oil	
31	Doctol R.O. Oils 32, 46, 68, 100	3700 lbs
32	El Mar 2000 Engine Oil	220 gal
33	Fleet Heavy Duty Engine Oil	360 lbs
34	Liquid Alive Bacteria 233	170 lbs
35	Peladow Mini-Pellets 90% Calcium Chloride	10,000 lbs
36	Soda Ash	1,000 lbs
37	Super All-Season Motor Oil	22 lbs
38	Super Hydraulic Oil 22, 32, 46, 68	400 lbs
39	Syncon R & O Oil	770 lbs
40	Zep-A-Lume	140 lbs
41	Ferrasweet Iron Sponge 3,000	3,000
42	Muriatic Acid	
43	Purple-K Dry Chemical Extinguishing Agent	1,000 lbs
44	Barrier Fluid- Royal Purple	
45	Control IS 1050	500 lbs
46	Spectrus BD 1500	3,800 lbs
47	Dianodic DN2104	4,800 lbs
48	Caustic Soda (liquid)	5,000 gal
49	Amerlock 400 High Solids Epoxy	130 lbs
50	Balanced Polymer 54418	4,000 lbs
51	EP Conolith HT Grease No. 2	42 lbs
52	Kravar I DF Herbicide NS	
53	Multigear Lubt EP SAE 85W-140	10 gal
54	Super-Sta M Grease	11 lbs
55	Chlorine NS	
56	Condensate	11,220,000 lbs
57	Corr-Shield MD100	500 lbs
58	Dixichlor	55 gal
59	FX-250 Liquid NS	
60	FX-250 Powder NS	
61	FX-263 NS	
62	FX-408 "A" Comp. NS	
63	FX-408 "B" Comp. NS	
64	FX-70-9 Gray "A" Comp. NS	
65	FX-70-9 Gray "B" Comp. NS	
66	FX-752 "A" Comp. NS	
67	FX-752 "B" Comp. NS	
68	Gasoline, Unleaded	300 gal
69	Halon 1301 Fire Extinguishant	200 lbs
70	Helium, Compressed Gas	25 lbs
70	Helium, Compressed Gas	25 lbs
70	Helium, Compressed Gas	25 lbs
70	Helium, Compressed Gas	25 lbs
73	Hydrogen	25,000 gal
74	Hypersperse Antifoulant	55 gal
75	Mercury NS	
76	Methane (Sweet Natural Gas) NS	
77	Methanol	793 lbs
78	Molecular Siev Types HPG-250 & HPG-429 NS	
79	N-Butane, ISO-Butane, "D" Grade Butane	12,600,00 lbs
80	Nitrogen, Compressed Gas	159 lbs
81	No 2 Diesel Fuel	1000 gal
82	Oust Herbicide NS	

ITEM	CHEMICAL INVENTORY	QUANTITY
83	Oxygen, Compressed Gas	61 lbs
84	PBC Mix/EPBC Mix	1,500,00 lbs
85	Perchloroethylene	10,000 gal
86	Perco Copper Sweetening Reagent NS	
87	PERCAP 355	26,800 lbs
88	Propane	5,363,000 lbs
89	Purple X	250 lbs
90	Genuine Safety Solvent N 0140	15 gal
91	Sulfuric Acid	21,600 lbs
92	UOP Type I-12 Catalyst NS	
93	White Oil 22	5 gal
94	Corr-Shield MD-4100	20 lbs
93	PPG CALCIUM HYPOCHLORITE TABLETS	
94	NOSE GUARD	
95	R&O 150 & Waste Oil Tank	150 gal & 300 gal

REFERENCE DRAWINGS:

NG&GP-WG-20007A CHEMICAL INVENTORY

NO.	DATE	REVISION	DRW	DES.	CHK.	APP.
2	02/14/02	ISSUED FOR SARA TITLE III REPORTS	Coff	WCB	WCB	WCB
1	01/16/01	UPDATED FOR SARA TITLE III REPORTS	Coff	WCB	WCB	WCB
0	2/11/00	ISSUED FOR SARA TITLE III REPORTS	VAC	WCB	WCB	WCB

CONOCO INC.

NATURAL GAS & GAS PRODUCTS DEPARTMENT

GALLUP, NEW MEXICO

WINGATE FRACTIONATING PLANT
CHEMICAL INVENTORY DETAILS

SCALE: 1"=100'
PLOT SCALE: 1=1200
AFE:
LOCATION: GALLUP,NEW MEXICO
DWG. NO: NG&GP-WG-20007B
REV. 2

DWG NO.

S:\Drafting\ROCKY\WINGATE\WG\PLANS\Wg20007b.dwg, 02/18/2002 09:03:49 AM, coffmca

6.0 MATERIALS STORED OR USED AT THE FACILITY

A number of process and non-process chemicals or additives are used at the Wingate Plant. A list of products and chemicals stored is presented in the Wingate Chemical Inventory attachment. The majority of the chemicals are stored in small quantities and any spills or leaks would be very small in volume and easily contained in the immediate area. Material Safety Data books are maintained and kept in the field office.

7.0 SOURCES AND QUANTITIES OF EFFLUENT WASTE

Waste streams originate from the backwashing of the sand filters in the pretreatment system, from the regeneration of the sodium zeolite ion exchanger, from the reverse osmosis waste, from the boiler and cooling tower blowdowns, from the backwashing of the condensers, from the backwashing of the side stream filters and from the septic tank systems. Table 7-1 list the waste streams with their flows.

The waste streams are directed to the general waste sump and are discharged directly to the evaporation pond.

The general waste sump provides a waste collection point for the iron filter backwash, the softener regeneration water, the reverse osmosis waste, the boiler blowdown waste, the cooling tower blowdown water, wsac blowdown, the boiler house drain water, and the plants septic tank water. The waste in the general waste sump may include some surface water runoff.

Domestic discharges are made through six septic tanks. One septic tank in the southeast corner of the plant is fed by one low use restroom. It has a leach field and does not empty into the evaporation ponds. The septic tanks in the processing plant area are discharged into the general waste sump. The septic tank discharge line for EPNG's general warehouse and pipeline district office ties into the Conoco Plant waste stream line which discharges into the evaporation ponds.

TABLE 7-1

Waste Water Streams

STREAM	FLOW
Sand Filter Backwash	Currently no-flow
Sodium Zeolite Regeneration	Estimated Volume is 775,260 gal / month*
Boiler Blowdown	Estimated Volume is 148,102 gal / month*
Cooling Tower Blowdown	Metered volume of 553,521 gal / month
Wsac Blowdown	Estimated Volume is 446,760 gal / month*
Reverse Osmosis Unit Waste Stream	Estimated Volume is 357,700 gal / month*
Caustic Waste (pH levels are as per RCRA standards)	Estimated Volume is 6000 gal / month*
Domestic Waste (sewage & gray water)	Estimated Volume is 9000 gal / month*
Water Quality Test Waste	Estimated Volume is 30 gal / month*
Rain Water	Varies
*Estimated volumes are based from engineering calculations of equipment maximum flow rates.	

8.0 DESCRIPTION OF CURRENT LIQUID AND SOLID WASTECOLLECTION/STORAGE/DISPOSAL PROCEDURES

8.1 Evaporation Ponds

Plant waste streams are discharged to the evaporation ponds for final disposal by evaporation. The streams enter the east pond through a metered line containing effluent from the Conoco facility and from the EPNG district office containing only domestic waste. When the east pond is full the west pond receives the overflow. The east pond is contained in a 560 foot by 940-foot area and has a surface area of 480,000 square feet (11.0 acres). The west pond is contained in a 900 foot by 850-foot area and has a surface area of 693,000 square feet (15.9 acres).

A series of flow meters have been installed to measure incoming water and outgoing waste steams. They measure both flow rate and total flow. These flowmeters are read monthly and the total flow recorded.

8.2 Waste Disposal

Waste oil from engines, generators, and motors is stored in waste oil tanks located in the concreted containment pads east of the processing area and vapor recovery unit. The waste oil is trucked out periodically and processed as recycled oil.

Other wastes generated at the facility are disposed of at OCD approved locations. Table 8-2 lists the potential waste generated.

TABLE 8-2
WASTE DISPOSAL STREAMS

Liquid / Solid Waste	Storage	Disposal
Asbestos	All items are properly wrapped and sealed. Small items are stored in special asbestos drums, large items are stored in designated storage area.	Keers Environmental, Albuquerque, NM
Contaminated Soil	Stored near the point of generation until disposal site is determined.	Picked up by Waste Management for disposal
Copper Sweep	Not Stored	TBD – based on sample results
E & P Exempt Waste (separator fluid/water, process fluid/water, solids/sludges from tank bottoms)	Not Stored	Basin Salt Water Disposal & Waste Management
Empty Drums	Per OCD Guidance	Recycled
Iron Sponge	Not Stored	TBD – based on sample results
Molecular Sieve		TBD – based on sample results
Office / Domestic Trash	Special Waste Dumpsters	Picked up by Waste Management for disposal
Paint (dried) Chips	Drums	Picked up by Waste Management for disposal
Painting Waste	Drum	TBD
Scrap Lumber & Concrete		Picked up by Waste Management for disposal
Scrap Metal	East side of plant	Recycled
Spent Alumina	Not Stored	Picked up by Waste Management for disposal
Universal Waste (lead acid batteries, florescent tubes)		TBD
Used Absorbent Pads	Special Waste Dumpsters	Picked up by Waste Management for disposal
Used Lube Oils	Tank	Pro Cycle Oil & Metals, Odessa Terminal
Used/Spent Filters	Special Waste Dumpsters	Picked up by Waste Management for disposal
Zeolite Resin Beads	Not Stored	Picked up by Waste Management for disposal

9.0 PROPOSED MODIFICATIONS

No modifications are being proposed in this discharge plan.

10.0 INSPECTION, MAINTENANCE, AND REPORTING

The Wingate Plant is operated in a manner to prevent and mitigate any unplanned releases to the environment. The plant is manned 24 hours per day and 365 days per year including holidays. Plant process and storage units are regularly observed by a number of personnel during normal operations, and any evidence or sign of spill/leaks are reported to supervisory personnel so that repairs or cleanup can be promptly implemented. Routine maintenance procedures conducted at the Wingate Plant also help to assure that equipment remains functional and that the possibility of spills/leaks is minimized.

11.0 SPILL/LEAK PREVENTION AND REPORTING PROCEDURES

The Spill Prevention Control and Countermeasure Plan shall serve as the contingency plan for any spills and releases.

12.0 SITE CHARACTERISTICS

12.1 Geology Description

12.1.1 Regional Geology

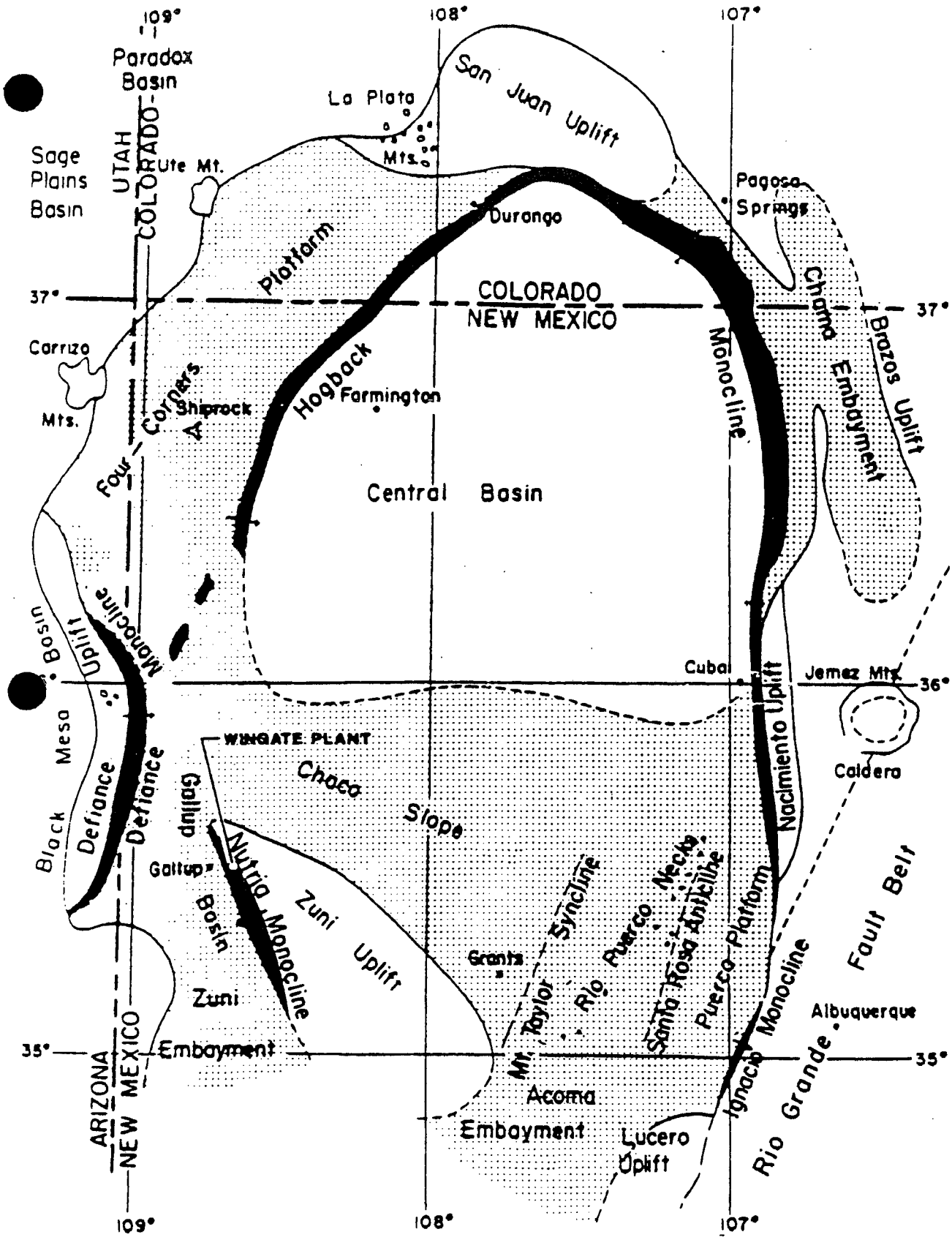
The Wingate Plant is situated along the southwestern margin of the San Juan Basin designated the Zuni Uplift, in the Colorado Plateau physiographic Province (Figure 12-1). The Zuni Uplift is a northwest trending structural dome comprising an area approximately 55 miles in length by 20 miles in width. The site lies at the head of the western side of the uplift termed the Nutria Monocline. The San Juan Basin forms an asymmetric basin covering an area of about 25,000 square miles in northwestern New Mexico, and portions of northeastern Arizona, and southwestern Colorado. The basin is reported to contain as much as 15, 000 feet of Paleozoic and Mesozoic sediments (Fassett and Hinds, 1971).

The regional geology in the area surrounding the Wingate Plant is shown in Figure 12-2. Based on available drilling log information the generalized stratigraphic column in Figure 12-3 was prepared. As shown, the surficial geology surrounding the site areas is comprised of Quaternary-aged alluvial deposits. Below the alluvium lies a thick sequence (on the order of 1,500 feet) of the Chinle Formation siltstones and mudstones. Underlying the Moenkopi Formation, also unconformably, are the Permian-age San Andres Limestone, and Glorieta Sandstone (102 and 230 feet thick, respectively), which comprise the regional aquifer in the site area. The deepest onsite well is completed into the top portion of the Yeso Formation also of Permian-age, described as fine-grained Arkosic sandstone, to a depth of approximately 2,000 feet. Below the base of the Yeso Formation in descending order are the sandstone, claystone and siltstone of the Permian-age Abo Formation, unnamed limestone and conglomerate rocks of Pennsylvania-age, and Percambrian granitic and metamorphic rocks, which comprise the basement, rocks in the regions.

12.1.2 Local Geology

The site lies along the south side of an east-west trending alluvial drainage formed by the south fork of the Puerco River. To the south of the site are the Zuni Mountains, reaching a maximum elevation of around 9,000 feet. North of the plant, a massive red sandstone escarpment comprised of the Triassic/Jurassic-age sandstone and siltstone deposits of the Entreda and Wingate sandstones. It rises approximately 400 feet above the valley to an elevation of around 7,000 feet. The Wingate Plant property ranges in elevation from around 6,580 to 6,612 ft-msl.

As shown in Figure 12-2, the surficial geology in the site area, consists of Quaternary-ages alluvium. These strata dip to the northwest at approximately 2-3 degrees.

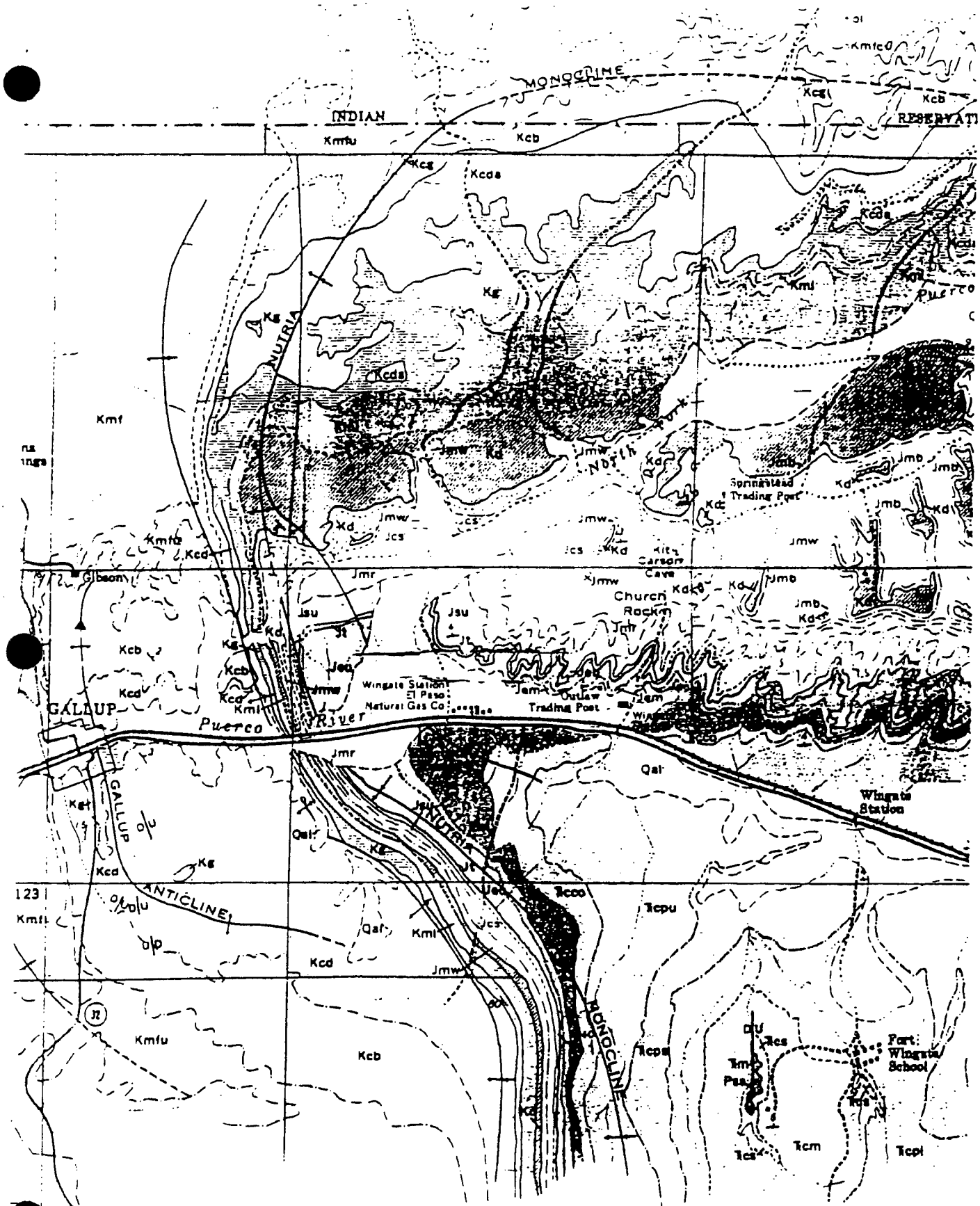


REGIONAL STRUCTURAL MAP SAN JUAN BASIN

Figure 12-1

Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92

DAMES & MOORE



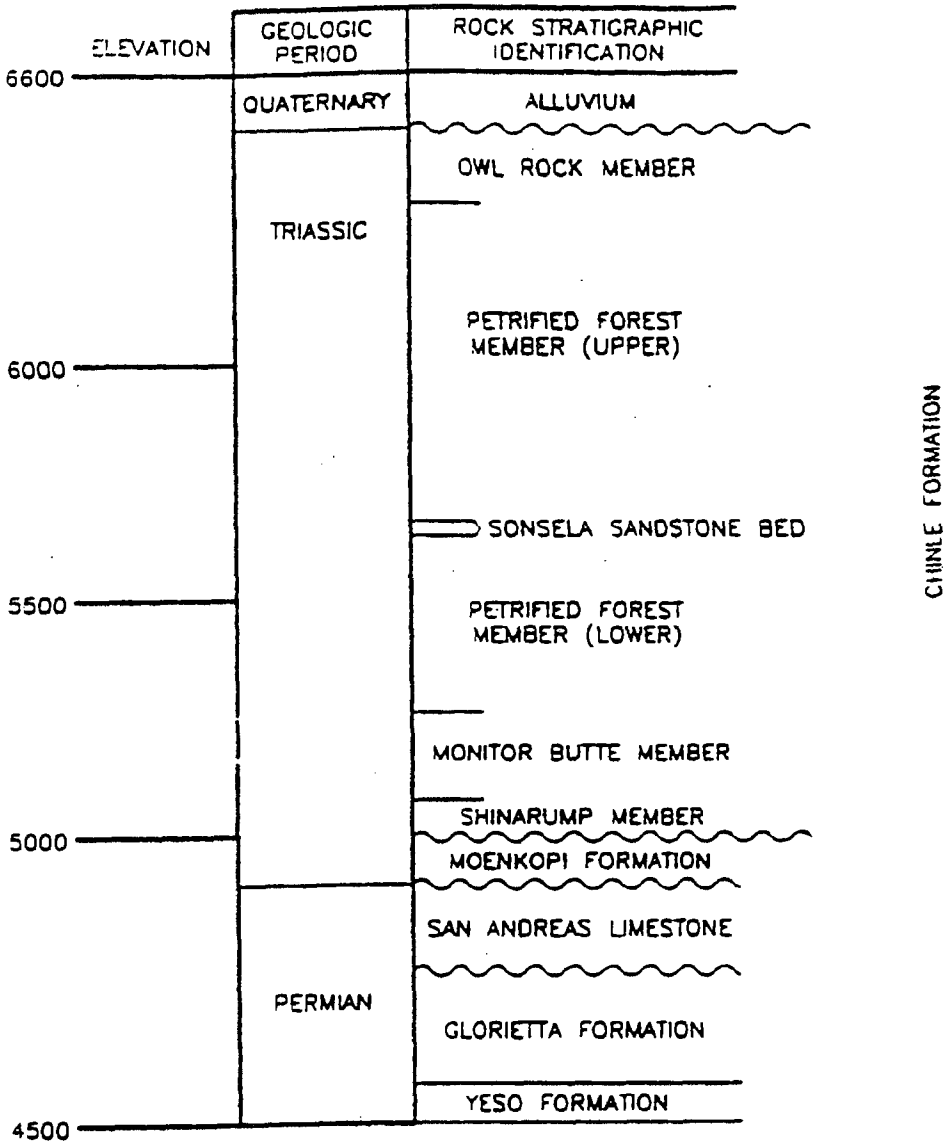
REGIONAL GEOLOGIC MAP

Figure 12-2

Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92

DAMES & MOORE

800122 11 14 90



LEGEND:

——— CONTACT

~~~ UNCONFORMABLE CONTACT

VERTICAL SCALE:

1 INCH = 400 FEET

GENERALIZED STRATIGRAPHIC COLUMN

Figure 12-3

Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92
~~~

12.2 Hydrogeology

12.2.1 Regional Hydrogeology

The hydrogeology of the region is a function of geologic structure and hydraulic properties of the sedimentary formations deposited in the basin. Permeable sandstones and limestones are typically interbedded with relatively impermeable shales, siltstones and mudstones, resulting in the formation of numerous confined aquifer systems in the Permian, Triassic, Jurassic, and Cretaceous-aged deposits. The northward dip of these strata in the southwestern portion of the San Juan Basin, in conjunction with the presence of impermeable overlying formation, results in recharge being limited to the outcrop exposure of the water-bearing unit, with progressively artesian conditions occurring to the north. The major regional aquifer in the site area is San Andres Limestone/Glorieta Sandstone of Permian-age. Recharge to the Sand Andres/Glorieta aquifer occurs primarily in areas of the Zuni Mountains to the south of the site area.

As stated previously, the San Andres Limestone/Glorieta Sandstone formations constitute the primary aquifer in the region. This aquifer has been designated part of the C multiple-aquifer in the region. This aquifer has been designated part of the C multiple-aquifer system (Cooley, et.al 1969). The top of the San Andres is found at a depth of approximately 1,6750 feet, according to the driller's log data from on site wells. The thickness of the combined aquifer system in the site area is reported to be about 3300 feet. Driller's log data from off site wells approximately six miles to the east, which service the plant via pipeline indicate the top of the San Andres/Glorieta aquifer to be present locally at a depth of around 1,000 feet. Based on well data from the four active wells (two onsite and two offsite), the San Andres/Glorieta aquifer appears to become more productive to the east perhaps reflecting an increased degree of fracturing and/or solution cavities in that area.

12.2.2 Local Hydrogeology

Shallow borings in the southwestern corner of the plant site associated with a geotechnical investigation for a railroad overpass (Sergent, Hauskins and Beckwith, 1987), encountered between 40 and 80 feet of unconsolidated clays, silty clays, silty sands and gravels, prior to auger refusal in weathered siltstones and sandstone. The specific capacity of offsite wells completed in

alluvium reported to range from 0.19 to 1.75 gpm/ft (Shomaker, 1971). A review of driller's logs for the onsite water supply wells indicated alluvial thickness on the order of 100 feet. These logs variously report that the Chinle Formation or basal unit of the Wingate sandstone to underlie the alluvial fill deposits.

In order to better define the hydrogeology of the shallow alluvial aquifer and assess the impact of the plant's wastewater impoundments (i.e. east and west evaporation ponds) three groundwater monitoring wells were installed around the impoundments (Dames & Moore 1990) and three additional test holes were drilled and four field permeability test were conducted (Shomaker 1992). The location of these monitoring wells (MW), bore holes (BH) and field test (FT) are shown in Figure 12-4. In addition, five other wells were installed onsite as part of a property transfer environmental assessment (WMW.-1,2,3,4 and WMW-5). The location of these wells is shown in Figure 12-5.

Three test holes were drilled around the ponds between January 6 and 8, 1992. Each hole was drilled to a depth of 26.5 feet. Split-spoon samples were collected to total depth in each hole. Core samples were collected in BH-3 from 12.5 to 14 feet (red clay), and 17.5 to 19 feet (dark red clayey silt). The core samples were submitted for laboratory analysis for column constant-head permeability test. The laboratory was unable to saturate the samples after 21 days. The samples were sieved and found to be very fine-grained with 76 percent of the samples passing 200 mesh. The plasticity and liquid limit of both samples were 35 and 51, respectively, indicating both samples were high plasticity clays. The permabilities were found to be less than 10^{-7} cm/sec.

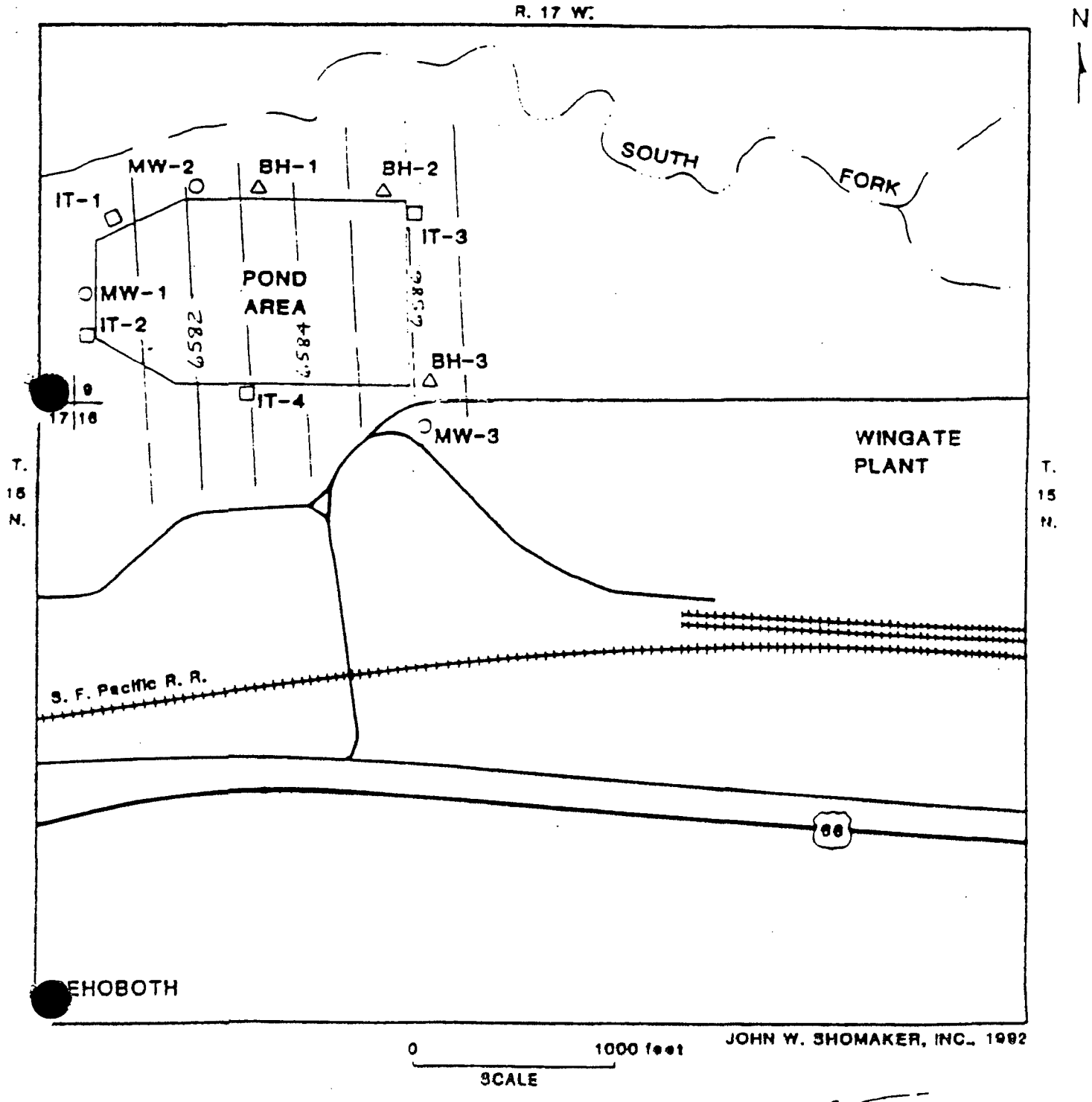
Based upon well logs, boreholes and cores, the stratigraphy of the alluvium under the ponds consist generally of three unconsolidated units which are illustrated in Figure 12-6. These units include (from the surface downward): an upper unit consisting of sands and silty clays to depths of four to five feet; and intermediate unit consisting of clay with minor silt and sands to depths of 15 to 23 feet; and a lower unit consisting of sands, silts and interbedded clay at depths from 15 to 55 feet. As discussed above, the hydraulic conductivity of the intermediate clay unit was determined to be less than 10^{-7} cm/sec. Saturated conditions were encountered only in the lower unit.

The shallow aquifer at the plant is in the shallow alluvium. In the pond area, the aquifer occurs in sands, silty sands interbedded with clays and silty clays of the lower unit at depths between 20 and 25

feet. Logs indicated soils were unsaturated to a depth of between 21 and 25 feet around the ponds. Saturated conditions were encountered below these depths. The potentiometric surface is about three feet below the land surface. The shallow aquifer, beneath the pond area, is confined by the overlying intermediate unit. This confining interval should restrict downward migration of water from the ponds.

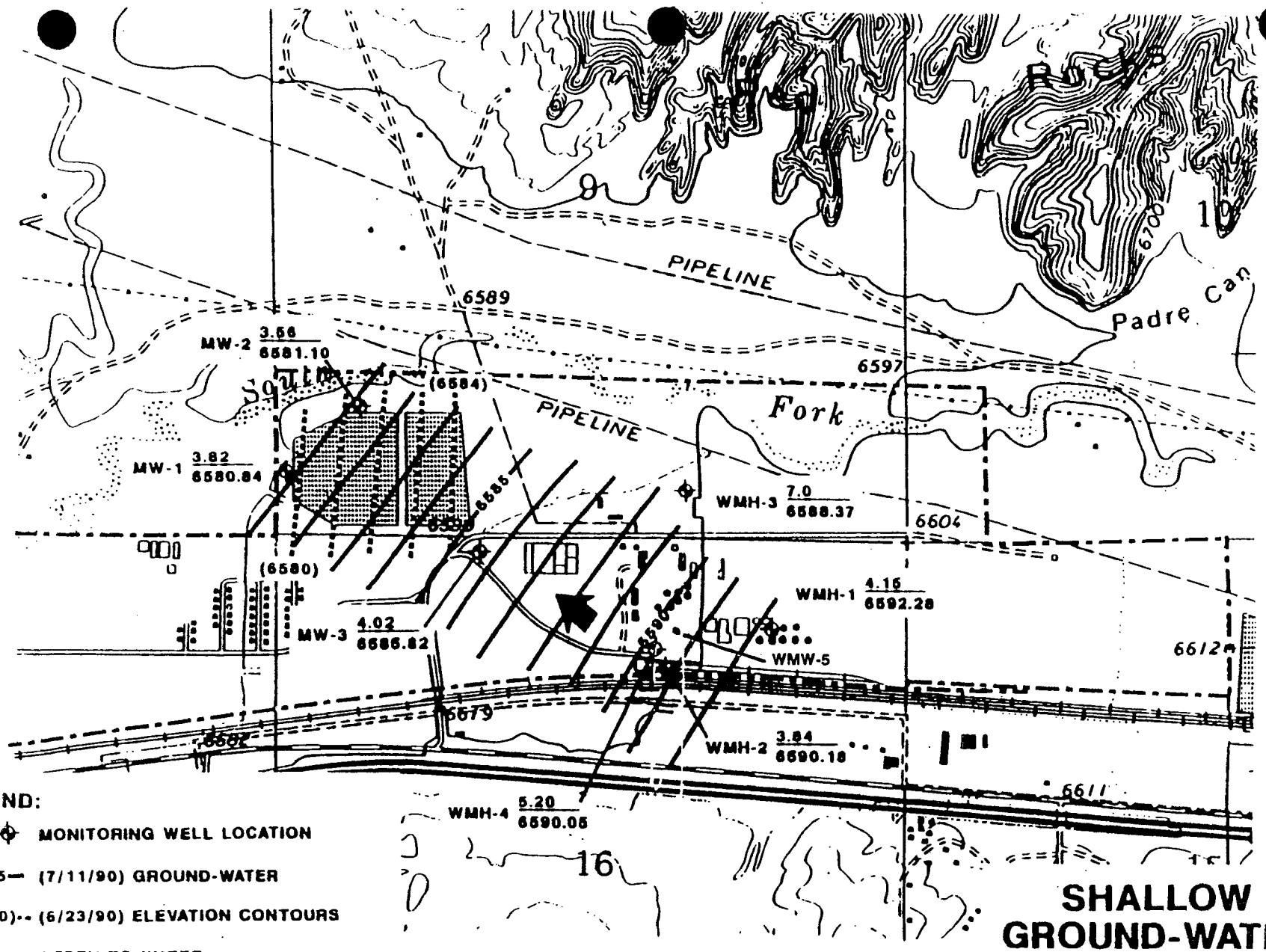
Figure 12-4

Potentiometric Surface of Alluvial Aquifer



Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92

6583 — water-level contour, ft



SHALLOW GROUND-WATER ELEVATIONS

Figure 12-5

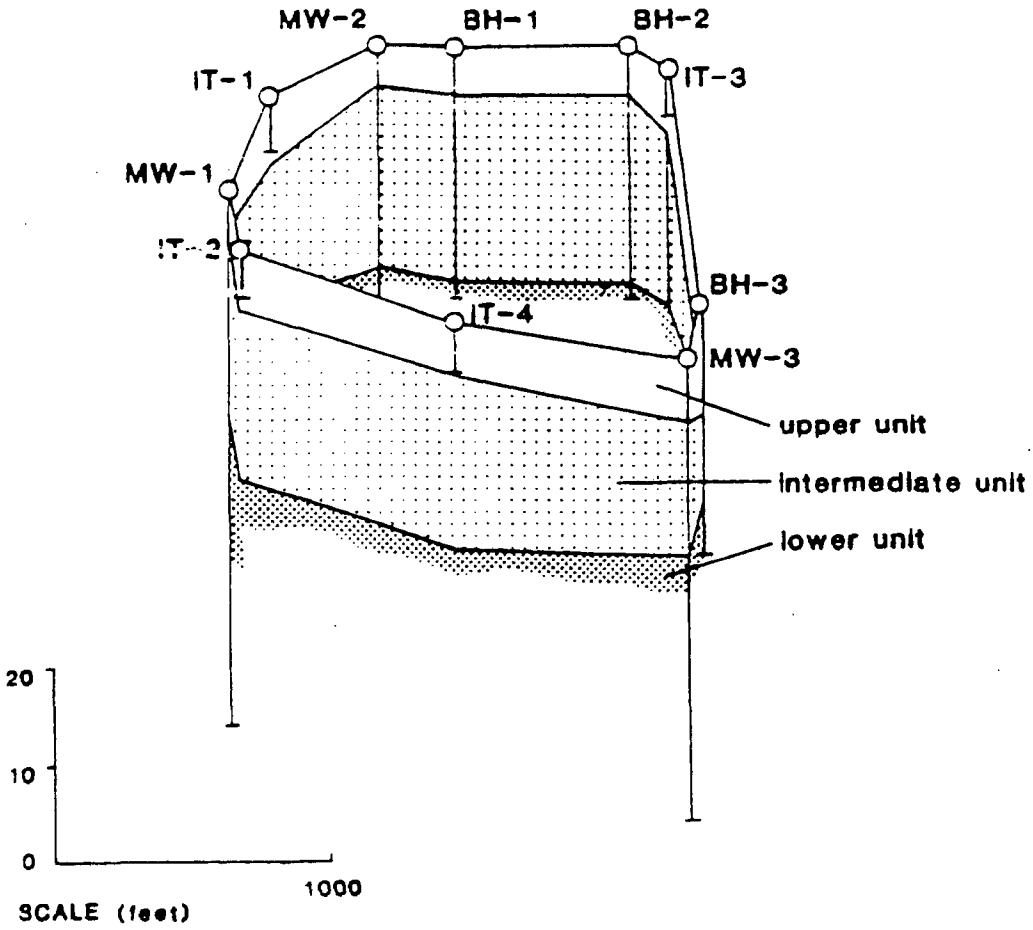
DAMES & MOORE

Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92

800057-05-10-90

Figure 12-6

Fence Diagram - Stratigraphic Relation Underlying Pond Area



JOHN W. SHOMAKER, INC., 1992

Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92

12.3 Water Quality

12.3.1 Regional Aquifer

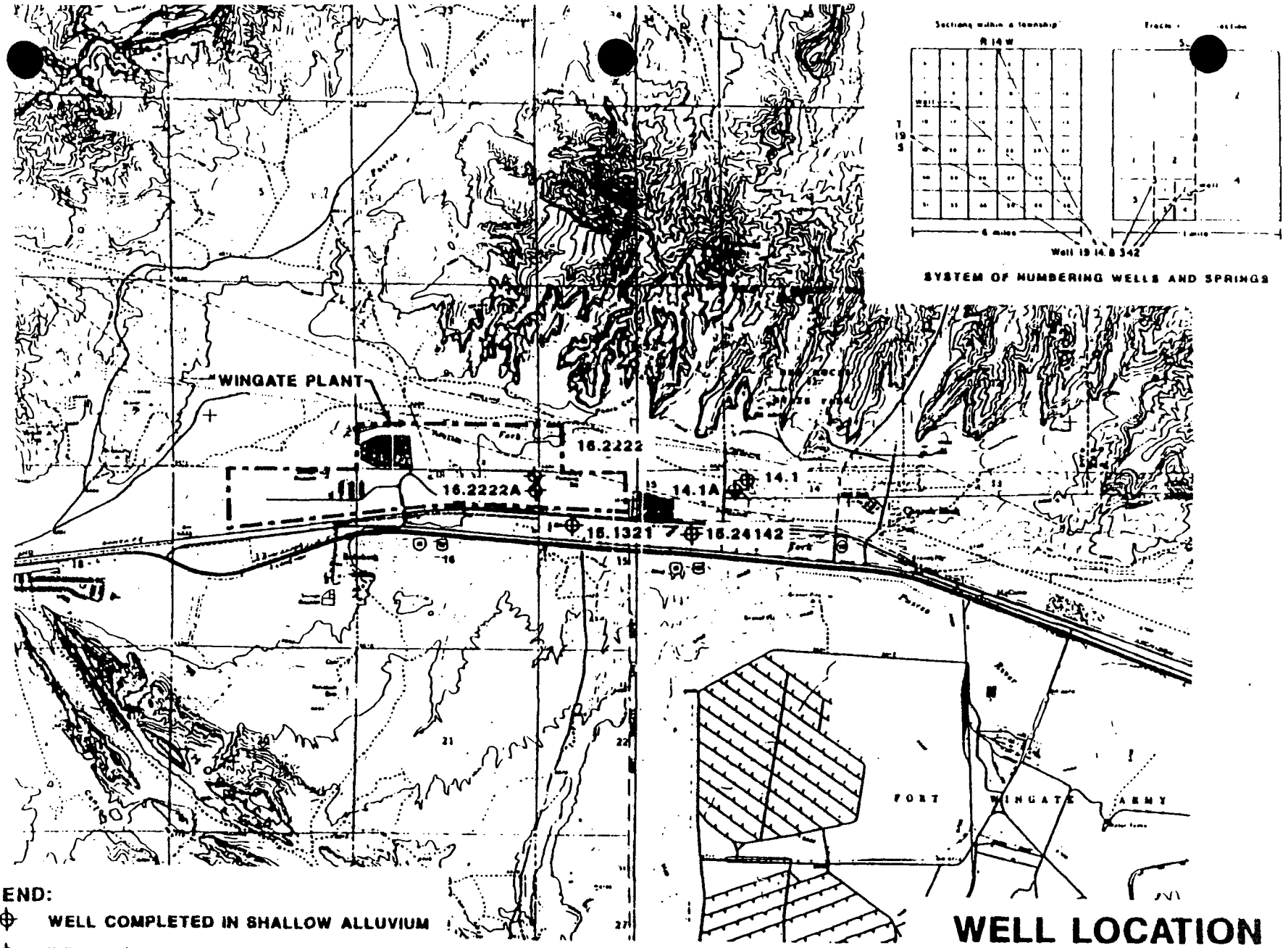
Water quality data for the four plant water supply wells are collected annually. Ground water from these wells meets New Mexico State water quality standards.

12.3.2 Alluvial Aquifer

The locations of wells within one mile of Wingate Plant and the onsite water supply wells are shown in Figure 12-7 (USGS, 1990). All the offsite wells are shallow alluvial wells to the east and upgradient of the facility.

The hydraulic and stratigraphic relationships previously discussed suggest water in the evaporation ponds is not likely to leak into the aquifer beneath the evaporation ponds. This interpretation is based upon the following:

- The clayey sediments in the intermediate unit underlying the evaporation ponds have a hydraulic conductivity less than 10^{-7} cm/sec.
- The intermediate interval is from 15 to 20 feet thick beneath the ponds.
- The confined hydraulic head in the shallow aquifer indicates upward flow is limited and restricted by the clay-rich intermediate unit.



WELL LOCATION MAP

Figure 12-7

DAMES & MOORE
01889-115-022

Ref.: Discharge Plan-Wingate Fractionating Plant, Meridian Oil Inc., 4/9/92

12.4 Hydrologic Features

The northern portion of the Wingate Plant property is bounded by the south fork of the Puerco River. The Puerco River is an intermittent stream tributary to the Little Colorado River watershed. The confluence of the north and south forks occurs to the west of the plant, upstream from the City of Gallup. The Puerco River (north and south branches) comprises a drainage area of approximately 558 square miles. No other surface water sources are known to be present with in a one-mile radius of the Wingate Plant.

Surface water runoff upgradient of the plant property to the south is intercepted by the I-40 Interstate, and routed to the south around the facility. Runoff from the east of the plant is channeled north to the Puerco River. Onsite run-off is routed to the north and south of the developed portion of the site, where it rejoins pre-existing natural drainages to the west.

13.0 OTHER COMPLIANCE INFORMATION

13.1 Spill/Leak Reporting

Should a reportable discharge occur as defined in OCD Rule 116 and WQCC section 12-3, verbal notification will be made to the following agencies:

OCD Santa Fe Office
OCD Aztec District Office
WQCC Ground Water Protection Agency – Chief

Notification to these agencies will be as soon as possible, but not more than 24 hours thereafter.

Information to be provided in the notification will include:

- Name, address and telephone number of person(s) in charge of the facility;
- Name and address of the facility;
- Date, time, location and duration of the discharge;
- Source and cause of the discharge;
- A description of the discharge and its chemical composition;
- Estimated volume of the discharge; and
- Actions taken to mitigate immediate damage from the discharge.

Conoco will provide written notification of a spill, to the WQCC and OCD following the notification guidelines.

13.2 Closure Plan

Conoco acknowledges and commits to the preparation of a closure plan at the time the decision is made to close the evaporation ponds. The Closure Plan will include a description of closure measures, maintenance and monitoring plans, post-closure maintenance and monitoring plans, a financial assurance mechanism, as well as other measures deemed necessary to prevent and/or abate contamination should it be found to be present.

14.0 REFERENCES

Cooley, M.E., Harsburger, J.W., Akers, J.P., and Hardt, W.F., 1969, Regional Hydrogeology of the Navajo and Hopi Indian Reservations, Arizona, New Mexico, and Utah, USGS Professional Paper 521-A.

Cresswell, L.W., The Fate of Petroleum in a Soil Environment, 1977 Oil Spill Conference Proceedings, American Petroleum Institute Publication N. 4284, pp. 479-482, 1977.

Dames and Moore, Hydrogeologic Assessment Wingate Fractionating Plant for El Paso Natural Gas Company, 1990, unpublished report prepared for El Paso Natural Gas Company.

Gudin, C., and W.J. Syratt, Biological Aspects of Land Rehabilitation Following Hydrocarbon Contamination, Environmental Pollution, volume 8:107-117, 1975.

Meridian Oil Inc., Discharge Plan, Wingate Fractionating Plant, April 9. 1992.

National Oceanic and Atmospheric Administration, Climatography of the United States No. 81 (New Mexico), 1982.

National Oceanic and Atmospheric Administration, Mean Relative Humidity (%), Monthly and Annual, pp 61-62, 1970.

Oil Conservation Division, "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations", Revised December 1995.

Sergent, Hauskins, and Beckwith Engineers, 1987, EPNG Wingate Plant Railroad Bridge Overpass - Geotechnical Investigation Report, June 26, 1987.

Shomaker, J. W., 1971, Water Resources of Fort Wingate Army Depot and Adjacent Areas, McKinley County, New Mexico, USGS Open File Report MK-32, September 1971.

Shomaker and Associates, 1992, Hydrologic Evaluation of Evaporation Pond Area, Wingate Plant, McKinley County, New Mexico, unpublished report prepared for Conoco Oil, Inc.

U.S. Department of Agriculture, Annual Lake Evaporation map, USSCS, 1978.

U.S. Department of Housing and Urban Development, Federal Insurance Administration, 1978, Flood Hazard Boundary Map, McKinley County, New Mexico.

U.S. Geological Survey, Well Information Database, McKinley County, New Mexico, June 6, 1990, Albuquerque, New Mexico.

Conoco Inc.
Beverly J. Cox
Compliance Coordinator
Office 505-863-1023
Fax 505-863-1040

Conoco Inc.
Wingate Fractionating Plant
PO Box 119
Rehoboth, NM 87322

March 27, 2002

Mr. Jack Ford
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
P.O. Box 6429
Santa Fe, NM 87505

Re: Exception From Protection of Migratory Birds Order R-8952
Wingate Fractionating Plant
McKinley County, Gallup, New Mexico

Dear Mr. Ford:

Conoco Inc. is submitting the attached form C-134 for an exemption to the Division Order R-8952 for two evaporation ponds located at our Wingate Fractionating Plant. The ponds were place in service between 1968 and 1970. An eight-foot high hurricane fence encloses the two evaporation ponds. The two ponds are in series with the east pond containing water throughout the year. The west pond generally receives overflow during the winter months and sometimes dries up in the summer months. The east pond is contained in a 560 foot by 940 foot area and has a surface area of 480,000 square feet (11.0 acres). The west pond in contained in a 900 foot by 850 foot area and has a surface area of 693,000 square feet (15.9 acres). The ponds are sampled pursuant to Discharge Plan GW-054 approval condition #17.

The largest volumes of water discharging into the evaporation ponds are non-contact water from the cooling towers, water filter backwash, boiler blowdown, reverse osmosis effluent and the water softener regeneration process. This water does not contact any process fluid. Septic tanks exist on the site and drain to the evaporation ponds as permitted by GW-054. In addition a de minimums amount of rainwater has the potential for entering these ponds.

Should you have questions or require additional information, please do not hesitate to call me at 505-863-1023.

Sincerely,

Beverly J. Cox

Attachments

cc: Joyce Miley – Houston Office
File: 2859-2

RECEIVED

APR 0 1 2002

Environmental Bureau
Oil Conservation Division

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-134
Revised March 17, 1999

Submit 4 Copies to appropriate District Office

Permit No._____ (For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952

FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule711(I)

Operator Name: _____*Conoco Inc.*_____

Operator Address: ____*#68 El Paso Circle, Gallup, NM 87301 (mailing address P.O. Box 119, Rehoboth, NM 87322*

Lon 108°38'3"west - Sec. 9,10,15,

Lease or Facility Name _*Wingate Fractionating Plant*_____Location *Lat 35° 32'36"north - 16&17 - 5N_17W*
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: _*East 560' X 940' West 900' X 850'*_____

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

__X_ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

The pit accepts non-contact cooling tower water used in the cooling tower exchangers. This fluid does not come in contact with process fluids. Additionally these ponds receive small amounts of septic tank effluents and surface water runoff.

1) If any oil or hydrocarbons should reach this facility, give method and time required for removal:

Oil or hydrocarbons will be removed by using absorbent booms to soak up oil. A supply of booms and absorbent materials are kept on hand at the facility at all times.

2) If any oil or hydrocarbons reach the above-described facility, the operator is required to notify the appropriate District Office of the OCD with 24 hours.

_____ Operator proposes the following alternate protective measures: _____

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Beverly J. Cox Title _Compliance Coordinator____Date _March 27, 2002____

Printed Name __Beverly J. Cox_____Telephone No. _505-863-1023_____

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected _____ Approved by _____

Inspected by _____ Title _____

Date_____

NEW MEXICO ENVIRONMENT DEPARTMENT

REVENUE TRANSMITTAL FORM

	Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1	CY Reimbursement Project _____ Tax ___	064	01						
5	Gross Receipt Tax	064	01		2329	900000	2329134		
3	Air Quality Title V	092	13	1300	1696	900000	4169134		
4	PRP Prepayments	248	14	1400	9696	900000	4969014		
2	Climax Chemical Co.	248	14	1400	9696	900000	4969015		
6	Circle K Reimbursements	248	14	1400	9696	900000	4969248		
7	Hazardous Waste Permits	339	27	2700	1696	900000	4169027		
8	Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		
10	I Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	4000=	
11	Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4169029		
12	Air Quality Permits	631	31	2500	1696	900000	4169031		
13	Payments under Protest	651	33		2919	900000	2919033		
*14	Xerox Copies	652	34		2349	900000	2349001		*
15	Ground Water Penalties	652	34		2349	900000	2349002		
16	Witness Fees	652	34		2349	900000	2439003		
17	Air Quality Penalties	652	34		2349	900000	2349004		
18	OSHA Penalties	652	34		2349	900000	2349005		
19	Prior Year Reimbursement	652	34		2349	900000	2349006		
20	Surface Water Quality Certification	652	34		2349	900000	2349009		
21	Jury Duty	652	34		2349	900000	2349012		
22	CY Reimbursements (I.e. telephone)	652	34		2349	900000	2349014		
*23	UST Owner's List	783	24	2500	9696	900000	4969201		*1
*24	Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*1
*25	UST Maps	783	24	2500	9696	900000	4969203		*1
*26	UST Owner's Update	783	24	2500	9696	900000	4969206		*1
*28	Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*2
*29	Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*2
*30	Superfund CERLIS List	783	24	2500	9696	900000	4969211		*2
31	Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		3
32	Smoking School	783	24	2500	9696	900000	4969214		3
*33	SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*3
*34	Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*3
*35	Sale of Equipment	783	24	2500	9696	900000	4969301		*3
*36	Sale of Automobile	783	24	2500	9696	900000	4969302		*3
*37	Lust Recoveries	783	24	2500	9696	900000	4969614		**3
*38	Lust Repayments	783	24	2500	9696	900000	4969615		**3
39	Surface Water Publication	783	24	2500	9696	900000	4969801		3
40	Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		4
41	Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		4
42	Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		4
44	Ust Permit Fees	989	20	3100	1696	900000	4169020		4
45	UST Tank Installers Fees	989	20	3100	1696	900000	4169021		4
46	Food Permit Fees	991	26	2600	1696	900000	4169026		4
43	Other								4

TOTAL $ 4080=

* Gross Receipt Tax Required

** Site Name & Project Code Required

Contact Person: ROGER C. ANDERSON Phone: 476-3490 Date: 12/5/02

Received in ASD By: _____ Date: _____ RT #: _____ ST #: _____

FSB025
Revised 07/07/00

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/29/02

or cash received on _____ in the amount of $ 4000.00

from CONOCO

for WINGATE FRACTIONATING PLANT GW-054
(Facility Name) (DP No.)

Submitted by: WAYNE PRICE Date: 12/5/02

Submitted to ASD by: _____ Date: 1/

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2003

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

conoco

No. [redacted] 62-31

CONOCO INC
PONCA CITY, OK 74602

To: Citibank Delaware
New Castle, DE 19720

NOVEMBER 27, 2002

*** VOID AFTER 90 DAYS ***

Vendor Code: 217921R01

Exactly ********4,000.00**

Pay To the Order Of
OIL CONSERVATION DIVISION
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO ST
SANTA FE NM 87505-5472

S. Z. Cousins

Authorized Signature

[redacted]

Energy, Minerals & Natural Resources Department
CASH REMITTANCE REPORT (CRR)

Location Name ① OCD ENVR BUREAU

Location Code ② ~~0740~~ check # 04683648 CONOCO GW-007 WW GAS

CRR0004811

Today's Date: 12 (MONTH) 5 (DAY) ③ 2002 (YEAR)

Collection Period: ___/___/___ (MM/DD/YYYY) through ___/___/___ (MM/DD/YYYY) ④

Cost Center ⑤	Revenue Code ⑥	Receipt Amount ⑦	Collected Amount ⑧
[redacted]	[redacted]	400.00 ✓	400.00

Total ========>	$ 400.00 ⑨	$ 400.00 ⑩

Over/Short Amount $ — ⑪

CRR Deposit Amount $ ⑫

Print Name: W FREE ⑬ Signature: [signature] ⑬

Print Name: J FORD ⑬ Signature: [signature] ⑬

Distribution: White and Yellow copy to Accounts Receivable-ASD.
Pink copy retained at CRR submitting location.

Official Use Only

Completed by the Accounts Receivable

Date Received: 12/6/02 ❶

Notes: ❷

Amount Received: 400.00 ❸

State Treasurer Deposit Number: ❹

Verified by: ❻

Deposit Date: ❺

EMNRDCRR - Revised 4/01

As Per 19.15.9.712(C)(4) Disposal Of Certain Non-Domestic Waste At Solid Waste Facilities, an amendment has been filed for the Ground Water Discharge Plan for the Conoco Inc., Wingate Fractionator Facility, located in McKinley, County, Gallup, New Mexico.

In the attached table (Table 8-2), the phrase "Process knowledge" may be used to make a determination of disposal location (e.g. stained concrete debris from a location where hydrocarbons are present will be handled as 'contaminated"). The phrase "Based on Analysis" refers to the "Limits" set forth in the 712-rule. If the analysis result equals or exceeds the specified limits, then the waste will be disposed of in the proper OCD approved disposal site. Therefore, the waste streams that are dependent upon analysis results may have multiple disposal sites listed.

TABLE 8-2
WASTE DISPOSAL STREAMS

Rule 712 Reference	Liquid / Solid Waste	Storage	Disposal
D(1)(n)	Absorbent Material / Pads; Used & Dry	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(1)(n)	Absorbent Material / Pads; Used & Wet	Drum	Paint Filter Test – Solid Waste Facility or Tierra Env; Envirotech Inc
D(2)(a)	Alumina – Spent/Used in air service	Not Stored	Based on Analysis/Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(2)(a)	Alumina > Spent/Used in hydrocarbon service	Not stored	Based on Analysis/Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(2)(d)	Asbestos	All items are properly wrapped and sealed. Small items are stored in special asbestos drums; large items are stored in designated storage area.	Keers Environmental, Albuquerque, NM
D(1)(a)	Barrels, drums, 5-gallon buckets, 1-gallon container; emptied and tripled washed	Special waste dumpsters and/or containment pad	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(1)(b)	Brush and vegetation arising from clearing operations; uncontaminated	East of facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(2)(b)	Carbon > Activated	TBD	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(3)(b)	Catalysts	Not Stored	Recycled by Manufacturer
D(3)(e)	Concrete > contaminated	Point of generation or East of Facility	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or Tierra Env.; Envirotech
D(1)(c)	Concrete > Uncontaminated	East of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill

Rule 712 Reference	Liquid / Solid Waste	Storage	Disposal
D(1)(d)	Construction Debris > Uncontaminated	East of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(2)(e)	Cooling Tower Filters	Drums / Special Waste Dumpsters	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(3)(n)	Copper Sweep	Not Stored	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(1)(d) D(3)(f)	Demolition Debris	Near Site Of Generation	Waste Management Solid Waste Facility
D(1)(f)	Detergent Buckets; empty	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(3)(g)	Dry Chemicals > Unused	Original Container	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill or Tierra Env.; Envirotech Inc
Liquid waste – N/A Solids – D(3)(n)	E & P Exempt Waste (separator fluid/water, process fluid/water, solids/sludges from tank bottoms)	Not Stored	Based on Process Knowledge > Liquid - Basin Salt Water Disposal & Solids - Waste Management Solid Waste Facility
D(1)(a)	Empty Drums	Cement Containment Pad	Recycled by vendors
D(3)(n)	Engine Water Filters > Spent/Used – Non-Contact Water	Special Waste Dumpsters	Based on Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(2)(i)	Ferrous Sulfate or Elemental Sulfur > (Iron Sponge) Contaminated	Drum	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(1)(i)	Ferrous Sulfate/Elemental Sulfur; Uncontaminated	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(1)(g)	Fiberglass Tanks; *EPA cleaned and* cut up/shredded	Special Waste *Dumpsters*	Waste Management Solid Waste Facility; Red Rock Regional Landfill

Rule 712 Reference	Liquid / Solid Waste	Storage	Disposal
D(2)(g)	Gas Condensate Filters (Inlet Product Filters) > Spent	Drums	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(1)(h)	Grease Buckets; empty and EPA Cleaned	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(3)(n)	Lube Oils > Spent/Used	Tank	Recycled - US Filter Recovery System Inc., Odessa Terminal
D(1)(o)	Lumber / Pallets Scrap & Uncontaminated	Next to Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(3)(l)	Lumber/Pallets > Contaminated	At point of generation or in containment pan	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill or Tierra Env.; Envirotech
D(3)(n)	Mercaptain Filters > Spent/Used	Special Waste Dumpsters	Based on Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(1)(j)	Metal Plate/Metal Cable/Junk Iron	East Side of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill or Recycled
D(2)(k)	Molecular Sieve	Not Stored	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
D(1)(k)	Office / Domestic Trash	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rocks Regional Landfill
D(2)(o)	Oil Filters > Used	Enclosed Drain Box	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or recycled
D(3)(n)	Paint (dried) Chips	Drums	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or Tierra Env.; Envirotech
D(3)(n)	Painting Waste	Drum	Safety Kleen
D(3)(n)	Pipe Scale, deposits removed from non-contact water equipment	Drums	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(2)(l)	Pipe Scale, Deposits removed from petroleum hydrocarbon pipeline and process equipment	Drums/Tanks	Based on Analysis & Testing > Waste Management Solid Waste Facility; Red Rock Regional Landfill

Rule 712 Reference	Liquid / Solid Waste	Storage	Disposal
D(1)(j)	Pipes & Valves – Used in non-contact water services	Eat Side of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill or Recycled
D(2)(j)	Pipes & Valves – Used in petroleum hydrocarbon services	East Side of Facility	Based on Testing &/or Process knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill or Recycled
D(1)(m)	Plastic Pit Liners; cleaned	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(1)(n)	Rags/Gloves > Dry	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
D(2)(n)	Sandblasting Sand > Spent/Used	Drums	Based on Analysis / Process knowledge > Waste Management Solid Waste Facility; Tierra Environmental; Envirotech Inc
D(1)(j)	Scrap Metal	East side of plant	Recycled
D(3)(c)	Soil – Contaminates other than petroleum	Drums	Based on Analysis / Process knowledge; Waste Management Solid Waste Facility; Tierra Env; Envirotech Inc.
D(3)(n)	Soil – Petroleum hydrocarbon contaminated	Stored near the point of generation until disposal site is determined.	Based on Process Knowledge > Disposal in Waste Management Solid Waste Facility
D(2)(k)	Support Balls	Not Stored	Part of Molecular Sieve waste
D(3)(k)	Tower Packing Materials	Not Stored	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or Tierra Env.; Envirotech
D(3)(n)	Universal Waste (lead acid & gel packed batteries)	Sealed Containers	Recycled – Recycling Center, Farmington, NM > currently under evaluation
D(3)(n)	Universal Waste (florescent tubes)	TBD	TBD
D(3)(n)	Zeolite Resin Beads	Not Stored	Based on Process Knowledge > Waste Management Solid Waste Facility

Conoco Gas & Power
Expanding Your Options

CONOCO

Conoco Inc.
Beverly J. Cox
Compliance Coordinator
P. O. Box 119
Rehoboth, NM 87322
505-863-1023, Fax 505-863-1040

Wingate Fractionating Plant
#68 El Paso Circle
Gallup, NM 87301
505-863-3900

June 6, 2002

State Of New Mexico
Oil Conservation Division
Wayne Price
1220 South St. Francis Drive
Santa FE, NM 87505

RE: Ground Water Discharge Plan (GW-054) Amendments

Mr. Price,

On Thursday, May 30, 2002, a facility walk thru was conducted of the Wingate Fractionating Facility, in preparation for the Ground Water Discharge Plan (GW-54) renewal. Two amendments were requested to complete the renewal process.

Amendment to Storm Water Discharge:

The storm water permit for the Wingate Plant was terminated in July 1998. The Spill Prevention Control & Countermeasure (SPCC) Plan is in place to assist in preventing the release of materials and address procedures to respond immediately to accidental spills that could enter the storm water drainage system. The SPCC plan has specific requirements for inspecting and releasing drainage water. The Ground Water Discharge Plan is also in place that addresses plant processes, waste streams, and chemical characteristics of materials found at the plant. The plan covers spill response procedures as well as general housekeeping practices. With these plans in place, Conoco is adequately prepared to respond in the event of a spill and prevent a material from reaching storm water.

Amendment to Waste Disposal as per Rule-712

During the walk thru, Rule-712 was presented by the OCD. After review of rule-712, Table 8-2 of the GW-054 renewal has been changed to meet its requirements. For your review, Table 8-2 is attached.

Should you have any questions, please do not hesitate to call me at 505-863-1023.

Sincerely,

Beverly J. Cox

Cc: Denny Foust
1000 Rio Brazos Rd
Aztec, NM 87401

Joyce Miley
HU 3036
Houston, TX

June 6, 2002

As Per 19.15.9.712(C)(4) Disposal Of Certain Non-Domestic Waste At Solid Waste Facilities, an amendment has been filed for the Ground Water Discharge Plan for the Conoco Inc., Wingate Fractionator Facility, located in McKinley, County, Gallup, New Mexico.

In the attached table (Table 8-2), the phrase "Based on Analysis" refers to the "Limits" set forth in the 712-rule. If the analysis results equal or exceeded the outlined limits, then the waste will be disposed of in the proper OCD approved disposal site. Therefore, the waste streams that are dependent upon analysis results may have multiple disposal sites listed.

TABLE 8-2
WASTE DISPOSAL STREAMS

Liquid / Solid Waste	Storage	Disposal
Absorbent Material / Pads; Used & Dry	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Absorbent Material / Pads; Used & Wet	Drum	Paint Filter Test – Solid Waste Facility or Tierra Env; Envirotech Inc
Alumina – Spent/Used in air service	Not Stored	Based on Analysis/Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Alumina > Spent/Used in hydrocarbon service	Not stored	Based on Analysis/Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Asbestos	All items are properly wrapped and sealed. Small items are stored in special asbestos drums; large items are stored in designated storage area.	Keers Environmental, Albuquerque, NM
Barrels, drums, 5-gallon buckets, 1-gallon container; emptied and tripled washed	Special waste dumpsters and/or containment pad	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Brush and vegetation arising from clearing operations; uncontaminated	East of facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Carbon > Activated	TBD	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Catalysts	Not Stored	Recycled by Manufacturer
Concrete > contaminated	Point of generation or East of Facility	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or Tierra Env.; Envirotech
Concrete > Uncontaminated	East of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Construction Debris > Uncontaminated	East of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Cooling Tower Filters	Drums / Special Waste Dumpsters	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Copper Sweep	Not Stored	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc

Ground Water Discharge Plane Amendment to Waste Streams

June 6, 2002

Liquid / Solid Waste	Storage	Disposal
Demolition Debris	Near Site Of Generation	Waste Management Solid Waste Facility
Detergent Buckets; empty	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Dry Chemicals > Unused	Original Container	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill or Tierra Env.; Envirotech Inc
E & P Exempt Waste (separator fluid/water, process fluid/water, solids/sludges from tank bottoms)	Not Stored	Based on Process Knowledge > Liquid - Basin Salt Water Disposal & Solids - Waste Management Solid Waste Facility
Empty Drums	Cement Containment Pad	Recycled by vendors
Engine Water Filters > Spent/Used – Non-Contact Water	Special Waste Dumpsters	Based on Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill
Ferrous Sulfate or Elemental Sulfur > (Iron Sponge) Contaminated	Drum	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Ferrous Sulfate/Elemental Sulfur; Uncontaminated	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Fiberglass Tanks; EPA cleaned and cut up/shredded	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Gas Condensate Filters (Inlet Product Filters) > Spent	Drums	Based on Analysis > Waste Management Solid Waste Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Grease Buckets; empty and EPA Cleaned	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Lube Oils > Spent/Used	Tank	Recycled - US Filter Recovery System Inc., Odessa Terminal
Lumber / Pallets Scrap & Uncontaminated	Next to Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Lumber/Pallets > Contaminated	At point of generation or in containment pan	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill or Tierra Env.; Envirotech
Mercaptain Filters > Spent/Used	Special Waste Dumpsters	Based on Process Knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill
Metal Plate/Metal Cable/Junk Iron	East Side of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill or Recycled
Molecular Sieve	Not Stored	Based on Analysis > Waste Management Solid Waste

Liquid / Solid Waste	Storage	Disposal
		Facility; Red Rock Regional Landfill; or Tierra Env; Envirotech Inc
Office / Domestic Trash	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rocks Regional Landfill
Paint (dried) Chips	Drums	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or Tierra Env.; Envirotech
Painting Waste	Drum	Safety Kleen
Pipe Scale, deposits removed from non-contact water equipment	Drums	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Pipe Scale, Deposits removed from petroleum hydrocarbon pipeline and process equipment	Drums/Tanks	Based on Analysis & Testing > Waste Management Solid Waste Facility; Red Rock Regional Landfill
Pipes & Valves – Used in non-contact water services	Eat Side of Facility	Waste Management Solid Waste Facility; Red Rock Regional Landfill or Recycled
Pipes & Valves – Used in petroleum hydrocarbon services	East Side of Facility	Based on Testing &/or Process knowledge > Waste Management Solid Waste Facility; Red Rock Regional Landfill or Recycled
Plastic Pit Liners; cleaned	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Rags/Gloves > Dry	Special Waste Dumpsters	Waste Management Solid Waste Facility; Red Rock Regional Landfill
Sandblasting Sand > Spent/Used	Drums	Based on Analysis / Process knowledge > Waste Management Solid Waste Facility; Tierra Environmental; Envirotech Inc
Scrap Metal	East side of plant	Recycled
Soil – Contaminates other than petroleum	Drums	Based on Analysis / Process knowledge; Waste Management Solid Waste Facility; Tierra Env; Envirotech Inc.
Soil – Petroleum hydrocarbon contaminated	Stored near the point of generation until disposal site is determined.	Based on Process Knowledge > Disposal in Waste Management Solid Waste Facility
Support Balls	Not Stored	Part of Molecular Sieve waste
Tower Packing Materials	Not Stored	Based on Analysis &/or Process Knowledge > Waste Management Solid Waste Facility or Tierra Env.; Envirotech

Ground Water Discharge Plane Amendment to Waste Streams

June 6, 2002

Liquid / Solid Waste	Storage	Disposal
Universal Waste (lead acid & gel packed batteries)	Sealed Containers	Recycled – Recycling Center, Farmington, NM > currently under evaluation
Universal Waste (florescent tubes)	TBD	TBD
Zeolite Resin Beads	Not Stored	Based on Process Knowledge > Waste Management Solid Waste Facility

Conoco Inc.
Beverly J. Cox
Compliance Coordinator
505-863-1023

Conoco Inc.
Wingate Fractionating Plant
PO Box 119
Rehoboth, NM 87322
Fax 505-863-1040

April 18, 2002

Mr. Jack Ford
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Re: Discharge Plan GW-054 Renewal
Wingate Fractionating Plant
McKinley County, New Mexico

Dear Mr. Ford:

Conoco Inc. is submitting the renewal for the Wingate Fractionating Plant Ground Water Discharge Plan (GW-054), located in McKinley County, New Mexico.

As part of the Ground Water Discharge Plan requirement, the sumps are visually inspected on an annual base with the last annual inspection on June 2, 2001 and the 2002 inspection due the week of June 24, 2002. The annual sump inspections are performed during the plant turn-a-round. As per OCD requirements, your office will be contacted prior to the next inspection.

Enclosed you will find a copy of the underground drain system test. This test was performed on February 25, 2002.

The evaporation ponds were sampled on October 4, 2001 and the monitoring wells, on November 13, 2001. These results were submitted to your office on December 17, 2001.

The required filing fee of $100 is enclosed. The required permit fee of $4000 for Gas Processing Plants will be paid at the time of permit approval.

Mr. Jack Ford
Energy, Minerals & Natural Resources Department
Oil Conservation Division

Should you have questions or require additional information, please contact Beverly Cox at 505-863-1023.

Sincerely,

Beverly J. Cox

Beverly J. Cox

Enclosures (2)

cc: State of New Mexico
Minerals and Natural Resources
Oil Conservation, District Office III
1000 Rio Brazos Road
Aztec, NM 87410

Joyce Miley – Houston Office
HU 3036
Houston, TX
File: 2852

CONOCO, INC.
WINGATE GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 2/25/02 Inspector: R. [illegible]

System or Equipment Being Tested: [illegible]

Plant ID Number: 155 Vessel or Equipment Serial No: _____

Maximum Working Pressure: [illegible]

Test Pressure: 7.8 # (Maximum Working Pressure X 1.5)

Time	PSIG	Temp. °F
10:35	7.8 #	43°
10:50	7.8 #	43°
11:05	7.8 #	44°
11:20	7.8 #	45°
11:35	7.8 #	45°

Comments: WINDY PARTLY CLOUDY

2-12-02- Mr Vince Vigil contacted referencing upcoming test.

==========

Circulate: Process Foreman _____

Maintenance Foreman [illegible]

Plant Manager [illegible]

*File - SSF-333 Safety File

Conoco Inc.
Beverly J. Cox
Compliance Coordinator
505-863-1023

Conoco Inc.
Wingate Fractionating Plant
PO Box 119
Rehoboth, NM 87322
Fax 505-863-1040

April 18, 2002

Mr. Jack Ford
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Re: Discharge Plan GW-054 Renewal
Wingate Fractionating Plant
McKinley County, New Mexico

Dear Mr. Ford:

Conoco Inc. is submitting the renewal for the Wingate Fractionating Plant Ground Water Discharge Plan (GW-054), located in McKinley County, New Mexico.

As part of the Ground Water Discharge Plan requirement, the sumps are visually inspected on an annual base with the last annual inspection on June 2, 2001 and the 2002 inspection due the week of June 24, 2002. The annual sump inspections are performed during the plant turn-a-round. As per OCD requirements, your office will be contacted prior to the next inspection.

Enclosed you will find a copy of the underground drain system test. This test was performed on February 25, 2002.

The evaporation ponds were sampled on October 4, 2001 and the monitoring wells, on November 13, 2001. These results were submitted to your office on December 17, 2001.

The required filing fee of $100 is enclosed. The required permit fee of $4000 for Gas Processing Plants will be paid at the time of permit approval.

Mr. Jack Ford
Energy, Minerals & Natural Resources Department
Oil Conservation Division

Should you have questions or require additional information, please contact Beverly Cox at 505-863-1023.

Sincerely,

Beverly J. Cox

Enclosures (2)

cc: State of New Mexico
Minerals and Natural Resources
Oil Conservation, District Office III
1000 Rio Brazos Road
Aztec, NM 87410

Joyce Miley – Houston Office
HU 3036
Houston, TX
File: 2852

CONOCO, INC.
WINGATE GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 2/13/02 Inspector: [illegible]

System or Equipment Being Tested: [illegible]

Plant ID Number: 155 Vessel or Equipment Serial No: _____

Maximum Working Pressure: [illegible]

Test Pressure: 7.8# (Maximum Working Pressure X 1.5)

Time	PSIG	Temp. °F
10:35	7.5#	43°
12:50	[illegible]	43°
[illegible]	[illegible]	43°
[illegible]	[illegible]	43°
[illegible]	[illegible]	43°

Comments: [illegible]

2-12-02- Mr Vince Vigil contacted referencing upcoming test.

==========

Circulate: Process Foreman _____

Maintenance Foreman [illegible]

Plant Manager [illegible]

*File - SSF-333 Safety File

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
1220 S. ST. FRANCIS DR.
SANTA FE, NM 87505
ATTN WAYNE PRICE

AD NUMBER: 264383 ACCOUNT: 56689
LEGAL NO: 71573 P.O.#: 02199000249
201 LINES 1 time(s) at $ 88.60
AFFIDAVITS: 5.25
TAX: 5.87
TOTAL: 99.72

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, K. Voorhees being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #71573 a copy of which is hereto attached was published in said newspaper 1 day(s) between 06/07/2002 and 06/07/2002 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 7 day of June, 2002 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ K. Voorhees
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 10 day of June A.D., 2002

Notary Laura E. Harding

Commission Expires 11/23/03

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

(GW-054) - Conoco Inc., Chuck White, Plant Manager, 505-863-1001, P.O. Box 119, Rehoboth, NM 87322 has submitted an application for renewal of its previously approved discharge plan for its Wingate Fractionating Plant located in portions of Section 9,10,15,16 and 17, Township 15 North, Range 17 West, NMPM, McKinley County, New Mexico. The plant fractionates natural gas liquids into usable products such as propane, butanes and light gasoline. Approximately 2 million gallons per month of wastewater is generated and disposed of in on-site surface evaporation ponds. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 5-30 feet with a total dissolved solids concentration of approximately 480-1400 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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 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 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 31 th day of May, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L
LORI WROTENBERY, Director

Legal #71573
Pub. June 7, 2002

Approved
W. Price

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 31 th day of May, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

for LORI WROTENBERY, Director

SEAL

NOTICE OF PUBLICATION

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

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 31 th day of May, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

for LORI WROTENBERY, Director

SEAL

Affidavit of Publication

STATE OF NEW MEXICO

) SS

COUNTY OF MCKINLEY

RANGEL, LYDIA being duly sworn upon oath, deposes and says:

As LEGALS CLERK of The Independent, a newspaper published in and having a general circulation in McKinley County, New Mexico and in the City of Gallup, New Mexico and having a general circulation in Cibola County, New Mexico and in the City of Grants, New Mexico and having a general circulation in Apache County, Arizona and in the City of St. Johns and in the City of Window Rock, Arizona therein: that this affiant makes this affidavit based upon personal knowledge of the facts herein sworn to. That the publication, a copy of which is hereto attached was published in said newspaper during the period and time of publication and said notice was published in the newspaper proper, and not in a supplement thereof, for one time, the first publication being on the 6th day of June, 2002, the second publica tion being on the _____ day of _____ 20_____, the third publlication being on the _____ day of _____ 20_____.

and the last publication being on the _____ day of _____, 20_____.

That such newspaper, in which such notice or advertisement was published, is now and has been at all times material hereto, duly qualified for such purpose, and to publish legal notices and advertisements within the meaning of Chapter 12, of the statutes of the State of New Mexico, 1941 compilation.

Lydia Rangel

Affiant.

Sworn and subscribed to before me this 12th day of June, A.D., 2002.

Karen Armstrong

Notary Public

My commission expires:

November 27, 2004

LEGAL NOTICE
Gallup-Mc[illegible]ounty
New Mexi[illegible]

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

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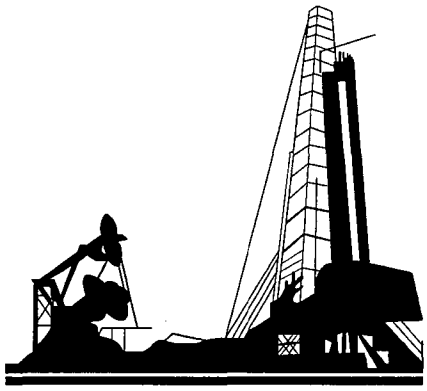
GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 31st day of May, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY, Director

Legal #3374 Published in The Independent June 6, 2002.

02 JUN 11 PM 12:35



TRANSMITTAL COVER SHEET

OIL CONSERVATION DIVISION
1220 S. ST. FRANCIS DRIVE
SANTA FE, NM 87505
(505) 476-3440
(505)476-3462 (Fax)

PLEASE DELIVER THIS FAX: 505-722-5750

TO: LYDIA RANGEL - GALLUP INDEPENDENT

FROM: WAYNE PRICE - 505-476-3487

DATE: 6/03/02

PAGES: 1

SUBJECT: PLEASE PUBLISH ATTACHED LEGAL NOTICE ONE TIME BEFORE JUNE 10, 2002. SEND AFFIDAVIT.

* INVOICE # 02199000 222

IF YOU HAVE TROUBLE RECEIVING THIS FAX, PLEASE CALL THE OFFICE NUMBER ABOVE.

Conoco Inc.
Beverly J. Cox
Compliance Coordinator
505-863-1023
Fax 505-863-1040

Conoco Inc.
Wingate Fractionating Plant
PO Box 119
Rehoboth, NM 87322
68 El Paso Circle
Gallup, NM 87301

RECEIVED
JAN 0 7 2002
Environmental Bureau
Oil Conservation Division

December 17, 2001

Mr. Jack Ford
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
P.O. Box 6429
Santa Fe, NM 87505

Re: Discharge Plan GW-054 Compliance
Wingate Fractionating Plant
McKinley County, New Mexico

Dear Mr. Ford:

Please find attached the results from the annual evaporation pond sampling event and the annual groundwater monitoring well sampling event at Conoco's Gas & Power Wingate facility.

The ponds were sampled on October 4, 2001 pursuant to Discharge Plan GW-054 Approval Condition #17 (November 21, 1997) and analyzed by Inter-Mountain Laboratories, Farmington, New Mexico. The monitoring wells, MW-1, MW-2, MW-3 and WMH-4 were sampled by El Paso Natural Gas on November 13, 2001 and analyzed by NEL Laboratories, Las Vegas Division, Las Vegas, Nevada.

Should you have questions or require additional information, please contact Beverly Cox at 505-863-1023.

Sincerely,

Beverly J. Cox

Attachments

Cc: Joyce Miley – Houston Office
Louis Ferrari – Wingate
File: ENV 215-5-6

elpaso Field Services

December 14, 2001

Ms. Beverly Cox
Conoco, Inc.
68 El Paso Circle
Gallup, NM 87301

RE: Wingate Plant
Gallup, New Mexico
Annual Groundwater Sampling

Dear Ms. Cox:

Enclosed please find the above referenced analytical results for submittal to the New Mexico Oil Conservation Division (NMOCD). Groundwater samples were collected from one on-site monitoring well (WMW-4) and from three monitoring wells located off-site (MW-1through 3) on November 13, 2001. A duplicate sample was collected from WMW-4.

Water level measurements were taken on November 13, 2001. Groundwater elevations for all monitoring wells were calculated using the Top of Riser measurements, consistent with the data previously submitted to NMOCD. A new potentiometric surface map is enclosed for submittal to NMOCD.

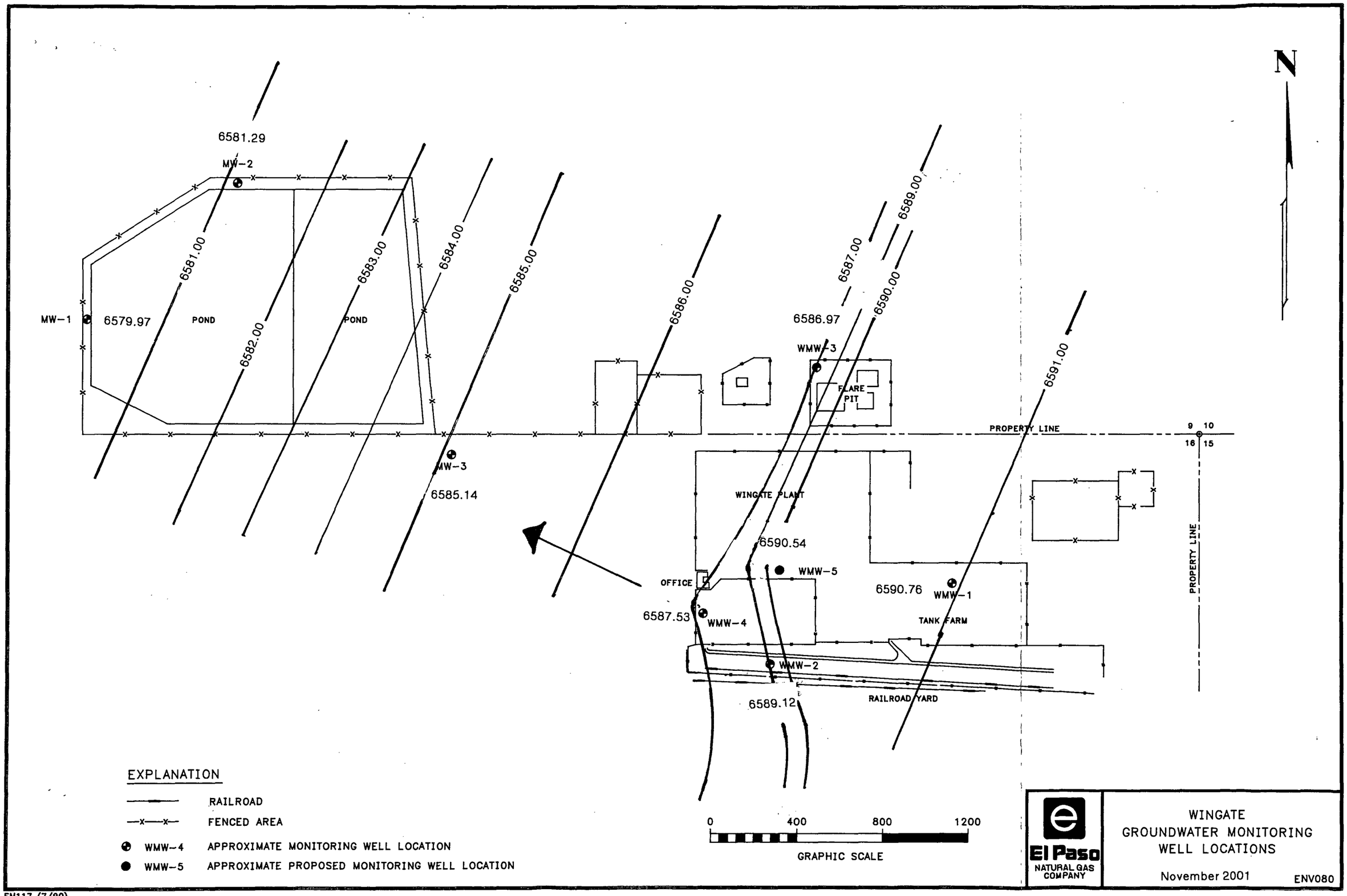
Please contact me at (505) 599-2124, if you have questions or comments.

Sincerely,

Scott T. Pope, PG
Senior Environmental Scientist
Environmental Remediation Department

Enclosure

El Paso Field Services
614 Reilly Farmington, New Mexico 87401


N
6581.29
MW-2
6581.00
6582.00
6583.00
6584.00
6585.00
6586.00
6587.00
6589.00
6590.00
6591.00
MW-1
6579.97
POND
POND
6586.97
WMW-3
FLARE PIT
PROPERTY LINE
9
10
16
15
MW-3
6585.14
WINGATE PLANT
6590.54
WMW-5
OFFICE
6590.76
WMW-1
6587.53
WMW-4
TANK FARM
WMW-2
RAILROAD YARD
6589.12
PROPERTY LINE
EXPLANATION
RAILROAD
FENCED AREA
WMW-4 APPROXIMATE MONITORING WELL LOCATION
WMW-5 APPROXIMATE PROPOSED MONITORING WELL LOCATION
0
400
800
1200
GRAPHIC SCALE
El Paso
NATURAL GAS COMPANY
WINGATE
GROUNDWATER MONITORING
WELL LOCATIONS
November 2001
ENV080

FM117 (7/90)

TABLES

WINGATE PLANT
GROUNDWATER ELEVATIONS
November 2001

WELL NUMBER	TOP OF RISER ELEVATION	DEPTH TO WATER	GROUNDWATER ELEVATION
MW-1	6,584.66	**4.69**	6,579.97
MW-2	6,585.37	**4.08**	6,581.29
MW-3	6,589.84	**4.70**	6,585.14
WMW-1	6,596.04	**5.28**	6,590.76
WMW-2	6,593.69	**4.57**	6,589.12
WMW-3	6,593.91	**6.94**	6,586.97
WMW-4	6,594.50	**6.97**	6,587.53
WMW-5	6,596.98	**6.44**	6,590.54
Data provided in feet.			

WINGATE PLANT
ANALYTICAL RESULTS

SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
11/15/91	MW-01	MOI	ND	ND	ND	ND	-	ND		
01/22/92	MW-01	MOI	ND	ND	ND	ND	-	-		
02/25/93	MW-01	MOI	19.0	2.7	ND	ND	-	-		
01/22/92	MW-01	EPNG	<0.5	<0.5	<0.5	<0.5	-	-		
01/93	MW-01	EPNG	-	-	-	-	-	-		
04/28/92	MW-01	EPNG	<1.0	<1.0	<1.0	<1.0	<100	-		
04/06/93	MW-01	EPNG	ND	ND	ND	ND	-	-		
01/06/94	MW-01	EPNG	1.5	1.5	1.2	3.6				
09/14/94	MW-01	EPNG	<0.5	<0.5	<0.5	<1.0				
09/14/94	MW-01D	EPNG	<0.5	<0.5	1.4	1.1				
03/01/95	MW-01	MOI	<0.3	<0.3	<0.3	<0.6		<0.3	535	20.4
08/22/95	MW-01	EPNG	ND	87	9	49				
03/27/96	MW-01	MOI	ND	ND	ND	ND		ND	690	22.5
03/27/96	MW-01D	MOI	ND	ND	ND	ND		ND	650	25
08/27/96	MW-01	EPNG	ND	ND	ND	ND				
03/26/97	MW-01	CON	1.2	ND	ND	ND		0.6	660	24
08/27/97	MW-01	EPNG	ND	ND	ND	ND				
03/31/98	MW-01	CON	1.8	10	ND	11		ND	610	20
08/25/98	MW-01	EPNG	ND	ND	ND	ND				
08/25/98	MW-01D	EPNG	ND	ND	ND	ND				
09/22/99	MW-01	EPNG	ND	ND	ND	ND			550	28
11/13/01	MW-01	EPNG	ND	ND	ND	ND		ND	964	45

WINGATE PLANT
ANALYTICAL RESULTS

SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
11/15/91	MW-02	MOI	ND	ND	ND	0.1	-	2.6		
01/22/92	MW-02	MOI	ND	ND	ND	ND	-	-		
02/25/93	MW-02	MOI	ND	ND	ND	ND	-	-		
01/22/92	MW-02	EPNG	<0.5	<0.5	<0.5	<0.5	-	-		
04/28/92	MW-02	EPNG	0.002	<1.0	<1.0	<1.0	<100	-		
01/93	MW-02	EPNG	-	-	-	-	-	-		
04/06/93	MW-02	EPNG	2.0	2.0	ND	1.0	-	-		
09/14/94	MW-02	EPNG	<0.5	<0.5	<0.5	<1.0				
03/01/95	MW-02	MOI	<0.3	<0.3	<0.3	<0.6		<0.3	1030	57
08/22/95	MW-02	EPNG	ND	ND	ND	ND				
03/27/96	MW-02	MOI	ND	ND	ND	ND		ND	1120	53.7
08/27/96	MW-02	EPNG	ND	ND	ND	ND				
03/26/97	MW-02	CON	2.0	ND	ND	ND		0.5	1100	56
08/27/97	MW-02	EPNG	ND	ND	ND	ND				
03/31/98	MW-02	CON	ND	ND	ND	ND		ND	1140	60.8
08/25/98	MW-02	EPNG	ND	ND	ND	ND				
09/22/99	MW-02	EPNG	ND	ND	ND	ND			980	70
09/22/99	MW-02D	EPNG	ND	ND	ND	ND			1000	66
11/13/01	MW-02	EPNG	ND	ND	ND	ND		ND	1100	71

WINGATE PLANT
ANALYTICAL RESULTS

SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
01/15/91	MW-03	MOI	0.2	0.2	0.4	1.7	ND	-		
01/21/92	MW-03	MOI	ND	3.9	0.6	4.4	-	-		
02/25/93	MW-03	MOI	ND	ND	ND	ND	-	-		
01/92	MW-03	EPNG	-	-	-	-	-	-		
04/28/92	MW-03	EPNG	<1.0	<1.0	<1.0	<1.0	<100	-		
01/12/93	MW-03	EPNG	<1.0	2.0	<1.0	<1.0	-	-		
04/06/93	MW-03	EPNG	ND	ND	ND	ND	-	-		
01/06/94	MW-03	EPNG	46	1.4	3.5	4.7				
01/06/94	MW-03	EPNG	1.5	1.4	1.2	3.4				
09/14/94	MW-03	EPNG	2	<0.5	<0.5	<1.0				
09/14/94	MW-03D	EPNG	1.4	<0.5	<0.5	<1.0				
03/01/95	MW-03	MOI	<0.3	<0.3	<0.3	<0.6		<0.3	481	18.7
08/22/95	MW-03	EPNG	ND	ND	ND	ND				
03/28/96	MW-03	MOI	ND	ND	ND	ND		ND	540	23.7
08/28/96	MW-03	EPNG	ND	ND	ND	ND				
03/26/97	MW-03	CON	9.2	ND	ND	ND		1.1	600	21
08/27/97	MW-03	EPNG	ND	ND	ND	ND				
03/31/98	MW-03	CON	ND	ND	ND	ND		ND	530	19.2
08/26/98	MW-03	EPNG	ND	ND	ND	ND				
09/22/99	MW-03	EPNG	ND	ND	ND	ND			750	59
11/13/01	MW-03	EPNG	ND	ND	ND	ND		ND	481	16

WINGATE PLANT
ANALYTICAL RESULTS

SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
07/10/91	WMW-04	MOI	ND	ND	ND	ND	-	14.7		
10/28/91	WMW-04	MOI	1.3	ND	ND	ND	-	ND		
01/21/92	WMW-04	MOI	1.9	4.0	1.1	5.1	-	-		
02/25/93	WMW-04	MOI	7.6	3.0	ND	ND	-	-		
02/06/92	WMW-04	EPNG	0.7	<0.5	<0.5	<0.5		-		
04/29/92	WMW-04	EPNG	3.0	<1.0	<1.0	<1.0	<100	-		
01/12/93	WMW-04	EPNG	68.0	8.0	<1.0	4.0	-	-		
04/07/93	WMW-04	EPNG	ND	1.0	ND	ND	-	-		
01/05/94	WMW-04	EPNG	13	1.5	3.3	5.6				
09/13/94	WMW-04	EPNG	<0.5	<0.5	2	2				
03/01/95	WMW-04	MOI	0.9	0.8	<0.3	<0.6		<0.3	1470	123
08/23/95	WMW-04	EPNG	ND	ND	ND	ND				
03/28/96	WMW-04	MOI	ND	ND	ND	ND		ND	1500	110
08/27/96	WMW-04	EPNG	ND	ND	ND	ND				
08/27/96	WMW-04D	EPNG	ND	ND	ND	ND				
03/25/97	WMW-04	CON	ND	ND	ND	ND		0.4	1500	120
08/26/97	WMW-04	EPNG	ND	ND	ND	ND				
03/30/98	WMW-04	CON	3.6	ND	ND	ND		ND	1440	110
08/25/98	WMW-04	EPNG	ND	ND	ND	ND				
09/22/99	WMW-04	EPNG	ND	ND	ND	ND			1200	110
11/13/01	WMW-04	EPNG	ND	ND	ND	ND		ND	1410	130
11/13/01	WMW-04D	EPNG	ND	ND	ND	ND		1	1390	150

SAMPLE KEY

SAMPLE NUMBER: M01-0514 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: FMP #1 before purging wells
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 09:30 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0515 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Bailer Blank before sampling wells
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 09:35 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0516 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Field Blank
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 09:40 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0517 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Monitor well #MW3
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 10:25 SAMPLE DATE: 11/13/2001
BY: Brisbin

ORIGINAL

SAMPLE KEY

SAMPLE NUMBER: M01-0518 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Monitor well #WMW4
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 12:15 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0519 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Monitor well #WMW4 Dup.
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 12:15 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0520 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Monitor well #MW2
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 15:30 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0521 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Monitor well #MW1
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 16:20 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0522 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: FMP #1 after purging wells
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 16:45 SAMPLE DATE: 11/13/2001
BY: Brisbin

SAMPLE KEY

SAMPLE NUMBER: M01-0523 LOCATION: Wingate Plant
MATRIX: Water
SAMPLE DESCRIPTION: Bailer after sampling wells
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 17:00 SAMPLE DATE: 11/13/2001
BY: Brisbin

NEL LABORATORIES
Reno • Las Vegas
Phoenix • Boise

Las Vegas Division
4208 Arcata Way, Suite A • Las Vegas, Nevada 89030
702-657-1010 • Fax: 702-657-1577
1-888-368-3282

CLIENT: El Paso Natural Gas Company
8645 Railroad Drive
El Paso, TX 79904
ATTN: Darrell Campbell

PROJECT NAME: Wingate M.W.'s
PROJECT NUMBER: NA

NEL ORDER ID: P0111032

Attached are the analytical results for samples in support of the above referenced project.

Samples submitted for this project were not sampled by NEL Laboratories. Samples were received by NEL in good condition, under chain of custody on 11/15/01.

Should you have any questions or comments, please feel free to contact our Client Services department at (602) 437-0099.

Stan Van Wagenen
Laboratory Manager

12/4/01
Date

CERTIFICATIONS:

	Reno	Las Vegas	S. California
Arizona	AZ0520	AZ0518	AZ0605
California	1707	2002	2264
US Army Corps of Engineers	Certified	Certified	

	Reno	Las Vegas	S. California
Idaho	Certified	Certified	
Montana	Certified	Certified	
Nevada	NV033	NV052	CA084
L.A.C.S.D.			10228

NEL LABORATORIES

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0514
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-01

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	21	10.	100	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	1080	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0515
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-02

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	0.25	0.1	1	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	ND	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	M01-0516
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-03

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	ND	0.1	1	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	ND	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	M01-0517
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-04

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	16	5.	50	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	481	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0518
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-05

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	130	10.	100	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	1410	30.	2	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0519
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-06

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	150	10.	100	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	1390	30.	2	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	M01-0520
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-07

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	71	10.	100	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	1100	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0521
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-08

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	45	10.	100	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	964	15.	1	SM 2540 C	mg/L	11/26/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0522
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-09

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	0.20	0.1	1	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	1110	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

CLIENT ID: M01-0523
DATE SAMPLED: 11/13/01
NEL SAMPLE ID: P0111032-10

TEST: **Inorganic Non-Metals**
MATRIX: Aqueous

PARAMETER	RESULT	R. L.	D. F.	METHOD	UNITS	ANALYZED
Chloride	ND	0.1	1	EPA 300.0	mg/L	11/29/01
Total Dissolved Solids	ND	15.	1	SM 2540 C	mg/L	11/21/01

R.L. - Reporting Limit
D.F. - Dilution Factor
ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**Method Blank**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	NA
PROJECT #:	NA	NEL SAMPLE ID:	011121TDS-BLK

TEST: **Non-Metals**

PARAMETER	RESULT	REPORTING LIMIT	D. F.	METHOD	UNITS	ANALYZED
Total Dissolved Solids	ND	15	1	SM 2540 C	mg/L	11/21/01

D.F. - Dilution Factor

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**Method Blank**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	NA
PROJECT #:	NA	NEL SAMPLE ID:	011126TDS-BLK

TEST: **Non-Metals**

PARAMETER	RESULT	REPORTING LIMIT	D. F.	METHOD	UNITS	ANALYZED
Total Dissolved Solids	ND	15	1	SM 2540 C	mg/L	11/26/01

D.F. - Dilution Factor

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**Method Blank**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	NA
PROJECT #:	NA	NEL SAMPLE ID:	011129CL-BLK

TEST: **Non-Metals**

PARAMETER	RESULT	REPORTING LIMIT	D. F.	METHOD	UNITS	ANALYZED
Chloride	ND	0.1	1	EPA 300.0	mg/L	11/29/01

D.F. - Dilution Factor

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0514**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-01

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	96	76 - 111
Toluene-d8	102	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0515**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-02
TEST:	**Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**		
METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	96	76 - 111
Toluene-d8	98	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0516**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-03

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	95	76 - 111
Toluene-d8	100	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0517**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-04

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	95	76 - 111
Toluene-d8	99	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0518**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-05

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	100	76 - 111
Toluene-d8	103	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0519**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-06
TEST:	**Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**		
METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	100	76 - 111
Toluene-d8	101	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0520**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-07

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	101	76 - 111
Toluene-d8	104	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0521**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-08

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	93	76 - 111
Toluene-d8	100	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0522**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-09

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/16/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	94	76 - 111
Toluene-d8	99	95 - 108

ND - Not Detected

NEL LABORATORIES

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**M01-0523**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	11/13/01
PROJECT #:	NA	NEL SAMPLE ID:	P0111032-10

TEST: **Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**

METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
DILUTION:	1	ANALYZED:	11/16/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	96	76 - 111
Toluene-d8	101	95 - 108

ND - Not Detected

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**Method Blank**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	NA
PROJECT #:	NA	NEL SAMPLE ID:	011115AQBX_2A-BLK
TEST:	**Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**		
METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
		ANALYZED:	11/15/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	91	76 - 111
Toluene-d8	96	95 - 108

ND - Not Detected

CLIENT:	El Paso Natural Gas Company	CLIENT ID:	**Method Blank**
PROJECT ID:	Wingate M.W.'s	DATE SAMPLED:	NA
PROJECT #:	NA	NEL SAMPLE ID:	011116AQBX_2A-BLK
TEST:	**Volatile Organic Compounds by EPA SW846 Method 8260B, Dec. 1996**		
METHOD:	EPA 8260B	ANALYST:	SKV - Las Vegas Division
MATRIX:	Aqueous	EXTRACTED:	NA
		ANALYZED:	11/16/01

PARAMETER	Result	Reporting Limit
MTBE	ND	5. µg/L
Benzene	ND	2. µg/L
Toluene	ND	2. µg/L
Ethylbenzene	ND	2. µg/L
Total Xylenes	ND	4. µg/L

QUALITY CONTROL DATA:

Surrogate	% Recovery	Acceptable Range
4-Bromofluorobenzene	95	76 - 111
Toluene-d8	100	95 - 108

ND - Not Detected

CLIENT: El Paso Natural Gas Company
PROJECT ID: Wingate M.W.'s
PROJECT #: NA

TEST: Total Extractable Petroleum Hydrocarbons by EPA Method 8015M, December 1996
METHOD: EPA 8015M
ORDER ID: P0111032
MATRIX: Aqueous ANALYST: JRW - Las Vegas Division

CLIENT SAMPLE ID	SAMPLE DATE	NEL SAMPLE ID	RESULT mg/L	C.R.	Reporting Limit	Surrogate Recovery*	EXTRACTED	ANALYZED
M01-0514	11/13/01	P0111032-01	ND	ND	0.5 mg/L	85 %	11/16/01	11/17/01
M01-0515	11/13/01	P0111032-02	ND	ND	0.5 mg/L	94 %	11/16/01	11/17/01
M01-0516	11/13/01	P0111032-03	ND	ND	0.5 mg/L	90 %	11/16/01	11/17/01
M01-0517	11/13/01	P0111032-04	ND	ND	0.5 mg/L	99 %	11/16/01	11/19/01
M01-0518	11/13/01	P0111032-05	ND	ND	0.5 mg/L	96 %	11/16/01	11/17/01
M01-0519	11/13/01	P0111032-06	1.0	G	0.5 mg/L	112 %	11/16/01	11/19/01
M01-0520	11/13/01	P0111032-07	ND	ND	0.5 mg/L	87 %	11/16/01	11/17/01
M01-0521	11/13/01	P0111032-08	ND	ND	0.5 mg/L	108 %	11/16/01	11/19/01
M01-0522	11/13/01	P0111032-09	ND	ND	0.5 mg/L	89 %	11/16/01	11/17/01
M01-0523	11/13/01	P0111032-10	ND	ND	0.5 mg/L	79 %	11/16/01	11/19/01

C.R.: Carbon Range
G Gas Range Organics (C4 to C14).

QUALITY CONTROL DATA (Total for Diesel Range):

Sample ID	Result	Acceptable Range	Surrogate Recovery*	Sample Number
Blank, 011116TP -BLK	ND	< 0.5 mg/L	95 %	NA
LCS, 011116TPHW-LCS	72 %	53 - 91 %	113 %	NA
LCSD, 011116TPHW-LCSD	77 %	53 - 91 %	124 %	NA

*** Surrogate used was Octacosane, acceptance limits 58-120%.**

ND - Not Detected

elpaso

Due 11/26

CHAIN OF CUSTODY RECORD

~~PO111040~~

PO111032

Page _____ of _____

PROJECT NUMBER	PROJECT NAME	SAMPLERS: (Signature)	DATE
	Wingate MW's		11/13/01

LAB ID	DATE	TIME	MATRIX	SAMPLE NUMBER	TOTAL NUMBER OF CONTAINERS	COMPOSITE OR GRAB	REQUESTED ANALYSIS: BTEX 8260	TPH 8015 Mod. Full Range	TDS	Cl	REMARKS
01	11/13/01	0930	H_2O	MO1-0514	5	G	X	X	X	X	X	
02	11/13/01	0935	H_2O	MO1-0515	5	G	X	X	X	X	X	
03	11/13/01	0940	H_2O	MO1-0516	5	G			X		X	
04	11/13/01	1025	H_2O	MO1-0517	5	G	X	X	X	X	X	
05	11/13/01	1315	H_2O	MO1-0518	5	G	X	X	X	X	X	RECIEVED ONE SAMPLE BROKEN
06	11/13/01	1215	H_2O	MO1-0519	5	G	X	X	X	X	X	
07	11/13/01	1530	H_2O	MO1-0520	5	G	X	X	X	X	X	
08	11/13/01	1620	H_2O	MO1-0521	5	G	X	X	X	X	X	
09	11/13/01	1645	H_2O	MO1-0522	5	G	X	X	X	X	X	Custody Seal Intact? Y N None Temp. 8° Correction when received: grad
10	11/13/01	1700	H_2O	MO1-0523	5	G	X	X	X	X	X	

CONTRACT LABORATORY

RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)
	11/14/01 1200	FED EX		11/15 1100	Bradley C Lemas
RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE/TIME	RECEIVED OF LABORATORY BY: Signature

REQUESTED TURNAROUND TIME:
☐ ROUTINE ☐ RUSH _____

CARRIER CO.

BILL NO.:

SAMPLE RECEIPT REMARKS

CHARGE CODE

RESULTS & INVOICES TO:

LABORATORY SERVICES
EL PASO CORPORATION
8645 RAILROAD DRIVE
EL PASO, TEXAS 79904

915-587-3729 FAX: 915-587-3835

White - Testing Laboratory Canary - EP Corp. Lab Pink - Field Sampler

FM-08-0566 (Rev. 3/01)

iml

Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

Date: 10/31/01

Client: Conoco, Inc. Gallup

Lab ID: 0301W04220 - 4221

Project: Wingate

Dear Client:

The sample was received for analysis at Inter-Mountain Laboratories (IML), Farmington, New Mexico. Enclosed are the results of the analyses.

Comment:

The enclosed report has been independently reviewed for compliance with IML-Farmington's Quality Assurance Plan and Data Quality Objectives. IML has examined all of the data in this report and has made every effort possible to make sure it is complete, accurate, and compliant. Quality Assurance data, if not included, is on file and available upon request.

Unless otherwise noted, all results were obtained by approved methods. Practical Quantification Limits (PQLs) are based on statistically derived determinations, and upon any dilutions necessary to obtain proper method response without matrix interference.

Surrogate recoveries in both 625 extractions were out of QC limits for three out of six compounds. Because the recoveries were high and the analytes were not detected the results are still acceptable.

If you have any questions, please call me at (505) 326-4737.

William Lipps
Laboratory Director/IML-Farmington, NM

Inter-Mountain Laboratories, Inc.

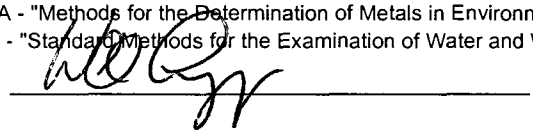
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE EAST POND
Lab ID: 0301W04221
Matrix: Water
Condition: Cool/Intact

Date Received: 10/04/01
Date Reported: 10/30/01
Date Sampled: 10/04/01
Time Sampled: 1030

Parameter	Analytical Result	Units		Units	PQL	Method	Analysis Date	Time	Init.
GENERAL PARAMETERS									
PH	8.5	s.u.			0.1	EPA 150.1	10/04/01	1620	ZW
Electrical Conductivity	72,800	µmhos/cm			10	EPA 120.1	10/04/01	1620	ZW
Solids - Total Dissolved	52,800	mg/L			10	EPA 160.1	10/05/01	1530	ZW
Cyanide (Total) - Colorimetric	<0.01	mg/L			0.01	SM 4500-CN E	10/23/01	0915	ML
Alkalinity (CaCO3)	200	mg/L			1	EPA 310.1	10/10/01	1340	ZW
Hardness (CaCO3)	6,370	mg/L			1	EPA 200.7	10/30/01	1622	WL
MAJOR ANIONS									
Bicarbonate (HCO3)	244	mg/L	4.00	meq/L	1	EPA 310.1	10/10/01	1340	ZW
Carbonate (CO3)	<1	mg/L	<0.01	meq/L	1	EPA 310.1	10/10/01	1340	ZW
Hydroxide (OH)	<1	mg/L	<0.01	meq/L	1	EPA 310.1	10/10/01	1340	ZW
Bromide (Br)	<0.2	mg/L	<0.01	meq/L	0.2	EPA 300.0	10/20/01	1837	ZW
Chloride	25,900	mg/L	730	meq/L	1	EPA 300.0	10/20/01	1837	ZW
Fluoride	0.65	mg/L	0.03	meq/L	0.05	EPA 340.2	10/08/01	1502	ZW
Nitrogen - Nitrate	<0.05	mg/L	<0.01	meq/L	0.05	EPA 353.2	10/12/01	1528	MC
Sulfate	10,600	mg/L	222	meq/L	5	EPA 300.0	10/20/01	1837	ZW
MAJOR CATIONS									
Calcium	1,010	mg/L	50.3	meq/L	0.2	EPA 200.7	10/30/01	1622	WL
Magnesium	937	mg/L	77.1	meq/L	0.2	EPA 200.7	10/30/01	1622	WL
Potassium	237	mg/L	6.05	meq/L	0.2	EPA 200.7	10/30/01	1622	WL
Sodium	18,700	mg/L	812	meq/L	0.2	EPA 200.7	10/30/01	1622	WL
CATION/ANION BALANCE QC INFORMATION									
Anion Sum			955	meq/L	0.01	SM 1030			
Cation Sum			946	meq/L	0.01	SM 1030			
Cation/Anion Balance			0.51	%	0.01	SM 1030			

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF,18th Edition, 1992.
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF,19th Edition, 1995.

Reviewed By: 

Inter-Mountain Laboratories, Inc.

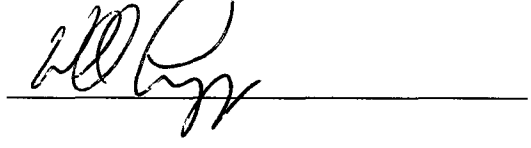
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE EAST POND
Lab ID: 0301W04221
Matrix: Water
Condition: Cool/Intact

Date Received: 10/04/01
Date Reported: 10/30/01
Date Sampled: 10/04/01
Time Sampled: 1030

Parameter	Analytical Result	Units	Units	PQL	Method	Analysis Date	Time	Init.
TOTAL METALS								
Arsenic	<0.005	mg/L		0.005	SM 3114B	10/26/01	1715	JG
Barium	0.17	mg/L		0.01	EPA 200.7	10/20/01	1817	WL
Cadmium	0.014	mg/L		0.001	EPA 200.9	10/20/01	1817	WL
Chromium	<0.01	mg/L		0.01	EPA 200.7	10/20/01	1817	WL
Lead	<0.005	mg/L		0.005	EPA 200.9	10/20/01	1817	WL
Mercury	<0.001	mg/L		0.001	EPA 245.1	10/08/01	1130	JG
Selenium	<0.005	mg/L		0.005	SM 3114B	10/15/01	1100	JG
Silica	21.1	mg/L		0.1	EPA 200.7	10/20/01	1817	WL
Silver	<0.01	mg/L		0.01	EPA 200.7	10/20/01	1817	WL

Reference: SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF,19th Edition, 1995.
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: 

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE EAST POND
Lab ID: 0301W04221
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: 10/03/01
Date Analyzed: 10/11/01

Parameter	Analytical Result	PQL	Units
Method 625 - Semivolatiles			
1,2,4-Trichlorobenzene	<10	10	µg/L
1,2-Dichlorobenzene	<10	10	µg/L
1,3-Dichlorobenzene	<10	10	µg/L
1,4-Dichlorobenzene	<10	10	µg/L
2,4,5-Trichlorophenol	<10	10	µg/L
2,4,6-Trichlorophenol	<10	10	µg/L
2,4-Dimethylphenol	<10	10	µg/L
2,4-Dinitrophenol	<50	50	µg/L
2,4-Dinitrotoluene	<10	10	µg/L
2,6-Dinitrotoluene	<10	10	µg/L
2-Chloronaphthalene	<10	10	µg/L
2-Chlorophenol	<10	10	µg/L
2-Methylnaphthalene	<10	10	µg/L
2-Methylphenol	<10	10	µg/L
2-Nitroaniline	<50	50	µg/L
2-Nitrophenol	<10	10	µg/L
3,3'-Dichlorobenzidine	<10	10	µg/L
3-Nitroaniline	<50	50	µg/L
4,6-Dinitro-2-methylphenol	<50	50	µg/L
4-Bromophenyl phenyl ether	<10	10	µg/L
4-Chloro-3-methylphenol	<20	20	µg/L
4-Chloroaniline	<20	20	µg/L
4-Chlorophenyl phenyl ether	<10	10	µg/L
4-Methylphenol	<10	10	µg/L
4-Nitrophenol	<10	10	µg/L
Acenaphthene	<10	10	µg/L
Acenaphthylene	<10	10	µg/L
Aniline	<10	10	µg/L
Anthracene	<10	10	µg/L
Benzidine	<20	20	µg/L
Benzo(a)anthracene	<10	10	µg/L
Benzo(a)pyrene	<10	10	µg/L
Benzo(b)fluoranthene	<10	10	µg/L

Reference: US-EPA 40 CFR Part 136, April 1995

Reviewed By: _____

Analyst: _____

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE EAST POND
Lab ID: 0301W04221
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: 10/03/01
Date Analyzed: 10/11/01

Parameter	Analytical Result	PQL	Units
Benzo(g,h,i)perylene	<10	10	µg/L
Benzo(k)fluoranthene	<10	10	µg/L
Benzoic Acid	<50	50	µg/L
Benzyl Alcohol	<20	20	µg/L
Butylbenzylphthalate	<10	10	µg/L
Carbazole	<10	10	µg/L
Chrysene	<10	10	µg/L
Di-n-Butylphthalate	<10	10	µg/L
Di-n-Octylphthalate	<10	10	µg/L
Dibenz(a,h)anthracene	<10	10	µg/L
Dibenzofuran	<10	10	µg/L
Diethylphthalate	<10	10	µg/L
Dimethylphthalate	<10	10	µg/L
Fluoranthene	<10	10	µg/L
Fluorene	<10	10	µg/L
Hexachlorobenzene	<10	10	µg/L
Hexachlorobutadiene	<10	10	µg/L
Hexachlorocyclopentadiene	<10	10	µg/L
Hexachloroethane	<10	10	µg/L
Indeno(1,2,3-cd)pyrene	<10	10	µg/L
Isophorone	<10	10	µg/L
N-Nitroso-di-n-propylamine	<10	10	µg/L
N-Nitrosodimethylamine	<20	20	µg/L
N-Nitrosodiphenylamine	<10	10	µg/L
Naphthalene	<10	10	µg/L
Nitrobenzene	<10	10	µg/L
Pentachlorophenol	<50	50	µg/L
Phenanthrene	<10	10	µg/L
Phenol	<10	10	µg/L
Pyrene	<10	10	µg/L
Pyridine	<10	10	µg/L
bis(2-Chloroethoxy)methane	<10	10	µg/L
bis(2-Chloroethyl)ether	<10	10	µg/L

Reference: US-EPA 40 CFR Part 136, April 1995

Reviewed By: _____

Analyst: _____

Inter·Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client:	**Conoco, Inc. Gallup**		
Project:	**Wingate Plant**	**Date Reported:**	10/31/01
Sample ID:	WINGATE EAST POND	**Date Sampled:**	10/04/01
Lab ID:	0301W04221	**Date Received:**	10/04/01
Matrix:	Water	**Date Extracted:**	10/03/01
Condition:	Cool/Intact	**Date Analyzed:**	10/11/01

Parameter	Analytical Result	PQL	Units
bis(2-Chloroisopropyl)ether	<10	10	µg/L
bis(2-Ethylhexyl)phthalate	<10	10	µg/L

Quality Control - Surrogate Recovery	%	QC Limits
2-Fluorobiphenyl	113	37 - 96
2-Fluorophenol	68	10 - 90
Nitrobenzene-d5	130	38 - 106
Phenol-d6	71	11 - 63
2,4,6-Tribromophenol	77	17 - 115
d14-Terphenyl	96	21 - 82

Reference: US-EPA 40 CFR Part 136, April 1995

Reviewed By: _____

Analyst: _____

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE EAST POND
Lab ID: 0301W04221
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: N/A
Date Analyzed: 10/04/01

Parameter	Analytical Result	PQL	Units
Method 624 - Volatiles			
1,1,1,2-Tetrachloroethane	<10	10	µg/L
1,1,1-Trichloroethane	<10	10	µg/L
1,1,2,2-Tetrachloroethane	<10	10	µg/L
1,1,2-Trichloroethane	<10	10	µg/L
1,1-Dichloroethane	<10	10	µg/L
1,1-Dichloroethene	<10	10	µg/L
1,1-Dichloropropene	<10	10	µg/L
1,2,3-Trichlorobenzene	<10	10	µg/L
1,2,3-Trichloropropane	<20	20	µg/L
1,2,4-Trichlorobenzene	<10	10	µg/L
1,2,4-Trimethylbenzene	<10	10	µg/L
1,2-Dibromo-3-chloropropane (DBCP)	<20	20	µg/L
1,2-Dibromoethane	<10	10	µg/L
1,2-Dichlorobenzene	<10	10	µg/L
1,2-Dichloroethane	<10	10	µg/L
1,2-Dichloropropane	<10	10	µg/L
1,3,5-Trimethylbenzene	<10	10	µg/L
1,3-Dichlorobenzene	<10	10	µg/L
1,3-Dichloropropane	<10	10	µg/L
1,4-Dichlorobenzene	<10	10	µg/L
1-Methylnaphthalene	<40	40	µg/L
2,2-Dichloropropane	<10	10	µg/L
2-Chloroethylvinyl ether	<500	500	µg/L
2-Chlorotoluene	<10	10	µg/L
2-Methylnaphthalene	<40	40	µg/L
4-Chlorotoluene	<10	10	µg/L
Benzene	<10	10	µg/L
Bromobenzene	<10	10	µg/L
Bromochloromethane	<10	10	µg/L
Bromodichloromethane	<10	10	µg/L
Bromoform	<10	10	µg/L
Bromomethane	<10	10	µg/L
Carbon Tetrachloride	<10	10	µg/L

Reference: EPA - 40 CFR Part 136.

Reviewed By: _____

Analyst: _____

Inter·Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE EAST POND
Lab ID: 0301W04221
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: N/A
Date Analyzed: 10/04/01

Parameter	Analytical Result	PQL	Units
Chlorobenzene	<10	10	µg/L
Chloroethane	<20	20	µg/L
Chloroform	<10	10	µg/L
Chloromethane	<10	10	µg/L
Dibromochloromethane	<10	10	µg/L
Dibromomethane	<20	20	µg/L
Dichlorobromomethane	<10	10	µg/L
Dichlorodifluoromethane	<10	10	µg/L
Ethylbenzene	<10	10	µg/L
Hexachlorobutadiene	<10	10	µg/L
Isopropylbenzene	<10	10	µg/L
Methyl tert-butyl Ether (MTBE)	<10	10	µg/L
Methylene chloride	<30	30	µg/L
Naphthalene	<20	20	µg/L
Styrene	<10	10	µg/L
Toluene	<10	10	µg/L
Trichlorofluoromethane	<10	10	µg/L
Vinyl Chloride	<20	20	µg/L
cis-1,2-Dichloroethene	<10	10	µg/L
cis-1,3-Dichloropropene	<10	10	µg/L
m,p-Xylene	<10	10	µg/L
o-Xylene	<10	10	µg/L
sec-Butylbenzene	<10	10	µg/L
tert-Butylbenzene	<10	10	µg/L
trans-1,2-Dichloroethene	<10	10	µg/L
trans-1,3-Dichloropropene	<10	10	µg/L

Quality Control - Surrogate Recovery	%	QC Limits
1,2-Dichloroethane-d4	99	75 - 123
Toluene-d8	97	84 - 115
4-Bromofluorobenzene	102	86 - 117

Reference: EPA - 40 CFR Part 136.

Reviewed By: _____

Analyst: _____

inl
Inter- Mountain
Laboratories, Inc.

CHAIN OF CUSTODY RECORD

Client/~~Project Name~~	Project Location	ANALYSES / PARAMETERS
[illegible]	Wibaux East Road	
Sampler: (Signature)	**Chain of Custody Tape No.**	**Remarks**
[signature]		

Sample No./ Identification	Date	Time	Lab Number	Matrix	No. of Containers					
[illegible]	10/4	10:30 AM	0092291							
East Ponds	10/4	10:30 AM								
2 Samples										
per Dallas										
Request										
Farm										

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
[signature]	10/5	8:45			
Relinquished by: (Signature)	**Date**	**Time**	**Received by: (Signature)**	**Date**	**Time**
Relinquished by: (Signature)	**Date**	**Time**	**Received by laboratory: (Signature)**	**Date**	**Time**
			[signature]	10/5	8:45

Inter-Mountain Laboratories, Inc.

☐ 555 Absaraka
Sheridan, Wyoming 82801
Telephone (307) 674-7506

☐ 1633 Terra Avenue
Sheridan, Wyoming 82801
Telephone (307) 672-8945

☐ 1701 Phillips Circle
Gillette, Wyoming 82718
Telephone (307) 682-8945

☐ 2506 West Main Street
Farmington, NM 87401
Telephone (505) 326-4737

☐ 11183 State Hwy. 30
College Station, TX 77845
Telephone (979) 776-8945

Inter-Mountain Laboratories, Inc.

2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Received: 10/04/01
Date Reported: 10/30/01
Date Sampled: 10/04/01
Time Sampled: 1030

Parameter	Analytical Result	Units		Units	PQL	Method	Analysis Date	Time	Init.
GENERAL PARAMETERS									
PH	7.4	s.u.			0.1	EPA 150.1	10/04/01	1620	ZW
Electrical Conductivity	189,000	µmhos/cm			10	EPA 120.1	10/04/01	1620	ZW
Solids - Total Dissolved	379,000	mg/L			10	EPA 160.1	10/05/01	1530	ZW
Cyanide (Total) - Colorimetric	<0.01	mg/L			0.01	SM 4500-CN E	10/23/01	0915	ML
Alkalinity (CaCO3)	1,030	mg/L			1	EPA 310.1	10/10/01	1340	ZW
Hardness (CaCO3)	88,100	mg/L			1	EPA 200.7	10/30/01	1620	WL
MAJOR ANIONS									
Bicarbonate (HCO3)	1,260	mg/L	20.6	meq/L	1	EPA 310.1	10/10/01	1340	ZW
Carbonate (CO3)	<1	mg/L	<0.01	meq/L	1	EPA 310.1	10/10/01	1340	ZW
Hydroxide (OH)	<1	mg/L	<0.01	meq/L	1	EPA 310.1	10/10/01	1340	ZW
Bromide (Br)	275	mg/L	3.44	meq/L	0.2	EPA 300.0	10/20/01	1825	ZW
Chloride	149,000	mg/L	4,190	meq/L	1	EPA 300.0	10/20/01	1825	ZW
Fluoride	<0.05	mg/L	<0.01	meq/L	0.05	EPA 340.2	10/08/01	1502	ZW
Nitrogen - Nitrate	<0.05	mg/L	<0.01	meq/L	0.05	EPA 353.2	10/12/01	1528	MC
Sulfate	86,900	mg/L	1,810	meq/L	5	EPA 300.0	10/20/01	1825	ZW
MAJOR CATIONS									
Calcium	202	mg/L	10.1	meq/L	0.2	EPA 200.7	10/30/01	1620	WL
Magnesium	21,300	mg/L	1,750	meq/L	0.2	EPA 200.7	10/30/01	1620	WL
Potassium	2,870	mg/L	73.5	meq/L	0.2	EPA 200.7	10/30/01	1620	WL
Sodium	97,100	mg/L	4,220	meq/L	0.2	EPA 200.7	10/30/01	1620	WL
CATION/ANION BALANCE QC INFORMATION									
Anion Sum			6,020	meq/L	0.01	SM 1030			
Cation Sum			6,060	meq/L	0.01	SM 1030			
Cation/Anion Balance			0.32	%	0.01	SM 1030			

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF,18th Edition, 1992.
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF,19th Edition, 1995.

Reviewed By:

Inter·Mountain Laboratories, Inc.

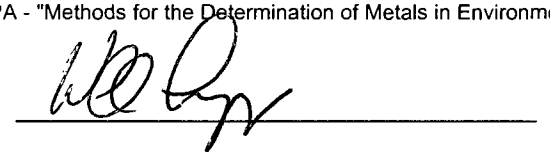
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Received: 10/04/01
Date Reported: 10/30/01
Date Sampled: 10/04/01
Time Sampled: 1030

Parameter	Analytical Result	Units	Units	PQL	Method	Analysis Date	Time	Init.
TOTAL METALS								
Arsenic	0.008	mg/L		0.005	SM 3114B	10/26/01	1715	JG
Barium	0.03	mg/L		0.01	EPA 200.7	10/20/01	1821	WL
Cadmium	0.001	mg/L		0.001	EPA 200.9	10/20/01	1821	WL
Chromium	<0.01	mg/L		0.01	EPA 200.7	10/20/01	1821	WL
Lead	0.071	mg/L		0.005	EPA 200.9	10/20/01	1821	WL
Mercury	<0.001	mg/L		0.001	EPA 245.1	10/08/01	1130	JG
Selenium	<0.005	mg/L		0.005	SM 3114B	10/15/01	1100	JG
Silica	12.1	mg/L		0.1	EPA 200.7	10/20/01	1821	WL
Silver	0.11	mg/L		0.01	EPA 200.7	10/20/01	1821	WL

Reference: SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF,19th Edition, 1995.
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: 

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: N/A
Date Analyzed: 10/04/01

Parameter	Analytical Result	PQL	Units
Method 624 - Volatiles			
1,1,1,2-Tetrachloroethane	<10	10	µg/L
1,1,1-Trichloroethane	<10	10	µg/L
1,1,2,2-Tetrachloroethane	<10	10	µg/L
1,1,2-Trichloroethane	<10	10	µg/L
1,1-Dichloroethane	<10	10	µg/L
1,1-Dichloroethene	<10	10	µg/L
1,1-Dichloropropene	<10	10	µg/L
1,2,3-Trichlorobenzene	<10	10	µg/L
1,2,3-Trichloropropane	<20	20	µg/L
1,2,4-Trichlorobenzene	<10	10	µg/L
1,2,4-Trimethylbenzene	<10	10	µg/L
1,2-Dibromo-3-chloropropane (DBCP)	<20	20	µg/L
1,2-Dibromoethane	<10	10	µg/L
1,2-Dichlorobenzene	<10	10	µg/L
1,2-Dichloroethane	<10	10	µg/L
1,2-Dichloropropane	<10	10	µg/L
1,3,5-Trimethylbenzene	<10	10	µg/L
1,3-Dichlorobenzene	<10	10	µg/L
1,3-Dichloropropane	<10	10	µg/L
1,4-Dichlorobenzene	<10	10	µg/L
1-Methylnaphthalene	<40	40	µg/L
2,2-Dichloropropane	<10	10	µg/L
2-Chloroethylvinyl ether	<500	500	µg/L
2-Chlorotoluene	<10	10	µg/L
2-Methylnaphthalene	<40	40	µg/L
4-Chlorotoluene	<10	10	µg/L
Benzene	<10	10	µg/L
Bromobenzene	<10	10	µg/L
Bromochloromethane	<10	10	µg/L
Bromodichloromethane	<10	10	µg/L
Bromoform	<10	10	µg/L
Bromomethane	<10	10	µg/L
Carbon Tetrachloride	<10	10	µg/L

Reference: EPA - 40 CFR Part 136.

Reviewed By: _____

Analyst: _____

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: N/A
Date Analyzed: 10/04/01

Parameter	Analytical Result	PQL	Units
Chlorobenzene	<10	10	µg/L
Chloroethane	<20	20	µg/L
Chloroform	<10	10	µg/L
Chloromethane	<10	10	µg/L
Dibromochloromethane	<10	10	µg/L
Dibromomethane	<20	20	µg/L
Dichlorobromomethane	<10	10	µg/L
Dichlorodifluoromethane	<10	10	µg/L
Ethylbenzene	<10	10	µg/L
Hexachlorobutadiene	<10	10	µg/L
Isopropylbenzene	<10	10	µg/L
Methyl tert-butyl Ether (MTBE)	<10	10	µg/L
Methylene chloride	<30	30	µg/L
Naphthalene	<20	20	µg/L
Styrene	<10	10	µg/L
Toluene	<10	10	µg/L
Trichlorofluoromethane	<10	10	µg/L
Vinyl Chloride	<20	20	µg/L
cis-1,2-Dichloroethene	<10	10	µg/L
cis-1,3-Dichloropropene	<10	10	µg/L
m,p-Xylene	<10	10	µg/L
o-Xylene	<10	10	µg/L
sec-Butylbenzene	<10	10	µg/L
tert-Butylbenzene	<10	10	µg/L
trans-1,2-Dichloroethene	<10	10	µg/L
trans-1,3-Dichloropropene	<10	10	µg/L

Quality Control - Surrogate Recovery	%	QC Limits
1,2-Dichloroethane-d4 (Surr)	96	75 - 123
Toluene-d8 (Surr)	99	84 - 115
4-Bromofluorobenzene(SUR-8021B)	106	86 - 117

Reference: EPA - 40 CFR Part 136.

Reviewed By: _____

Analyst: _____

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: 10/03/01
Date Analyzed: 10/11/01

Parameter	Analytical Result	PQL	Units
Method 625 - Semivolatiles			
1,2,4-Trichlorobenzene	<10	10	µg/L
1,2-Dichlorobenzene	<10	10	µg/L
1,3-Dichlorobenzene	<10	10	µg/L
1,4-Dichlorobenzene	<10	10	µg/L
2,4,5-Trichlorophenol	<10	10	µg/L
2,4,6-Trichlorophenol	<10	10	µg/L
2,4-Dimethylphenol	<10	10	µg/L
2,4-Dinitrophenol	<50	50	µg/L
2,4-Dinitrotoluene	<10	10	µg/L
2,6-Dinitrotoluene	<10	10	µg/L
2-Chloronaphthalene	<10	10	µg/L
2-Chlorophenol	<10	10	µg/L
2-Methylnaphthalene	<10	10	µg/L
2-Methylphenol	<10	10	µg/L
2-Nitroaniline	<50	50	µg/L
2-Nitrophenol	<10	10	µg/L
3,3'-Dichlorobenzidine	<10	10	µg/L
3-Nitroaniline	<50	50	µg/L
4,6-Dinitro-2-methylphenol	<50	50	µg/L
4-Bromophenyl phenyl ether	<10	10	µg/L
4-Chloro-3-methylphenol	<20	20	µg/L
4-Chloroaniline	<20	20	µg/L
4-Chlorophenyl phenyl ether	<10	10	µg/L
4-Methylphenol	<10	10	µg/L
4-Nitrophenol	<10	10	µg/L
Acenaphthene	<10	10	µg/L
Acenaphthylene	<10	10	µg/L
Aniline	<10	10	µg/L
Anthracene	<10	10	µg/L
Benzidine	<20	20	µg/L
Benzo(a)anthracene	<10	10	µg/L
Benzo(a)pyrene	<10	10	µg/L
Benzo(b)fluoranthene	<10	10	µg/L

Reference: US-EPA 40 CFR Part 136, April 1995

Reviewed By: _____

Analyst: _____

Inter·Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: 10/03/01
Date Analyzed: 10/11/01

Parameter	Analytical Result	PQL	Units
Benzo(g,h,i)perylene	<10	10	µg/L
Benzo(k)fluoranthene	<10	10	µg/L
Benzoic Acid	<50	50	µg/L
Benzyl Alcohol	<20	20	µg/L
Butylbenzylphthalate	<10	10	µg/L
Carbazole	<10	10	µg/L
Chrysene	<10	10	µg/L
Di-n-Butylphthalate	<10	10	µg/L
Di-n-Octylphthalate	<10	10	µg/L
Dibenz(a,h)anthracene	<10	10	µg/L
Dibenzofuran	<10	10	µg/L
Diethylphthalate	<10	10	µg/L
Dimethylphthalate	<10	10	µg/L
Fluoranthene	<10	10	µg/L
Fluorene	<10	10	µg/L
Hexachlorobenzene	<10	10	µg/L
Hexachlorobutadiene	<10	10	µg/L
Hexachlorocyclopentadiene	<10	10	µg/L
Hexachloroethane	<10	10	µg/L
Indeno(1,2,3-cd)pyrene	<10	10	µg/L
Isophorone	<10	10	µg/L
N-Nitroso-di-n-propylamine	<10	10	µg/L
N-Nitrosodimethylamine	<20	20	µg/L
N-Nitrosodiphenylamine	<10	10	µg/L
Naphthalene	<10	10	µg/L
Nitrobenzene	<10	10	µg/L
Pentachlorophenol	<50	50	µg/L
Phenanthrene	<10	10	µg/L
Phenol	<10	10	µg/L
Pyrene	<10	10	µg/L
Pyridine	<10	10	µg/L
bis(2-Chloroethoxy)methane	<10	10	µg/L
bis(2-Chloroethyl)ether	<10	10	µg/L

Reference: US-EPA 40 CFR Part 136, April 1995

Reviewed By: _____

Analyst: _____

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client:	**Conoco, Inc. Gallup**		
Project:	**Wingate Plant**	**Date Reported:**	10/31/01
Sample ID:	WINGATE WEST POND	**Date Sampled:**	10/04/01
Lab ID:	0301W04220	**Date Received:**	10/04/01
Matrix:	Water	**Date Extracted:**	10/03/01
Condition:	Cool/Intact	**Date Analyzed:**	10/11/01

Parameter	Analytical Result	PQL	Units
bis(2-Chloroisopropyl)ether	<10	10	µg/L
bis(2-Ethylhexyl)phthalate	<10	10	µg/L

Quality Control - Surrogate Recovery	%	QC Limits
2-Fluorobiphenyl	84	37 - 96
2-Fluorophenol	69	10 - 90
Nitrobenzene-d5	94	38 - 106
Phenol-d6	68	11 - 63
2,4,6-Tribromophenol	122	17 - 115
d14-Terphenyl	210	21 - 82

Reference: US-EPA 40 CFR Part 136, April 1995

Reviewed By: _____

Analyst: _____

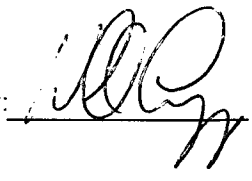
Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: N/A
Date Analyzed: 10/04/01

Parameter	Analytical Result	PQL	Units
Method 624 - Volatiles			
1,1,1,2-Tetrachloroethane	<10	10	µg/L
1,1,1-Trichloroethane	<10	10	µg/L
1,1,2,2-Tetrachloroethane	<10	10	µg/L
1,1,2-Trichloroethane	<10	10	µg/L
1,1-Dichloroethane	<10	10	µg/L
1,1-Dichloroethene	<10	10	µg/L
1,1-Dichloropropene	<10	10	µg/L
1,2,3-Trichlorobenzene	<10	10	µg/L
1,2,3-Trichloropropane	<20	20	µg/L
1,2,4-Trichlorobenzene	<10	10	µg/L
1,2,4-Trimethylbenzene	<10	10	µg/L
1,2-Dibromo-3-chloropropane (DBCP)	<20	20	µg/L
1,2-Dibromoethane	<10	10	µg/L
1,2-Dichlorobenzene	<10	10	µg/L
1,2-Dichloroethane	<10	10	µg/L
1,2-Dichloropropane	<10	10	µg/L
1,3,5-Trimethylbenzene	<10	10	µg/L
1,3-Dichlorobenzene	<10	10	µg/L
1,3-Dichloropropane	<10	10	µg/L
1,4-Dichlorobenzene	<10	10	µg/L
1-Methylnaphthalene	<40	40	µg/L
2,2-Dichloropropane	<10	10	µg/L
2-Chloroethylvinyl ether	<500	500	µg/L
2-Chlorotoluene	<10	10	µg/L
2-Methylnaphthalene	<40	40	µg/L
4-Chlorotoluene	<10	10	µg/L
Benzene	<10	10	µg/L
Bromobenzene	<10	10	µg/L
Bromochloromethane	<10	10	µg/L
Bromodichloromethane	<10	10	µg/L
Bromoform	<10	10	µg/L
Bromomethane	<10	10	µg/L
Carbon Tetrachloride	<10	10	µg/L

Reference: EPA - 40 CFR Part 136.

Reviewed By: 

Analyst: _____

Inter-Mountain Laboratories, Inc.
2506 West Main Street
Farmington, NM 87401

Client: Conoco, Inc. Gallup
Project: Wingate Plant
Sample ID: WINGATE WEST POND
Lab ID: 0301W04220
Matrix: Water
Condition: Cool/Intact

Date Reported: 10/31/01
Date Sampled: 10/04/01
Date Received: 10/04/01
Date Extracted: N/A
Date Analyzed: 10/04/01

Parameter	Analytical Result	PQL	Units
Chlorobenzene	<10	10	µg/L
Chloroethane	<20	20	µg/L
Chloroform	<10	10	µg/L
Chloromethane	<10	10	µg/L
Dibromochloromethane	<10	10	µg/L
Dibromomethane	<20	20	µg/L
Dichlorobromomethane	<10	10	µg/L
Dichlorodifluoromethane	<10	10	µg/L
Ethylbenzene	<10	10	µg/L
Hexachlorobutadiene	<10	10	µg/L
Isopropylbenzene	<10	10	µg/L
Methyl tert-butyl Ether (MTBE)	<10	10	µg/L
Methylene chloride	<30	30	µg/L
Naphthalene	<20	20	µg/L
Styrene	<10	10	µg/L
Toluene	<10	10	µg/L
Trichlorofluoromethane	<10	10	µg/L
Vinyl Chloride	<20	20	µg/L
cis-1,2-Dichloroethene	<10	10	µg/L
cis-1,3-Dichloropropene	<10	10	µg/L
m,p-Xylene	<10	10	µg/L
o-Xylene	<10	10	µg/L
sec-Butylbenzene	<10	10	µg/L
tert-Butylbenzene	<10	10	µg/L
trans-1,2-Dichloroethene	<10	10	µg/L
trans-1,3-Dichloropropene	<10	10	µg/L

Quality Control - Surrogate Recovery	%	QC Limits
1,2-Dichloroethane-d4	96	75 - 123
Toluene-d8	99	84 - 115
4-Bromofluorobenzene	106	86 - 117

Reference: EPA - 40 CFR Part 136.

Reviewed By: _____

Analyst: _____

CHAIN OF CUSTODY RECORD

Inter-Mountain Laboratories, Inc.

Client/Project Name	Project Location	ANALYSES / PARAMETERS
Sampler: (Signature)	**Chain of Custody Tape No.**	**Remarks**

Sample No./ Identification	Date	Time	Lab Number	Matrix	No. of Containers					

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Relinquished by: (Signature)	**Date**	**Time**	**Received by: (Signature)**	**Date**	**Time**
Relinquished by: (Signature)	**Date**	**Time**	**Received by laboratory: (Signature)**	**Date**	**Time**

Inter-Mountain Laboratories, Inc.

☐ 555 Absaraka
Sheridan, Wyoming 82801
Telephone (307) 674-7506

☐ 1633 Terra Avenue
Sheridan, Wyoming 82801
Telephone (307) 672-8945

☐ 1701 Phillips Circle
Gillette, Wyoming 82718
Telephone (307) 682-8945

☒ 2506 West Main Street
Farmington, NM 87401
Telephone (505) 326-4737

☐ 11183 State Hwy. 30
College Station, TX 77845
Telephone (979) 776-8945

WINGATE PLANT
ANALYTICAL RESULTS

SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
11/15/91	MW-02	MOI	ND	ND	ND	0.1	-	2.6		
01/22/92	MW-02	MOI	ND	ND	ND	ND	-	-		
02/25/93	MW-02	MOI	ND	ND	ND	ND	-	-		
01/22/92	MW-02	EPNG	<0.5	<0.5	<0.5	<0.5	-	-		
04/28/92	MW-02	EPNG	0.002	<1.0	<1.0	<1.0	<100	-		
01/93	MW-02	EPNG	-	-	-	-	-	-		
04/06/93	MW-02	EPNG	2.0	2.0	ND	1.0	-	-		
09/14/94	MW-02	EPNG	<0.5	<0.5	<0.5	<1.0				
03/01/95	MW-02	MOI	<0.3	<0.3	<0.3	<0.6		<0.3	1030	57
08/22/95	MW-02	EPNG	ND	ND	ND	ND				
03/27/96	MW-02	MOI	ND	ND	ND	ND		ND	1120	53.7
08/27/96	MW-02	EPNG	ND	ND	ND	ND				
03/26/97	MW-02	CON	2.0	ND	ND	ND		0.5	1100	56
08/27/97	MW-02	EPNG	ND	ND	ND	ND				
03/31/98	MW-02	CON	ND	ND	ND	ND		ND	1140	60.8
08/25/98	MW-02	EPNG	ND	ND	ND	ND				
09/22/99	MW-02	EPNG	ND	ND	ND	ND			980	70
09/22/99	MW-02D	EPNG	ND	ND	ND	ND			1000	66
11/13/01	MW-02	EPNG	ND	ND	ND	ND		ND	1100	71

WINGATE PLANT
ANALYTICAL RESULTS

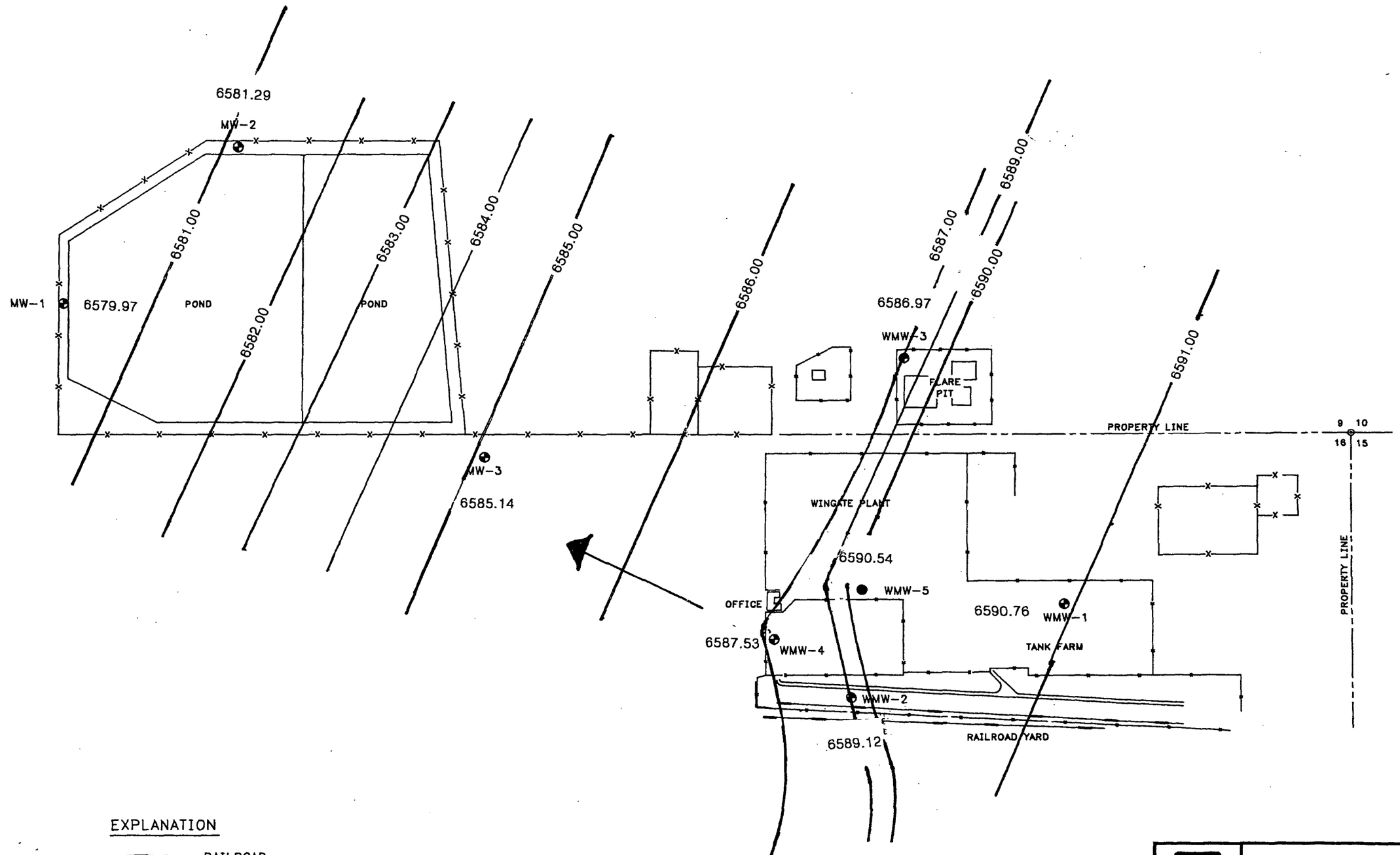
SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
01/15/91	MW-03	MOI	0.2	0.2	0.4	1.7	ND	-		
01/21/92	MW-03	MOI	ND	3.9	0.6	4.4	-	-		
02/25/93	MW-03	MOI	ND	ND	ND	ND	-	-		
01/92	MW-03	EPNG	-	-	-	-	-	-		
04/28/92	MW-03	EPNG	<1.0	<1.0	<1.0	<1.0	<100	-		
01/12/93	MW-03	EPNG	<1.0	2.0	<1.0	<1.0	-	-		
04/06/93	MW-03	EPNG	ND	ND	ND	ND	-	-		
01/06/94	MW-03	EPNG	46	1.4	3.5	4.7				
01/06/94	MW-03	EPNG	1.5	1.4	1.2	3.4				
09/14/94	MW-03	EPNG	2	<0.5	<0.5	<1.0				
09/14/94	MW-03D	EPNG	1.4	<0.5	<0.5	<1.0				
03/01/95	MW-03	MOI	<0.3	<0.3	<0.3	<0.6		<0.3	481	18.7
08/22/95	MW-03	EPNG	ND	ND	ND	ND				
03/28/96	MW-03	MOI	ND	ND	ND	ND		ND	540	23.7
08/28/96	MW-03	EPNG	ND	ND	ND	ND				
03/26/97	MW-03	CON	9.2	ND	ND	ND		1.1	600	21
08/27/97	MW-03	EPNG	ND	ND	ND	ND				
03/31/98	MW-03	CON	ND	ND	ND	ND		ND	530	19.2
08/26/98	MW-03	EPNG	ND	ND	ND	ND				
09/22/99	MW-03	EPNG	ND	ND	ND	ND			750	59
11/13/01	MW-03	EPNG	ND	ND	ND	ND		ND	481	16

WINGATE PLANT
ANALYTICAL RESULTS

SAMPLE DATE	WELL ID	Sampled by	Benzene	Toluene	Ethylbenzene	Total Xylenes	Gasoline	TPH	TDS	Chloride
			µg/L	µg/L	µg/L	µg/L		µg/L	mg/L	mg/L
		Standard	10 µg/L	750 µg/L	750 µg/L	620 µg/L			1000	250
		MCLs	5 µg/L	1000 µg/L	700 µg/L	10000 µg/L				
07/10/91	WMW-04	MOI	ND	ND	ND	ND	-	14.7		
10/28/91	WMW-04	MOI	1.3	ND	ND	ND	-	ND		
01/21/92	WMW-04	MOI	1.9	4.0	1.1	5.1	-	-		
02/25/93	WMW-04	MOI	7.6	3.0	ND	ND	-	-		
02/06/92	WMW-04	EPNG	0.7	<0.5	<0.5	<0.5		-		
04/29/92	WMW-04	EPNG	3.0	<1.0	<1.0	<1.0	<100	-		
01/12/93	WMW-04	EPNG	68.0	8.0	<1.0	4.0	-	-		
04/07/93	WMW-04	EPNG	ND	1.0	ND	ND	-	-		
01/05/94	WMW-04	EPNG	13	1.5	3.3	5.6				
09/13/94	WMW-04	EPNG	<0.5	<0.5	2	2				
03/01/95	WMW-04	MOI	0.9	0.8	<0.3	<0.6		<0.3	1470	123
08/23/95	WMW-04	EPNG	ND	ND	ND	ND				
03/28/96	WMW-04	MOI	ND	ND	ND	ND		ND	1500	110
08/27/96	WMW-04	EPNG	ND	ND	ND	ND				
08/27/96	WMW-04D	EPNG	ND	ND	ND	ND				
03/25/97	WMW-04	CON	ND	ND	ND	ND		0.4	1500	120
08/26/97	WMW-04	EPNG	ND	ND	ND	ND				
03/30/98	WMW-04	CON	3.6	ND	ND	ND		ND	1440	110
08/25/98	WMW-04	EPNG	ND	ND	ND	ND				
09/22/99	WMW-04	EPNG	ND	ND	ND	ND			1200	110
11/13/01	WMW-04	EPNG	ND	ND	ND	ND		ND	1410	130
11/13/01	WMW-04D	EPNG	ND	ND	ND	ND		1	1390	150

WINGATE PLANT
GROUNDWATER ELEVATIONS
November 2001

WELL NUMBER	TOP OF RISER ELEVATION	DEPTH TO WATER	GROUNDWATER ELEVATION
MW-1	6,584.66	**4.69**	6,579.97
MW-2	6,585.37	**4.08**	6,581.29
MW-3	6,589.84	**4.70**	6,585.14
WMW-1	6,596.04	**5.28**	6,590.76
WMW-2	6,593.69	**4.57**	6,589.12
WMW-3	6,593.91	**6.94**	6,586.97
WMW-4	6,594.50	**6.97**	6,587.53
WMW-5	6,596.98	**6.44**	6,590.54
Data provided in feet.			


N
6581.29
MW-2
6581.00
6582.00
6583.00
6584.00
6585.00
6586.00
6587.00
6589.00
6590.00
6591.00
MW-1
6579.97
POND
POND
6586.97
WMW-3
FLARE PIT
PROPERTY LINE
9
10
16
15
MW-3
6585.14
WINGATE PLANT
6590.54
WMW-5
OFFICE
6590.76
WMW-1
6587.53
WMW-4
TANK FARM
WMW-2
RAILROAD YARD
6589.12
PROPERTY LINE
EXPLANATION
RAILROAD
FENCED AREA
WMW-4 APPROXIMATE MONITORING WELL LOCATION
WMW-5 APPROXIMATE PROPOSED MONITORING WELL LOCATION
0
400
800
1200
GRAPHIC SCALE
El Paso
NATURAL GAS COMPANY
WINGATE
GROUNDWATER MONITORING
WELL LOCATIONS
November 2001
ENV080

FM117 (7/90)

Joyce M. Miley
Environmental Consultant
Natural Gas & Gas Products

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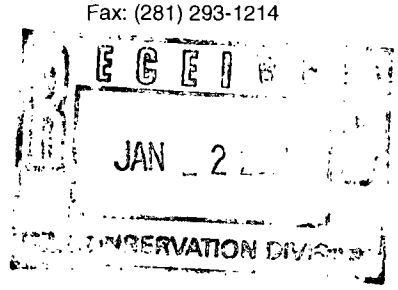
(281) 293-4498
Fax: (281) 293-1214



Certified Mail No: 7099 3220 0003 1150 1865
Return Receipt Requested

December 28, 2000

Mr. Jack Ford
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
P.O. Box 6429
Santa Fe, NM 87505

Re: Discharge Plan GW-054 Compliance
Wingate Fractionating Plant
McKinley County, New Mexico

Dear Mr. Ford:

Please find attached the results from the annual evaporation pond sampling event and the annual groundwater monitoring well sampling event at Conoco's NGGP's Wingate facility.

The ponds were sampled on October 10, 2000 pursuant to Discharge Plan GW-54 Approval Condition #17 (November 21, 1997) and analyzed by Inter-Mountain Laboratories, Farmington New Mexico. The monitoring wells were sampled according to our agreement and follow-up letter dated June 23, 1999 reducing the sampling of MW-1, MW-2, MW-3 and WMW-4 to an annual basis. Monitoring wells were sampled on October 13, 2000 and analyzed by Pinnacle Laboratories, Albuquerque, New Mexico. Water level measurements were taken on October 13, 2000.

If you have any questions or require any additional information, please contact Joyce Miley or Louis Ferrari at (505) 863-1028. Thank you for your time and consideration.

Sincerely,

Joyce Miley

Joyce M. Miley

cc: Chuck White – Wingate
Louis Ferrari - Wingate
File: ENV 215-5-6