

GW - 71-0

**GENERAL
CORRESPONDENCE**

YEAR(S):

2002-1998

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 1088971 dated 9/12/02,
or cash received on 9/18/02 in the amount of \$ 4,075.00
from EL PASO FIELD SERVICES

for CHACO PLANT

GW-071

Submitted by: ED MARTIN Date: 9/18/02

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ☒

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____

**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						1
5 Gross Receipt Tax	064	01		2329	900000	2329134		2
3 Air Quality Title V	092	13	1300	1696	900000	4169134		3
4 PRP Prepayments	248	14	1400	9696	900000	4969014		4
2 Climax Chemical Co.	248	14	1400	9696	900000	4969015		5
7 Circle K Reimbursements	248	14	1400	9696	900000	4969248		6
8 Hazardous Waste Permits	339	27	2700	1696	900000	4169027		7
8 Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		8
0 Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	\$ 4,075.00	10
1 Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4169029		11
2 Air Quality Permits	631	31	2500	1696	900000	4169031		12
3 Payments under Protest	851	33		2919	900000	2919033		13
4 Xerox Copies	652	34		2349	900000	2349001		*14
5 Ground Water Penalties	652	34		2349	900000	2349002		15
6 Witness Fees	652	34		2349	900000	2439003		16
7 Air Quality Penalties	652	34		2349	900000	2349004		17
8 OSHA Penalties	652	34		2349	900000	2349005		18
9 Prior Year Reimbursement	652	34		2349	900000	2349006		19
0 Surface Water Quality Certification	652	34		2349	900000	2349009		20
1 Jury Duty	652	34		2349	900000	2349012		21
2 CY Reimbursements (i.e. telephone)	652	34		2349	900000	2349014		22
3 UST Owner's List	783	24	2500	9696	900000	4969201		*23
4 Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
5 UST Maps	783	24	2500	9696	900000	4969203		*25
6 UST Owner's Update	783	24	2500	9696	900000	4969205		*26
8 Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
9 Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
0 Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
1 Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
2 Smoking School	783	24	2500	9696	900000	4969214		32
3 SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
4 Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
5 Sale of Equipment	783	24	2500	9696	900000	4969301		*35
6 Sale of Automobile	783	24	2500	9696	900000	4969302		*36
7 Lost Recoveries	783	24	2500	9696	900000	4969814		**37
8 Lost Repayments	783	24	2500	9696	900000	4969815		**38
9 Surface Water Publication	783	24	2500	9696	900000	4969801		39
0 Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
1 Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
2 Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
4 Ust Permit Fees	988	20	3100	1696	900000	4169020		44
5 UBT Tank Installers Fees	988	20	3100	1696	900000	4169021		45
8 Food Permit Fees	991	26	2600	1696	900000	4169026		46
3 Other								43

Gross Receipt Tax Required

Site Name & Project Code Required

TOTAL \$ 4,075.00

Intact Person: EO MARTIN Phone: 476-3492 Date: 9/18/02
 Received in ASD By: _____ Date: _____ RT #: _____ ST #: _____

EL PASO FIELD SERVICES L.P.
EL PASO FIELD SERVICES
Houston, TX 77002

CHECK DATE
09/12/2002

CHECK NUMBER

STATE OF NEW MEXICO

WATER QUALITY MANAGEMENT FUND
OIL CONSERVATION DIVISION
1220 SOUTH ST FRANCIS DRIVE
SANTA FE, NM 87505

REMITTANCE ADVICE RETAIN FOR YOUR RECORDS
Refer Payment Inquires to FPFS - 713-420-4200

VENDOR 0000002667
STATE OF NEW MEXICO

Voucher ID	Invoice Number	Invoice Date	Description	Discount	Paid Amount
00144771	CKREQ020904	09/04/2002	DISCHARGE PLAN RENEWAL GW-071	0.00	4,075.00
TOTAL				\$0.00	\$4,075.00

EL PASO FIELD SERVICES L.P.
EL PASO FIELD SERVICES
Houston, TX 77002

CITIBANK
One Penn's Way
New Castle, DE 19720

CHECK DATE
09/12/2002

CHECK NUMBER

62-20
311

Amount

***\$4,075.00

VOID AFTER ONE YEAR

Pay ***FOUR THOUSAND SEVENTY-FIVE AND XX / 100 US DOLLAR***

To The
Order Of

STATE OF NEW MEXICO

WATER QUALITY MANAGEMENT FUND
OIL CONSERVATION DIVISION
1220 SOUTH ST FRANCIS DRIVE
SANTA FE, NM 87505

H. Brent Austin
Authorized Signature

Martin, Ed

To: Bays, David
Subject: RE: Discharge Permit Fees

OK. I will move to Kutz. Total due for Chaco will be \$4,075 after taking credit for the \$25 overpayment for Kutz.

-----Original Message-----

From: Bays, David [mailto:David.Bays@ElPaso.com]
Sent: Tuesday, August 20, 2002 10:45 AM
To: 'Martin, Ed'
Subject: RE: Discharge Permit Fees

It would be better for El Paso's accounting procedures if you can move the \$1825 to the GW-049-1 account. The original check was booked against the Kutz Sparator location code, and I cannot request another check charge to the same location without significant paperwork justifying the second charge.

-----Original Message-----

From: Martin, Ed [mailto:EMARTIN@state.nm.us]
Sent: Tuesday, August 20, 2002 10:09 AM
To: 'Bays, David'
Subject: RE: Discharge Permit Fees

OK. I found the \$1,825 due for GW-049-1. I calculated this amount incorrectly. It should have been \$1,800 total. The \$1825 is still applied to Chaco, but I can move it. Is this what you want to do? Or, do you want to cut another check for \$1800 for GW-49-1 and then cut a final check for Chaco in the amount of \$2,275 (\$4100 - 1825)? Have I confused this issue enough??

-----Original Message-----

From: Bays, David [mailto:David.Bays@ElPaso.com]
Sent: Monday, August 12, 2002 8:41 AM
To: 'Martin, Ed'
Subject: RE: Discharge Permit Fees

Hi,

I am back to work now, and I looked up the facility. The \$1,825 is for the Kutz Hydrocarbon Recovery Facility (GW-049-1). The Special Conditions for that Plan were issued in July.

-----Original Message-----

From: Martin, Ed [mailto:EMARTIN@state.nm.us]
Sent: Wednesday, August 07, 2002 9:36 AM
To: David Bays (E-mail)
Subject: Discharge Permit Fees

I received a check from El Paso Field Services (# 1086722) in the amount of \$1,825.00. I was unable to determine to which discharge permit this applied. So, I have applied this to the Chaco Gas Plant (GW-71). Total fees due on this facility are: 100.00 Filing Fee 4000.00 Flat permit fee for a total of \$4,100. After applying the 1,825, this leaves a balance due for Chaco of \$2,275 which will be due upon receipt by you of the permit approval.

If this \$1,825 should have been applied elsewhere, please let me know. I will be out of town next Monday, Tuesday and Wednesday.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor
Betty Rivera
Cabinet Secretary

August 28, 2002

Lori Wrotenberg
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3929-9574

Mr. David Bays
El Paso Field Services
614 Reilly Avenue
Farmington, NM 87401

RE: Discharge Plan Renewal GW-071
El Paso Field Services
Chaco Gas Plant
San Juan County, New Mexico

Dear Mr. Bays:

The ground water discharge plan renewal GW-071 for the El Paso Field Services Chaco Gas Plant located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan 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 thirty (30) days of receipt of this letter. Please note new mailing address below.

The discharge plan renewal application letter, dated February 22, 2002, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Note Section 3109.G, which provides for possible future amendment of the plan. Be advised that approval of this plan does not relieve El Paso Field Services of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve El Paso Field Services of its responsibility to comply with any other governmental authority's rules and regulations.

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

Note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, El Paso Field Services is required to notify the Director of any facility

Mr. David Bays
GW- 071
August 28, 2002
Page 2

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 renewal plan is for a period of five years. This renewal will expire on May 18, 2007, and El Paso Field Services should submit an application in ample time before this date. Note that under 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 renewal application for the El Paso Field Services Chaco Gas Plant is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application is assessed a filing fee of \$100.00. There is a renewal flat fee assessed for natural gas processing plants of \$4,000.00.

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
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

Xc: OCD Aztec Office

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To DAVID BAYS, EL PASO F.S. Street, Apt. No., or PO Box No. 614 REILLY AVE. City, State, ZIP+4 FARMINGTON, NM 87401	

PS Form 3800, January 2001 See Reverse for Instructions

4256 6263 3923 4000 0641 7002

87505 AUG 29 2002

GW-71

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-071
EL PASO FIELD SERVICES
CHACO GAS PLANT
DISCHARGE PLAN APPROVAL CONDITIONS
August 28, 2002

1. Payment of Discharge Plan Fees: Twenty-five (25) dollars has been applied to this discharge permit. **Total due upon receipt of this approval is \$4,075.00.** All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.
2. Commitments: El Paso Field Services will abide by all commitments submitted in the discharge plan renewal application letter dated, February 22, 2002, and these conditions for approval.
3. 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 permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
 1. the waste stream is identified, and authorized, as such in the discharge plan, and;
 2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.
4. Drum Storage: All drums containing material other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment. Empty drum storage should be kept to a minimum.
5. 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.
6. 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 tanks or existing

tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure. The inlet/outlet of these tanks should be kept within the enclosure.

7. 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.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information. These labels should contain the generic information (common chemical name) pertaining to the material inside the container.
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All 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. Concrete sumps must be free of all debris to allow for visual inspection. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be 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.
11. 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 be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities that 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.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to

prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years. All areas within the confines of the plant property should be free of spilled material.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: El Paso Field Services shall maintain storm water runoff controls. 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 storm water run-off, then El Paso Field Services shall: take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.
16. Closure: The OCD will be notified when operations of the Chaco Gas Plant are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Conditions accepted by: El Paso Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

El Paso Field Services

Print Name: _____

Signature: _____

Title: _____

Date: _____

Martin, Ed

From: Foust, Denny
Sent: Thursday, July 25, 2002 8:27 AM
To: Martin, Ed
Subject: EPFS Chaco Plant Inspection 7/7/02

ED,

I have not included your attachment, my concerns are for correcting the bird netting problems at the Ballard Separator ponds even if it is a separate permit. Sumps and containments needed to be cleaned up at the facility at particular issue is the acid tank sump. Sumps will need to be filled in or visually inspected. There were some questions about leak detection on some of the older underground sumps or tanks on the waste water drain system. Renew and modify all tank labeling for visibility and clarity of identification. The process areas suffer from liquids from the train reaching the ground (gravel) need better housekeeping and prevention procedures. A couple of lube oil and/or chemical pumps need the goo cleaned off and the associated staining cleaned up. Keep the number of empty chemical barrels to a minimum.


**RICHARDSON OPERATING COMPANY
3100 LaPLATA HWY.**

Phone (505) 564-3100 FARMINGTON, NM 87401 FAX (505) 564-3109

August 5, 2002

Mr. Ed Martin
Oil Conservation Division
Via FAX 505-476-3471
Santa Fe, NM

Richardson Operating Company proposes to hydro-test and purge the Red Pepper Pipeline from the El Paso Field Services Chaco Plant to the Western Gas Resources San Juan Plant in San Juan County, New Mexico. The residual water will be injected into Richardson's Salty Dog #1 SWD.

Procedure approved by  August 5,
2002 Ed Martin

1220 S. St. Francis
Santa Fe, NM 87505
Phone: 505-476-3492
Fax: 505-476-3471

**New Mexico Oil
Conservation
Division**

Fax

To: Anne Jones	From: Ed Martin
Fax: 505-564-3109	Pages: 2
Phone:	Date: 8/5/2002
Re: Hydrostatic Test	CC: Denny Foust, ^{AZTEC} Artesia OCD
<input type="checkbox"/> Urgent <input type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle	

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 7/25/02,
or cash received on 8/7/02 in the amount of \$ 1825.00
from EL PASO FIELD SERVICES
KUTZ HYDROCARBON RECOVERY FACILITY
for CHACO GAS PLANT 77 49-1
(Facility Name)
Submitted by: Ed Martin (Signature) Date: 8/7/02 (Date)
Submitted to ASD by: Date:
Received in ASD by: Date:

Filing Fee New Facility Renewal ✓
Modification Other
(Specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment

~~PARTIAL Pmt.~~

~~FLAT Fee Due 4000~~
~~FILING " " 100~~

~~RECEIVED <1825>~~

~~STILL DUE 2275~~

MOVED \$1800 TO GW-49-1. TOTAL DUE.
\$25 EXCESS APPLIED TO CHACO PLANT.

GW-71 DUE \$ 4100
CREDIT - 25
DUE \$ 4075

EL PASO FIELD SERVICES L.P.
EL PASO FIELD SERVICES
Houston, TX 77002

CHECK DATE
07/25/2002

CHECK NUMBER

NEW MEXICO OIL CONSERVATION DIVISION

WATER QUALITY MANAGEMENT FUND
1220 SOUTH ST FRANCIS DRIVE
SANTA FE, NM 87505

REMITTANCE ADVICE RETAIN FOR YOUR RECORDS
Refer Payment Inquires to EPFS - 713-420-4200

VENDOR F000000858
NEW MEXICO OIL CONSERVATION DIVISION

Voucher ID	Invoice Number	Invoice Date	Description	Discount	Paid Amount
00140963	CKREQ020722	07/22/2002	GW-49-1 <i>[Signature]</i>	0.00	1,825.00
TOTAL				\$0.00	\$1,825.00

EL PASO FIELD SERVICES L.P.
EL PASO FIELD SERVICES
Houston, TX 77002

CITIBANK
One Penn's Way
New Castle, DE 19720

CHECK DATE
07/25/2002

CHECK NUMBER

62-20
311

Amount

***\$1,825.00

VOID AFTER ONE YEAR

Pay ***ONE THOUSAND EIGHT HUNDRED TWENTY-FIVE AND XX / 100 US DOLLAR***

To The
Order Of

NEW MEXICO OIL CONSERVATION DIVISION

WATER QUALITY MANAGEMENT FUND
1220 SOUTH ST FRANCIS DRIVE
SANTA FE, NM 87505

H. Brent Austin
Authorized Signature

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION

AD NUMBER: 250145 ACCOUNT: 56689
LEGAL NO: 70858 P.O.#: 02199000249
170 LINES 1 time(s) at \$ 69.69
AFFIDAVITS: 5.25
TAX: 4.68
TOTAL: 79.62

AFFIDAVIT OF PUBLICATION

**NOTICE OF
PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL RE-
SOURCE DEPARTMENT
OIL CONSERVATION
DIVISION**

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440: (GW-071) - El Paso Field Services, Mr. David Bays, Principal Environmental Scientist, 614 Reilly Ave., Farmington, NM 87401, has submitted a discharge plan renewal application for their Chaco Gas Plant located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMMP, San Juan County, New Mexico. Contact process wastewater is discharged into double lined, surface evaporation ponds with leak detection. Groundwater most likely to be affected by an accidental discharge to the surface is at a depth of approximately 220 feet with a total dissolved solids concentration ranging from 560 to 1,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Con-

servation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 27th day of February, 2002. STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL
LORI WROTENBERY, Director
Legal #70858
Pub. March 7, 2002

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, K. Donkees 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 #70858 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/07/2002 and 03/07/2002 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 7 day of March, 2002 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ K. Donkees
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
8 day of March A.D., 2002

Notary Laurel E. Harding

Commission Expires 11/23/03

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION

AD NUMBER: 250145 ACCOUNT: 56689
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SEAL
LORI WROTENBERY, Director
Legal #70858
Pub. March 7, 2002

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 #70858 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/07/2002 and 03/07/2002 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 7 day of March, 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
8 day of March A.D., 2002

Notary Nancy E. Harding

Commission Expires 4/03/03

AFFIDAVIT OF PUBLICATION

Ad No. 45770

STATE OF NEW MEXICO County of San Juan:

CONNIE PRUITT, being duly sworn says:
That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s):
Thursday, March 7, 2002.

And the cost of the publication is \$71.40

Connie Pruitt

ON 3.7.02 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Denny Beck
My Commission Expires April 2, 2004.

COPY OF PUBLICATION

918

Legals

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-071) - El Paso Field Services, Mr. David Bays, Principal Environmental Scientist, 614 Reilly Ave., Farmington, NM 87401, has submitted a discharge plan renewal application for their Chaco Gas Plant located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. Contact process wastewater is discharged into double lined, surface evaporation ponds with leak detection. Groundwater most likely to be affected by an accidental discharge to the surface is at a depth of approximately 220 feet with a total dissolved solids concentration ranging from 560 to 1,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 27th day of February, 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

Legal No. 45770, published in The Daily Times, Farmington, New Mexico, Thursday, March 7, 2002.

AFFIDAVIT OF PUBLICATION

Ad No. 45770

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Connie Pruitt

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Jerry Beck
My Commission Expires April 2, 2004.

COPY OF PUBLICATION

918

Legals

NOTICE OF PUBLICATION

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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

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AFFIDAVIT OF PUBLICATION

Ad No. 45770

STATE OF NEW MEXICO
County of San Juan:

COPY OF PUBLICATION

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Thursday, March 7, 2002.

And the cost of the publication is \$71.40

Connie Pruitt

ON 3-7-02 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Jimmy Beck
My Commission Expires April 2, 2004.

Martin, Ed

From: Martin, Ed
Sent: Wednesday, February 27, 2002 3:28 PM
To: Santa Fe New Mexican (E-mail)
Cc: Anaya, Mary; Bruce S. Garber; Chris Shuey; Colin Adams; Director, State Parks; Gerald R. Zimmerman; Jack A. Barnett; James Bearzi; Jay Lazarus; Lee Wilson & Associates; Marcy Leavitt; Mike Matush; Mike Schultz; Ned Kendrick; Regional Forester; Ron Dutton; Secretary, NMED
Subject: Legal Notices

Please publish the attached legal notices, one time only, on or before Thursday, March 7, 2002.

Upon publication, forward to this office:

Publisher's affidavit

Invoice. Our purchase order number is **02199000249**

If you have any questions, please contact me.

Thank you.



Publ. Notice
GW-104.doc



Publ. Notice
GW-105.doc



Publ. Notice
GW-071.doc

Ed Martin

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Phone: (505) 476-3492
Fax: (505) 476-3471



February 22, 2002

Mr. Ed Martin
New Mexico Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505

RE: Chaco Plant Discharge Plan, Number GW-071

Dear Sir:

Please find attached an application to renew the Chaco Plant Discharge Plan, Number GW-071. For whatever additional information you may need, please call me at (505) 599-2256.

Sincerely yours,

David Bays, REM
Principal Environmental Scientist

cc: Denny Foust – NMOCD – Aztec, NM
Troy Chamberlain
Joe Velasquez
Chaco Disch. Plan file

District I - (505) 393-6161

P. O. Box 1980

Hobbs, NM 88241-1980

District II - (505) 748-1283

811 S. First

Artesia, NM 88210

District III - (505) 334-6178

1000 Rio Brazos Road

Aztec, NM 87410

District IV - (505) 827-7131

New Mexico

Energy Minerals and Natural Resources Departments

Oil Conservation Division

2040 South Pacheco Street

Santa Fe, New Mexico 87505

(505) 827-7131

Revised 12/1/95

Submit Original

Plus 1 Copy

to Santa Fe

1 Copy to appropriate

District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,
GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS
(Refer to OCD Guidelines for assistance in completing the application)

☐ New

☒ Renewed

☐ Modification

1. Type: Natural Gas Cryogenic Processing Plant
2. Operator: El Paso Field Services Co.
Address: 614 Reilly Avenue Farmington, NM 87401
Contact Person: David Bays
3. Location: SW/4 Section 16 Township 26 North Range 12 West
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 daily quality and daily volume of waste water must be included.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
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 rules, regulations, and/or orders.
14. CERTIFICATION

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

NAME: David Bays Title: Principal Environmental Scientist

Signature: David Bays Date: February 22, 2002

EL PASO FIELD SERVICES COMPANY

Chaco Plant

DISCHARGE PLAN GW-071

Renewal Application February 22, 2002

Prepared for:

NEW MEXICO OIL CONSERVATION DIVISION

1220 S. St. Francis

Santa Fe, New Mexico 87505

El Paso Field Service Co.
614 Reilly Avenue
Farmington, NM 87401
(800) 203-1347

This Discharge Plan has been prepared in accordance with Oil Conservation Division "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants".

I. Type of Operation

The Chaco Plant ("Plant") is a natural gas compressor station and cryogenic natural gas liquids extraction plant. The gas is compressed to approximately 900 pounds per square inch then processed through an expander plant operating at cryogenic temperatures to remove condensable liquid hydrocarbons (propane and heavier). The condensed liquids are sold to a natural gas liquids fractionation processor and the liquid free natural gas is discharged into the El Paso Natural Gas Co. transportation pipeline.

II. Operator/Legally Responsible Party and Local Representative

Legally Responsible Party: Mr. Randy West
El Paso Field Services Company
4 Greenway Plaza
P. O. Box 4503
Houston, TX 77210
(713) 676-5410

Environmental Manager: Mr. Doug Jordan
El Paso Field Services Company
4 Greenway Plaza
P. O. Box 4503
Houston, TX 77210
(713) 676-5454

Operations Manager: Mr. Joe Velasquez
El Paso Field Services Company
614 Reilly Avenue
Farmington, NM 87401
(505) 632-6501

III. Location of Facility

See On File

IV. Landowner

See On File

V. Facility Description

See On File

VI. Sources, and Quantities of Effluent

Waste Stream	Approximate Quantity / Month	Disposal Method
Exempt Hydrocarbon Liquids	65,000 Barrels	Recycling - Giant Refining
Non-Exempt Hydrocarbon Liquids	3,000 Barrels	Recycling – Safety-Kleen
Exempt Wastewater	6,000 Barrels	Injection well – McGrath
Non-Contact Wastewater	20,000 Barrels	On-Site Earthen Ponds
Non-Exempt Wastewater	9,000 Barrels	Injection well - Key Energy
Amine Filters	25 Filters	Landfill - Waste Management
Glycol Filters	50 Filters	Landfill - Waste Management
Oil Filters	150 Filters	Landfill - Waste Management
Oil Absorbent Pads & Wiping Rags	50 Pounds	Landfill - Waste Management
Office Trash	300 Pounds	Landfill - Waste Management

VII. Transfer and Storage of Process Fluids and Effluent

See On File

VIII. Effluent Disposal

Offsite Disposal

All liquids from this site are handled in accordance with NMOCD and NMED regulations. Hydrocarbon liquids from this site will be collected into existing tanks on site for storage prior to off-site recycling and/or disposal. Exempt wastewater is stored in double lined ponds prior to off-site disposal. All non-contact wastewater is discharged into unlined earthen ponds on-site. Non-exempt wastewater is stored in a steel tank with concrete berm prior to off-site disposal. All filters, absorbent material and trash is collected and stored in commercial dumpsters prior to off-site disposal.

Waste Stream	Transporter	Disposal Site
Exempt Hydrocarbon Liquids	Giant Oil Transportation, Inc. 4551 Herrera Road Bloomfield, NM 87413	Giant Refining 89 Road 4990 Bloomfield, NM 87413
Non-Exempt Hydrocarbon Liquids	Safety-Kleen Corp. 4210A Hawkins Farmington, NM 87401	Safety-Kleen Corp. 1340 W. Lincoln Phoenix, AZ 85010
Exempt Contact Wastewater	NA	On-site lined ponds (temporary storage prior to off-site disposal)
Exempt Contact Wastewater	Dawn Trucking 318 E. Highway 64 Farmington, NM 87402	McGrath SWD Well Block B, Section 34, T34N, R12W, San Juan Co. (Temporary storage in on-site lined ponds prior to disposal)
Exempt Non-Contact Wastewater	NA	On-site earthen ponds
Non-Exempt Wastewater	Key Energy Services 5651 Highway 64 Farmington, NM 87401	Key Energy Services Class 1 Disposal Well County Road 3500 San Juan County, NM (Temporary storage in on-site steel tank prior to disposal)
Solid Waste	Waste Management, Inc. 101 Spruce Farmington, NM 87401	Waste Management, Inc. San Juan Regional Landfill County Road 3500 San Juan County, NM

IX. Inspection, Maintenance and Reporting

See On File

X. Spill/Leak Prevention and Reporting (Contingency Plans)

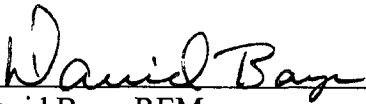
See On File

XI. Site Characteristics

See On File

XIII. Affirmation

I here by certify that I am familiar with the information contained in and submitted with this discharge plan for the Largo Compressor Station, and that such information is true, accurate, and complete to the best of my knowledge and belief.



David Bays, REM
Principal Environmental Scientist

Date: February 22, 2002

Martin, Ed

To: David Bays (E-mail)
Subject: Discharge Plan Renewals

The following El Paso facilities' discharge plans are coming up for renewal soon:

GW-92	Rio Vista Compressor Station	Expires: 01/17/02
GW-71	Chaco Gas Plant	Expires: 05/18/02

Please forward renewal applications for these two along with the application fees of \$100.00 each and we can set up inspections at a later date. As soon as I get the renewals, I will do what needs to be done on my end as far as public notification and the like goes.

Hope you have a very nice Christmas.

Ed



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary October 3, 2001

Lori Wrotenbery

Director

Oil Conservation Division

Mr. David Bays
El Paso Field Services
614 Reilly Avenue
Farmington, NM 87401

Dear Mr. Bays,

Regarding your letter of September 13, 2001 requesting approval on a modification to the Chaco Gas Plant discharge plan. Request to modify the plan is hereby granted. Please send me all of the pertinent data on the tank installation, and the double-walled below grade tank so that I can make them a part of the plan.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Martin".

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau

cc: Aztec OCD – Denny Foust

September 13, 2001

Mr. Roger Anderson
New Mexico Oil Conservation Division
1220 South St. Francis
Santa Fe, NM 87505

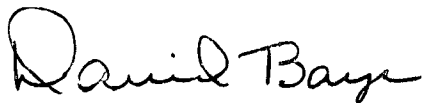
RE: El Paso Field Services Co. Chaco Plant, Discharge Plan GW-071

Dear Roger:

El Paso Field Services (EPFS) is seeking to make a minor change to the waste piping at the Chaco Plant. EPFS is installing a double-walled below grade tank to collect incidental spills and wash water from the floor drain of the new work shop. The tank, purchased from Double Tank Corp. of Bloomfield, NM, has a capacity of 500 gallons. The interstitial space between the inner and outer tank walls will be visually inspected for leaks once each calendar quarter.

EPFS is seeking approval to modify the Plant Discharge Plan and to include the new 500 gallon tank in the list of Plant waste handling equipment. If you need any additional information, please call me at (505) 599-2256.

Sincerely yours,



David Bays, REM
Principal Environmental Scientist

cc: Mr. Denny Foust – NMOCD – Aztec, NM
Mr. Troy Chamberlain
Mr. Wes Van Bramer

Roger Anderson



Industrial Services Group
Central Region

COPY

March 22, 2000

Navajo Nation EPA
P.O. Box 1999
Shiprock, New Mexico 87420



GW-071

RE: Closure of South Chaco Pit.

Dear Sirs:

Philip Environmental Services Corp. (Philip) has prepared this report on behalf of El Paso Field Services (EPFS). This report describes the recent removal of the plastic liner and closure of the South Chaco Pit.

On January 10, 2000, Philip Services received a request from EPFS for removal of the plastic liners and pit closure of the South Chaco Pit (pit). The pit is located in Township 26 North, Range 12 West, and Section 21 just outside of the Chaco Plant. It measured approximately 30 feet in length by 30 feet in width and had approximately 18 inches to 24 inches of sludge mixed with debris. The pit was lined with three liners. The work required for this closure included the removal of security fencing, the high-pressure washing and removal of the plastic liners from the pit, the disposal of the liners, and the collection of soil samples for laboratory analysis.

Prior to activities at the South Chaco Pit site, the New Mexico OCD and the Navajo Environmental Protection Agency were given forty-eight hours notice of site activities and pit closure.

The sludge was diluted with a high-pressure water spray and then pumped out of the pit with a vacuum truck. Approximately 430 gallons of sludge was removed from the pit and sent to be land-farmed. After removal of sludge by hydroblasting and vacuum truck, the liners were removed sequentially. The third liner was not removed until a representative from the Navajo EPA was present. Upon removal of the third liner, soil samples were collected from the pit walls and the center of the pit and combined as a composite sample as directed by the Navajo EPA. Once the soil samples were collected from the pit walls and center area, a twelve-foot excavation was done below the center of the pit and a soil sample collected from the bottom of the excavation. All soil samples were sent for laboratory analysis for BTEX and TPH. The pit was backfilled and the site re-graded to conform to the existing topography.

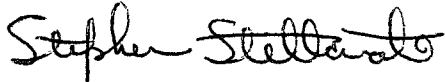
Combining the Strengths of Philip Services Corp., Allwaste and Serv-Tech



All sludge was removed from the pit and disposed of at a State approved land-farm. The three liners removed from the pit showed no evidence of leaking. Soils beneath the pit showed no evidence of staining. Based on the analytical results of the composite soil sample collected from the pit walls and center of pit, and the soil sample collected twelve feet below the pit bottom there was no hydrocarbon impact at the pit. The analytical results and the associated quality control data are included with this report.

Sincerely,

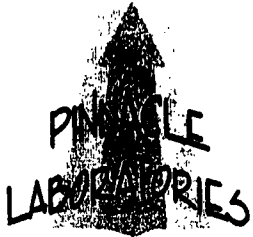
PHILIP ENVIRONMENTAL SERVICES CORPORATION

A handwritten signature in cursive script, reading "Stephen Stellavato".

Stephen Stellavato
Geologist

Attachment: South Chaco Pit Analytical Results.

xc: Mr. Jimmy Walker, United States EPA
Mr. David Bays, El Paso Field Services
Philip Project File



MAR - 3 2000

2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

Pinnacle Lab ID number 002067
March 02, 2000

PHILIP ENVIRONMENTAL
4000 MONROE ROAD
FARMINGTON, NM 87401

Project Name EPFS SOUTH CHACO PIT
Project Number 62800112

Attention: CECIL IRBY

On 02/18/00 Pinnacle Laboratories, Inc. Inc., (ADHS License No. AZ0592 pending), received a request to analyze non-aq samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

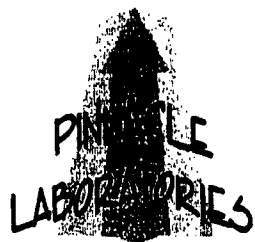
If you have any questions or comments, please do not hesitate to contact us at (505)344-3777.

Kimberly D. McNeill
Project Manager

H. Mitchell Rubenstein, Ph. D.
General Manager

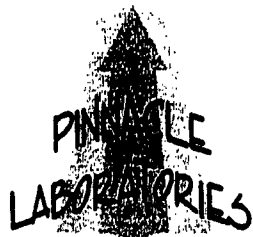
MR: jt

Enclosure



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

CLIENT	: PHILIP ENVIRONMENTAL	PINNACLE ID	: 002067
PROJECT #	: 62800112	DATE RECEIVED	: 02/18/00
PROJECT NAME	: EPFS SOUTH CHACO PIT	REPORT DATE	: 03/02/00
PIN			
ID. #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	CP0002-D	NON-AQ	02/16/00
02	CP0002-S	NON-AQ	02/16/00



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8021 MODIFIED
CLIENT : PHILIP ENVIRONMENTAL
PROJECT # : 62800112
PROJECT NAME : EPFS SOUTH CHACO PIT

PINNACLE I.D.: 002067

SAMPLE			DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	CP0002-D	NON-AQ	02/16/00	02/22/00	02/22/00	1
02	CP0002-S	NON-AQ	02/16/00	02/22/00	02/22/00	1
PARAMETER		DET. LIMIT	UNITS	CP0002-D	CP0002-S	
BENZENE		0.025	MG/KG	< 0.025	< 0.025	
TOLUENE		0.025	MG/KG	< 0.025	< 0.025	
ETHYLBENZENE		0.025	MG/KG	< 0.025	< 0.025	
TOTAL XYLENES		0.025	MG/KG	< 0.025	< 0.025	

SURROGATE:

BROMOFLUOROBENZENE (%)

101

99

SURROGATE LIMITS (65 - 120)

CHEMIST NOTES:

N/A



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS
REAGENT BLANK

TEST	: EPA 8021 MODIFIED	PINNACLE I.D.	: 002067
BLANK I. D.	: 022200	DATE EXTRACTED	: 02/22/00
CLIENT	: PHILIP ENVIRONMENTAL	DATE ANALYZED	: 02/22/00
PROJECT #	: 62800112	SAMPLE MATRIX	: NON-AQ
PROJECT NAME	: EPFS SOUTH CHACO PIT		

PARAMETER	UNITS	
BENZENE	MG/KG	<0.025
TOLUENE	MG/KG	<0.025
ETHYLBENZENE	MG/KG	<0.025
TOTAL XYLENES	MG/KG	<0.025

SURROGATE:
BROMOFLUOROBENZENE (%) 113
SURROGATE LIMITS: (80 - 120)
CHEMIST NOTES:
N/A



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMATOGRAPHY QUALITY CONTROL
MSMSD

TEST : EPA 8021 MODIFIED
MSMSD # : 002067-01
CLIENT : PHILIP ENVIRONMENTAL
PROJECT # : 62800112
PROJECT NAME : EPFS SOUTH CHACO PIT

PINNACLE I.D. : 002067
DATE EXTRACTED : 02/22/00
DATE ANALYZED : 02/22/00
SAMPLE MATRIX : NON-AQ
UNITS : MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD	REC LIMITS	RPD LIMITS
BENZENE	<0.025	1.00	1.04	104	1.08	108	4	(68 - 120)	20
TOLUENE	<0.025	1.00	0.97	97	1.00	100	3	(64 - 120)	20
ETHYLBENZENE	<0.025	1.00	1.09	109	1.10	110	1	(49 - 127)	20
TOTAL XYLENES	<0.025	3.00	3.19	106	3.19	106	0	(58 - 120)	20

CHEMIST NOTES:
N/A

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
CLIENT : PHILIP ENVIRONMENTAL
PROJECT # : 62800112
PROJECT NAME : EPFS SOUTH CHACO PIT

PINNACLE I.D.: 002067

SAMPLE		MATRIX	DATE	DATE	DATE	DIL.
ID. #	CLIENT I.D.		SAMPLED	EXTRACTED	ANALYZED	FACTOR
01	CP0002-D	NON-AQ	02/16/00	02/24/00	02/25/00	1
02	CP0002-S	NON-AQ	02/16/00	02/24/00	02/25/00	1

PARAMETER	DET. LIMIT	UNITS	CP0002-D	CP0002-S
FUEL HYDROCARBONS, C6-C10	10	MG/KG	< 10	< 10
FUEL HYDROCARBONS, C10-C22	10	MG/KG	< 10	< 10
FUEL HYDROCARBONS, C22-C36	20	MG/KG	< 20	< 20
CALCULATED SUM:				

SURROGATE:

O-TERPHENYL (%)

103

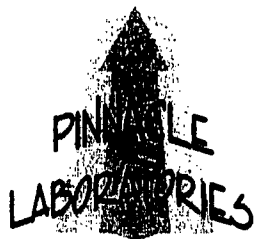
123

SURROGATE LIMITS

(66 - 151)

CHEMIST NOTES:

N/A



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMATOGRAPHY RESULTS

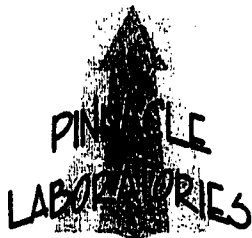
REAGENT BLANK

TEST	: EPA 8015 MODIFIED (DIRECT INJECT)		
BLANK I.D.	: 022400	PINNACLE I.D.	: 002067
CLIENT	: PHILIP ENVIRONMENTAL	DATE EXTRACTED	: 02/24/00
PROJECT #	: 62800112	DATE ANALYZED	: 02/24/00
PROJECT NAME	: EPFS SOUTH CHACO PIT	SAMPLE MATRIX	: NON-AQ

PARAMETER	UNITS	
FUEL HYDROCARBONS, C6-C10	MG/KG	< 10
FUEL HYDROCARBONS, C10-C22	MG/KG	< 10
FUEL HYDROCARBONS, C22-C36	MG/KG	< 20

SURROGATE:
O-TERPHENYL (%) 107
SURROGATE LIMITS (80 - 151)

CHEMIST NOTES:
N/A



2709-D Pan American Freeway NE
Albuquerque, New Mexico 87107
Phone (505) 344-3777
Fax (505) 344-4413

GAS CHROMATOGRAPHY QUALITY CONTROL

MSMSD

TEST : EPA 8015 MODIFIED (DIRECT INJECT)
MSMSD # : 002081-01
CLIENT : PHILIP ENVIRONMENTAL
PROJECT # : 62800112
PROJECT NAME : EPFS SOUTH CHACO PIT

PINNACLE I.D. : 002067
DATE EXTRACTED : 02/24/00
DATE ANALYZED : 02/25/00
SAMPLE MATRIX : NON-AQ
UNITS : MG/KG

PARAMETER	SAMPLE RESULT	CONC SPIKE	SPIKED SAMPLE	% REC	DUP SPIKE	DUP % REC	RPD	REC LIMITS	RPD LIMITS
FUEL HYDROCARBONS	<10	200	220	110	219	110	0	(56 - 148)	20

CHEMIST NOTES:

N/A

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$



Samples Iced: <input type="checkbox"/> Yes <input type="checkbox"/> No Preservatives (ONLY for Water Samples) <input type="checkbox"/> Cyanide Sodium hydroxide (NaOH) <input type="checkbox"/> Volatile Organic Analysis Hydrochloric acid (HCl) <input type="checkbox"/> Metals Nitric acid (HNO ₃) <input type="checkbox"/> TPH (418.1) Sulfuric acid (H ₂ SO ₄) <input type="checkbox"/> Other (Specify) _____ <input type="checkbox"/> Other (Specify) _____	Carrier: _____ Airbill No. _____ Shipping and Lab Notes: 2 bottles/ice/5.0°C Bill EPFS Direct Results to EPFS & Philip Clo Cecil Irby
---	--

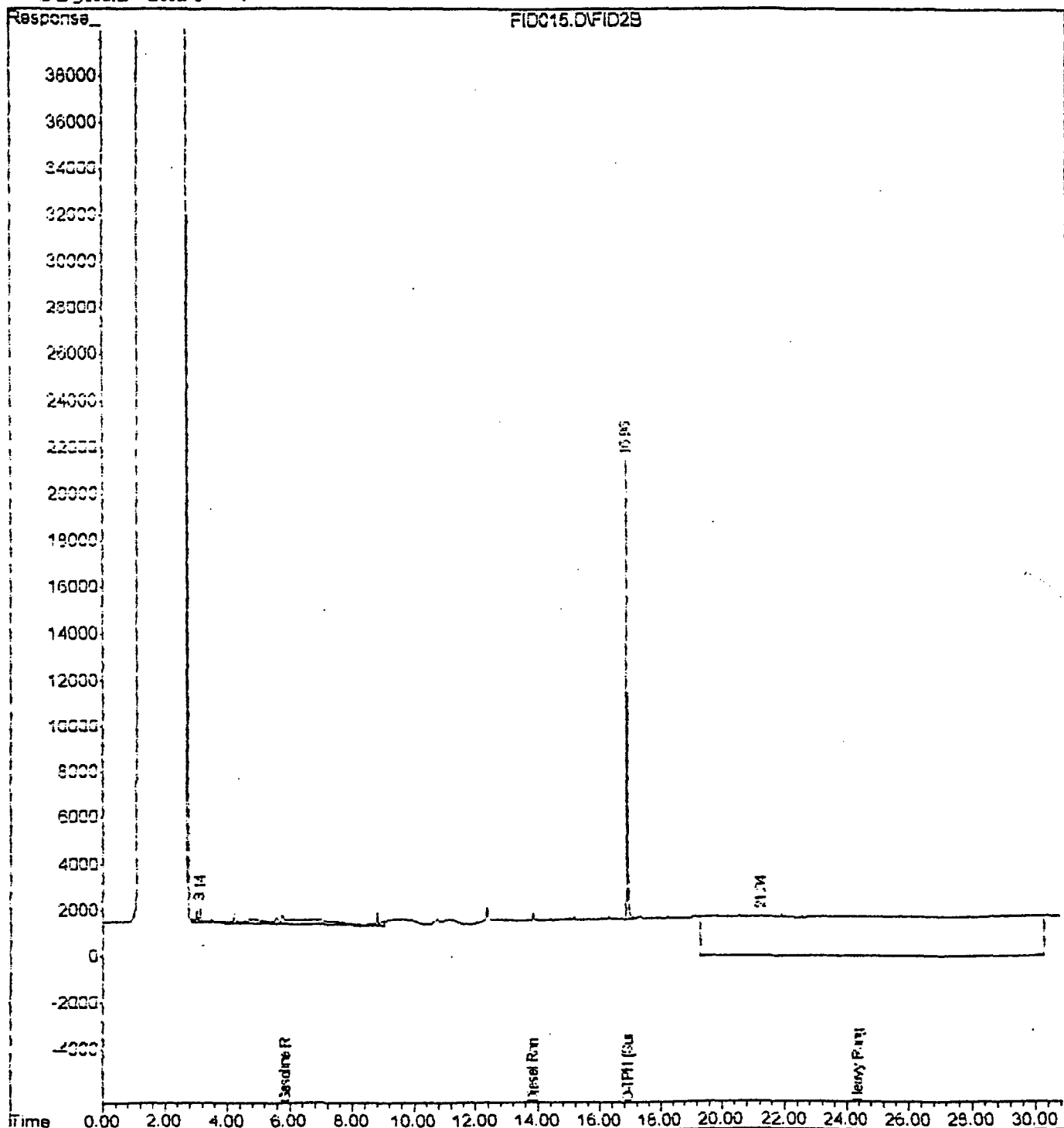
Data File : C:\HPCHEM\2\DATA\022400\FID015.D
Acq On : 25 Feb 2000 00:14
Sample : 002067-01
Misc :
IntFile : EVENTS.E

Vial: 15
Operator: cff
Inst : FID-1
Multiplr: 1.00

Quant Time: Mar 1 15:51 2000 Quant Results File: NM102799.RES

Quant Method : C:\HPCHEM\2\METHODS\NM102799.M (Chemstation Integrator)
Title : NM 8015
Last Update : Wed Nov 10 11:29:39 1999
Response via : Multiple Level Calibration
DataAcq Meth : NM102799.M

Volume Inj. : 2ul
Signal Phase :
Signal Info :



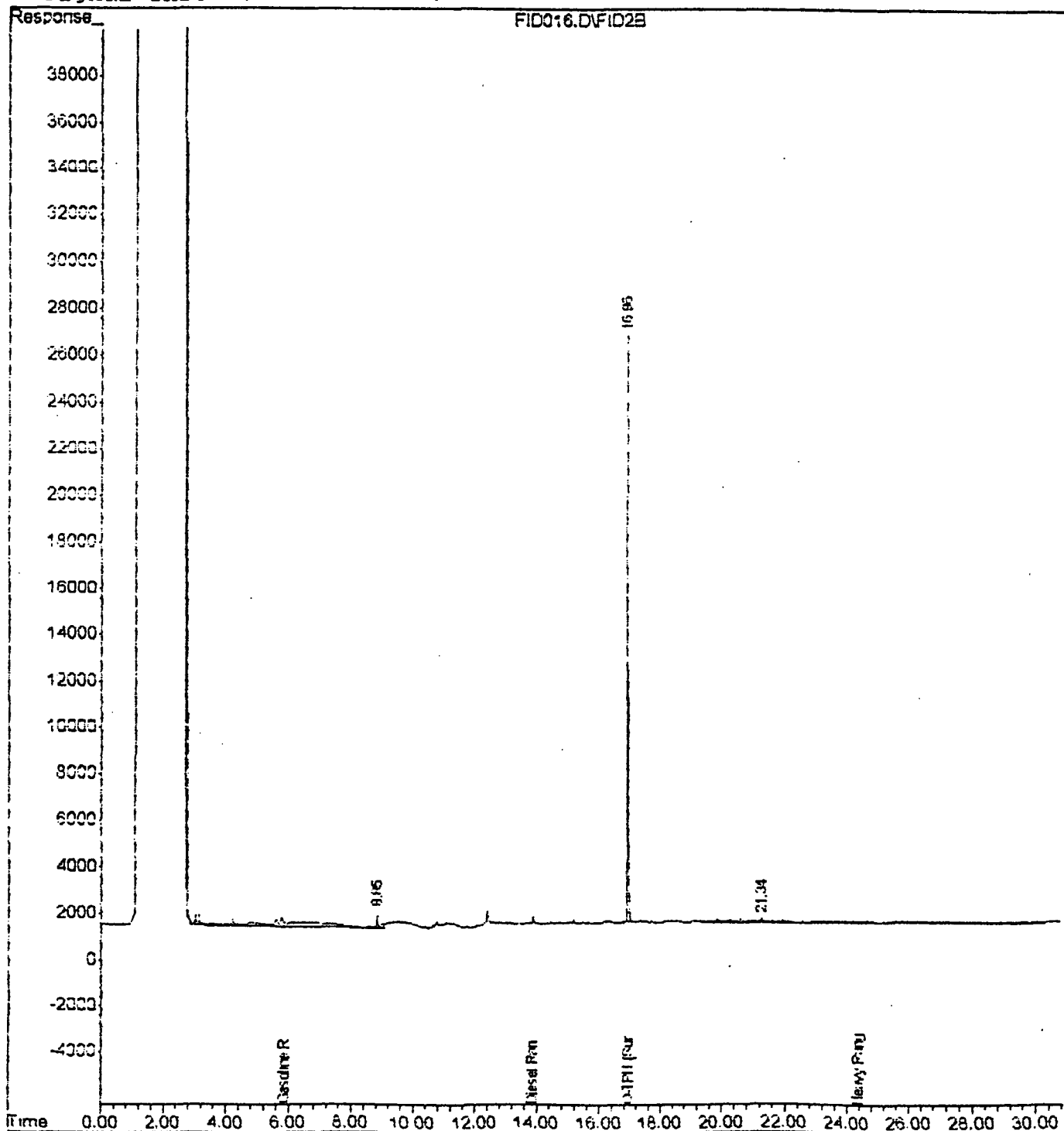
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Acq On : 25 Feb 2000 1:04
Sample : 002067-02
Misc :
IntFile : EVENTS.E

Vial: 16
Operator: off
Inst : FID-1
Multiplr: 1.00

Quant Time: Mar 1 15:51 2000 Quant Results File: NM102799.RES

Quant Method : C:\HPCHEM\2\METHODS\NM102799.M (Chemstation Integrator)
Title : NM 8015
Last Update : Wed Nov 10 11:29:39 1999
Response via : Multiple Level Calibration
DataAcq Meth : NM102799.M

Volume Inj. : 2ul
Signal Phase :
Signal Info :



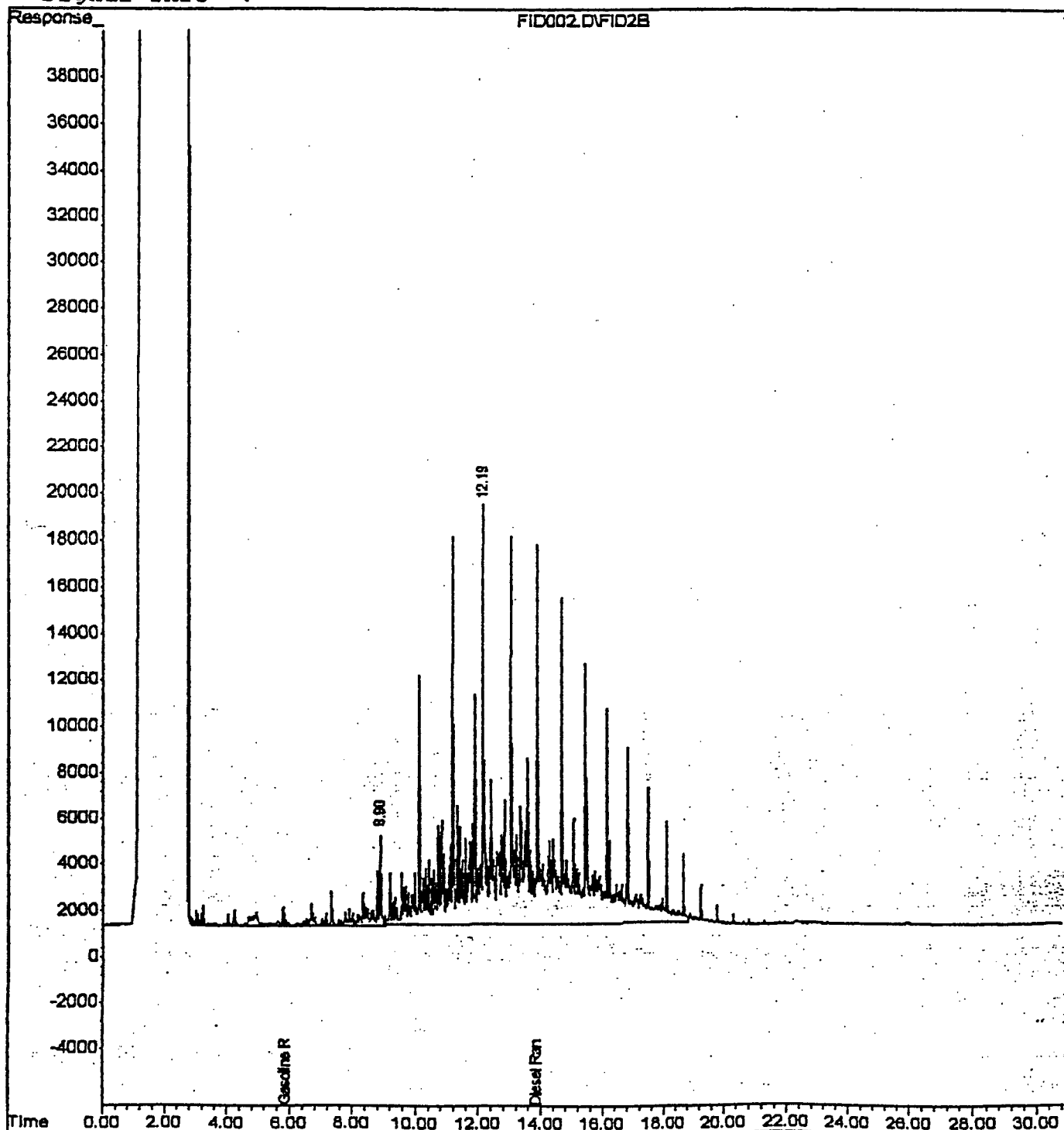
Data File : C:\HPCHEM\2\DATA\111299\FID002.D
 Acq On : 12 Nov 1999 10:32
 Sample : diesel
 Misc : at 200ug/mL
 IntFile : EVENTS.E

Vial: 2
 Operator: CFF
 Inst : FID-1
 Multiplr: 1.00

Quant Time: Nov 12 11:42 1999 Quant Results File: NM102799.RES

Quant Method : C:\HPCHEM\2\METHODS\NM102799.M (Chemstation Integrator)
 Title : NM 8015
 Last Update : Wed Nov 10 11:29:39 1999
 Response via : Multiple Level Calibration
 DataAcq Meth : NM102799.M

Volume Inj. : 2ul
 Signal Phase :
 Signal Info :



Quantitation Report

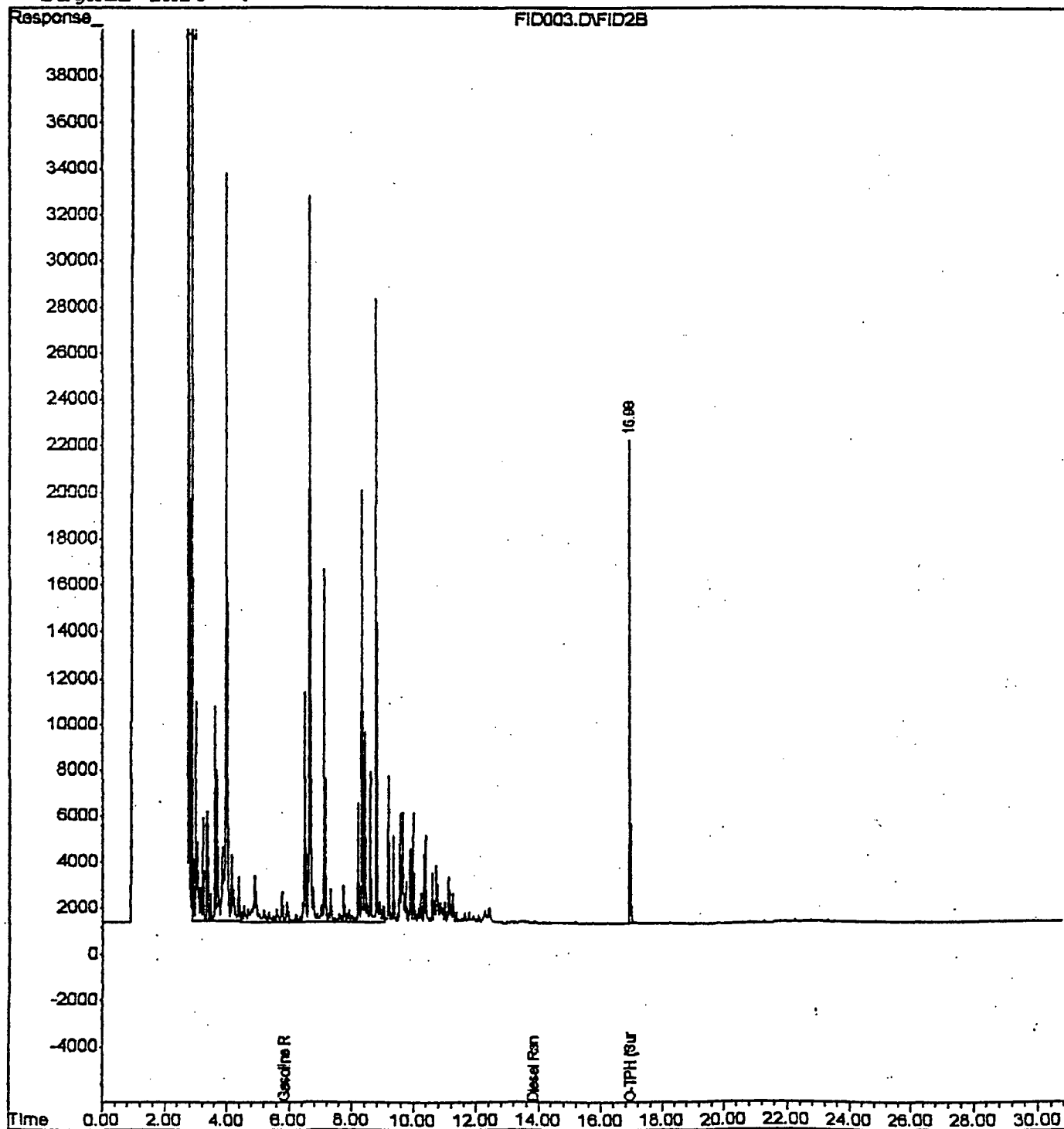
Data File : C:\HPCHEM\2\DATA\111299\FID003.D
 Acq On : 12 Nov 1999 11:21
 Sample : gasoline
 Misc : at 200ug/mL
 IntFile : EVENTS.E

Vial: 3
 Operator: CFF
 Inst : FID-1
 Multiplr: 1.00

Quant Time: Nov 12 13:07 1999 Quant Results File: NM102799.RES

Quant Method : C:\HPCHEM\2\METHODS\NM102799.M (Chemstation Integrator)
 Title : NM 8015
 Last Update : Wed Nov 10 11:29:39 1999
 Response via : Multiple Level Calibration
 DataAcq Meth : NM102799.M

Volume Inj. : 2ul
 Signal Phase :
 Signal Info :





NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

October 26, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-544

Mr. David Bays, REM
El Paso Energy Corporation
614 Reilly Avenue
Farmington, New Mexico 87401

RE: Site Modification Notification
GW-071, Chaco Gas Plant
San Juan County, New Mexico

Dear Mr. Bays:

The OCD has received and reviewed the analytical results requested in OCD's letter, dated September 17, 1999, pertaining to the removal of berms at the north wastewater pond at the El Paso Energy Chaco Gas Plant GW-071 located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. Based upon the information supplied the closure plan for the north wastewater pond and conversion to wastewater collection in a 2000 barrel tank is hereby approved. **The site modifications are approved without modification to the discharge plan.**

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 El Paso Energy Corporation 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. Further, this approval does not relieve El Paso Energy Corporation from liability should operations result in contamination to the environment.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

Z 274 520 544 500

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

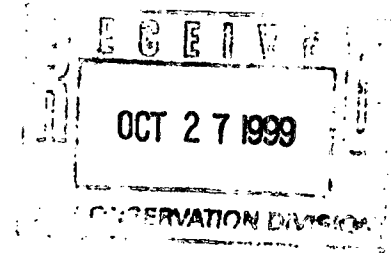
Sent to	D. Bays	
Street & Number	614 Reilly Avenue	
Post Office, State, & ZIP Code	Farmington, NM 87401	
Postage		\$
Certified Fee		\$
Special Delivery Fee		\$
Restricted Delivery Fee		\$
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees		\$
Postmark or Date	GW-071	

PS Form 3800, April 1995



October 25, 1999

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505+



Dear Sir:

By a letter dated September 17, 1999, Mr. Anderson authorized closure of the north contact wastewater pond at the El Paso Field Services (EPFS) Chaco Plant. That authorization required submittal of soil sampling results prior to demolition of the pond berms. Attached are the results of the composite soil samples collected after removal of the synthetic liners. All the sample results are all less than 5 milligrams total petroleum hydrocarbon per kilogram of soil.

Mr. Anderson's approval also required that EPFS submit samples from groundwater monitoring wells number 9 and 10 prior to removal of the berms. This was based on our original belief that these two wells would be destroyed during the berm removal. We have since determined that the two wells will not be impacted. Therefore we will continue to maintain wells 9 and 10, and continue to sample them routinely along with the other plant monitoring wells.

Based on the enclosed sample results, EPFS would like to proceed with removal of the pond berms.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Mr. Denny Foust – NMOCD – Aztec, NM
Chaco reg. file

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

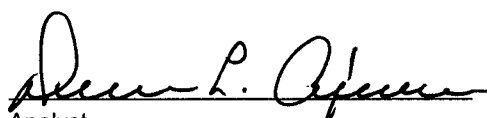
Client:	El Paso Field Services	Project #:	404701
Sample ID:	SS - 1	Date Reported:	10-15-99
Laboratory Number:	G201	Date Sampled:	10-14-99
Chain of Custody No:	7436	Date Received:	10-14-99
Sample Matrix:	Soil	Date Extracted:	10-15-99
Preservative:	Cool	Date Analyzed:	10-15-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

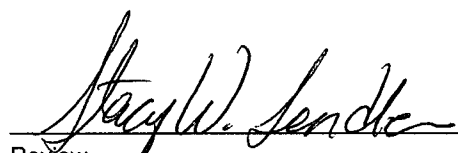
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	1.2	0.1
Total Petroleum Hydrocarbons	1.2	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Chaco Plant North Pond.**


Analyst


Review

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Client:	El Paso Field Services	Project #:	404701
Sample ID:	SS - 2	Date Reported:	10-15-99
Laboratory Number:	G202	Date Sampled:	10-14-99
Chain of Custody No:	7436	Date Received:	10-14-99
Sample Matrix:	Soil	Date Extracted:	10-15-99
Preservative:	Cool	Date Analyzed:	10-15-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	0.9	0.1
Total Petroleum Hydrocarbons	0.9	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Chaco Plant North Pond.**


Analyst


Review

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

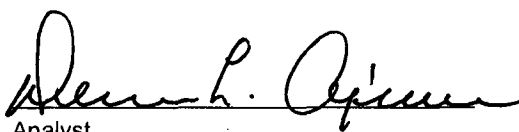
Client:	El Paso Field Services	Project #:	404701
Sample ID:	SS - 3	Date Reported:	10-15-99
Laboratory Number:	G203	Date Sampled:	10-14-99
Chain of Custody No:	7436	Date Received:	10-14-99
Sample Matrix:	Soil	Date Extracted:	10-15-99
Preservative:	Cool	Date Analyzed:	10-15-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

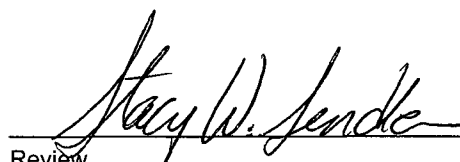
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	2.3	0.1
Total Petroleum Hydrocarbons	2.3	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Chaco Plant North Pond.**


Analyst


Review

EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	10-15-TPH QA/QC	Date Reported:	10-15-99
Laboratory Number:	G196	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-15-99
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
Gasoline Range C5 - C10	06-17-99	2.6200E-002	2.6173E-002	0.10%	0 - 15%
Diesel Range C10 - C28	06-17-99	2.7356E-002	2.7301E-002	0.20%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	0.2	0.2	0.0%	0 - 30%
Diesel Range C10 - C28	3.1	3.1	0.0%	0 - 30%

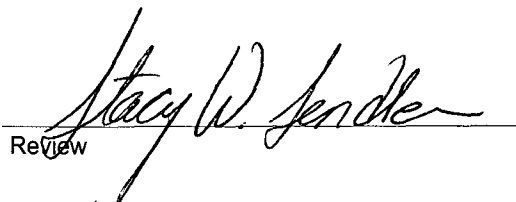
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	0.2	250	250	100%	75 - 125%
Diesel Range C10 - C28	3.1	250	253	100%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for samples G196 - G203.


Analyst


Review

7436

[illegible]



October 25, 1999

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505+

Dear Sir:

By a letter dated September 17, 1999, Mr. Anderson authorized closure of the north contact wastewater pond at the El Paso Field Services (EPFS) Chaco Plant. That authorization required submittal of soil sampling results prior to demolition of the pond berms. Attached are the results of the composite soil samples collected after removal of the synthetic liners. All the sample results are all less than 5 milligrams total petroleum hydrocarbon per kilogram of soil.

Mr. Anderson's approval also required that EPFS submit samples from groundwater monitoring wells number 9 and 10 prior to removal of the berms. This was based on our original belief that these two wells would be destroyed during the berm removal. We have since determined that the two wells will not be impacted. Therefore we will continue to maintain wells 9 and 10, and continue to sample them routinely along with the other plant monitoring wells.

Based on the enclosed sample results, EPFS would like to proceed with removal of the pond berms.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Mr. Denny Foust - NMOCD - Aztec, NM
Chaco reg. file

ENVIROTECH LABS**PRACTICAL SOLUTIONS FOR A BETTER TOMORROW****EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons**

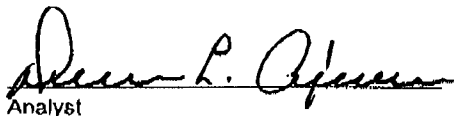
Client:	El Paso Field Services	Project #:	404701
Sample ID:	SS - 1	Date Reported:	10-15-99
Laboratory Number:	G201	Date Sampled:	10-14-99
Chain of Custody No:	7436	Date Received:	10-14-99
Sample Matrix:	Soil	Date Extracted:	10-15-99
Preservative:	Cool	Date Analyzed:	10-15-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

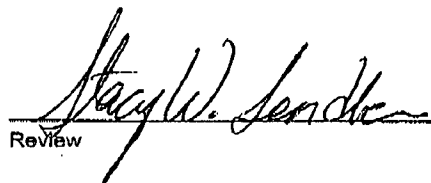
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	1.2	0.1
Total Petroleum Hydrocarbons	1.2	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,
SW-846, USEPA, December 1996.

Comments: Chaco Plant North Pond.


Analyst


Review

ENVIROTECH LABS**PRACTICAL SOLUTIONS FOR A BETTER TOMORROW****EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons**

Client: El Paso Field Services
Sample ID: SS - 2
Laboratory Number: G202
Chain of Custody No: 7436
Sample Matrix: Soil
Preservative: Cool
Condition: Cool and Intact

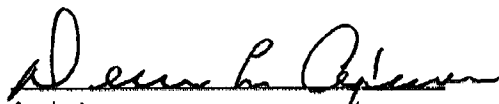
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Date Reported: 10-15-99
Date Sampled: 10-14-99
Date Received: 10-14-99
Date Extracted: 10-15-99
Date Analyzed: 10-15-99
Analysis Requested: 8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	0.9	0.1
Total Petroleum Hydrocarbons	0.9	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Chaco Plant North Pond.


Analyst


Review

ENVIROTECH LABS**PRACTICAL SOLUTIONS FOR A BETTER TOMORROW****EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons**

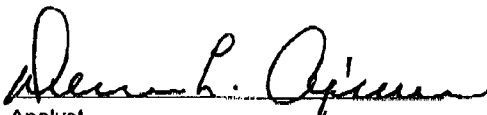
Client:	El Paso Field Services	Project #:	404701
Sample ID:	SS - 3	Date Reported:	10-15-99
Laboratory Number:	G203	Date Sampled:	10-14-99
Chain of Custody No:	7436	Date Received:	10-14-99
Sample Matrix:	Soil	Date Extracted:	10-15-99
Preservative:	Cool	Date Analyzed:	10-15-99
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	ND	0.2
Diesel Range (C10 - C28)	2.3	0.1
Total Petroleum Hydrocarbons	2.3	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste,
SW-846, USEPA, December 1996.

Comments: Chaco Plant North Pond.


Analyst


Review

ENVIROTECH LABS**PRACTICAL SOLUTIONS FOR A BETTER TOMORROW****EPA Method 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons****Quality Assurance Report**

Client:	QA/QC	Project #:	N/A
Sample ID:	10-15-TPH QA/QC	Date Reported:	10-15-99
Laboratory Number:	G196	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	10-15-99
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF	C-Cal RF	% Difference	Accept. Range
Gasoline Range C5 - C10	06-17-99	2.6200E-002	2.6173E-002	0.10%	0 - 15%
Diesel Range C10 - C28	06-17-99	2.7356E-002	2.7301E-002	0.20%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	0.2	0.2	0.0%	0 - 30%
Diesel Range C10 - C28	3.1	3.1	0.0%	0 - 30%

Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	0.2	250	250	100%	75 - 125%
Diesel Range C10 - C28	3.1	250	253	100%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for samples G196 - G203.

James L. Apurum
Analyst

Stacy W. Jendler
Review

CHAIN OF CUSTODY RECORD

7436

Client / Project Name <i>E1 Pato ES</i>			Project Location <i>Chaco Plant / North Pond</i>		ANALYSIS / PARAMETERS									
Sampler: <i>SLB</i>			Client No. <i>404701</i>		No. of Containers <i>8015</i>								Remarks	
Sample No./ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix										
<i>SS-1</i>	<i>10/14/99</i>	<i>13:45</i>	<i>G201</i>	<i>Soil</i>	<i>1</i>	<i>✓</i>								
<i>SS-2</i>	<i>1</i>	<i>14:00</i>	<i>G202</i>	<i>1</i>	<i>1</i>	<i>✓</i>								
<i>SS-3</i>	<i>1</i>	<i>14:15</i>	<i>G203</i>	<i>1</i>	<i>1</i>	<i>✓</i>								
Relinquished by: (Signature) <i>[Signature]</i>			Date <i>10/14/99</i>	Time <i>15:10</i>	Received by: (Signature) <i>[Signature]</i>			Date <i>10/14/99</i>	Time <i>15:10</i>					
Relinquished by: (Signature)					Received by: (Signature)									
Relinquished by: (Signature)					Received by: (Signature)									
ENVIROTECH INC. 5796 U.S. Highway 64 Farmington, New Mexico 87401 (505) 632-0615										Sample Receipt				
											Y	N	N/A	
										Received Intact	<i>✓</i>			
										Cool - Ice/Blue Ice	<i>✓</i>			

12:46 No.006 P.07
OCT 25 '99
ID:5055992119
EPNG EXEC



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 17, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z-274-520-537

Mr. David Bays, REM
El Paso Energy Corporation
614 Reilly Avenue
Farmington, New Mexico 87401

**RE: Site Modification Notification
GW-071, Chaco Gas Plant
San Juan County, New Mexico**

Dear Mr. Bays:

The OCD has received the site modification request letter and accompanying diagrams, dated September 9, 1999, for El Paso Energy Chaco Gas Plant GW-071 located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. The closure plan for the north wastewater pond and conversion to wastewater collection in a 2000 barrel tank **is hereby approved with the following stipulations:**

1. Soil sample collection will be in accordance to the proposed plan with analytical results reported to the OCD;
2. Samples will be collected from monitoring wells number 9 and number 10 and analytical results reported prior to removal of berm material.
3. The OCD must approve removal of berms and soil spreading after review, by the OCD, of reported analytical results.

The site modifications are approved, subject to stipulations, without modification to the discharge plan.

Mr. David Bays, REM
GW-071, Chaco Gas Plant
September 17, 1999
Page 2

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 El Paso Energy Corporation 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. Further, this approval does not relieve El Paso Energy Corporation from liability should operations result in contamination to the environment.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

Z 274 520 537 OCD

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

Sent to	D. Bays
Street & Number	EP Energy
Post Office, State, & ZIP Code	Farmington
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	SEP 16 1999

PS Form 3800, April 1995

USPS

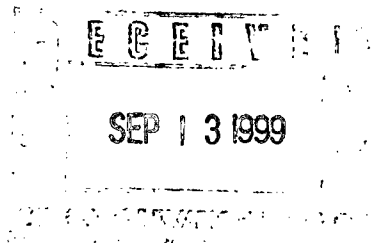
SEP 16 1999

GW-071



September 9, 1999

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



RE: Minor Modification to the El Paso Field Services Chaco Plant Discharge Plan (GW-071)

Dear Sir:

As you are aware, El Paso Field Services Co. (EPFS) Chaco Plant has experienced considerable difficulty in preventing leaks in the north lined contact wastewater pond. EPFS has attempted to repair the pond twice, and late in 1998 installed a complete new liner. The new liner failed to meet the state standard of zero leaks.

Rather than make any further attempts to repair the liner, EPFS has decided to discontinue use of the contact water ponds. The proposed changes outlined below will not affect the volume or water quality of the contact wastewater generated by plant operations.

The contact wastewater will continue to be processed through the existing oil water classifier. The classifier is series of double walled below grade tanks feeding into a packed column gravity separator. The tanks have been re-piped so that wastewater flows through the classifier in series from tank to tank. Wastewater from the Water Tank (see attached flow diagram) will be pumped into an existing 2,000 barrel above ground steel tank. This tank was formerly used for absorption oil storage when the gasoline plant was in operation. Once the wastewater collected in the 2,000 barrel tank has been characterized, it will transported to a commercial Class 1 injection well for disposal.

There is a small amount of liquid in north contact pond left from the liner testing and from rainfall collected over the summer. This liquid will be transferred to the south contact pond. Any sludge in the bottom of the pond will be characterized and disposed off in accordance with the analysis results. The north pond liner material will then be removed and disposed of off site. Composite samples will then be collected from the earthen bottom and side walls, and analyzed for total petroleum hydrocarbons (TPH). A plot plan of the pond showing proposed sample points is attached. Provided the soil samples test to be less than 100 parts per million (ppm) TPH, the berms will then be removed and the soil spread evenly over the area. Any contaminated soils will be disposed of at a commercial land farming facility.

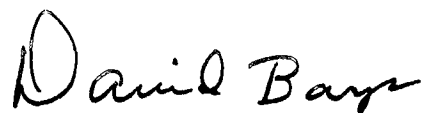
During the removal of the berms on the north pond, monitoring wells number 9 and 10 will very likely be irreparably damaged. These two wells were originally installed to monitor possible leaks from the north contact pond. Since the pond will no longer exist, EPFS proposes that these two wells not be replaced.

Mr. Roger Anderson
August 27, 1999
Page 2

The liquids in the south contact will be transported to a Class 1 non-hazardous disposal well. Any sludge in the bottom of the pond will then be characterized and disposed of in accordance with the sample results. Once the south pond has been cleaned it will be kept for use in emergencies.

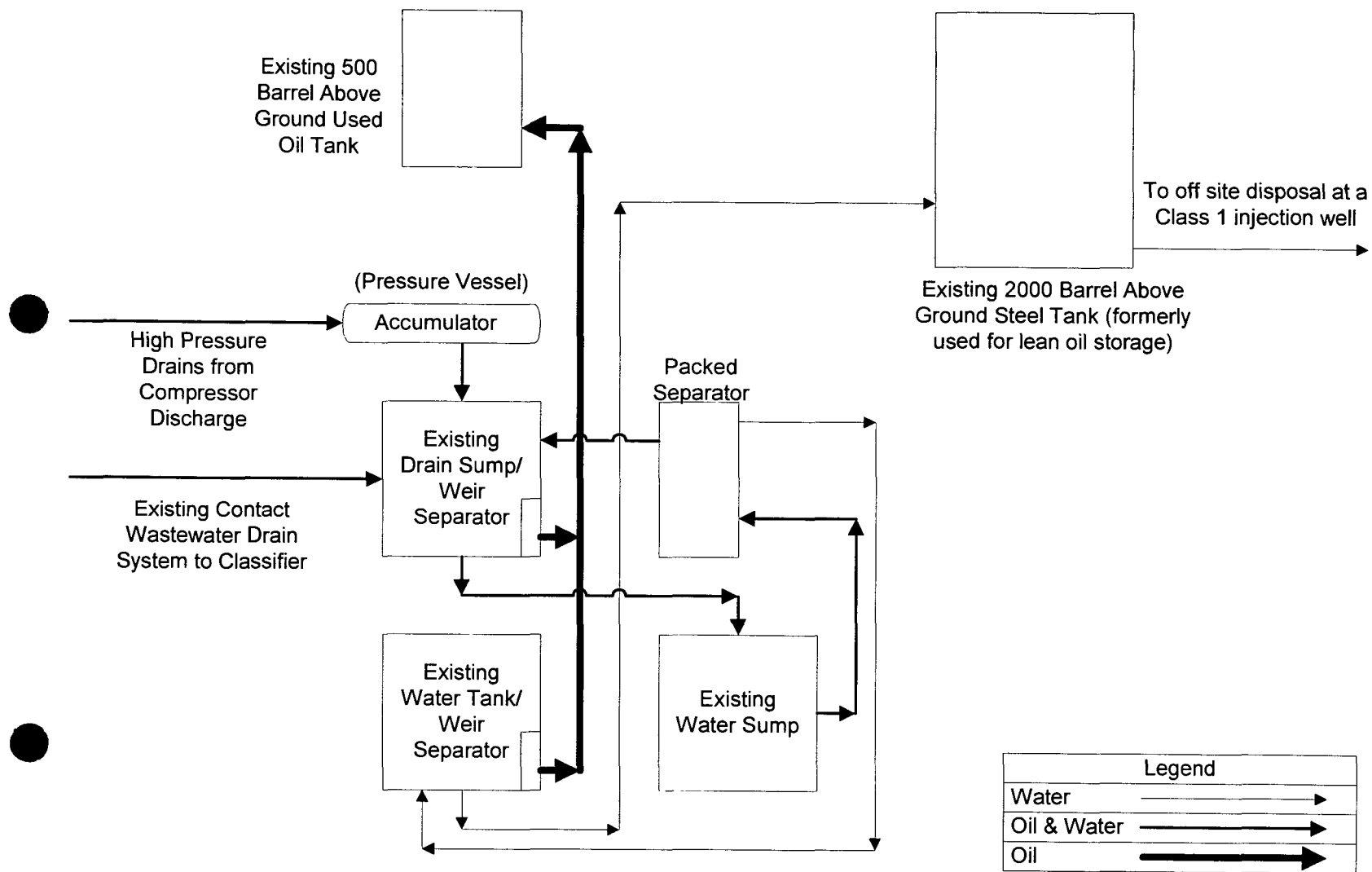
Once you have had opportunity to review these proposed changes, please call me at (505) 599-2256 if you have any questions or need additional information.

Sincerely yours,

A handwritten signature in black ink that reads "David Bays". The signature is written in a cursive, flowing style.

David Bays, REM
Principal Environmental Scientist

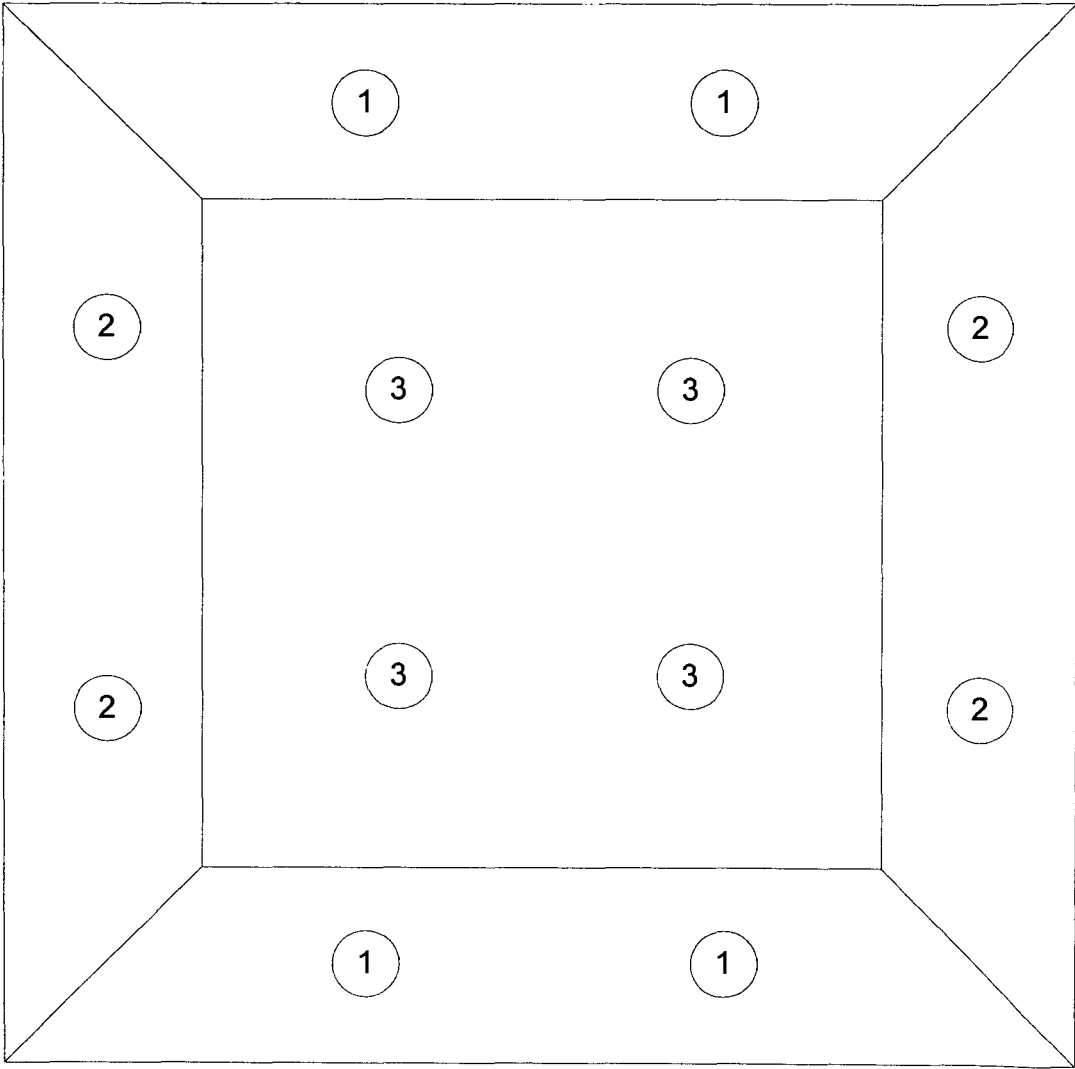
cc: Denny Foust – NMOCD – Aztec, NM
Mike Hansen
Don Hensley
Chaco Regulatory file



El Paso Field Services Co.
Chaco Plant
Contact Wastewater System Modification
September 8, 1999

El Paso Field Services Co.
Chaco Plant
North Contact Wastewater Pond
Proposed Sample Points

(Sample points with the same numbers will be
combined onto one composite sample)





**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

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

August 6, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z - 274-520-518

Mr. David Bays, REM
Principal Environmental Scientist
El Paso Field Services (EPFS)
614 Reilly Avenue
Farmington, NM 87401

**RE: Molecular Sieve
GW-071, Chaco Gas Plant
San Juan County, New Mexico**

Dear Mr. Bays:

The New Mexico Oil Conservation Division (OCD) has received the El Paso Energy Corporation letter dated August 4, 1999 requesting that the OCD allow El Paso Energy Corporation on site burial of the RCRA Subtitle C Exempt Molecular Sieve. The OCD **hereby approves of the burial of this molecular sieve at the El Paso Energy Corporation Chaco Gas Plant within the facility area with the stipulation that the material will be dry and purged of any residual hydrocarbons.**

Note, that OCD approval does not relieve El Paso Energy Corporation of liability should El Paso Energy Corporation operation's result in contamination of surface waters, ground waters or the environment. OCD approval does not relieve El Paso Energy Corporation from compliance with other Federal, State, and Local Regulations/Rules that may apply.

Sincerely,

W. Jack Ford, C.P.G.
Water Resource Engineering Specialist
Environmental Bureau

XC: Aztec District Office

Z 274 520 518

US Postal Service *Ford GW-071*

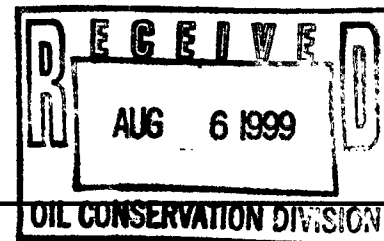
Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	\$
Special Delivery Fee	06 1999
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995



August 4, 1999

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Mr. Ford:

Following the El Paso Field Services Co. Chaco Plant annual plant maintenance shut down, plant operations personnel determined that it is necessary to change out a second molecular sieve bed. This bed is identical to the one changed during the shut down, and will generate an additional 46 cubic yards of molecular sieve.

EPFS is seeking authorization to dispose of this additional volume of used mole sieve by on site burial within the Chaco Plant property. NMOCD authorized the on site disposal of the beads from the original mole sieve bed change out on July 14, 1999.

At the time of disposal, the mole sieve will be dry and purged of any residual hydrocarbons. If you need any additional information concerning the material please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Denny Foust – NMOCD - Aztec, NM
Mike Hansen
Chaco Reg. file



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

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

July 14, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z - 274-520-514

Mr. David Bays, REM
Principal Environmental Scientist
El Paso Field Services (EPFS)
614 Reilly Avenue
Farmington, NM 87401

**RE: Molecular Sieve
GW-071, Chaco Gas Plant
San Juan County, New Mexico**

Dear Mr. Bays:

The New Mexico Oil Conservation Division (OCD) has received the El Paso Energy Corporation letter dated July 6, 1999 requesting that the OCD allow El Paso Energy Corporation on site burial of the RCRA Subtitle C Exempt Molecular Sieve. The OCD hereby approves of the burial of this molecular sieve at the El Paso Energy Corporation Chaco Gas Plant within the facility area with the stipulation that the material will be dry and purged of any residual hydrocarbons.

Note, that OCD approval does not relieve El Paso Energy Corporation of liability should El Paso Energy Corporation operation's result in contamination of surface waters, ground waters or the environment. OCD approval does not relieve El Paso Energy Corporation from compliance with other Federal, State, and Local Regulations/Rules that may apply.

Sincerely,

W. Jack Ford, C.P.G.
Water Resource Engineering Specialist
Environmental Bureau

XC: Aztec District Office

Z 274 520 514

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	<i>David Bays</i>
Street & Number	<i>EPFS</i>
Post Office, State, & ZIP Code	<i>Farmington</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>GW-071</i>

PS Form 3800 April 1995



July 6, 1999

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Mr. Ford:

The El Paso Field Services Co. Chaco Plant has scheduled the annual plant maintenance shut down for later this month. During the shut down EPFS will be changing out approximately 46 cubic yards of molecular sieve.

In the past EPFS has obtained authorization from the Oil Conservation Division to dispose of the used mole sieve by road spreading within the plant yard. However, experience has shown that the mole sieve beads do not pack well enough to make good road surface. Rather than disposal by road spreading, this year EPFS is seeking authorization to dispose of the used mole sieve by on site burial within the Chaco Plant property.

At the time of disposal, the mole sieve will be dry and purged of any residual hydrocarbons. If you need any additional information concerning the material please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Mike Hansen
Chaco Reg. file



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 8, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-078

Mr. David Bays, REM
El Paso Energy Corporation
614 Reilly Avenue
Farmington, New Mexico 87401

RE: Site Modification Notification
GW-071, Chaco Gas Plant
San Juan County, New Mexico

Dear Mr. Bays:


The OCD has received the request letter, dated April 6, 1999, from El Paso Energy Corporation for the Chaco Gas Plant GW-071 located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. The temporary storage of gasoline product utilizing unused propane storage tanks currently located on site is hereby approved with following stipulations:

1. A visual inspection of the storage area shall be conducted daily during periods in which product is stored in the propane tanks.
2. Product storage will cease by March 31, 2000.

The site modification is approved without modification to the discharge plan.

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 El Paso Energy Corporation 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. Further, this approval does not relieve El Paso Energy Corporation from liability should operations result in contamination to the environment.

Sincerely,


W. Jack Ford, R.P.G.
Environmental Bureau
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

Z 357 870 078

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	DAVID BAYS	
Street & Number	EPING	
Post Office, State, & ZIP Code	Farmington	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	GW-071	

PS Form 3800, April 1995



April 6, 1999

RECEIVED
APR - 7 1999

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Mr. Ford:

The El Paso Energy (EPE) Y2K contingency team in considering the possibility of temporary gasoline storage in case there are fuel availability problems related to the year 2000 date change. If this storage plan is adopted, we anticipate beginning bulk gasoline purchase in late September.

EPE would store the fuel in two of the unused propane storage tanks at the El Paso Field Services (EPFS) Chaco Plant. The maximum stored would be 100,000 gallons. The fuel will be on site for between 4 and 6 months. We are asking for authorization from NMOCD to use the tanks without the installation of containment berms. The cost of installing berms for the temporary storage would be prohibitive. If the propane tanks are used for gasoline storage, EPFS will have the tanks emptied by the end of March, 2000.

If you have any questions or need any additional information, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Mr. Denny Foust – NMOCD – Aztec
Al Wussler
Chaco Reg. File



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 19, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z - 357-870-049

Mr. David Bays
El Paso Field Services (EPFS)
P.O. Box 4990
Farmington, NM 87499

**RE: Molecular Sieve and Sandblast Material
GW-71, Chaco Plant
San Juan County, NM**

Dear Mr. Bays:

The New Mexico Oil Conservation Division (OCD) received on November 13, 1998 a letter from EPFS dated November 11, 1998 requesting that the RCRA Subtitle C Exempt Molecular Sieve and non-hazardous sandblast material be spread on the facility as road base. **Based upon the information and analyses provided the OCD approves of the spreading of 10 cubic yards of this molecular sieve and sandblast material for the beneficial use as road base at the EPFS Chaco plant within the facility area with the following condition:**

- The molecular sieve and sandblast materials will be liquid free prior to spreading.

Note, that OCD approval does not relieve EPFS of liability should EPFS operation's result in contamination of surface water, ground water, or the environment. OCD approval does not relieve EPFS from compliance with other federal, state, and local regulations/rules that may apply.

Sincerely,

W. Jack Ford, C.P.G.
Water Resources Engineering Specialist
Environmental Bureau

c: Mr. Denny Foust - Aztec District Office, OCD.

Z 357 870 049

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	David Bays
Street & Number	EPFS
Post Office, State, & ZIP Code	Farmington
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	GW-071

orm 3800, April 1995



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 22, 1998

Z 357 870 045

CERTIFIED MAIL

RETURN RECEIPT NO. Z-357-870-045

Mr. David Bays, REM
El Paso Energy Corporation
614 Reilly Avenue
Farmington, New Mexico 87401

**RE: Evaporation Pond Approval
GW-071, Chaco Gas Plant
San Juan County, New Mexico**

Dear Mr. Bays:

The OCD has received El Paso Energy Corporation's request, dated December 15, 1998, for the Chaco Gas Plant GW-071 located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. The request to temporarily utilize the north contact wastewater pond for wastewater storage until March, 1999 is **hereby approved**. It is OCD's understanding that leak detection will be continued during this period and repairs to the pond lining will be undertaken no later than March 1, 1999.

Note, that OCD approval does not relieve El Paso Energy Corporation of liability should El Paso Energy Corporation's operation result in contamination of surface waters, ground waters or the environment. If you have any questions contact me at (505) 827-7156.

Sincerely,

W. Jack Ford, R.P.G.
Environmental Bureau
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>DAVID BAYS</i>	
Street & Number <i>EL PASO</i>	
Post Office, State, & ZIP Code <i>Farmington</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>GW-071</i>	

PS Form 3800 April 1995



December 15, 1998

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

RE: EPFS Chaco Plant North Contact Wastewater Pond

Dear Roger:

During September El Paso Filed Services installed a new liner in the Chaco north contact wastewater pond and put the pond back in service. As soon as water was introduced into the newly lined pond, the leak detection system indicated there was a leak. The new liner was apparently damaged during the installation of the suction piping for the aeration system.

The pond was taken back out of service, drained, and repairs made to the liner. The pond was again put back in service in November. When the water level reached one foot, the leak detection system indicated another leak.

The evaporation rates in the San Juan Basin during the winter months are very nearly zero. Due to the very low evaporation rates, Chaco will have a severe shortage of water storage space if the north pond is again taken out of service. EPFS is requested permission to use the north pond during the winter. In order to mitigate any water loss to the underlying soil, the leak detection system will be continuously pumped using small pumps equipped with automatic level control systems. In addition the ground water monitoring wells around the pond will be tested as usual. EPFS would then take the pond out of service in March, 1999 to begin necessary repairs.

If you need any additional information about this winter operation plan, please call me at 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Denny Foust – NMOCD – Aztec, NM
Danny Baker
Mike Hansen
S. D. Miller/Chaco Regulatory File



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

November 24, 1998

Z 357 870 041

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-041

Mr. David Bays, REM
El Paso Energy Corporation
614 Reilly Avenue
Farmington, New Mexico 87401


RE: Site Modification Notification
GW-071, Chaco Gas Plant
San Juan County, New Mexico

Dear Mr. Fleak:

The OCD has received the site modification request letter, dated November 19, 1998, from El Paso Energy Corporation for the Chaco Gas Plant GW-071 located in the SW/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. The storage, under atmospheric pressure, of methanol in previously used pressure vessels until transport to various field locations is **hereby approved**. **The site modifications are approved without modification to the discharge plan.**

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 El Paso Energy Corporation 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. Further, this approval does not relieve El Paso Energy Corporation from liability should operations result in contamination to the environment.

Sincerely,


W. Jack Ford, R.P.G.
Environmental Bureau
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	DAVID BAYS
Street & Number	EL PASO
Post Office, State, & ZIP Code	FARMINGTON
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	GW-071

PS Form 3800, April 1995



November 19, 1998

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

RE: Chaco Plant, Discharge Plan GW-071

Dear Roger:

As part of the winterization plan for the San Juan Basin production area, El Paso Field Services Co. (EPFS) is beginning storage of a large volume of methanol at the Chaco Plant. This methanol will be used throughout the basin to prevent wellhead and pipeline freezing during the winter. EPFS is requesting a permanent waiver of the above ground storage tank berming requirements for the methanol storage tanks. EPFS believes granting the waiver is valid for three reasons:

- (1) The methanol is to be stored in four of the "bullet" tanks formerly used for propane storage. These tanks are not atmospheric pressure vessels. They were designed to operate at 90 PSI. Since they are coded, pressure rated tanks, the construction material is much thicker than normal tank walls. Given the near zero corrosion potential of methanol coupled with the higher wall thickness tanks, the likelihood of a tank leak is very low.
- (2) If ignited, methanol burns with a colorless, nearly invisible flame. If the tanks are bermed and a large spill should occur, then the methanol would represent a serious safety hazard. When an employee entered the bermed area to make repairs, he or she could be severely burned because they could not tell visually whether the methanol had ignited or not.
- (3) The bullet tanks are located in the plant process area well away from the site boundaries. Anything less than a total tank failure would not release sufficient quantities of methanol to cause an off-site release.

If you have any questions regarding this request for waiver, or need any additional information, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Denny Foust – NMOCD – Aztec
Chaco Regulatory File



Wayne Price
Jack Ford

November 11, 1998

Mr. Denny Foust
New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410

RE: Disposal of Molecular Sieve and Sand Blasting Media at Chaco Plant

Dear Denny:

El Paso Field Services Co. (EPFS) Chaco Plant has recently changed out the molecular sieve in the plant dehydrator beds. This change out generated approximately 10 cubic yards of molecular sieve. The material is an activated alumina compound contained in a calcium carbonate matrix, and is virtually inert when removed from service. EPFS would like to dispose of the used material by spreading it on a graveled road within the plant yard. NMOCD has authorized on-site disposal of this material in previous years.

The plant also made repairs to the amine plant contactor. It was necessary to sandblast some scale from the inside of the vessel. An analysis report for the used sandblast media is attached. Since the material contains no regulated levels of any leachable metal, EPFS also requests authorization to dispose of it by road spreading within the plant property.

If you need any additional information or have any questions about the proposed on-site disposal, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays
Principal Environmental Scientist

cc: Danny Baker
Mike Hansen
S. D. Miller/Chaco Regulatory file

RECEIVED
NOV 18 1998
OIL & GAS DIV.
325.3

JUNE 30, 1998

ANALYTICAL REPORT

**Chaco Cryo Plant
Sandblast Media
TCLP RCRA Metal Characterization Results
Lab Sample #: 980737
Sampled 10/13/98
Sampled by Bob Heath**

REMARKS:

This sample was collected in order to determine disposal options for the spent sandblast media at this location. The request to sample came from David Bays. The sample was tested for all RCRA required TCLP metals. No RCRA limit was exceeded.

Distribution: David Bays
Mike Hansen
Results File

Attachments:

TCLP METALS

Lab Name: Paragon Analytics, Inc.
 Client Name: El Paso Field Services
 Client Project ID: Chaco Plant Amine System
 Lab Sample ID: 9810167-2

Sample Matrix: TCLP Leachate

Sample ID

980737

Date Collected: 10/13/98

Prep Date: 10/20, 25/98

Date Analyzed: 10/21, 26/98

EPA HW Number	CAS Number	Analyte	Concentration mg/L	Reporting Limit (mg/L)	Regulatory Limit (mg/L)
D004	7440-38-2	Arsenic	0.1	0.1	5.0
D005	7440-39-3	Barium	ND	1	100
D006	7440-43-9	Cadmium	ND	0.05	1.0
D007	7440-47-3	Chromium	0.1	0.1	5.0
D008	7439-92-1	Lead	0.78	0.03	5.0
D009	7439-97-6	Mercury	ND	0.002	0.2
D010	7782-49-2	Selenium	ND	0.05	1.0
D011	7440-22-4	Silver	ND	0.1	5.0

ND = Not detected at or above the reporting limit.

*All Acceptable.
 J.S.
 11/6/98*

000005

DP

EPFS Sample ID # 90737



PARAGON ANALYTICS, INC.

225 Commerce Drive ♦ Fort Collins, CO 80524 ♦ (800) 443-1511 ♦ (970) 490-1511 ♦ FAX (970) 490-1522
November 2, 1998

Mr. John Lambdin
El Paso Field Services
770 West Navajo
Farmington, NM 87401



RE: Paragon Workorder: 98-10-167
Client Project Name: Chaco Plant Amine System
Client Project Number: None Submitted

Dear Mr. Lambdin:

One solid sample was received from El Paso Field Services on October 16, 1998. The sample was scheduled for TCLP Metals analysis. The results for this analysis are contained in the enclosed report pages 1-6.

Thank you for your confidence in Paragon Analytics, Inc. Should you have any questions, please call.

Sincerely,

Paragon Analytics, Inc.
Adrienne Mackzum
Project Manager

AM/ar
Enclosure: Report

Paragon Analytics, Incorporated

Sample Number(s) Cross-Reference Table

Paragon OrderNum: 9810167

Client Name: El Paso Field Services

Client Project Name: Chaco Plant Amine System

Client Project Number:

Client PO Number:

Client Sample	Lab Sample Number	COC Number	Matrix	Date Collected	Time Collected
980737	9810167-1		Solid	10/13/98	12:55
980737	9810167-2		Leachate	10/13/98	



PARAGON ANALYTICS, INC.
225 Commerce Drive Ft. Collins, CO 80524

(800) 443-1511 or (970) 490-1511
(970) 490-1522 - Fax

CHAIN OF CUSTODY

DATE 10/15/98 Page 1 of 1

ACCESSION NUMBER (LAB ID)

9810167

REPORT TO: John Lambdin
COMPANY: El Paso Field Services
ADDRESS: 770 W. NAVAJO
Farmington, NM 87401
SAMPLER: Bob Heath
(505) 599-2144 (505) 599-2261
PHONE NO. FAX NO.

ANALYSIS REQUESTED

SAMPLE ID	DATE	TIME	MATRIX	LAB ID	Oil & G	418.1	8015 A	8015 n	8015m	8020 -	8240/8	8270 -	8080 -	8080 -	8310/6	8150 -	8141/6	TOX - E	Total N	TCLP:	Gross A	Gross G	Gamma	Isotopic	Isotopic	Total U	Radium	Tritium	Strontiu	8315 -	% Moist			Number	
980737	10/13/98	1255	Solid	01																X															

PROJECT INFORMATION Chaco Plant

PROJECT NUMBER:
PROJECT NAME: Amine System
P.O. NUMBER:

TAT: ☒ STANDARD ☐ RUSH DUE

SAMPLE DISPOSAL: ☐ HAZ WASTE \$5.00 ea ☐ RAD CHEM \$15.00 ea ☐ RETURN

COMMENTS: TCLP Metals (All)

Sand blast media

SAMPLE RECEIPT

TOTAL NO. OF CONTAINERS

CHAIN OF CUSTODY SEALS

SEALS INTACT

REC'D GOOD CONDITION

RELINQUISHED BY:

1 Marlon Hopper 1135
Time
10/15/98
Date
Print
Company EPFS

Company

RECEIVED BY:

1 Fed Ex Time
Date
Company

Company

RELINQUISHED BY:

2 Fed Ex Time
Date
Print
Company

Company

RECEIVED BY:

2 A Mackey 0930
Time
10/14/98
Date
Print
Company Paragon Anal.

Company

RELINQUISHED BY:

3 Sign. Time
Date
Print
Company

Company

RECEIVED BY:

3 Sign. Time
Date
Print
Company

Company

* DO NOT WRITE IN SHADED AREAS

DISTRIBUTION: White, Canary - PARAGON ANALYTICS, INC. Pink - Originator

CONDITION OF SAMPLE UPON RECEIPT

CLIENT: El Paso Field ServicesSHIPPING CONTAINER #: client coolerWORKORDER NO. 98 10167INITIALS: AMDATE: 10/16/98

1.	Does this project require special handling according to NEESA, Level 3, or CLP protocols? If yes, complete a. and b. a. Cooler Temperature _____ b. Lot No's. _____ c. Airbill Number _____	Yes	No
2.	Are custody seals on the cooler intact? If so, how many	<u>N/A</u>	Yes
3.	Are custody seals on sample containers intact?	<u>N/A</u>	Yes
4.	Is there a Chain of Custody (COC) or other representative documents, letters or shipping memos?	<u>Yes</u>	No
5.	Is the COC complete? Relinquished: Yes <u>X</u> No Requested Analysis: Yes <u>X</u> No	<u>N/A</u>	<u>Yes</u>
6.	Is the COC in agreement with the samples received? No. of Samples: Yes <u>X</u> No Sample ID's: Yes <u>X</u> No Matrix: Yes <u>X</u> No No. of Containers: Yes <u>X</u> No	<u>Yes</u>	No
7.	Are the samples requiring chemical preservation preserved correctly?	<u>N/A</u>	Yes
8.	Is there enough sample? If so, are they in the proper containers?	<u>Yes</u>	No
9.	Are all samples within holding times for the requested analyses?	<u>Yes</u>	No
10.	Were the sample(s) shipped on ice?	<u>N/A</u>	<u>Yes</u>
11.	Were all sample containers received intact? (not broken or leaking, etc.)	<u>Yes</u>	No
12.	Are samples requiring no headspace, headspace free?	<u>N/A</u>	Yes
13.	Do the samples require quarantine?	Yes	<u>No</u>
14.	Do samples require Paragon disposal?	<u>Yes</u>	No
15.	Did the client return any unused bottles?	Yes	<u>No</u>

Describe "NO" items (except No's 1, 13, & 14): _____

Was the client contacted? Yes _____ No _____

If yes, Date: _____ Name of person contacted: _____

Describe actions taken or client instructions: _____

Group Leader's Signature: _____

Date: _____

Cooler Temperature: 3°C



Paragon Analytics, Inc.

TCLP METALS CASE NARRATIVE

El Paso Field Services

Chaco Plant Amine System

Order Number - 9810167

1. This report consists of 1 TCLP sample.
 2. The sample was received cool and intact on 10/16/98.
 3. The sample was prepared for analysis based on SW-846, 3rd Edition procedures.
The sample was processed through the TCLP leaching procedure based on method 1311. The leachate was then digested at a 10 fold dilution.
For analysis by Trace ICP, the leachate was digested following method 3010A.
For analysis by Cold Vapor AA (CVAA), the leachate was digested following method 7470.
 4. The leachate was analyzed following SW846 protocols by Trace ICP (Method 6010A) and CVAA (Method 7470). The analysis of silver was done by Trace ICP.
 5. All standards and solutions are NIST traceable and were used within their recommended shelf life.
 6. The sample was prepared and analyzed within the established hold times.
 7. Sample results which are below PAI's standard reporting limits are reported as "ND" on the enclosed report.
- All in house quality control procedures were followed, as described below.
8. General quality control procedures.
 - A preparation (method) blank and laboratory control sample were digested and analyzed with the samples in each digestion batch. There were not more than 20 samples in each digestion batch.
 - The preparation (method) blank results associated with each batch were below the reporting limits for the requested analytes. This indicates that no contaminants were introduced to the samples during the digestion procedure.
 - The laboratory control sample associated with this batch each within



acceptance limits. This indicates complete digestion according to the method.

- All initial and continuing calibration blanks associated with each batch were below the reporting limits for the requested analytes. This indicates a valid calibration and stable instrument conditions.
 - All initial and continuing calibration verifications associated with each batch were within acceptance criteria for the requested analytes. This indicates a valid calibration and stable instrument conditions.
 - The interference check samples, and high standard readbacks associated with Method 6010A analyses were within acceptance criteria.
9. A sample from this Order Number was used as the matrix QC sample for each batch.
- A matrix spike and matrix spike duplicate were digested and analyzed with each batch. All acceptance criteria for accuracy were met.
 - A sample duplicate and spike duplicate were digested and analyzed with each batch. All acceptance criteria for precision were met.
 - A serial dilution was analyzed with the ICP batch. All acceptance criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below:

Darryl Patrick
Darryl Patrick
Senior Inorganic Chemist

10/30/98
Date

SW
Reviewer's Initials

10/30/98
Date

CERTIFICATION

Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

Reviewed & Accepted
J. Galdi 11/5/98

Paragon Analytics, Incorporated

Sample Number(s) Cross-Reference Table

Paragon OrderNum: 9810167

Client Name: El Paso Field Services

Client Project Name: Chaco Plant Amine System

Client Project Number:

Client PO Number:

Client Sample	Lab Sample Number	COC Number	Matrix	Date Collected	Time Collected
980737	9810167-1		Solid	10/13/98	12:55
980737	9810167-2		Leachate	10/13/98	

TCLP METALS

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Field Services
Client Project ID: Chaco Plant Amine System
Lab Sample ID: RB 9810167

Sample Matrix: TCLP Leachate

Sample ID

TCLP Blank

Date Collected: N/A
Prep Date: 10/20, 25/98
Date Analyzed: 10/21, 26/98

EPA HW Number	CAS Number	Analyte	Concentration mg/L	Reporting Limit (mg/L)
D004	7440-38-2	Arsenic	ND	0.1
D005	7440-39-3	Barium	ND	1
D006	7440-43-9	Cadmium	ND	0.05
D007	7440-47-3	Chromium	ND	0.1
D008	7439-92-1	Lead	ND	0.03
D009	7439-97-6	Mercury	ND	0.002
D010	7782-49-2	Selenium	ND	0.05
D011	7440-22-4	Silver	ND	0.1

ND = Not detected at or above the reporting limit.

000004 DP

TCLP METALS MATRIX SPIKE

Lab Name: Paragon Analytics, Inc.
Client Name: El Paso Field Services
Lab Sample ID: 9810167-2

Sample ID

980737

Prep Date: 10/20, 25/98
Date Analyzed: 10/21, 26/98

Sample Matrix: TCLP Leachate

Analyte	Spike Added mg/L	Sample Conc. mg/L	MS Conc. mg/L	% Rec (limits 80-120%)	Flags
Arsenic	20.0	0.1	20.7	103	
Barium	20	< 1	19	94	
Cadmium	0.50	< 0.05	0.53	107	
Chromium	2.0	0.1	2.2	104	
Lead	5.00	0.78	5.86	102	
Mercury	0.020	< 0.002	0.020	98	
Selenium	20.0	< 0.05	20.1	101	
Silver	0.5	< 0.1	0.5	96	

Analyte	MSD Conc. mg/L	MSD % Rec (limits 80-120%)	Relative % Difference (limits 0-20%)	Flags
Arsenic	20.5	102	1	
Barium	18	91	2	
Cadmium	0.53	105	1	
Chromium	2.2	103	1	
Lead	5.85	101	0	
Mercury	0.019	95	4	
Selenium	19.9	100	1	
Silver	0.5	96	0	

Sample results shown on spike page(s) may differ slightly from results on sample page(s).
Where sample concentration is sufficiently high, three significant figures are used to determine spike recoveries and relative percent difference.

Handwritten signature/initials

Handwritten initials DP

000006



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC NM 87410
(505) 334-6178 FAX: (505) 334-6170
[http://nemnr.state.nm.us/ocd/District 10/district.htm](http://nemnr.state.nm.us/ocd/District%2010/district.htm)

GARY E. JOHNSON
GOVERNOR

Jennifer A. Salisbury
CABINET SECRETARY

September 2, 1998

San Juan County Public Works Director
305 South Oliver Drive
Aztec NM 87410-2436

RE: Use of Non-contact Wastewater for Use in County Road Construction and Maintenance

Dear Mr. Keck:

Mr. David Bays of El Paso Field Services has requested that we re-authorize you to use non-contact wastewater generated and discharged at the El Paso Field Services (Chaco Plant), for San Juan County road construction and maintenance.

You may use this water as proposed with the following conditions:

1. The water will be applied so that no excess water runs off into roadside ditches or into any watercourse.
2. At the end of each day's activity, unused water will be stored in trucks or tanks so the water does not drip or drain onto the ground overnight. Alternatively, the water may be returned to the Chaco Plant, if no other material has been added to the water intentionally or accidentally mixed with liquids that were previously contained in any truck or tank.

This approval is for one year, starting on this letter date and any further requests beyond that time must be approved by this office. This approval does not relieve you of liability should your operation result in actual pollution of surface waters, ground waters, or the environment that may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve San Juan County of responsibility for compliance with any other county, state, federal, or other local laws and/or regulations.

Sincerely,

Frank T. Chavez
District Supervisor

FTC\mk

cc: Roger Anderson
David Bays, El Paso Field Services (Chaco Plant)



RECEIVED

June 18, 1998

JUN 22 1998

Mr. Ernie Busch
New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410

Environmental Bureau
Oil Conservation Division

**RE: Use of El Paso Field Services Co. Chaco Plant Non-Contact Wastewater for Dust
Suppression on County Roads**

Dear Mr. Busch:

For the past several years NMOCD has authorized the use of non-contact waste water from the El Paso Field Services Co. (EPFS) Chaco Plant to control dust on county roads. The authorization was sent to Mr. David Keck, San Juan County Public Works Director, with copies to Mr. Roger Anderson and to EPFS.

EPFS would like to request authorization to continue furnishing this waste water to San Juan County under the same conditions as previously agreed.

1. The water will be applied so that there is no excess run off into roadside ditches or into any watercourse.
2. At the end of each day all unused water will be stored in trucks or tanks, or returned to the Chaco Plant.

If you need any additional information, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays

cc: Mr. Roger Anderson
Mr. Danny Baker
Mr. Mike Hansen
Mr. David Keck - San Juan County
Ms. Sandra Miller/Chaco Regulatory File

Submit 4 Copies
to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Roger Anderson

Form C-134
Aug. 1, 1989

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, New Mexico 87504-2088

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 Rule 711(T)

Operator Name: El Paso Field Services Co.

Operator Address: 614 Reilly Ave. Farmington, NM 87401

Lease or Facility Name Chaco Plant Location K 16 26N 12W
Ut. Ltr. Sec. Twp. Rgs

Size of pit or tank: Earthen pond, 300 feet by 375 feet (pond #4)

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

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

This pond contains only non-contact process water. It is used by waterfowl as a

nesting area.

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

If any should be discharged to the pond, it will be cleaned up within 24 hours

using floating booms, sorbent pads and a portable skimmer.

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 David Bays Title Principal Scientist Date 3/27/98

Printed Name David Bays Telephone No. (505) 599-2256

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 3/26/98

Inspected by _____

Approved by Denny G. Jant

Title Environmental Geologist

Date 3/31/98

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to Appropriate
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Energy, Minerals and Natural Resources Department

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Aug. 1, 1989

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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 Rule 711(I)

Operator Name: El Paso Field Services Co.

Operator Address: 614 Reilly Ave. Farmington, NM 87401

Lease or Facility Name Chaco Plant Location K 16 26N 12W
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: Earthen pond, 300 feet by 675 feet (pond #3)

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.
This pond contains only non-contact process water. It is used by waterfowl as a
nesting area.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:
If any should be discharged to the pond, it will be cleaned up within 24 hours
using floating booms, sorbent pads and a portable skimmer.

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 David Bays Title Principal Scientist Date 3/27/98

Printed Name David Bays Telephone No. (505) 599-2256

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 3/26/98

Inspected by [Signature]

Approved by Denny G. Fount

Title Environmental Geologist

Date 3/31/98

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State of New Mexico
Energy, Minerals and Natural Resources Department

Roger Anderson
Form C-134
Aug. 1, 1989

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OIL CONSERVATION DIVISION

2040 South Pacheco

Santa Fe, New Mexico 87504-2088

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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 Rule 711(I)

Operator Name: El Paso Field Services Co.

Operator Address: 614 Reilly Ave. Farmington, NM 87401

Lease or Facility Name Chaco Plant Location SW/4 16 26N 12W
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: 300' by 940' by 4' deep

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

☒ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.
This earthen pond contains only non-contact industrial waste water. It is used by
water fowl as a nesting area.

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

If any oil should ever reach the pond, it would be removed by sorbent pads
within 24 hours.

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 David Bays Title Principal Env. Scientist Date March 18, 1998

Printed Name David Bays Telephone No. (505) 599-2256

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 3/26/98
Inspected by DZ7

Approved by Denny G. Zant
Title Environmental Geologist
Date 3/31/98

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to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Roger Anderson

Form C-134
Aug. 1, 1989

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2040 South Pacheco
Santa Fe, New Mexico 87504-2088

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 Rule 711(T)

Operator Name: El Paso Field Services Co.

Operator Address: 614 Reilly Ave. Farmington, NM 87401

Lease or Facility Name Chaco Plant Location SW/4 16 26N 12W

Size of pit or tank: 185' by 525' by 4' deep Ut. Ltr. Sec. Twp. Rgs

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.

This earthen pond contains only non-contact industrial waste water. It is used by
water fowl as a nesting area.

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

If any oil should ever reach the pond, it would be removed by sorbent pads
within 24 hours.

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 David Bays Title Principal Env. Scientist Date March 18, 1998

Printed Name David Bays Telephone No. (505) 599-2256

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 3/26/98

Inspected by D-27

Approved by Denny G. Faint

Title Environmental Geologist

Date 3/31/98