GW - 124

GENERAL CORRESPONDENCE

YEAR(S):
1991 - 1992

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

May 6, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-813

Mr. Buddy Shaw
Amoco Production Company
200 Amoco Court
Farmington, NM 87401

RE: Discharge Plan GW-124, Closure Plan Approval
Amoco Production Company (APC)
Hammond Ditch Compressor Station
San Juan County, New Mexico

Dear Mr. Shaw:

The OCD has received the "Closure Plan" dated April 17, 1997 from Blagg Engineering, Inc. on behalf of APC. The "Closure Plan" was required be the OCD Santa Fe Office on February 26, 1997 pursuant to 20 NMAC 6.2.3107.A.11, for the **Hammond Ditch Compressor Station** GW-124 located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico.

Pursuant to 20 NMAC 6.2.3107.A.11 the OCD hereby approves of the "Closure Plan" as submitted for the Hammond Ditch Compressor Station GW-124 with the following conditions of approval:

1. Mr. Denny Foust with the Aztec OCD office will be notified 72 hours in advance of any field activity regarding the closure of this site.

2. Any wastes generated during the closure process will be submitted to the OCD Santa Fe Office for approval prior to disposal. All exempt and non-exempt wastes will be segregated. All non-exempt wastes will be properly characterized per 40 CFR Part 261 for Hazardous characteristics.

3. If groundwater contamination is found during the closure process APC will within 24 hours of discovery notify the Environmental Bureau Chief at (505)-827-7152 pursuant to 20 NMAC 6.2.1203.

Please submit the original "Site Assessment Report " and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office.

Be advised that OCD approval of this work plan does not relieve APC from liability should the plan fail to properly close the facility in accordance with 20 NMAC 6.2.3107.A.11. Further, OCD approval does not relieve APC from responsibility to comply with other federal, state, and local rules and regulations that may apply to this closure.

If APC has any questions, please do not hesitate to contact me at (505)-827-7152 or Pat Sanchez at (505) 827-7156.

Sincerely,

Roger C. Anderson
Bureau Chief,
Environmental Bureau - OCD

RCA/pws

c: Mr. Denny Foust - OCD Aztec District

P 288 258 813

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

Sent to APC - Buddy Shaw	
Street & Number GW-124 "Closure" APR.	
Post Office, State, & ZIP Code	
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	

PS Form 3800, April 1995

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 11:13 AM	Date 5/6/97

Originating Party	Other Parties
Buddy Shaw - Amoco	Pat Sanchez - OCD

Subject: Amoco Hammond Ditch (GW-124) closure plan.

Discussion

Mr. Shaw called and left me a message that the tanks on the site are for produced water storage from the GCU field production wells. These tanks are not part of the discharge plan per say - they are for centralized collection of produced water.

Conclusions or Agreements

OCD will not consider the tanks used for the GCU produced water collection in the discharge plan.

Distribution: File, Denny Foust.

Signed: Pat Sanchez

File Copy

BLAGG ENGINEERING, INC.
P.O. Box 87
Bloomfield, New Mexico 87413
Phone: (505) 632-1199
Fax: (505) 632-3903

April 17, 1997

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

RE: Amoco Production Company
Hammonds Ditch Compressor Station Facility Closure Plan
SW/4, Sec, 28, T29N, R12W, NMPM, San Juan County, NM

Dear Mr. Anderson:

Blagg Engineering, Inc. (BEI) has been contracted by Amoco Production Company (APC) to prepare a closure plan for the referenced facility. Referencing your correspondence to APC dated February 26, 1997, this document summarizes assessment and closure procedures for the facility. These procedures have been used by BEI for previous Amoco pit closures and have been approved by the New Mexico Oil Conservation Division (NMOCD) and the U.S. Bureau of Land Management (BLM).

Site assessment and closure verification performed by BEI will be completed according to published guidelines as outlined in the NMOCD document, "Unlined Surface Impoundment Closure Guidelines," February 1993, and in the BLM document, "Unlined Surface Impoundment Remediation and Closure for Approximately 47,175 to 62,900 Unlined Surface Impoundments," December, 1993.

Prior to the subsurface assessment, Amoco will remove the separator/dehydrator unit. This unit will not be removed until receipt of NMOCD's approval of this closure plan. Between March 7 & 12, 1997, a compressor at the facility was removed due to two factors; 1) the facility is currently no longer in operation, and 2) to eliminate high rental cost for the equipment. Please refer to the attached photo mount for separator/dehydrator unit and compressor locations. Other items at the site, including above ground tanks and transfer pumps, are presently in use and are not scheduled for removal.

Assessment Plan

Amoco intends to perform an initial site assessment to evaluate subsurface soil and/or groundwater quality at the facility prior to total abandonment. BEI will utilize either a mobile drill rig or a backhoe in obtaining soil and groundwater samples to verify current conditions. The equipment will be operated by a qualified Amoco Production Company subcontractor under the direction of BEI.

To assure Quality Assurance/Quality Control in sampling techniques, BEI will incorporates stringent controls in sampling protocols. The following procedures will be used to verify accuracy and precision in sample results:

1) Sampling will be performed by a qualified engineer and/or geologist experienced in environmental sampling techniques.

2) Sample containers cleaned to USEPA standards will be supplied by the laboratory for laboratory testing.

3) Photoionization detectors (PID's) will be calibrated daily using a 100 ppm isobutylene standard to achieve a proper hydrocarbon response factor.

4) A field TPH Petroleum Hydrocarbon Analyzer manufactured by General Analysis Corporation of Norwalk, Connecticut follows a modified version of USEPA Method 418.1 will be used for hydrocarbon analysis. Instrument calibration will be checked daily using a laboratory prepared certified standard of 500 ppm total petroleum hydrocarbons. Precision will be checked by running duplicate samples every 20 tests to assure repeatability of results. Accuracy will further be checked by collecting duplicate laboratory samples every 20 samples for comparisons.

5) All sampling and drilling equipment will be decontaminated prior to each sampling event.

The following procedure will be followed by BEI prior to and during the site assessment of the facility:

1) BEI will notify NMOCD at least 48 hours in advance of any subsurface work as to allow NMOCD personnel to split samples.

2) The engineer or geologist will prepare a field report summarizing facility name, legal description, soil type encountered, boring locations, and any other pertinent information. Estimations for depth to groundwater, distance to nearest surface waters, and distance to fresh water sources per NMOCD and BLM guidelines will be suitably noted as well.

3) Any soil and/or groundwater samples collected may be field screened, field tested, or submitted for laboratory analysis based on arbitrary and judgmental methods. At a minimum, various areas such as but not limited to; the compressor sump, the compressor location, and the suspected down gradient site perimeter will be investigated as to delineate any on and/or off site impact from any contamination associated with the operation of the facility. In addition, soil samples from each boring will be taken from the interval with the highest field PID readings and bottom of the boring. If groundwater is encountered, Amoco will adhere to its NMOCD's approved revised groundwater plan dated February 7, 1997.

4) Based on the findings from the site assessment, Amoco will either submit a report of the investigation or undertake remediation of any impacted areas delineated. The following two (2) procedures will be followed.

Site Assessment Report

The report will include the following information:

1) A brief description all activities which occurred during the investigation conducted at the facility.

2) A summary table listing sample identification, field results, and laboratory results.

3) A site map showing boring locations.

4) Individual boring logs showing lithologic information and sampling point information (i.e. - PID reading).

5) Field report and laboratory reports of soil and/or groundwater sampling including copies of the field or laboratory quality assurance / quality control data.

Remediation Plan

If hydrocarbon impacts are discovered, the remediation level required at the facility will be based on closure standards as determined by the site assessment described above. Site ranking criteria will be applied to determine the TPH closure standard necessary for impacted soils. The remediation method applied at the facility will be determined on the size and type of impact discovered. Amoco will follow its NMOCD's approved pit closure plan for impacted soils (submitted August 6, 1993) and its NMOCD's approved revised groundwater plan if groundwater has been impacted. After closure standards have been achieved at the facility, a report will be submitted to the NMOCD office in Santa Fe, NM along with a copy submitted to the district office in Aztec, NM.

Summation

This closure plan, pursuant to 20 NMAC 6.2 3107.A.11, is specifically addressing Amoco's request to cancel the groundwater discharge plan, GW-124 for the facility at the current time. However, certain units including above ground holding tanks and transfer pumps will remain at the site. Final site closure will not be pursued until these items are removed. When total abandonment of the facility takes place, Amoco intends to follow all of the proceeding procedures in the same manner. In addition, Amoco will grade the facility so that precipitation events will not pool on the facility pad.

We appreciate your cooperation and look forward to hearing from you. If you have any questions or comments, please contact either Nelson Velez or Jeff Blagg of Blagg Engineering at (505) 632-1199.

Respectfully submitted,
BLAGG ENGINEERING, INC.

Nelson J. Velez
Staff Geologist

Reviewed by:

Jeffrey C. Blagg, President
NMPE 11607

xc: Buddy Shaw, Environmental Coordinator, Amoco, Farmington, NM
Denny Foust, Oil & Gas Inspector, NMOCD, Aztec, NM

Attachment: Photo mount

NJV/njv

HAMM-CP.DOC

PHOTO 1	LOCATION VIEWED FROM SW DIRECTION INCLUDING CLOSE UP OF COMPRESSOR UNIT	3/3/97 @ 9:25 AM
HAMMONDS DITCH COMPRESSOR FACILITY PHOTOGRAPHS SW/4 SEC. 28, T29N, R12W – SAN JUAN COUNTY, NM		*BLAGG ENGINEERING, INC.* *P.O. BOX 87, BLOOMFIELD, NM*
PHOTO PAGE 1	BY: JCB	*PHONE: (505)632-1199*

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

P 288 258 770

February 26, 1997

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

Sent to Amoco - Mr. Buddy Shaw.	
Street & Number 6W-124, Closure plan.	
Post Office, State, & ZIP Code	
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	

PS Form 3800, April 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-770

Mr. Buddy Shaw
Amoco Production Company
200 Amoco Court
Farmington, NM 87401

RE: Discharge Plan GW-124 (Closure)
Amoco Production Company (APC)
Hammond Ditch Compressor Station
San Juan County, New Mexico

Dear Mr. Shaw:

On February 21, 1997, the OCD received the notification from APC to "cancel" the groundwater discharge plan, GW-124, for the **Hammond Ditch Compressor Station** located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico.

Pursuant to 20 NMAC 6.2.3107.A.11 APC will submit for approval a "Closure Plan" for the Hammond Ditch compressor station to the OCD Santa Fe Office by April 26, 1997. APC shall have the "Closure Plan" approved by the OCD Santa Fe office prior to commencing any closure activities at the facility.

The plan will address the following:

1. A proposal to remove all surface equipment at the facility and remove/close any existing pits and below grade lines.

2. A proposal to remove any surface/soil type contamination sources, including evaluating the vertical extent of contamination in the vadose zone and groundwater based upon the water quality constituents in 20 NMAC 6.2.3103. (see 20 NMAC 6.2.3107.A.11)

3. The surface area of the facility will be graded in such a manner so that precipitation events would not pool on the facility area.

Please submit the original "Closure Plan" and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office.

If APC has any questions, please do not hesitate to contact Pat Sanchez at (505) 827-7156.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/pws

c: Mr. Denny Foust - OCD Aztec District

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

SAN JUAN OPER. DIST.
DATE
JAN 1 4 '97

January 10, 1997

RECEIVED
FEB 2 1 1997
Environmental Bureau
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-739

Mr. Buddy Shaw
Amoco Production Company
200 Amoco Court
Farmington, NM 87401

Compressor removed
3-3-97
Cancel!
Thanks,
Buddy Shaw

RE: Discharge Plan GW-124
Amoco Production Company (APC)
Hammond Ditch Compressor Station
San Juan County, New Mexico

Dear Mr. Shaw:

On July 28, 1992, the groundwater discharge plan, GW-124, for the **Hammond Ditch Compressor Station** located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on July 28, 1997.**

If the facility continues to have potential or actual effluent or leachate discharges and APC wishes to continue operation, the discharge plan must be renewed. **Pursuant to WQCC Section 3106.F, if an application for renewal is submitted at least 120 days before the discharge plan expires (on or before March 28, 1997), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether APC has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **Hammond Ditch Compressor Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $50 for Compressor Stations less than 1,000 horsepower. The $50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

- Called Mr. Shaw (326-9219) on 2-24-97, let him know that he needed to submit a "closure" plan pursuant to 20.NMAC.6.2.3107.A.11
- OCD can then approve of closure plan.

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

January 10, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-739

Mr. Buddy Shaw
Amoco Production Company
200 Amoco Court
Farmington, NM 87401

RE: Discharge Plan GW-124
Amoco Production Company (APC)
Hammond Ditch Compressor Station
San Juan County, New Mexico

Dear Mr. Shaw:

On July 28, 1992, the groundwater discharge plan, GW-124, for the **Hammond Ditch Compressor Station** located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. **The approval will expire on July 28, 1997.**

If the facility continues to have potential or actual effluent or leachate discharges and APC wishes to continue operation, the discharge plan must be renewed. **Pursuant to WQCC Section 3106.F, if an application for renewal is submitted at least 120 days before the discharge plan expires (on or before March 28, 1997), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether APC has made, or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **Hammond Ditch Compressor Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $50 for Compressor Stations less than 1,000 horsepower. The $50 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

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

Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.**(Copies of the WQCC regulations, discharge plan application form, and guidelines have been provided to APC in the past. If you require copies of these items notify the OCD at (505)-827-7152. A complete copy of the regulations is also available on OCD's website at **www.emnrd.state.nm.us/ocd.htm**.)

If APC no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If APC has any questions, please do not hesitate to contact Pat Sanchez at (505) 827-7156.

Sincerely,

Will Anderson for

Roger C. Anderson
Environmental Bureau Chief

RCA/pws

xc: Mr. Denny Foust - OCD Aztec District

P 288 258 739

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

Sent to Amoco - Shaw	
Street & Number 6 Mon REN. Ltr.	
Post Office, State, & ZIP Code GW-124	
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	

PS Form 3800, April 1995

Pat Sanchez

AMOCO

Southern
Rockies
Business
Unit

San Juan Operations Center

RECEIVED
AUG 26 1996
Environmental Bureau
Oil Conservation Division

AUGUST 6,1996

NEW MEXICO OIL CONSERVATION DIVISION
1000 RIO BRAZOS RD
AZTEC,NM 87410

DISCHARGE PLANS-BHP TO AMOCO

AMOCO PRODUCTION COMPANY REQUESTS THAT THE FOLLOWING DISCHARGE PLANS FOR BHP COMPRESSOR SITES BE TRANSFERRED TO AMOCO EFFECTIVE IMMEDIATELY :

GCU HWY 64 COMPRESSOR	SW/NE SECTION 21-29N-12W
GCU 3-C COMPRESSOR	SW/SE SECTION 29-29N-12W
E.H.PIPKIN COMPRESSOR	NW/NW SECTION 36-28N-11W
W. HAMMOND COMPRESSOR	SW/SW SECTION 28-29N-12W

PLEASE CALL IF YOU HAVE QUESTIONS OR NEED ADDITIONAL INFO. THANKS FOR YOUR HELP IN THIS MATTER.

Buddy Shaw

BUDDY SHAW
ENVIRONMENTAL COORDINATOR
326-9219

P.S. WE DO NOT HAVE ANY PAPERWORK ON THESE SITES. CAN YOU FURNISH US WITH EXPIRATION DATES?

RECEIVED
AUG - 7 1996
OIL CON. DIV.
DIST. 3

Americas Division
BHP Petroleum

1 August, 1996

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

Re: Change of Ownership - Facilities with Discharge Plans

Dear Mr. Anderson,

Effective January 1, 1996, BHP Petroleum (Americas) Inc. sold properties in the San Juan Basin to Amoco Production Co. Several of the properties had compressor facilities with discharge plans. Following are the affected facilities. These properties are all located in San Juan County.

Discharge Plan GW-088
Gallegos Canyon Compressor Station
NW/4, Section 21, Township 29 North, Range 12 West, NMPM

Discharge Plan GW-120
Pipkin Compressor Station
NW/4, Section 36, Township 28 North, Range 11 West, NMPM

Discharge Plan GW-124
Hammond Ditch Compressor Station
SW/4, Section 28, Township 29 North, Range 12 West, NMPM

Discharge Plan GW-171
Gallegos Canyon 3-C Compressor Station
SE/4, Section 29, Township 29 North, Range 12 West, NMPM

BHP Petroleum (Americas) Inc
1360 Post Oak Boulevard Suite 500
Houston Texas 77056-3020 USA
Telephone 713 961 8500 Facsimile 713 961 8400

It is our understanding that the Amoco office in Farmington will be handling environmental permits and plans so further correspondence should be directed to them. Unfortunately I do not have a Amoco contact name to provide you, but their address is 200 Amoco Court, Farmington, New Mexico 87401.

Thank you very much.

Sincerely,

Jesse Roberts

Jesse L. Roberts
Safety, Health and Environment Coordinator

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

July 28, 1992

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-131

Mr. Fred Lowery
BHP-Petroleum (Americas), Inc.
P.O. Box 977
Farmington, New Mexico 87499

RE: Discharge Plan GW-124
Hammond Ditch Compressor Station
San Juan County, New Mexico

Dear Mr. Lowery:

The groundwater discharge plan GW-124 for the BHP Petroleum Hammond Ditch Compressor Station located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated June 9, 1992.

The discharge plan was submitted pursuant to Section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

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

Please note that section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.c. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire July 28, 1997 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the BHP Petroleum Hammond Ditch Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of zero (-0-) dollars for compressor stations with under 1000 Horsepower.

The OCD has received your $50 filing fee.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay

William J. LeMay
Director

WJL/rca

xc: OCD Aztec Office

ATTACHMENT TO DISCHARGE PLAN GW-124 APPROVAL
BHP HAMMOND DITCH COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(July 28, 1992)

1. Drum Storage: All drums will be stored on pad and curb type containment.

2. Sump Inspection: All pre-existing sumps at this facility will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade will be approved by the OCD prior to installation and will incorporate leak detection in their designs.

3. Berms: All tanks that contain materials other than fresh water will be bermed to contain one and one-third the volume of the tank or interconnected tanks within the berm.

JES
ENVIRONMENTAL CONSULTING
(PERMITTING/ENGINEERING/REGULATORY COMPLIANCE)
1805 CAMINO RASO N.W. ALBUQUERQUE, NM 87107 (505) 345-5219

June 11, 1992

Mr. Roger C. Anderson
New Mexico Oil Conservation Division
P.O. Box 2088 Land Office Building
Santa Fe NM 87504-2088

GW-124

RE: Waste Discharge Plan: BHP-Petroleum Hammond Ditch Compressor Station

File Copy

Dear Mr. Anderson:

Enclosed are three copies of the Waste Discharge Plan for BHP Petroleum's proposed Hammond Ditch Compressor Station. The proposed station will be located in the SW/4 Section 28, Township 29N, Range 12W, NMPM. Also enclosed is a check in the amount of $50.00 as the filing fee.

Please let me or Mr. Fred Lowery, BHP-Petroleum, know if further information is required.

Sincerely,

Gary L. Jordan
President
JES Environmental Consulting

Enclosure:
cc:Mr. Carl Kolbe, BHP-Petroleum, Houston w/enclosure
Mr. Fred Lowery, BHP-Petroleum, Farmington w/enclosure

GW-124

DISCHARGE PLAN - BHP-PETROLEUM HAMMOND DITCH NATURAL GAS COMPRESSOR STATION

I. GENERAL INFORMATION

A. NAME OF DISCHARGER OR LEGALLY RESPONSIBLE PARTY.

BHP-Petroleum (Americas) Inc.
5647 San Felipe, Suite 3600
Houston, TX 77057
(713) 780-5000

B. NAME OF LOCAL REPRESENTATIVE OR CONTACT PERSON.

BHP-Petroleum (Americas) Inc.
P.O. Box 977
Farmington, NM 87499
Attention: Mr. Fred Lowery
(505) 327-1639

C. LOCATION OF DISCHARGE.

The location of the proposed Hammond Ditch Station is in the SW/4 of Section 28, Range 12W, Township 29N. The UTM location is 759.25 UTMH, 4064.1 UTMV. This location is in San Juan County, NM and is shown on Figure 1.

D. TYPE OF NATURAL GAS OPERATION.

The Hammond Ditch Station will consist of a single reciprocating compressor with a derated horsepower of 457 and a Glycol Dehydrator to remove moisture. The gas will be compressed and discharged as pipeline quality natural gas. Suction pressure will nominally be 50 psig and will be discharged from the compressor at 275 to 300 psig. The station capacity will be 5MMft^3/day.

E. COPIES.

Three copies of this discharge plan are included in the submittal to the Oil Conservation Division.

F. AFFIRMATION.

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true and accurate to the best of my knowledge and belief.

Fred Lowery — (Signature)

4-9-92 — (Date)

FRED LOWERY — (Printed Name of Person Signing)

OPERATIONS SUPT. — (Title)

II. PLANT PROCESSES.

A. Sources and quantities of effluent and process fluids.

The three sources of effluents are 1) precipitation water that falls directly on the compressor and dehydrator skids that could be contaminated with lubricants or ethelene glycol 2) used engine oil lubricants and 3) water removed from the gas by the Inlet Separator entering the station (See Figure 2). The amounts of these materials is as follows:

precipitation water - variable and dependent on precipitation event.
used engine oil - on average, 25-35 gallons per month
natural gas moisture - variable and dependent on concentration in gas stream, but will average less than 6300 gallons per month.

B. QUALITY CHARACTERISTICS.

Precipitation water that falls directly on the compressor and dehydrator skids may have very small amounts of lubricant or ethylene glycol contamination. Engine oil is changed only after testing has been conducted on the oil to determine that its useful life has been spent. Appendix A is the MSDS sheets for the engine oil and ethylene glycol. Natural gas moisture (water) removed from the inlet gas may have some heavier hydrocarbon contamination that occurs with natural gas production.

C. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS.

Precipitation that falls on the compressor skid and dehydrator skid is routed to the lowest corner (elevation) of the pad which is equipped with an "environmental rail" (Figure 3) . The water drains to an above ground tank set on gravel designed to hold all engine oil (165 gallons) plus the two makeup oil tanks (100 gallons) or 265 gallons. The level in these tank are checked periodically and the contents pumped into one of the 242 BBL waste water storage tanks (Figure 4).

Spent engine oil is removed from the compressor and pumped into storage on a mobile vehicle equipped with a spent oil tank and fresh oil tank. Once the used oil is removed from the compressor and maintenance performed, the compressor is refilled from a mobile vehicle with fresh engine oil.

Natural gas moisture removed in the inlet separator is stored in above ground tanks which have been placed on a gravel bed (Figure 3). The tanks are a nominal 242 BBL (10,164 gallons) each. The level in the tanks are checked periodically and pumped for disposal in Injection Well No. 328 (OCD No. SWD-236) which has been approved by OCD for injection disposal.

D. SPILL/LEAK PREVENTION AND HOUSEKEEPING PROCEDURES.

The compressor and dehydrator are checked on a routine basis to detect any major engine oil leaks. Also the levels of liquids in the water storage tanks and compressor skid and dehydrator skid drainage tanks are checked on a routine basis and pumped into the water storage tanks for injection well disposal.

The compressor skid drainage tank, the dehydrator skid drainage tank and the water storage tanks will be bermed to contain the volume of 1.3 times their respective tank volumes. They will be constructed on a 1" gravel bed for leak detection.

Any major leak detected will be reported to the OCD immediately by phone. Verbal and written notification of leaks or spills will be made to the OCD in accordance with OCD Rule 116.

III-EFFLUENT DISPOSAL.

Compressor skid, dehydrator skid and waste water tanks contents will be injection well disposed of. The injection well is located in Section 33, T29N, R12W NMPM.

Used engine oil will be picked up and recycled by:

Mesa Oil, Inc.
4701 Broadway Blvd. N.E.
Albuquerque, NM 87105

IV-SITE CHARACTERISTICS.

Hammond Ditch Station is located in the west-central part of the San Juan Basin, a large asymmetric structural depression that contains up to 15,000-feet of Paleozoic and Mesozoic sediments. The stratigraphy of the San Juan Basin is comprised of Sedimentary rocks ranging in age from the Cambrian to Holocene. During Late Cretaceous time, three basin-wide cycles of transgression and regression resulted in an intertonguing lithology of sandstone, siltstone, shale and coal. Sedimentary rocks of Jurassic and Cretaceous age crop out around the rim of the basin and over a broad area in the southern and western parts of the basin. Tertiary sedimentary rocks cover most of the central basin. Quaternary deposits are restricted mainly to the major river valleys. Quaternary deposits include outwash terraces along the San Juan River Valley and it's tributaries, sand dunes on higher palteaus, and cut and filled alluvial drainages and arroyos.

The site is underlaid by weathered outcrops of the Cretaceous-Tertiary age Nacimiento Formation, which is comprised of shales, sandstones and siltstones. Older Quaternary terrace deposits of cobbles and boulders are present on the interfluvial ridges. The San Juan River Valley contains several hundred feet of alluvial fill.

Total dissolved solids of the groundwater is estimated to be above 1000 milligrams per liter at the site.

IV-C. FLOOD PROTECTION.

The 100yr-24hour precipitation event at the station site is approximately 2.8 inches. This small amount of rainfall for the area should pose no flood hazards.

V- ADDITIONAL INFORMATION.

Additional information will be furnished upon request from the Oil Conservation Division.

Appendix A
Manufacturer's Safety Data Sheets

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing, Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
OILS UNLIMITED	918-583-1155

ADDRESS (Number, Street, City, State and ZIP Code)
334 S. Gilcrease Museum RD. Tulsa, OK. 74127 (P.O. Box 3066 74101)

CHEMICAL NAME AND SYNONYMS	TRADE NAME AND SYNONYMS
LUBRICATING OIL	SE/CC ENGINE OIL SAE 10W40
CHEMICAL FAMILY: PETROLEUM PRODUCTS	FORMULA:

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
NONE		
(REFINED PETROLEUM OIL ->80%, HAZARD DATA - LD50 (rats, oral)		
5g/kg		

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	ND	SPECIFIC GRAVITY (H_2O=1)	0.876
VAPOR PRESSURE (mm Hg.)	$<1x10^{-4}$	PERCENT, VOLATILE BY VOLUME (%)	ND
VAPOR DENSITY (AIR=1)	>1	EVAPORATION RATE (_____ =1)	
SOLUBILITY IN WATER	SLIGHT		
APPEARANCE AND ODOR	AMBER CLEAR LIQUID - SLIGHT SULFURIZED ODOR		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel
410°F		ND	ND

EXTINGUISHING MEDIA
CO_2, Dry Chemical, Foam or Water Fog

SPECIAL FIRE FIGHTING PROCEDURES
NONE

UNUSUAL FIRE AND EXPLOSION HAZARDS
Water May Cause Frothing

(Continued on reverse side)

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE
slightly toxic - 1PT TO 1 QT IS APPROX. LETHAL ORAL DOSE FOR 150 LB. HUMAN ADULT.

EFFECTS OF OVEREXPOSURE
INHALATION-LOW RISK-HIGH CONCENTRATIONS MAY CAUSE DROWSINESS, DIZZINESS, LUNG IRRITATION.

EMERGENCY AND FIRST AID PROCEDURES
INHALATION: REMOVE TO FRESH AIR, RESPIRATORY SUPPORT IF NECESSARY.

SKIN: WASH WITH SOAP, WATER. DO NOT WEAR HEAVILY CONTAMINATED CLOTHING BEFORE LAUNDERING.

~~EYES: FLUSH WITH LARGE VOLUMES OF WATER.~~

~~INGESTION: DO NOT INDUCE VOMITING.~~

SECTION VI - REACTIVITY DATA

STABILITY STABLE	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	

INCOMPATABILITY *(Materials to avoid)*
STRONG OXIDANTS

HAZARDOUS DECOMPOSITION PRODUCTS
CO, CO_2, TRACE SO_2, ZINC, AND PHOSPHORUS OXIDES.

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID NONE
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
FOLLOW ACCEPTED INDUSTRY PRACTICES AND/OR LOCAL, STATE, AND FEDERAL REGULATIONS

WASTE DISPOSAL METHOD

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)*
NONE NORMALLY REQUIRED-IF HIGH MIST CONCENTRATIONS EXPECTED, ORGANIC RESPIRATOR.

VENTILATION	LOCAL EXHAUST TLV 5 mg./cu m as oil mist	SPECIAL
	MECHANICAL *(General)*	OTHER

PROTECTIVE GLOVES OIL IMPERVIOUS GLOVES	EYE PROTECTION SAFETY GOGGLES IF SPLASHING IS ANTICIPATED.

OTHER PROTECTIVE EQUIPMENT

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS
STORE IN STEEL CONTAINER BELOW 120° F, - DO NOT APPLY HIGH HEAT TO CONTAINER

DOT HAZARD LABEL NOT REQUIRED.

MATERIAL SAFETY DATA SHEET

DOW CHEMICAL U.S.A. MIDLAND, MICHIGAN 48674 EMERGENCY (517) • 636 • 4400

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90 MSDS:000597

1. INGREDIENTS: (% w/w, unless otherwise noted)

Ethylene glycol CAS# 000107-21-1 >99%

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

2. PHYSICAL DATA:

BOILING POINT: 387.1F 197C
VAP PRESS: 0.12 mmHg @ 25C
VAP DENSITY: 2.14
SOL. IN WATER: Completely miscible.
SP. GRAVITY: 1.1155 @ 20/20C
APPEARANCE: Colorless liquid.
ODOR: Practically odorless.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: 247F, 119C
METHOD USED: Setaflash

FLAMMABLE LIMITS
LFL: 3.2%
UFL: Not determined.

EXTINGUISHING MEDIA: Water fog, alcohol foam, CO2, and dry chemical.

FIRE & EXPLOSION HAZARDS: None expected under normal storage and handling conditions (i.e. ambient temperatures). However,

(Continued On Page 2)

3. FIRE AND EXPLOSION HAZARD DATA: (CONTINUED)

ethylene glycol or solutions of ethylene glycol and water can form flammable vapors with air if heated sufficiently.

FIRE-FIGHTING EQUIPMENT: Wear positive-pressure, self-contained breathing apparatus.

4. REACTIVITY DATA:

STABILITY: (CONDITIONS TO AVOID) Will ignite in air at 775F. (413C).

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Oxidizing material.

HAZARDOUS DECOMPOSITION PRODUCTS: Burning produces normal products of combustion, such as carbon monoxide, carbon dioxide, and water.

HAZARDOUS POLYMERIZATION: Will not occur.

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS: Avoid entry into sewers or natural waters. Small spills: Soak up with absorbent material. Large spills: Dike and pump into suitable containers for disposal.

DISPOSAL METHOD: Burn in an approved incinerator in accordance with all local, state, and federal requirements, or salvage.

6. HEALTH HAZARD DATA:

(Continued On Page 3)

6. HEALTH HAZARD DATA:

EYE: May cause slight transient (temporary) eye irritation. Corneal injury is unlikely. Vapors or mists may irritate eyes.

SKIN CONTACT: Essentially nonirritating to skin.

SKIN ABSORPTION: Repeated skin exposure to large quantities may result in absorption of harmful amounts. The dermal LD50 has not been determined.

INGESTION: Single dose oral toxicity is moderate. Excessive exposure may cause central nervous system effects, cardiopulmonary effects (metabolic acidosis), and kidney failure. The estimated lethal dose for an average person is 100 ml. The oral LD50 for rats is in the 6000-13,000 mg/kg range. Amounts ingested incidental to industrial handling are not likely to cause injury; however ingestion of larger amounts could cause serious injury, even death.

INHALATION: At room temperature, vapors are minimal due to low vapor pressure. If heated or sprayed as an aerosol, concentrations may be attained that are sufficient to cause irritation and other effects.

SYSTEMIC & OTHER EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Did not cause cancer in long-term animal studies. Based on animal studies, ingestion of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals) or skin contact, the primary routes of occupational exposure, have minimal or essentially no effect on the fetus. In studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of

(Continued On Page 4)

6. HEALTH HAZARD DATA: (CONTINUED)

ethylene glycol in large amounts caused a small decrease in the number of litters per pair, live pups per litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests have been negative. Results of mutagenicity tests in animals have been negative.

7. FIRST AID:

EYES: Irrigate immediately with water for at least 5 minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Early administration of ethanol may counter the toxic effects of ethylene glycol--metabolic acidosis and renal damage. Hemodialysis or peritoneal dialysis have been of benefit. New Eng. J. Med. 304:21 1981. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): OSHA PEL and ACGIH TLV are 50 ppm Ceiling for ethylene glycol vapor.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary

(Continued On Page 5)

8. HANDLING PRECAUTIONS: (CONTINUED)

for some operations.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator.

SKIN PROTECTION: Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Avoid ingestion. Practice reasonable caution and personal cleanliness. Avoid skin and eye contact.

Trace quantities of ethylene oxide (EO) may be present in this product. While these trace quantities could accumulate in headspace areas of storage and transport vessels, they are not expected to create a condition which will result in EO concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zone of the workplace for appropriate applications. OSHA has established a permissible exposure limit of 1.0 ppm 8 hr TWA for EO. (Code of Federal Regulations Part 1910.1047 of Title 29)

MSDS STATUS: Revised section 9 and regsheet.

(Continued On Page 6)

REGULATORY INFORMATION: (Not meant to be all-inclusive--selected regulations represented.)

NOTICE: The information herein is presented in good faith and believed to be accurate as the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numberous federal, state or provincial, and local laws and regulations. See MSD Sheet for health and safety information.

U.S. REGULATIONS

SARA 313 INFORMATION: This product contains the following substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

CHEMICAL NAME	CAS NUMBER	CONCENTRATION
ETHYLENE GLYCOL	000107-21-1	99 %

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard
A delayed health hazard

CANADIAN REGULATOINS

(Continued on Page 7)

REGULATORY INFORMATION (CONTINUED)

The Workplace Hazardous Materials Information System (W.H.M.I.S.) Classification for this product is:

D2A

The Transportation of Dangerous Goods Act (T.D.G.A.) classification for this product is:

Not regulated

FIGURE 2 PLAN VIEW OF STATION

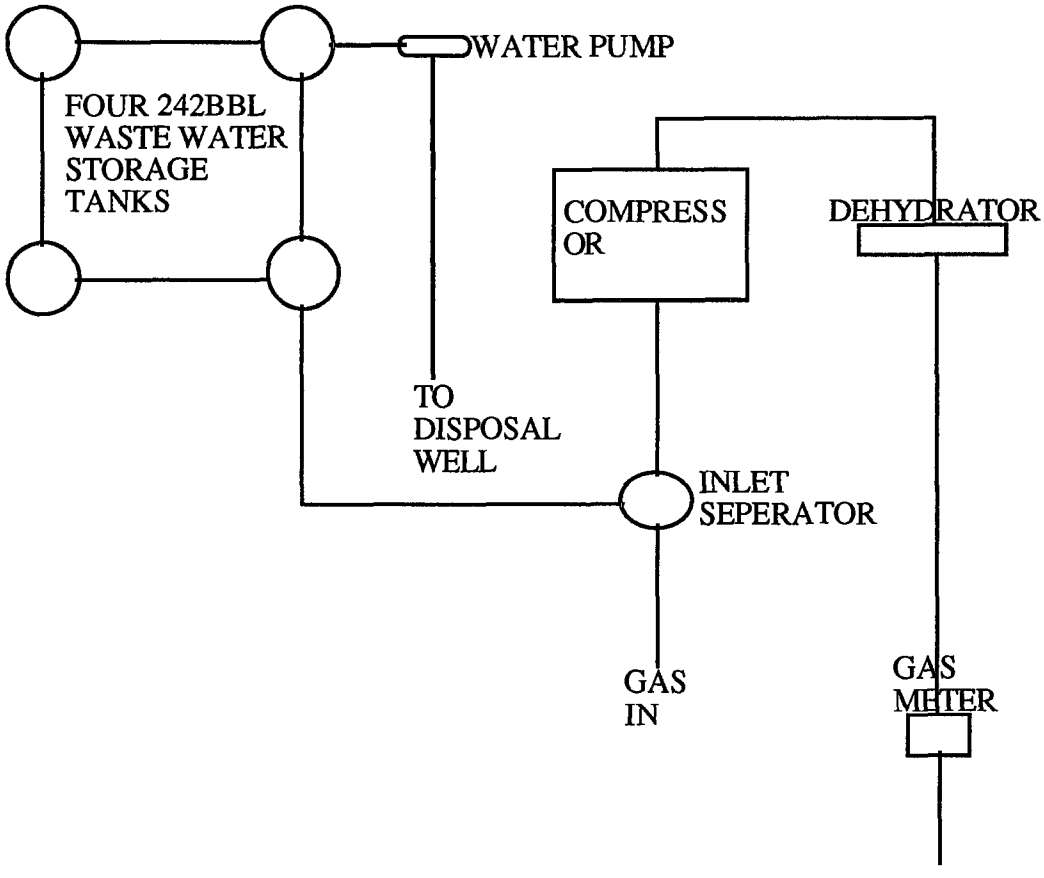
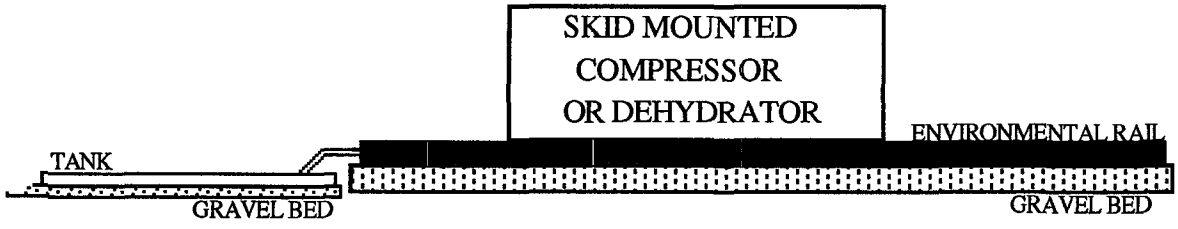
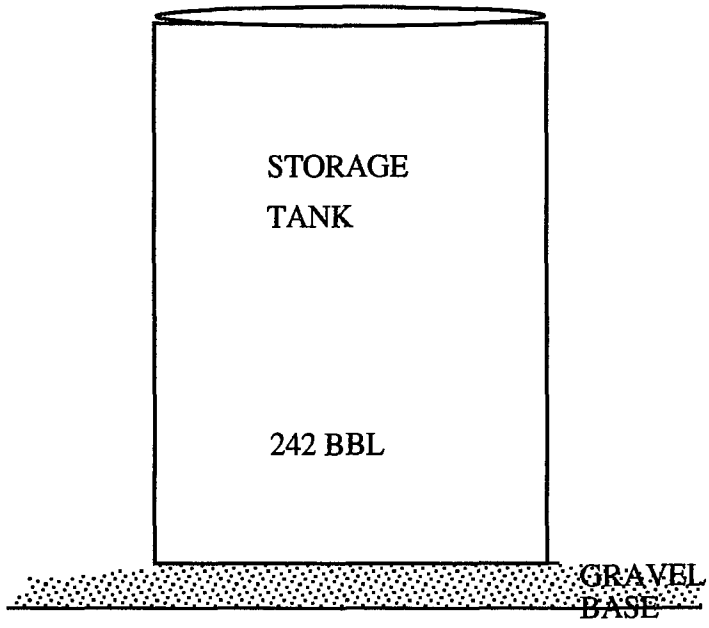


FIGURE 3 COMPRESSOR AND DEHYDRATOR DRAINAGE



NOTE: TANK WILL BE BERMED TO HOLD 1.3 TIMES TANK VOLUME

FIGURE 4 WASTE WATER TANK(S)



NOTE: EACH OF THE FOUR TANKS WILL BE BERMED
TO HOLD 1.3 TIMES TANK VOLUME

(FARMINGTON NORTH) 4357 I SW

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

HORN CANYON QUADRANGLE
NEW MEXICO – SAN JUAN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

(AZTEC 1:62 500) 4357 IV

108°07'30" 36°45' 757 000m E. 758 759 760 5' 761 4357 I SE (FLORA VISTA) AZTEC 7 MI 763 R 12 W 2'30" R 11 W 765 766 767 450 000 FEET 108°00' 36°45'

4070 000m N. 2 090 000 FEET

42'30"

2 050 000 FEET

36°37'30" 108°07'30" 758 760 5' 762 (GALLEGOS TRADING POST) 4357 II SE R 12 N R 11 N 764 2'30" 765 766 768 000m E. 108°00' 36°37'30"

420 000 FEET

(HUGH LAKE) 4357 II SW

(FARMINGTON SOUTH) 4357 II NW

(BLOOMFIELD 1:62 500) 4457 III

(BLANCO TRADING POST 22 MI)

(BLOOMFIELD 1:62 500) 4357 III

HAMMOND DITCH COMPRESSOR STATION

Bloomfield

T 29 N
T 28 N

Mapped, edited and published by the Geological Survey

Control by USGS and NOS/NOAA, and U. S. Bureau of Reclamation

Topography by photogrammetric methods from aerial photographs taken 1964 and by planetable surveys of the Bureau of Reclamation 1965. Field checked by USGS 1965

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, west zone
1000 meter Universal Transverse Mercator grid ticks, zone 12, shown in blue

Fine red dashed lines indicate selected fence lines

To place on the predicted North American Datum 1983 move the projection lines 2 meters north and 56 meters east as shown by dashed corner ticks

UTM GRID AND 1979 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

CONTOUR INTERVAL 20 FEET
DOTTED LINES REPRESENT 10-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

NEW MEXICO
QUADRANGLE LOCATION

ROAD CLASSIFICATION

Heavy duty — Light duty
Medium duty — Unimproved dirt
State Route

HORN CANYON, N. MEX.
N3637.5—W10800/7.5

1965
PHOTOREVISED 1979
DMA 4357 II NE—SERIES V881

FIGURE 1

BHP-PETROLEUM PROPOSED HAMMOND DITCH COMPRESSOR STATION

G-1-124
File Copy

GW-124

DISCHARGE PLAN - BHP-PETROLEUM
HAMMOND DITCH NATURAL GAS COMPRESSOR STATION

I. GENERAL INFORMATION

A. NAME OF DISCHARGER OR LEGALLY RESPONSIBLE PARTY.

BHP-Petroleum (Americas) Inc.
5647 San Felipe, Suite 3600
Houston, TX 77057
(713) 780-5000

B. NAME OF LOCAL REPRESENTATIVE OR CONTACT PERSON.

BHP-Petroleum (Americas) Inc.
P.O. Box 977
Farmington, NM 87499
Attention: Mr. Fred Lowery
(505) 327-1639

C. LOCATION OF DISCHARGE.

The location of the proposed Hammond Ditch Station is in the SW/4 of Section 28, Range 12W, Township 29N. The UTM location is 759.25 UTMH, 4064.1 UTMV. This location is in San Juan County, NM and is shown on Figure 1.

D. TYPE OF NATURAL GAS OPERATION.

The Hammond Ditch Station will consist of a single reciprocating compressor with a derated horsepower of 457 and a Glycol Dehydrator to remove moisture. The gas will be compressed and discharged as pipeline quality natural gas. Suction pressure will nominally be 50 psig and will be discharged from the compressor at 275 to 300 psig. The station capacity will be 5MMft^3/day.

E. COPIES.

Three copies of this discharge plan are included in the submittal to the Oil Conservation Division.

F. AFFIRMATION.

I hereby certify that I am familiar with the information contained in and submitted with this application and that such information is true and accurate to the best of my knowledge and belief.

Fred Lowery — (Signature)

4-9-92 — (Date)

FRED LOWERY — (Printed Name of Person Signing)

OPERATIONS SUPT. — (Title)

II. PLANT PROCESSES.

A. Sources and quantities of effluent and process fluids.

The three sources of effluents are 1) precipitation water that falls directly on the compressor and dehydrator skids that could be contaminated with lubricants or ethelene glycol 2) used engine oil lubricants and 3) water removed from the gas by the Inlet Separator entering the station (See Figure 2). The amounts of these materials is as follows:

precipitation water - variable and dependent on precipitation event.
used engine oil - on average, 25-35 gallons per month
natural gas moisture - variable and dependent on concentration in gas stream, but will average less than 6300 gallons per month.

B. QUALITY CHARACTERISTICS.

Precipitation water that falls directly on the compressor and dehydrator skids may have very small amounts of lubricant or ethylene glycol contamination. Engine oil is changed only after testing has been conducted on the oil to determine that its useful life has been spent. Appendix A is the MSDS sheets for the engine oil and ethylene glycol. Natural gas moisture (water) removed from the inlet gas may have some heavier hydrocarbon contamination that occurs with natural gas production.

C. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS.

Precipitation that falls on the compressor skid and dehydrator skid is routed to the lowest corner (elevation) of the pad which is equipped with an "environmental rail" (Figure 3) . The water drains to an above ground tank set on gravel designed to hold all engine oil (165 gallons) plus the two makeup oil tanks (100 gallons) or 265 gallons. The level in these tank are checked periodically and the contents pumped into one of the 242 BBL waste water storage tanks (Figure 4).

Spent engine oil is removed from the compressor and pumped into storage on a mobile vehicle equipped with a spent oil tank and fresh oil tank. Once the used oil is removed from the compressor and maintenance performed, the compressor is refilled from a mobile vehicle with fresh engine oil.

Natural gas moisture removed in the inlet separator is stored in above ground tanks which have been placed on a gravel bed (Figure 3). The tanks are a nominal 242 BBL (10,164 gallons) each. The level in the tanks are checked periodically and pumped for disposal in Injection Well No. 328 (OCD No. SWD-236) which has been approved by OCD for injection disposal.

D. SPILL/LEAK PREVENTION AND HOUSEKEEPING PROCEDURES.

The compressor and dehydrator are checked on a routine basis to detect any major engine oil leaks. Also the levels of liquids in the water storage tanks and compressor skid and dehydrator skid drainage tanks are checked on a routine basis and pumped into the water storage tanks for injection well disposal.

The compressor skid drainage tank, the dehydrator skid drainage tank and the water storage tanks will be bermed to contain the volume of 1.3 times their respective tank volumes. They will be constructed on a 1" gravel bed for leak detection.

Any major leak detected will be reported to the OCD immediately by phone. Verbal and written notification of leaks or spills will be made to the OCD in accordance with OCD Rule 116.

III-EFFLUENT DISPOSAL.

Compressor skid, dehydrator skid and waste water tanks contents will be injection well disposed of. The injection well is located in Section 33, T29N, R12W NMPM.

Used engine oil will be picked up and recycled by:

Mesa Oil, Inc.
4701 Broadway Blvd. N.E.
Albuquerque, NM 87105

IV-SITE CHARACTERISTICS.

Hammond Ditch Station is located in the west-central part of the San Juan Basin, a large asymmetric structural depression that contains up to 15,000-feet of Paleozoic and Mesozoic sediments. The stratigraphy of the San Juan Basin is comprised of Sedimentary rocks ranging in age from the Cambrian to Holocene. During Late Cretaceous time, three basin-wide cycles of transgression and regression resulted in an intertonguing lithology of sandstone, siltstone, shale and coal. Sedimentary rocks of Jurassic and Cretaceous age crop out around the rim of the basin and over a broad area in the southern and western parts of the basin. Tertiary sedimentary rocks cover most of the central basin. Quaternary deposits are restricted mainly to the major river valleys. Quaternary deposits include outwash terraces along the San Juan River Valley and it's tributaries, sand dunes on higher palteaus, and cut and filled alluvial drainages and arroyos.

The site is underlaid by weathered outcrops of the Cretaceous-Tertiary age Nacimiento Formation, which is comprised of shales, sandstones and siltstones. Older Quaternary terrace deposits of cobbles and boulders are present on the interfluvial ridges. The San Juan River Valley contains several hundred feet of alluvial fill.

Total dissolved solids of the groundwater is estimated to be above 1000 milligrams per liter at the site.

IV-C. FLOOD PROTECTION.

The 100yr-24hour precipitation event at the station site is approximately 2.8 inches. This small amount of rainfall for the area should pose no flood hazards.

V- ADDITIONAL INFORMATION.

Additional information will be furnished upon request from the Oil Conservation Division.

Appendix A
Manufacturer's Safety Data Sheets

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing, Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917).

SECTION I

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
OILS UNLIMITED	918-583-1155

ADDRESS (Number, Street, City, State, and ZIP Code): 334 S. Gilcrease Museum RD. Tulsa, OK. 74127 (P.O. Box 3066 74101)

CHEMICAL NAME AND SYNONYMS	TRADE NAME AND SYNONYMS
LUBRICATING OIL	SE/CC ENGINE OIL SAE 10W40
CHEMICAL FAMILY: PETROLEUM PRODUCTS	FORMULA

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
NONE		
(REFINED PETROLEUM OIL ->80%, HAZARD DATA - LD50 (rats, oral)		
5g/kg		

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	ND	SPECIFIC GRAVITY (H_2O=1)	0.876
VAPOR PRESSURE (mm Hg.)	$<1 \times 10^{-4}$	PERCENT, VOLATILE BY VOLUME (%)	ND
VAPOR DENSITY (AIR=1)	>1	EVAPORATION RATE (_____ =1)	
SOLUBILITY IN WATER	SLIGHT		

APPEARANCE AND ODOR: AMBER CLEAR LIQUID - SLIGHT SULFURIZED ODOR

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel
410°F		ND	ND

EXTINGUISHING MEDIA: CO_2, Dry Chemical, Foam or Water Fog

SPECIAL FIRE FIGHTING PROCEDURES: NONE

UNUSUAL FIRE AND EXPLOSION HAZARDS: Water May Cause Frothing

(Continued on reverse side)

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE
SLIGHTLY TOXIC - 1PT TO 1 QT IS APPROX. LETHAL ORAL DOSE FOR 150 LB. HUMAN ADULT.

EFFECTS OF OVEREXPOSURE
INHALATION-LOW RISK-HIGH CONCENTRATIONS MAY CAUSE DROWSINESS, DIZZINESS, LUNG IRRITATION.

EMERGENCY AND FIRST AID PROCEDURES
INHALATION: REMOVE TO FRESH AIR, RESPIRATORY SUPPORT IF NECESSARY.

SKIN: WASH WITH SOAP, WATER. DO NOT WEAR HEAVILY CONTAMINATED CLOTHING BEFORE LAUNDERING.

~~EYES: FLUSH WITH LARGE VOLUMES OF WATER.~~

~~INGESTION: DO NOT INDUCE VOMITING.~~

SECTION VI - REACTIVITY DATA

STABILITY STABLE	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	

INCOMPATABILITY *(Materials to avoid)*
STRONG OXIDANTS

HAZARDOUS DECOMPOSITION PRODUCTS
CO, CO_2, TRACE SO_2, ZINC, AND PHOSPHORUS OXIDES.

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID NONE
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

FOLLOW ACCEPTED INDUSTRY PRACTICES AND/OR LOCAL, STATE, AND FEDERAL REGULATIONS

WASTE DISPOSAL METHOD

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)*
NONE NORMALLY REQUIRED-IF HIGH MIST CONCENTRATIONS EXPECTED, ORGANIC RESPIRATOR.

VENTILATION	LOCAL EXHAUST TLV 5 mg./cu m as oil mist	SPECIAL
	MECHANICAL *(General)*	OTHER

PROTECTIVE GLOVES
OIL IMPERVIOUS GLOVES

EYE PROTECTION
SAFETY GOGGLES IF SPLASHING IS ANTICIPATED.

OTHER PROTECTIVE EQUIPMENT

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS
STORE IN STEEL CONTAINER BELOW 120^0 F, - DO NOT APPLY HIGH HEAT TO CONTAINER

DOT HAZARD LABEL NOT REQUIRED.

MATERIAL SAFETY DATA SHEET

DOW CHEMICAL U.S.A. MIDLAND, MICHIGAN 48674 EMERGENCY (517) • 636 • 4400

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90 MSDS:000597

1. INGREDIENTS: (% w/w, unless otherwise noted)

Ethylene glycol CAS# 000107-21-1 >99%

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

2. PHYSICAL DATA:

BOILING POINT: 387.1F 197C
VAP PRESS: 0.12 mmHg @ 25C
VAP DENSITY: 2.14
SOL. IN WATER: Completely miscible.
SP. GRAVITY: 1.1155 @ 20/20C
APPEARANCE: Colorless liquid.
ODOR: Practically odorless.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: 247F, 119C
METHOD USED: Setaflash

FLAMMABLE LIMITS
LFL: 3.2%
UFL: Not determined.

EXTINGUISHING MEDIA: Water fog, alcohol foam, CO2, and dry chemical.

FIRE & EXPLOSION HAZARDS: None expected under normal storage and handling conditions (i.e. ambient temperatures). However,

(Continued On Page 2)

3. FIRE AND EXPLOSION HAZARD DATA: (CONTINUED)

ethylene glycol or solutions of ethylene glycol and water can form flammable vapors with air if heated sufficiently.

FIRE-FIGHTING EQUIPMENT: Wear positive-pressure, self-contained breathing apparatus.

4. REACTIVITY DATA:

STABILITY: (CONDITIONS TO AVOID) Will ignite in air at 775F. (413C).

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Oxidizing material.

HAZARDOUS DECOMPOSITION PRODUCTS: Burning produces normal products of combustion, such as carbon monoxide, carbon dioxide, and water.

HAZARDOUS POLYMERIZATION: Will not occur.

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS: Avoid entry into sewers or natural waters. Small spills: Soak up with absorbent material. Large spills: Dike and pump into suitable containers for disposal.

DISPOSAL METHOD: Burn in an approved incinerator in accordance with all local, state, and federal requirements, or salvage.

6. HEALTH HAZARD DATA:

(Continued On Page 3)

6. HEALTH HAZARD DATA:

EYE: May cause slight transient (temporary) eye irritation. Corneal injury is unlikely. Vapors or mists may irritate eyes.

SKIN CONTACT: Essentially nonirritating to skin.

SKIN ABSORPTION: Repeated skin exposure to large quantities may result in absorption of harmful amounts. The dermal LD50 has not been determined.

INGESTION: Single dose oral toxicity is moderate. Excessive exposure may cause central nervous system effects, cardiopulmonary effects (metabolic acidosis), and kidney failure. The estimated lethal dose for an average person is 100 ml. The oral LD50 for rats is in the 6000-13,000 mg/kg range. Amounts ingested incidental to industrial handling are not likely to cause injury; however ingestion of larger amounts could cause serious injury, even death.

INHALATION: At room temperature, vapors are minimal due to low vapor pressure. If heated or sprayed as an aerosol, concentrations may be attained that are sufficient to cause irritation and other effects.

SYSTEMIC & OTHER EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Did not cause cancer in long-term animal studies. Based on animal studies, ingestion of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals) or skin contact, the primary routes of occupational exposure, have minimal or essentially no effect on the fetus. In studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of

(Continued On Page 4)

6. HEALTH HAZARD DATA: (CONTINUED)

ethylene glycol in large amounts caused a small decrease in the number of litters per pair, live pups per litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests have been negative. Results of mutagenicity tests in animals have been negative.

7. FIRST AID:

EYES: Irrigate immediately with water for at least 5 minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Early administration of ethanol may counter the toxic effects of ethylene glycol--metabolic acidosis and renal damage. Hemodialysis or peritoneal dialysis have been of benefit. New Eng. J. Med. 304:21 1981. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): OSHA PEL and ACGIH TLV are 50 ppm Ceiling for ethylene glycol vapor.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary

(Continued On Page 5)

8. HANDLING PRECAUTIONS: (CONTINUED)

for some operations.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator.

SKIN PROTECTION: Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Avoid ingestion. Practice reasonable caution and personal cleanliness. Avoid skin and eye contact.

Trace quantities of ethylene oxide (EO) may be present in this product. While these trace quantities could accumulate in headspace areas of storage and transport vessels, they are not expected to create a condition which will result in EO concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zone of the workplace for appropriate applications. OSHA has established a permissible exposure limit of 1.0 ppm 8 hr TWA for EO. (Code of Federal Regulations Part 1910.1047 of Title 29)

MSDS STATUS: Revised section 9 and regsheet.

(Continued On Page 6)

REGULATORY INFORMATION: (Not meant to be all-inclusive--selected regulations represented.)

NOTICE: The information herein is presented in good faith and believed to be accurate as the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numberous federal, state or provincial, and local laws and regulations. See MSD Sheet for health and safety information.

U.S. REGULATIONS

SARA 313 INFORMATION: This product contains the following substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

CHEMICAL NAME	CAS NUMBER	CONCENTRATION
ETHYLENE GLYCOL	000107-21-1	99 %

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

An immediate health hazard
A delayed health hazard

CANADIAN REGULATOINS

(Continued on Page 7)

REGULATORY INFORMATION (CONTINUED)

The Workplace Hazardous Materials Information System (W.H.M.I.S.) Classification for this product is:

D2A

The Transportation of Dangerous Goods Act (T.D.G.A.) classification for this product is:

Not regulated

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

HORN CANYON QUADRANGLE
NEW MEXICO – SAN JUAN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

HAMMOND DITCH COMPRESSOR STATION

FIGURE 1

BHP-PETROLEUM PROPOSED HAMMOND DITCH COMPRESSOR STATION

Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA, and U. S. Bureau of Reclamation

Topography by photogrammetric methods from aerial photographs taken 1964 and by planetable surveys of the Bureau of Reclamation 1965. Field checked by USGS 1965

Polyconic projection. 1927 North American datum
10,000-foot grid based on New Mexico coordinate system, west zone
1000 meter Universal Transverse Mercator grid ticks, zone 12, shown in blue

Fine red dashed lines indicate selected fence lines

To place on the predicted North American Datum 1983 move the projection lines 2 meters north and 56 meters east as shown by dashed corner ticks

UTM GRID AND 1979 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

SCALE 1:24 000

CONTOUR INTERVAL 20 FEET
DOTTED LINES REPRESENT 10-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

ROAD CLASSIFICATION

Heavy duty — Light duty
Medium duty — Unimproved dirt
State Route

NEW MEXICO
QUADRANGLE LOCATION

HORN CANYON, N. MEX.
N3637.5—W10800/7.5

1965
PHOTOREVISED 1979
DMA 4357 II NE—SERIES V881

FIGURE 2 PLAN VIEW OF STATION

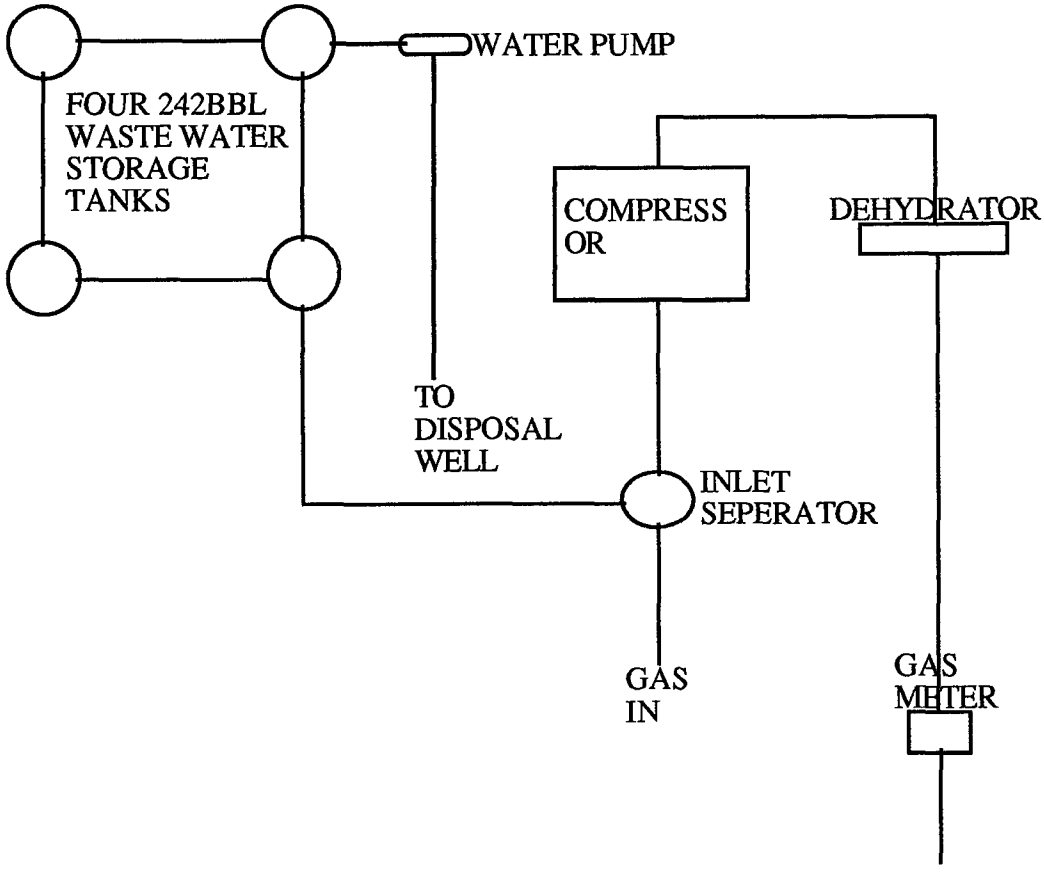
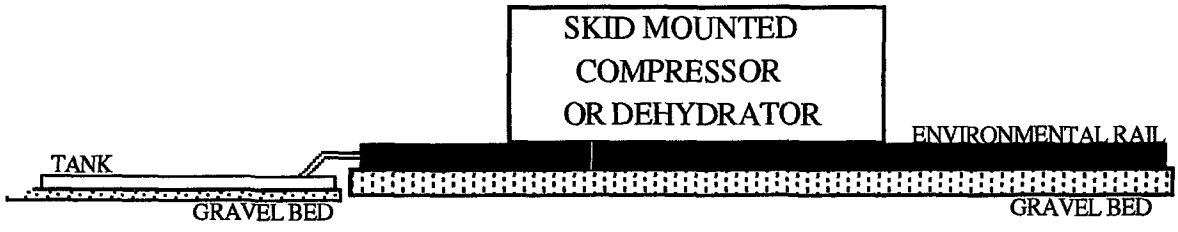
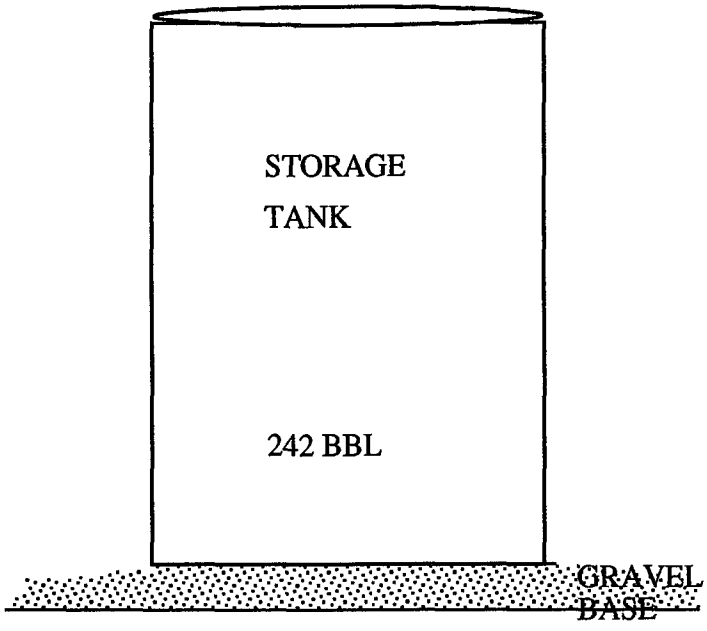


FIGURE 3 COMPRESSOR AND DEHYDRATOR DRAINAGE



NOTE: TANK WILL BE BERMED TO HOLD 1.3 TIMES TANK VOLUME

FIGURE 4 WASTE WATER TANK(S)



NOTE: EACH OF THE FOUR TANKS WILL BE BERMED
TO HOLD 1.3 TIMES TANK VOLUME

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

June 23, 1992

Mr. William J. Lemay
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on June 18, 1992, regarding Oil Conservation Division (OCD) discharge permits GW-122, GW-121, GW-120, and GW-124 on fish, shellfish, and wildlife resources in New Mexico.

The Service has the following comments regarding the issuance of these permits.

GW-122 - Williams Field Services, San Juan 29-6 No. 4 CDP Compressor Station, SE/4 SE/4, Section 19, T29N, R6W, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility.

GW-121 - Williams Field Services, San Juan 29-6 No. 2 CDP Compressor Station, NE/4 NE/4 and NW/4 NE/4, Section 10, T29N, R6W, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility.

GW-120 - BHP-Petroleum (Americas) Inc., Pipkin Compressor Station, NW/4, Section 36, T28N, R11W, NMPM, San Juan County, New Mexico. Approximately 150 gallons per day of waste water will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility.

GW-124 - BHP-Petroleum (Americas) Inc., Hammond Ditch Compressor Station, SW/4, Section 28, T29N, R12W, NMPM, San Juan County, New Mexico. Approximately 210 gallons per day of waste water will be stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility.

Natural gas pipeline condensates contain many organic constituents including benzene, C1 to C5 alkylated benzenes, and toluene. Polychlorinated biphenyls may also be incorporated into the condensate through some compressor lubricants. The Service is concerned that washdown water at the compressor site may contain any or all of these organic constituents, and that accidental spills could result in potential toxicity to Department of the Interior Trust Resources over time. The Service suggests that a surface soil monitoring program be implemented and that open storage tanks as well as holding ponds be netted. Such precautions would ensure the compressor site would not represent a potential threat to endangered species or to migratory birds that may be found in the area.

The Service is the Federal agency responsible for the protection of migratory birds and endangered species. Please note the following legal mandates.

1. Endangered Species Act of 1973, as amended. Section 9 prohibits any "take" (harass, harm, pursue, hunt, shoot, would, kill, trap, capture, or collect, or to attempt to engage in any such conduct) of listed species without a special exemption. Harm is further defined to include specific habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

2. Migratory Bird Treaty Act (Act). Section 703 prohibits anyone at anytime or in any manner to capture, transport, or kill any migratory birds unless permitted by regulations promulgated under it. If migratory birds become exposed to and/or accumulate harmful levels of contaminants, this constitutes "take" under the Act. The courts have stated the Act can be constitutionally applied to impose penalties to persons, associations, partnerships, or corporations which did not intend to "kill" migratory birds and that the Act includes poisoning by any means. The unlawful killing of even one migratory birds is an offense.

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

Sincerely,

for Jennifer Fowler-Propst
Field Supervisor

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

Affidavit of Publication

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

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

(GW-122) — Williams Field Services, Robert Peacock, Project Manager, P. O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their San Juan 29-6 No. 4 C.D.P. Compressor Station located in the SE/4 SE/4, Section 19, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/1 is stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 2000 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-121) — Williams Field Services, Robert Peacock, Project Manager, P. O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their San Juan 29-6 No. 2 CDP Compressor Station located in the NE/4 NE/4 and the NW/4 NE/4, Section 10, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/1 is stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 1300 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-120) — BHP Petroleum (Americas) Inc., Fred Lowery, Operations Superintendent, P. O. Box 977, Farmington, New Mexico 87499, has submitted a discharge plan application for their Pipkin Compressor Station located in the NW/4, Section 36, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 150 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/1 is stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 3700, mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-124) — BHP Petroleum (Americas) Inc., Fred Lowery, Operations Superintendent, P. O. Box 977, Farmington, New Mexico 87499, has submitted a discharge plan application for their Hammond Ditch Compressor Station located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 210 gallons per day of washdoen water with a total dissolved solids concentration of approximately 1100 mg/1 is stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 1000 mg/1. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN unde the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 18th day of June, 1992.

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

(SEAL)

(Published June 25, 1992)

F NEW MEXICO
Rio Arriba } ss.

bert Trapp, being first duly sworn, declare and say that I am the Pub-
he Rio Grande Sun, a weekly newspaper, published in the English lan-
d having a general circulation in the City of Espanola and County of
, State of New Mexico, and being a newspaper duly qualified to pub-
notices and advertisements under the provisions of Chapter 167 of the
ws of 1937; that the publication, a copy of which is hereto attached,

hed in said paper once each week for 1 ..... consecutive weeks, and
ne day of each week in the regular issue of the paper during the time
tion, and that the notice was published in the newspaper proper, and

supplement, the first publication being on the 25th ..... day of
June 19 92 and the last publication on the 25th ..... day
June 19 92; that payment for said advertisement has
made), or (assessed as court costs); that the undersigned has person-
dge of the matters and things set forth in this affidavit.

Robert Trapp
Publisher

Subscribed and sworn to before me this 25th .....
day of June, A.D., 19 92

Notary Public

My Commission expires
5-17-93

Display Advertising — SS - Stand Sales

Bold balance after 30 days

OIL CONSERVATION DIVISION
RECEIVED

'92 SEP 11 AM 8 57

STATE OF NEW MEXICO
County of Bernalillo ss

Thomas J. Smithson being duly sworn declares and says that he is National Advertising manager of the **Albuquerque Journal** , and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chaper 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 26 day

of June, 1992, and the subsequent consecutive

publications on ....., 1992.

OFFICIAL SEAL
Signatur Bernadette Ortiz
BERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO
NOTARY BOND FILED WITH SECRETARY OF STATE
My Commission Expires 12-18-93

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 9 day of Sept, 1992.

PRICE $46.83

Statement to come at end of month.

CLA-22-A (R-12/92) ACCOUNT NUMBER C81184

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

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

(GW-122) - Williams Field Services, Robert Peacock, Project Manager, P.O. Box 58900, M.S. 10068, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their San Juan 29-6 No. 4 C.D.P. Compressor Station located in the SE/4 SE/4, Section 19, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-121) - Williams Field Services, Robert Peacock, Project Manager, P.O. Box 58900, M.S. 10068, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their San Juan 29-6 No. 2 CDP Compressor Statin located in the NE/4 NE/4 and the NW/4 NE/4, Section 10, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 1900 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-19) - BHP Petroleum (Americas) Inc., Fred Lowery, Operations Superintendent, P.O. Box 977, Farmington, New Mexico 87499, has submitted a discharge plan application for their Pipkin Compressor Station located in the NW/4, Section 36, Township 28 North, Range 11 West, NMPM, in San Juan County, New Mexico. Approximately 150 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 3700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-124) - BHP-Petroleum (Americas) Inc., Fred Lowery, Operations Superintendent, P.O. Box 977, Farmington, New Mexico 87499, has submitted a discharge plan application for their Hammond Ditch Compressor Station located in the SE/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 210 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m. Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A

AFFIDAVIT OF PUBLICATION

No. 29665

STATE OF NEW MEXICO,
County of San Juan:

CHRISTINE HILL being duly sworn, says: "That she is the NATIONAL AD MANAGER of The Farmington Daily Times, a daily newspaper of general circulation published in English in Farmington, said county and state, and that the hereto attached LEGAL NOTICE

was published in a regular and entire issue of the said Farmington Daily Times, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for ONE consecutive (days) (/////) on the same day as follows:

First Publication FRIDAY, JUNE 26, 1992

Second Publication

Third Publication

Fourth Publication

and the cost of publication was $ 60.85

Christine Hill

Subscribed and sworn to before me this 2nd day of JULY, 1992.

Ginny Beck
Notary Public, San Juan County, New Mexico

My Comm expires: April 2, 1996

COPY OF PUBLICATI

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

Notice is hereby given that pursuant to New Mexico Water Quality Contro Commission Regulations, the following discharge plan applications have been submitte to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 208 Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-122) WilliamsField Services, Robert Peacock, Project Manager, P.O. Bo 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge pla application for their San Juan 29-6 No 4 C.D.P. Compressor Station located in the SE/ SE/4, Section 19, Township 29 North, Range 6 West, NMPM, Rio Arriba County, Nev Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solid concentration of approximately 1100 mg/l is stored in an above ground steel tank prior t transport to an OCD approved off-site disposal facility. Groundwater most likely to b affected by an accidental discharge is at a depth of approximately 100 feet with a tota dissolved solids concentration of approximately 2000 mg/l. The discharge plan addresse how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-121) WilliamsField Services, Robert Peacock, Project Manager, P.O. Bo 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge pla application for their San Juan 29-6 No 2 C.D.P. Compressor Station located in the NE/ NE/4 and the NW/4 NE/4, Section 10, Township 29 North, Range 6 West, NMPM, Ri Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility Groundwater most likely to be affected by an accidental discharge is at a depth o approximately 200 feet with a total dissolved solids concentration of approximately 130 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges t the surface will be managed.

(GW-120) - BHP-Petroleum (Americas) Inc., Fred Lowery, Operation Superintendent, P.O. Box 977, Farmington, New Mexico 87499, has submitted discharge plan application for their Pipkin Compressor Station located in the NW/4 Section 36, Township 28 North, Range 11 West, NMPM San Juan County, New Mexico Approximately 150 gallons per day of waste water with a total dissolved solid concentration of approximately 1100 mg/l is stored in an above ground steel tank prior t transport to an OCD approve off-site disposal facility. Groundwater most likely to b affected by an accidental discharge is at a depth of approximately 200 feet with a tota dissolved solids concentration of approximately 3700 mg/l. The discharge plan addresse how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-124) - BHP-Petroleum (Americas) Inc., Fred Lowery OperationsSuperintendent, P.O. Box 977, Farmington, New Mexico 87499, has submitte a discharge plan application for their Hammond Ditch Compressor Station located in th NW/4, Section 28, Township 29 North, Range 12 West, NMPM San Juan County, Nev Mexico. Approximately 210 gallons per day of washdown water with a total dissolve solids concentration of approximately 1100 mg/l is stored in an above ground steel tan prior to transport to an OCD approve off-site disposal facility. Groundwater most likely t be affected by an accidental discharge is at a depth of approximately 10 feet with a tota dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresse how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe New Mexico, on this 18th day of June, 1992.

STATE OF NEW MEXIC
OIL CONSERVATION DIVISIO
WILLIAM J. LEMAY, Directo

SEAL

Legal No 29665 published in the Farmington Daily Times, Farmington, New Mexic on Friday, June 26, 1992.

NOTICE OF PUBLICATION

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

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

(GW-122) - Williams Field Services, Robert Peacock, Project Manager, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their San Juan 29-6 No 4 C.D.P. Compressor Station located in the SE/4 SE/4, Section 19, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 2000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-121) - Williams Field Services, Robert Peacock, Project Manager, P.O. Box 58900, M.S. 10368, Salt Lake City, Utah 84158-0900, has submitted a discharge plan application for their San Juan 29-6 No. 2 CDP Compressor Station located in the NE/4 NE/4 and the NW/4 NE/4, Section 10, Township 29 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 5 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 1300 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-120) - BHP-Petroleum (Americas) Inc., Fred Lowery, Operations Superintendent, P.O. Box 977, Farmington, New Mexico 87499, has submitted a discharge plan application for their Pipkin Compressor Station located in the NW/4, Section 36, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 150 gallons per day of waste water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility.

Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 200 feet with a total dissolved solids concentration of approximately 3700 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-124) - BHP-Petroleum (Americas) Inc., Fred Lowery, Operations Superintendent, P.O. Box 977, Farmington, New Mexico 87499, has submitted a discharge plan application for their Hammond Ditch Compressor Station located in the SW/4, Section 28, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 210 gallons per day of washdown water with a total dissolved solids concentration of approximately 1100 mg/l is stored in an above ground steel tank prior to transport to an OCD approved off-site disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 18th day of June, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

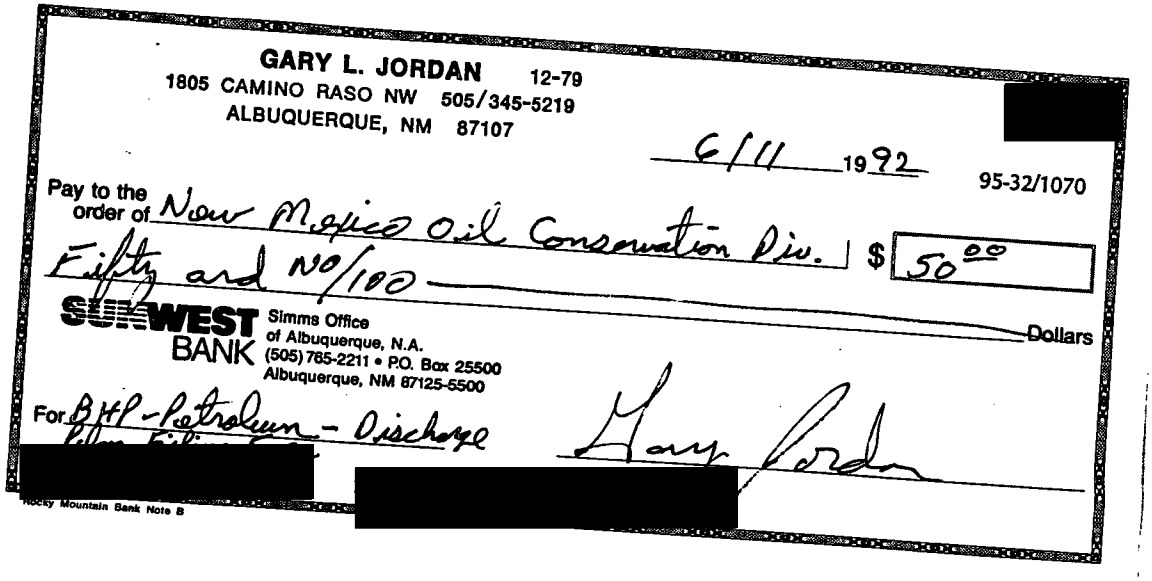
ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/11/92,
or cash received on 6/15/92 in the amount of $ 50.00
from Gary Jordan For BHP Petroleum
for Hammond Ditch Comp Sta GW-124
(Facility Name) (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: Roger Anderson Date: 6/15/92
Received in ASD by: Maria G. Bailey Date: 6/15/92
Filing Fee X New Facility X Renewal ___
Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 90

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___


GARY L. JORDAN 12-79
1805 CAMINO RASO NW 505/345-5219
ALBUQUERQUE, NM 87107
[redacted]
6/11 1992 95-32/1070
Pay to the order of New Mexico Oil Conservation Div. $ 50.00
Fifty and NO/100 Dollars
SUNWEST BANK Simms Office of Albuquerque, N.A. (505) 765-2211 • P.O. Box 25500 Albuquerque, NM 87125-5500
For BHP-Petroleum-Discharge Plan Fee [redacted]
Gary Jordan
[redacted]
Rocky Mountain Bank Note 8