

GW - 168

**GENERAL
CORRESPONDENCE**

YEAR(S):

2007-1994

Chavez, Carl J, EMNRD

To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD
Subject: Duke Energy Field Services- Note to File

On January 1, 2007, Wayne Price and Carl Chavez of the Oil Conservation Division (OCD) contacted Ruth Lang of Duke Energy Field Services at (303) 605-1713 and left a phone message regarding the large number of expired facilities (see attachment) where the discharge plan was not renewed within 120 or in advance of their expiration. Wayne Price referred to Ms. Lang's December 2, 2006 e-mail message regarding "Duke Energy Field Services Expired Discharge Plan Facilities."

Mr. Price informed Ms. Lang that all discharge plan renewal applications need to be submitted to the OCD for review by March 1, 2007. In addition, she was informed that the OCD will be issuing an Notice of Violation for neglecting to renew its discharge plan permits with the OCD.

Carl J. Chavez, CHMM
New Mexico Energy, Minerals & Natural Resources Dept.
Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
Fax: (505) 476-3462
E-mail: CarlJChavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>
(Pollution Prevention Guidance is under "Publications")

Permit ID	Facility	Company	Status	Expired	Contact	phone	e-mail	Comments
150	Pure Gold "28" CS	Duke	A	11/22/03	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
162	Antelope Ridge Gas Plant	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
167	Malaga CS	Duke	A	7/25/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
311	Cotton Draw CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
316	Hat Mesa CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
176	Boot Leg CS	Duke	A	1/20/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
227	Lee CS	Duke	I	12/28/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Submitted correspondence to Ben Stone during meeting in Sept. 2006
168	Feagen Booster Station	Duke	I	12/27/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 2/1/05
177	Maljamar CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
178	Wonton CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
24	Avalon Gas Plant	Duke	A	9/18/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
163	Apex CS	Duke	A	4/29/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
175	Hobbs Gas Process Plant	Duke	A	1/9/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
16	Eunice Gas Plant	Duke	A	4/25/09	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
139	CP-1 CS	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 10/15/03
42	Indian Hills Gas Plant	Duke	I	4/6/2002	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Dismantled



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

February 1, 2005

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Mr. Stephen Weathers
Duke Energy Field Services
370 17th Street, Suite 2500
Denver, Colorado 80202

**RE: Closure Workplan
Feagan Booster Station GW-168**

Dear Mr. Weathers:

The New Mexico Oil Conservation Division (OCD) received the Closure workplan for the Feagan Booster Station located in UL-N of Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. The workplan, dated January 19, 2005, was submitted in accordance to the stipulations issued with the discharge permit GW-168 approved February 4, 2000. **The Closure Workplan is hereby approved, with the following conditions:**

- Notification shall be provided to Mr. Mike Bratcher, OCD Artesia District Office at least 48 hours prior to commencement of work.
- All of the items listed in the workplan, dated January 19, 2005 shall be adhered with during the Closure process.
- Upon completion of the project a final report for the closure of the facility shall be submitted to the Santa Fe OCD office for approval within 30 days of final closure.

Note, that OCD approval does not limit Duke Energy Field Services to the work proposed should it later be found that contamination exists which is beyond the scope of this plan, or if Duke Energy Field Services has failed to completely define the extent of contamination. In addition, OCD approval does not relieve Duke Energy Field Services of responsibility for compliance with any other Federal, State, or other Local Laws and Regulations.

If you have any questions regarding this matter feel free to call me at (505)-476-3489.

Sincerely,

W. Jack Ford, C.P.G.
Environmental Bureau, OCD

cc: OCD Artesia District Office



DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 2500
Denver, CO 80202
303 595 3331

January 19, 2005

Mr. Jack Ford, C.P.G.
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

**RE: Closure Workplan
Feagan Booster Station, Eddy County New Mexico (GW-168)
Unit N (SE/4 SW/4), Section 31, Township 19 South, Range 25 East**

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has prepared the following workplan to complete a site closure at the DEFS Feagan Booster Station (GW-168) also known as the Feagan South Booster Station located in Eddy County, New Mexico (Figure 1). The closure workplan was developed based on DEFS decision to cancel discharge plan GW-168 and close the site. Under the discharge plan, a closure plan must be submitted to the New Mexico Oil Conservation Division (NMOCD) for approval prior to the expiration of the current discharge plan. The discharge plan expired on December 27, 2004. DEFS requested and was granted an extension until January 27, 2005 to submit the closure plan.

BACKGROUND INFORMATION

The site is located approximately 21 miles northwest of Carlsbad in Eddy County, New Mexico. The legal description is Unit N of Section 31, Township 19 South, Range 25 East (Latitude 32° 36' 48"; Longitude 104° 31' 31"). The site is relatively flat with a gentle slope to the north and east. Groundwater across the site is estimated to be 220 feet below ground surface (bgs) based on the New Mexico Office of State Engineers water well database.

The original site plan of the facility can be found on Figure 2. Based on the site plan and discussions with field personal, the remaining equipment onsite only consists of:

- One 500 bbl Tank
- Scrubber
- Underground piping

CLOSURE ACTIVITIES

The anticipated closure activities associated with the Feagan Booster Station will entail DEFS removing all remaining equipment from the site. During the closure activities, the site will be visual inspected to determine if any hydrocarbon-impacted soil is present at the site. If no hydrocarbon-impacted soil is encountered, the site will be leveled and reseeded with native grass.

If hydrocarbon-impacted soils are encountered at the site, the impacted soil will be remediated following the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases, August, 1993* and using the site characteristics as discussed in the following table to determine the remedial goals for this site.

NMOCD Ranking Criteria for the DEFS Feagan Booster Station		
Criteria	Site Characteristic	Ranking Score
Depth to Water*	220' bgs	0
Well Head Protections	> 1000 feet	0
Distance to Surface Water	> 1000 feet	0
Ranking Score		0

*New Mexico Office of State Engineers water well database.

Based on the above site specific ranking score, hydrocarbon-impacted soil, if encountered, will be remediated to the following clean up levels:

- Benzene - 10 parts per million (ppm)
- BTEX - 50 ppm
- TPH (EPA 8015m) - 5000 ppm

A photo ionization detector (PID) might be used to screen potential hydrocarbon-impacted soil. If the headspace reading is ≤ 100 ppm, the PID reading will be used as a substitute to laboratory analysis for benzene/BTEX. If the PID is not used for screening, confirmation soil samples will be analyzed for BTEX using EPA Method 8021B.

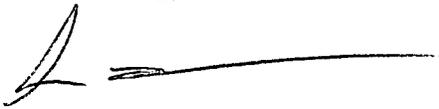
Hydrocarbon-impacted soil that is found to be higher than the clean up criteria will be excavated and properly disposed at an NMOCD approved facility. Discrete confirmation soil samples will then be collected within the base and sidewalls of the excavation to confirm that the hydrocarbon-impacted soils have been removed to below the NMOCD clean up standards for this site.

After the confirmation soil samples confirm the impacted soil has been removed to below the NMOCD clean up standards, the excavation will be backfilled with clean fill material and the area reseeded with native grass.

A closure report will be completed summarizing all field activities and analytical results. The closure report will also request that no further action will be needed at this site.

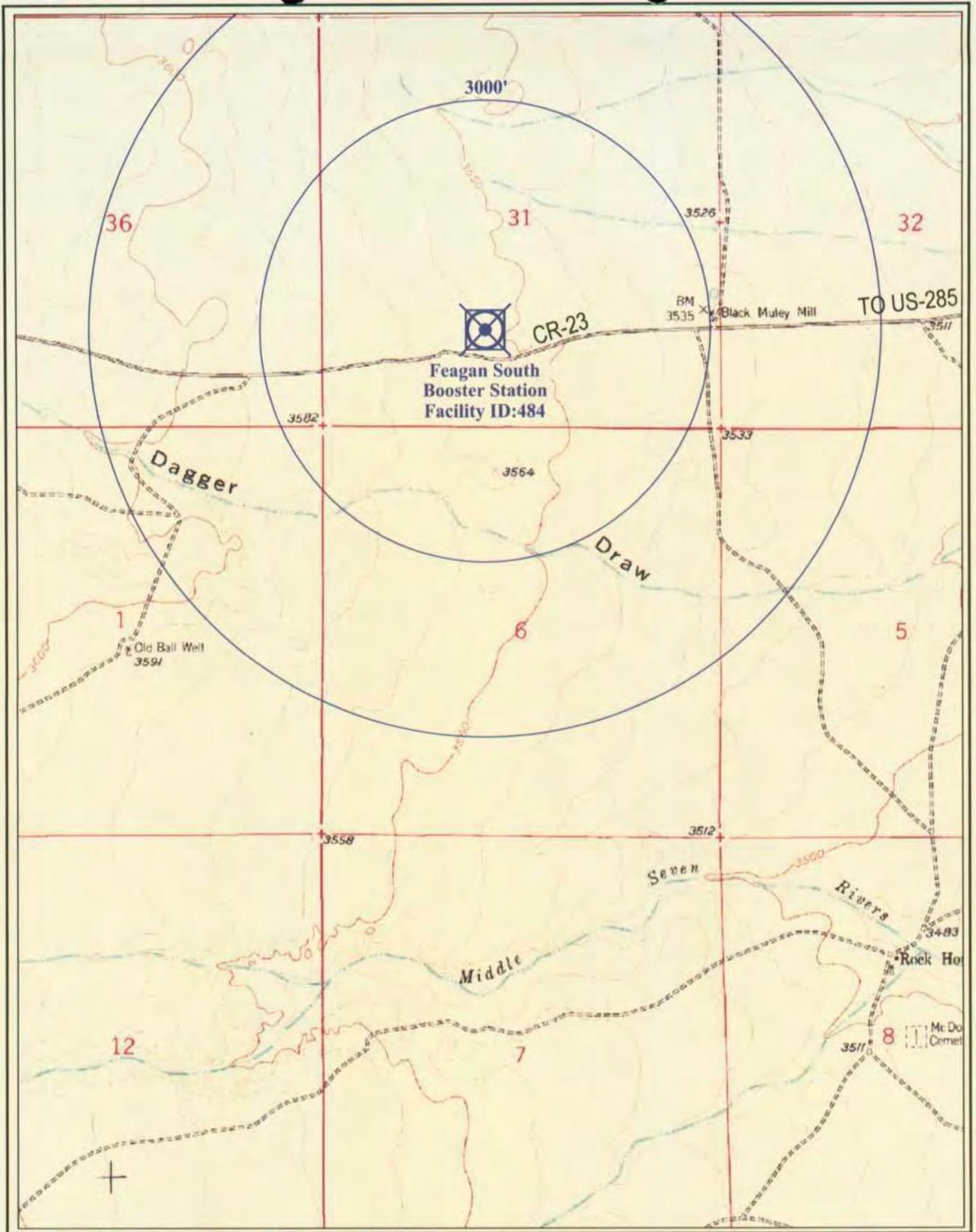
Upon your approval of this workplan, field activities will be scheduled. A 48 hour notice will be given to the NMOCD Artesia district office informing them of the start up of the field activities. If you have any questions pertaining to this closure workplan, please give me a call at 303-605-1718.

Sincerely
Duke Energy Field Services, LP



Stephen Weathers P.G.
Sr. Environmental Specialist

cc: NMOCD Artesia District Office
Boyd Fortin – DEFS Midland Office
Johnny Lamb – DEFS Carlsbad



Duke Energy®
Field Services

Feagan South Booster Station

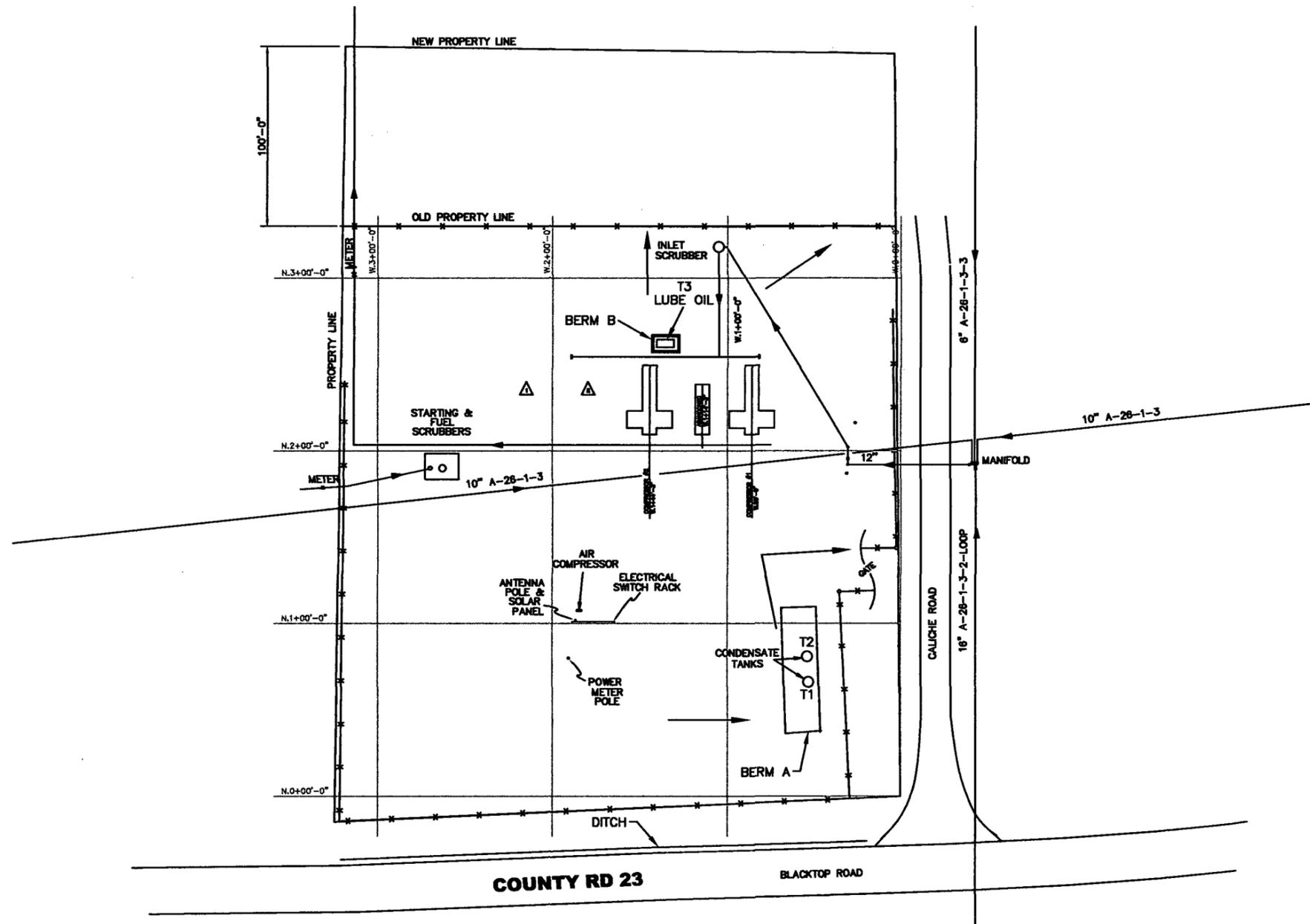
Eddy County, New Mexico
Zone 13 UTMH 544539m UTMV 3608522m
Lat. 32° 36' 48" Long. 104° 31' 31"

PHOTO VERIFIED

VICINITY



32104E5 Foster Ranch
Source: USGS 1:24,000 scale
Drawn by: JRE
Revised by:
Date 1-25-05
ENVIRONMENTAL
AFFAIRS DEPARTMENT



NOT TO SCALE
NOTE: SCALE IS APPROXIMATE.
DRAWING IS BASED ON A
FIELD SKETCH; ACTUAL
FACILITIES MAY VARY IN SIZE
AND POSITION FROM THOSE
REPRESENTED HERE.

FIGURE 2

**FEAGAN SOUTH BOOSTER STATION
DAGGER DRAW GATHERING SYSTEM**

**Eddy County
NEW MEXICO**

\\data\EhsDrawings\Mapping\NewMexico\DaggerDraw\FeaganSouth_Plot

REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.	REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.
0	1-25-05	DRAWN FROM PENDERGAST SKETCH (11-11-00)	J.R.E.	S.W.W.									





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

January 3, 2005

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Mr. Stephen Weathers PG
Duke Energy Field Services
370 17th Street, Suite 2500
Denver, Colorado 80202

**RE: Closure Plan Extension
Feagan Compressor Station GW-168
Eddy County, New Mexico**

Dear Mr. Weathers:

The New Mexico Oil Conservation Division is in receipt of your request to extend the submittal of a closure plan for the Feagan Compressor Station facility to January 31, 2005. The extension is hereby granted.

If you have any questions please contact me at (505) 476-3489.

Sincerely,

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



DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 2500
Denver, CO 80202
303 595 3331

RECEIVED

DEC 27 2004

Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505

December 22, 2004

Mr. Jack Ford
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

**RE: Duke Energy Field Services
Feagan Compressor Station (GW-168)
Eddy County, New Mexico**

Dear Mr. Ford:

In your letter dated August 2, 2004, you requested Duke Energy Field Services, LP (DEFS) submit a closure workplan by December 27, 2004 for the DEFS Feagan Compressor Station located in SE/4 SW/4 (UL N) of Section 31, Township 19 South, Range 25 East, Eddy County, New Mexico. The request for the closure plan was based on DEFS decision to cancel discharge plan GW-168.

DEFS would like to request an extension for submitting that closure workplan until January 28, 2005. DEFS operations had considered restarting some part of the operations at the site, but recently determined not to move forward with the restart.

If you have any questions regarding the extension request, please call me at 303-605-1718.

Sincerely

Duke Energy Field Services, LP

Stephen Weathers PG
Sr. Environmental Specialist

OF DEFS decision to cancel discharge plan GW-168
make a closure workplan by December 27, 2004 for the DEFS Feagan
Compressor Station located in SE/4 SW/4 (UL N) of Section 31, Township 19 South,
Range 25 East, Eddy County, New Mexico. The request for the closure plan was based
on DEFS decision to cancel discharge plan GW-168.



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

August 2, 2004

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

Ms. Karin Char Kimura
Duke Energy Field Services
P.O. Box 5493
Denver, Colorado 80202

**RE: Feagan Compressor Station GW-168
Eddy County, New Mexico**

Dear Ms. Kimura:

The New Mexico Oil Conservation Division is in receipt of your letter, dated July 27, 2004, regarding the discontinuance of operations at the Feagan Compressor Station located in the SE/4 SW/4 of Section 31, Township 19 South, Range 25 East, Eddy County, New Mexico. If Duke Energy Field Services does not wish to renew the discharge permit (GW-168) for this facility a closure workplan will be required to be submitted for approval as stipulated in Item 16 of Attachment of Conditions of the discharge permit approved February 4, 2000.

Please furnish the New Mexico Oil Conservation Division Santa Fe office with two copies of the workplan and one copy to the Oil Conservation Division Artesia District Office. The closure workplan should be submitted prior to expiration of the current discharge permit of December 27, 2004.

If you have any questions please contact me at (505) 476-3489.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Jack Ford".

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

cc: Artesia OCD District Office



DUKE ENERGY FIELD SERVICES
370 17th Street
Suite 900
Denver, CO 80202
303 595 3331

RECEIVED

AUG 02 2004

OIL CONSERVATION
DIVISION

July 27, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED (Article No. 7003 2260 0003 4604 9305)

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

SUBJECT: Feagan Compressor Station
Discharge Plan No. GW-168
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) is in receipt of the New Mexico Oil Conservation's (OCD) discharge plan renewal notice dated July 12, 2004. Please be advised that the facility is no longer operational; all of the equipment has been removed from the site or taken out of service. Therefore, DEFS does not intend to renew this discharge plan.

Please send any correspondence regarding this matter to Duke Energy Field Services, LP, 370 17th Street, Suite 2500, Denver, CO 80202. If you have any questions regarding this matter, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Kimura
Environmental Specialist

cc: NMOCD District 2 Office (Certified Mail Return Receipt Requested Article No. 7003 2260 0003 4604 9312)
1301 W. Grand Avenue
Artesia, NM 88210



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

July 12, 2004

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

Ms. Karin Char Kumura
Environmental Scientist
Duke Energy Field Services, Inc.
P.O. Box 5493
Denver, Colorado 80217

**RE: Discharge Plan GW-168 Renewal
Fegan Compressor Station
Eddy County, New Mexico**

Dear Ms. Kumura:

On February 4, 2000, the groundwater discharge plan renewal, GW-168, for the Duke Energy Field Services, Inc. Fegan Compressor Station located in the SE/4 SW/4 of Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan renewal was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years beginning in 1999. **The approval will expire on December 27, 2004.**

If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed. **Pursuant to 20 NMAC 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, 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 Duke Energy Field Services, Inc. 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 **Fegan Compressor Station** is subject to 20 NMAC 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$100.00 plus a flat fee equal to \$1,700.00 for compressor facilities with greater than 1,001 horsepower rating. The \$100.00 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.

Ms. Karin Char Kumura

July 12, 2004

Page 2

Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Artesia District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request** A complete copy of the regulations is also available on OCD's website at www.emnrd.state.nm.us/ocd/.

If the Fegan Compressor Station no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Duke Energy Field Services, Inc. Company has any questions, please do not hesitate to contact me at (505) 476-3489.

Sincerely,



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

cc: OCD Artesia District Office

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 2-6-02
or cash received on _____ in the amount of \$ 49.50

from Duke Energy Field Services
for Fegan Booster Station GW-168

Submitted by: [Signature] Date: 2-14-02

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee New Facility _____ Renewal
Modification _____ Other _____

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER WITH VISIBLE FIBERS AND A TRUE WATERMARK ON THE REVERSE SIDE.

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

THE CHASE MANHATTAN BANK
Syracuse, NY 50-937/213

VOID [REDACTED] CHECK DATE 2/6/02 CHECK NUMBER [REDACTED]

NOT NEGOTIABLE AFTER 120 DAYS

CHECK AMOUNT ***\$49.50

Pay Forty-nine and 50/100 Dollars

To The Order Of NMED-
Water Quality Management Fund
NM Oil Conservation District
1220 South St Francis Drive

[Signature]
Authorized Signature

HOLD BETWEEN THUMB AND FOREFINGER. OR BREATHE ON COLORED BOX. COLOR WILL DISAPPEAR, THEN REAPPEAR.



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

February 7, 2002

RECEIVED

FEB 14 2002
Environmental Bureau
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Feagan Booster Station
Discharge Plan No. GW-168
Eddy County, New Mexico

Dear Mr. Ford:

On January 21, 2002, Duke Energy Field Services, LP (DEFS) submitted a check in the amount of \$345.50 as requested by NMOCD for the Feagan Booster Station discharge plan flat fee. As discussed in our telephone conversation on February 4, 2002, you indicated that the discharge plan flat fee should have been \$345.00. Therefore, there is an overpayment of \$0.50. However, since the discharge plan application fee of \$50.00 was not submitted by GPM when the discharge plan was renewed in February 2000, per your instruction, DEFS submits the enclosed check in the amount of \$49.50 for the Feagan Booster Station discharge plan application fee.

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

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

Enclosure

cc: NMOCD District 2. Office
1301 W. Grand Avenue
Artesia, NM 88210

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 1/18/02
or cash received on _____ in the amount of \$ 345.50

from Duke Energy Field Services

for Feagan Booster CS GW-168
(Facility Name)

Submitted by: [Signature] Date: 1-29-02
(DP No.)

Submitted to ASD by: _____ Date: _____

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal
Modification _____ Other _____
(Category)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER WITH VISIBLE FIBERS AND A TRUE WATERMARK ON THE REVERSE SIDE.

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

THE CHASE MANHATTAN BANK
Syracuse, NY 50-937/213

Vendor No. 111615	Check Date 1/18/02	Check Number [REDACTED]
NOT NEGOTIABLE AFTER 120 DAYS		Check Amount ***\$345.50

Pay Three hundred forty-five and 50 / 100 Dollars

To The Order Of
NMED-
Water Quality Management Fund
NM Oil Conservation District
1220 South St Francis Drive

[Signature]
Authorized Signature

HOLD BETWEEN THUMB AND FOREFINGER; OR BREATHE ON COLORED BOX, COLOR WILL DISAPPEAR, THEN REAPPEAR.



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

January 21, 2002

CERTIFIED MAIL
RETURN RECEIPT

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

SUBJECT: Feagan Booster Station
Discharge Plan No. GW-168
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP submits the enclosed check in the amount of \$345.50 for the Feagan Booster Station discharge plan flat fee.

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

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

Enclosure



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

January 11, 2002

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 3929 7419

Ms. Karin Char
Duke Energy Field Services, LP
P.O. Box 5493
Denver, Colorado 80217

RE: Discharge Plan Fee GW-168
Artesia Gas Plant
Eddy County, New Mexico

Dear Ms. Char:

On February 7, 2000, GPM Gas Services (Duke Energy Field Services, LP), received, via certified mail, an approval dated February 4, 2000 from the New Mexico Oil Conservation Division (OCD) for discharge plan GW-168. Each discharge plan has a filing fee and a flat fee as described in WQCC Section 3114. A review of the files for this facility indicates that the OCD has not, as of this date (January 10, 2002), received either the filing fee or the flat fee for this facility. The last check submitted by GPM Gas Services (Duke Energy Field Services, LP) was dated August 9, 1995 in the amount of \$740.00 for the required flat fee for the discharge plan. The filing fee of \$50.00 and the flat fee of \$345.50 is due and payable for discharge renewal plan GW-168.

Duke Energy Field Services, LP will submit the remaining \$50.00 filing fee and the \$345.50 flat fee in full by February 28, 2002 in order to be in compliance with Water Quality Control Commission Regulation 3114.B.6, or the OCD may initiate enforcement actions which may include fines and/or an order to cease all operations at the facility. Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

If you have any questions regarding this matter, please contact Mr. Jack Ford at (505) 476-3489.

Sincerely,

Roger Anderson
Environmental Bureau Chief

RCA/wjf

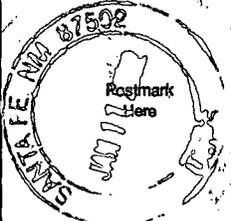
xc: Artesia OCD district office

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only. No Insurance Coverage Provided)

7001 1940 0004 3929 7419

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$



Sent To *R. Char*
Street, Apt. No.; or PO Box No. *Duke*
City, State, ZIP+4 *030-168*

FULBRIGHT & JAWORSKI L.L.P.

A REGISTERED LIMITED LIABILITY PARTNERSHIP

1301 MCKINNEY, SUITE 5100
HOUSTON, TEXAS 77010-3095

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

WRITER'S INTERNET ADDRESS:
elewis@fulbright.com

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

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

January 15, 2001

Re: Notification of Name Change to Duke Energy Field Services, LP

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

Dear Mr. Anderson:

In a February 16, 2000 letter addressed to you from Mel Driver of GPM Gas Company, LLC, Mr. Driver informed you that GPM Gas Company, LLC and Duke Energy Field Services, LLC were planning to undergo an internal corporate reorganization later in the year. As a result of this corporate reorganization, which has now taken place, facilities that were formerly operated under the name of GPM Gas Company, LLC are now being operated under the name of Duke Energy Field Services, LP. A chart that lists facilities with New Mexico Oil Conservation Division permits that are affected by this change is enclosed with this letter. Please update your records to reflect Duke Energy Field Services, LP as the permit holder for the facilities listed on the enclosed chart.

Thank you for your assistance, and please feel free to call me at (713) 651-3760 if you have any questions.

Very truly yours,



Edward C. Lewis

ECL/jnr

Mr. Roger Anderson
January 15, 2001
Page 2

cc: Ms. Nelda Morgan
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

Ms. Vicki Gunter
Duke Energy Field Services, LP
P. O. Box 50020
Midland, Texas 79710

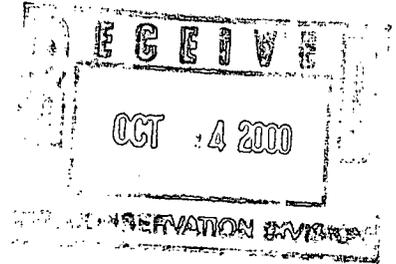
FACILITY NAME	PERMIT NUMBER	CURRENT NAME	NEAREST CITY
Artesia Plant	GW-168	GPM Gas Company, LLC	Artesia
Avalon Plant	GW-024	GPM Gas Company, LLC	Carlsbad
Eunice Plane	GW-009	GPM Gas Company, LLC	Eunice
Feagen	GW-168	GPM Gas Company, LLC	Artesia ✓
Hat Mesa	GW-128	GPM Gas Company, LLC	Hobbs
Hobbs	GW-044	GPM Gas Company, LLC	Hobbs
Indian Hills	GW-042	GPM Gas Company, LLC	Carlsbad
Lee Plant	GW-002	GPM Gas Company, LLC	Lovington
Linam Ranch Plant	GW-015	GPM Gas Company, LLC	Hobbs
Maljamar	GW-177	GPM Gas Company, LLC	Lovington
Sand Dunes	GW-142	GPM Gas Company, LLC	Loving
Won Ton	GW-178	GPM Gas Company, LLC	Lovington
Zia Plant	GW-145	GPM Gas Company, LLC	Maljamar



A New Kind of Energy

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

September 29, 2000



CERTIFIED MAIL
RETURN RECEIPT 7099 3220 0001 5281 6159

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

RE: Stormwater Run-off Plan Submittal
Feagan Compressor Station, Eddy County, New Mexico (GW-168)
Maljamar Compressor Station, Lea County, New Mexico (GW-177)
Won Ton Compressor Station, Lea County, New Mexico (GW-178)

Dear Mr. Ford:

Duke Energy Field Services, LLC respectfully submits the Stormwater Run-off Plans for the above facilities as required by the discharge plan approval conditions.

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

Sincerely,
Duke Energy Field Services, LLC

Karin Char
Environmental Specialist

Attachments

cc: Harley Temple Corp. File 2.2.3.3: Feagan CS, Maljamar CS, Won Ton CS
Mark Nault W. Permian Env. File 2.2.3.3: Feagan CS, Maljamar CS, Won Ton CS
Steve McNair Facility File 2.2.3.3: Feagan CS, Maljamar CS, Won Ton CS
Jack Braun
Vicki Gunter
Greg Hyde

STORMWATER RUN-OFF PLAN

FOR:

Feagan Compressor Station, Eddy County, New Mexico (GW-168)
Maljamar Compressor Station, Lea County, New Mexico (GW-177)
Won Ton Compressor Station, Lea County, New Mexico (GW-178)

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



NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

August 3, 2000

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9832

Ms. Karin Char
Duke Energy Field Services
P. O. Box 5493
Denver, Colorado 80217

RE: Stormwater Plan Submittal Extension
✓ GW-168, Feagan Compressor Station, Eddy County, New Mexico
GW-177, Maljamar Compressor Station, Lea County, New Mexico
GW-178, Won Ton Compressor Station, Lea County, New Mexico

Dear Ms. Char:

The OCD received on August 1, 2000, the letter request for a 90 day extension, dated May 30, 2000, from Duke Energy Field Services for the submittal of a stormwater runoff plan for the aboved captioned facilities. **The request for a 90 day extension based on the date requested would require the submittal by August 28, 2000, however, since the OCD did not receive the request until August 1, 2000 the extension for submittal of the stormwater run-off plans will be extented to October 3, 2000.**

Further, this approval does not relieve Duke Energy Field Services from liability should operations result in contamination to the environment. In the future extension requests received more than 30 days from dated request will be returned without action.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

cc: OCD Artesia District Office
OCD Hobbs District Office

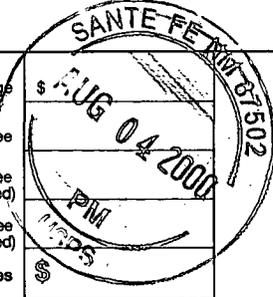
U.S. Postal Service
CERTIFIED MAIL RECEIPT *FORD* *OKD*
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:

[Redacted]

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Return Receipt Fee
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(Endorsement Required)
Total Postage & Fees \$



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Here

Name (Please Print Clearly) (To be completed by mailer)

K. Chal

Street, Apt. No., or PO Box No.

DEFS

City, State, ZIP+4

Denver

GW-168

PS Form 3800, July 1999

See Reverse for Instructions



AUG - 1 2000

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

May 30, 2000

CERTIFIED MAIL
RETURN RECEIPT 7099 3220 0001 5281 0904

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

RE: Request for Extension for Stormwater Run-off Plans

Dear Mr. Ford:

As discussed in our telephone conversation on July 26, 2000, due to the recent merger of GPM with DEFS, Inc., Duke Energy Field Services, LLC needs more time to adequately prepare stormwater run-off plans for the following former GPM facilities:

- Feagan Compressor Station (GW-168)
- Maljamar Compressor Station (GW-177)
- Won Ton Compressor Station (GW-178)

We understand that this is a discharge plan approval condition for the discharge plans for the above referenced facilities. The stormwater run-off plan for Feagan is due on August 4, 2000 and the stormwater run-off plans for Maljamar and Won-Ton Compressor Stations are due on August 11, 2000. Since DEFS, LLC only recently found out about this requirement and are in the process of familiarizing ourselves with these sites, we request a 90-day extension for the submittal of the stormwater run-off plans for the above referenced facilities. We also request a written response to our request.

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

Sincerely,
Duke Energy Field Services, LLC

Karin Char
Environmental Specialist

cc: Harley Temple
Mark Nault
Steve McNair
Jack Braun
Vicki Gunter

Corp. File 2.2.3.3: Feagan CS, Maljamar CS, Won Ton CS
W. Permian Env. File 2.2.3.3: Feagan CS, Maljamar CS, Won Ton CS
Facility File 2.2.3.3: Feagan CS, Maljamar CS, Won Ton CS

The Santa Fe New Mexican

Since 1849 We Read You.

NM OIL CONSERVATION DIVISION
ATTN: LUPE SHERMAN
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER: 111364 ACCOUNT: 56689
LEGAL NO: 66162 P.O.#: 0019900278
214 LINES 1 time(s) at \$ 94.22
AFFIDAVITS: 5.25
TAX: 6.22
TOTAL: 105.69

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, Betty Peiner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #66162 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/01/1999 and 10/01/1999 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 1 day of October, 1999 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

1/s/

Betty Peiner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
30 day of September A.D., 1999

Notary

Commission Expires 2-13-2001

Industry. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 140 to 160 feet with a total dissolved solids concentration of 2500 to 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 27th day of September, 1999.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY

NOTICE OF PUBLICATION

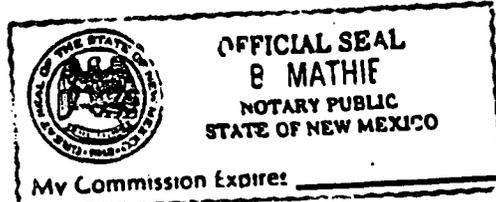
STATE OF NEW MEXICO
ENERGY, MINERALS
AND NATURAL
RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION

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

(GW-168) - GPM Gas Services Company, Mel D. Driver, (915) 620-4142, 3300 North "A" Street, Building 7, Midland, Texas 79705-5421, has submitted a discharge renewal application for the Feagan South Compressor Station located in the SE/4 SW/4 of Section 31, Township 19 South, Range 23 East, NMPM, Eddy County, New Mexico. There are no anticipated waste discharges from the facility. Ground water most likely to be affected in the event of an accidental discharge is at a depth ranging from 30 to 130 feet with a total dissolved solids concentration ranging from approximately 1,720 mg/l to 5,100 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(BW-009) - Sims-McCasland Water Sales, Bob Patterson, Manager, P.O. Box 99, Eunice New Mexico, 88231, has submitted an application for the renewal of a discharge plan for the Sims-McCasland Brine Station, located in the NE/4 NE/4 of Section 32, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 200 barrels per day of brine water with a TDS of approxi-

APPROVED BY
W. P. C. - O.C.D. J
10/18/99



Affidavit of Publication

NO. 16735

STATE OF NEW MEXICO

County of Eddy:

Gary Scott being duly

sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and county and state, and that the here to attached

Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks/days on the same day as follows:

First Publication October 5 1999

Second Publication _____

Third Publication _____

Fourth Publication _____

Subscribed and sworn to before me this

6th day of October 1999

Barbara Ann Beans
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 2003

Copy of Publication:

Section 31, Township Range 25 East, NM County, New Mexico no anticipated waste from the facility. It is most likely to be affected by an accidental spill at a depth ranging from 1 to 2 feet with a total dissolved concentration ranging from approximately 1,720 to 5,100 mg/l. The discharge addresses how spills, other accidental discharge surface will be managed. Any interested person for further information from Conservation Division submit written comment to the Director of the Oil Conservation Division at the address above. The discharge publication(s) may be viewed above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on proposed discharge plan(s), the Director of Conservation Division shall at least thirty (30) days date of publication of the during which comments submitted and public hearing

LEGAL NOTICE

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

Notice is hereby given that pursuant to New Mexico Quality Control Commission Regulations, the following discharge plan application(s) have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505. Telephone (505) 827-7131:
(GW-168) GPM Gas Services Company, Mel D. Driver, (915) 620-4142, 3300 North "A" Street, Building 7, Midland, Texas 79705-5421, has submitted a discharge renewal application for the Feagan South Compressor Station located in the SE/4 SW/4 of

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DEP.

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6:02 p.m.

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NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

February 4, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. Z-142-564-966

Mr. Mel Driver
GPM Gas Services Company
P.O. Box 50020
Midland, Texas 79710-0020

**RE: Discharge Plan Renewal GW-168
GPM Gas Services Company
South Feagan Compressor Station
Eddy County, New Mexico**

Dear Mr. Driver:

The ground water discharge plan renewal application GW-168 for the GPM Gas Services Company South Feagan Compressor Station located in the SE/4 SW/4 of Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on May 25, 1994 and approved December 28, 1994. The discharge plan renewal application, dated September 17, 1999, submitted pursuant to Sections 5101.B.3. of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Sections 5101.A. and 3109.C. Please note Section 3109.G., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve GPM Gas Services Company of liability should operations result in pollution of surface water, ground water, or the environment.

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

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

Mr. Mel Driver
GW-168 South Feagan Compressor Station
February 4, 2000
Page 2

Pursuant to Section 3109.G.4., this renewal plan is for a period of five years. This renewal will expire on **December 27, 2004**, and GPM Gas Services Company should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan .

GPM Gas Services Company will submit a storm water run-off plan for approval by the OCD within six (6) months of the date of this approval letter for the South Feagan Compressor Station facility.

The discharge plan renewal application for the GPM Gas Services Company South Feagan Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50. There is a renewal flat fee assessed for gas compressor facilities, with horsepower between 1001 and 3000 horsepower, equal to one-half of the original flat fee or \$345.50. The OCD has not received the filing fee.

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

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Artesia Office

Z 142 564 966

OCD
Ford

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

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Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 2.55
Postmark or Date	GW-168

PS Form 3800 April 1995

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-168
GPM GAS SERVICES COMPANY
SOUTH FEAGAN COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(February 4, 2000)

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has not been received by the OCD and is payable upon receipt of this approval. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations. The renewal flat fee required for this facility is \$345.50 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.
2. GPM Gas Services Company Commitments: GPM Gas Services Company will abide by all commitments submitted in the discharge plan renewal application dated September 17, 1999 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every 5 years. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Closure: The OCD will be notified when operations of the South Feagan Compressor Station are discontinued for a period in excess of six months. Prior to closure of the South Feagan Compressor Station a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Certification: GPM Gas Services Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. GPM Gas Services Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

GPM GAS SERVICES COMPANY

by _____
Title

NOTICE OF PUBLICATION

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

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

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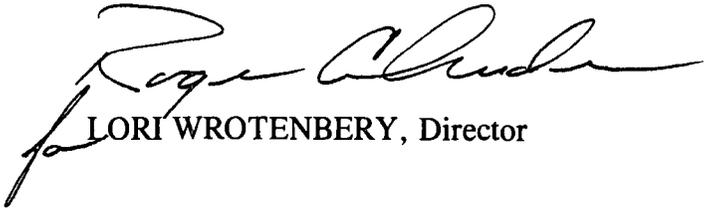
(BW-009) - Sims-McCasland Water Sales, Bob Patterson, Manager, P.O. Box 99, Eunice New Mexico, 88231, has submitted an application for the renewal of a discharge plan for the Sims-McCasland Brine Station, located in the NE/4 NE/4 of Section 32, Township 21 South, Range 37 East, NMPM, Lea County, New Mexico. Approximately 200 barrels per day of brine water with a TDS of approximately 300,000 mg/l is produced for use in the oil industry. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of 140 to 160 feet with a total dissolved solids concentration of 2500 to 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico,
on this 27th day of September 1999.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


LORI WROTENBERY, Director

SEAL

P 326 937 180

00D / J. FORD
6W-168

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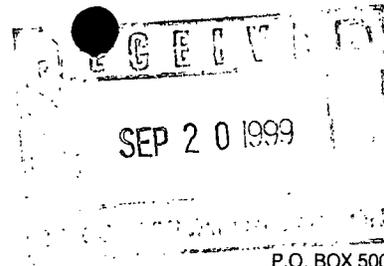
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PS Form 3800, April 1995



GPM GAS CORPORATION

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



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

September 17, 1999

Mr. Roger Anderson
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

**RE: Discharge Plan Renewal
Feagan South Compressor Station
Discharge Plan GW-168**

Dear Mr. Anderson:

Submitted herewith is the application to renew the ground water discharge plan (GW-168) for GPM's Feagan South Compressor Station in Eddy County, New Mexico in accordance with Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals.

GPM has operated Feagan South Compressor Station in accordance with the terms and conditions of Groundwater Discharge Plan GW-168. GPM has made no major changes to Feagan South Compressor that would change the quantity or quality of the discharges since the original discharge plan went into effect and would like to renew the discharge plan under the present terms of the existing permit.

Please do not hesitate to contact me at (915) 620-4142 should you have any questions or require additional information.

Sincerely,

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



GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

August 15, 1995



Mr. Mark Ashley
Geologist
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
P.O. Box 6429
Santa Fe, New Mexico 87505-6429

RE: **Discharge Plan GW-168**
Feagan South Compressor Station
Eddy County, New Mexico

Dear Mr. Ashley:

Groundwater Discharge Plan GW-168 for the GPM Gas Corporation (GPM) Feagan South Compressor Station was approved by the New Mexico Oil Conservation Division (OCD) on December 28, 1994. The Feagan South Compressor Station is located in the SE4 SW4 of Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico.

Discharge Plan GW-168 is subject to Water Quality Control Commission Regulation 3-114.B.6, "discharge plan fee". As such, GPM is pleased to submit to the OCD the attached payment of seven hundred forty dollars (\$740) payable to **NMED - Water Quality Management**, which is equal to the sum of the filing fee of fifty dollars (\$50) plus the flat rate of six hundred ninety dollars (\$690).

On behalf of GPM, I would like to thank you for your continued cooperation in support of our operations in New Mexico. If you have any questions regarding this matter, please contact me at (915) 368-1085.

Sincerely,

Vince Bernard
Safety & Environmental Director
New Mexico Region

VBB
Attachment

cc: Tim Gum, OCD Artesia Office
Ray Smith, OCD Artesia Office

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/19/95
or cash received on 8/22/95 in the amount of \$ _____
from GPM Gas Svcs.

for Feagan South CS. GW-168
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Joseph Chandler Date: 9/1/95

Received in ASD by: Angie Alore Date: 9/1/95

Filing Fee New Facility Renewal _____

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____

WESTSTAR BANK, n.a.
BARTLESVILLE, OKLAHOMA

GPM GAS CORPORATION
BARTLESVILLE, OKLAHOMA 74004

86-82/103

8000027604

DATE: 08/09/95 CHECK NO. [redacted] AMOUNT: \$740.00

PAY TO THE ORDER OF EXACTLY *****\$740 DOLLARS AND 00 CENT

NEW MEXICO ENVIRONMENTAL DEPT
WATER QUALITY MANAGEMENT
2040 S. PACHECO
SANTA FE, NM 87505

GPM GAS CORPORATION 51

Joseph Chandler



OIL CONSERVATION DIVISION

August 2, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-751

Mr. Vince Bernard
 Safety & Environmental Supervisor
 GPM Gas Corporation
 4044 Penbrook
 Odessa, Texas 79762

RE: Discharge Plan Fees GW-168
South Feagan Compressor Station
Eddy County, New Mexico

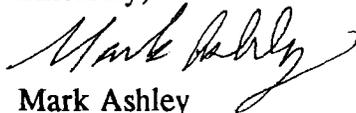
Dear Mr. Bernard:

On December 28, 1994, GPM Gas Corporation received, via certified mail, a letter from the New Mexico Oil Conservation Division (OCD) stating that the discharge plan GW-168 for the South Feagan Compressor Station, located in the SE4 SW4 of Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico was approved. In that letter it was also stated that, in accordance with Water Quality Control Commission Regulation 3-114.B.6, a \$50 filing fee and a \$690 flat fee were required upon receipt of the approval letter. As of this date, the OCD has not received either of the required fees. Please submit both fees by September 2, 1995.

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

If you have any questions regarding this matter, please contact me at (505) 827-7155.

Sincerely,



Mark Ashley
 Geologist

xc: Tim Gum, OCD Artesia Office
 Ray Smith, OCD Artesia Office

Z 765 962 751



**Receipt for
Certified Mail**
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

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

PS Form 3800, March 1993

DATE	INVOICE NO. (DESCRIPTION)	COMPANY	*VOUCHER NO.	GRC	DISCOUNT	NET
08-08-95	SEE BELOW NEW MEXICO ENVIRONMENT DEPARTMENT WATER QUALITY MANAGEMENT		JR H72500001		740.00	740.00
	FILING FEE AND FLAT FEE FOR OCD GROUNDWATER DISCHARGE PERMIT FOR GPM S FEAGAN COMPRESSOR STATION.					
	CHARGE 055100-20-860 \$740.00 FEAGAN BOOSTER EXP.					
	PAYEE NUMBER B000027604	CHECK DATE 08/09/95	CHECK NO. [REDACTED]		CHECK AMOUNT \$740.00	

* PLEASE REFER TO VOUCHER NUMBER WHEN MAKING INQUIRIES REGARDING THIS PAYMENT
DETACH THIS STATEMENT AND KEEP FOR TAX PURPOSES. DUPLICATES CANNOT BE FURNISHED.

THE ATTACHED CHECK IS IN FULL PAYMENT OF ITEMS STATED ABOVE. ENDORSEMENT MUST BE IDENTICAL WITH THE PAYEE DESIGNATED.

FORM 2301-00 4-93

WE DO NOT REQUIRE MONTHLY STATEMENTS. IF ANY INVOICES BECOME PAST DUE, PLEASE SEND US COPIES AT ONCE.

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



January 12, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-086

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

**RE: PROPOSED FACILITY NAME CHANGE
(GW-168) DAGGAR DRAW COMPRESSOR STATION
(GW-168) SOUTH FEAGAN COMPRESSOR STATION
EDDY COUNTY, NEW MEXICO**

Dear Mr. Bernard:

The Oil Conservation Division (OCD) has received your request dated January 4, 1995 to name of the Daggar Draw Compressor Station (GW-168) to South Feagan Compressor Station (GW-168).

Based upon the information provided your request is hereby approved.

If you have any questions, call me at (505) 827-7153.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Eustice".

Chris Eustice
Geologist

cc: Wayne Price - OCD Hobbs Office

VILLAGRA BUILDING - 408 Gallisteo

Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830

Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco

Office of the Secretary
827-5950

Administrative Services
827-5925

Energy Conservation & Management
827-5900

Mining and Minerals
827-5970

Oil Conservation
827-7131



GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

January 6, 1995

OIL CONSERVATION DIVISION
RECEIVED

95 JAN 12 AM 8 52

Mr. Chris Eustice - Geologist
State of New Mexico
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

**Re: Discharge Plan (GW-168)
Dagger Draw Compressor Station
Name Change**

Dear Chris:

As requested, this will serve as a written follow-up to my verbal notification to you this morning concerning the subject discharge plan. As we discussed, please change the name on discharge plan GW-168 from "Dagger Draw Compressor Station" to "South Feagan" Compressor Station. Once we receive the corrected discharge plan, we will disregard the current plan.

As we agreed, since this plan was approved and issued on December 28, 1994, an additional public comment period is not required to facilitate this name change. Please accept my apology for any inconvenience this may have caused you or your office. If I can be of any further assistance, please call me at (915) 368-1085.

Thank you for your assistance and prompt attention to this matter.

Sincerely,

Vince Bernard
Safety & Environmental Director
New Mexico Region

VBB:mdp

cc: G. R. Glinnsman
D. A. Stell
J. Kuchinski
S. J. Seeby
OCD Artesia Office
Maureen Gannon - GCL, Albuquerque



MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time	Date
-----------------------------------------------	-----------------------------------	------	------

<u>Originating Party</u>	<u>Other Parties</u>
Vince Bernard GPM Gas Services	Choi Justice OCT-EB

Subject Dogger Draw Compressor Station (GW-168)

Discussion

Total site rating horse power needed to determine the flat fee. Horse power not specified in application.

Conclusions or Agreements

2200 hp site ratings

Signature

Signed

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

OIL CONSERVATION DIVISION

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

(GW-168) GPM. Gas Corporation, Vincent Bernard, Safety and Environmental Supervisor, 4044 Ponbrook, Odessa, Texas, 79762, has submitted an application for a discharge plan for their Dagger Draw Compressor Station located in the SE/4 SW/4, Section 31, Township 18 South, Range 25 East, NMPM, Eddy County, New Mexico. There are no anticipated waste discharges from this facility. Groundwater most likely to be affected by a spill, leak or accidental discharge to the surface is at a depth ranging from 30 to 130 feet with a total dissolved solids concentration ranging from 1720 to 5100 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 and Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plans or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

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

GIVEN under the Seal of New Mexico, Conservation Commission at Santa Fe, New Mexico; on this 6th day of July, 1994.

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

Journal: October 6, 1994

OIL CONSERVATION DIVISION
RECEIVED

STATE OF NEW MEXICO

County of Bernalillo

ss

'94 NO: 7

AM 8 52

Bill Tafoya being duly sworn declares and says that he is Classified Advertising Manager of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 6th day of October, 1994 and the subsequent consecutive publications on _____, 1994

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 6th day of October 1994.

PRICE \$ 30.85

Statement to come at end of month.



OFFICIAL SEAL

Aegan Millage

NOTARY PUBLIC
STATE OF NEW MEXICO

My Commission Expires: May 30, 1998

CLA-22-A (R-1/93) ACCOUNT NUMBER C80932

Affidavit of Publication

No. 14759

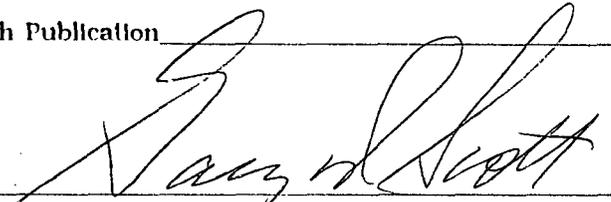
STATE OF NEW MEXICO.

County of Eddy:

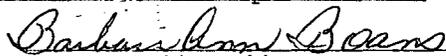
Gary D. Scott being duly sworn, says: That he is the Publisher of The Artesia Daily Press, a daily newspaper of general circulation, published in English at Artesia, said county and state, and that the hereto attached Legal Notice

was published in a regular and entire issue of the said Artesia Daily Press, a daily newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 consecutive weeks on the same day as follows:

First Publication September 2, 1994
Second Publication _____
Third Publication _____
Fourth Publication _____



Subscribed and sworn to before me this 20th day of September 19 94


Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

FILE COPY

Copy of Publication

Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth ranging from 30 to 130 feet with a total dissolved solids concentration ranging from 1720 to 5100 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 6th day of July, 1994.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY,
Director

SEAL
Published in the Artesia Daily Press, Artesia, N.M. September 2, 1994.
Legal 14759

LEGAL NOTICE

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application has been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:
(GW-168) - GPM Gas Corporation, Vincent Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for a discharge plan for their Dagger Draw Compressor Station located in the SE/4 SW/4, Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. There are no anticipated waste discharges from this facility.



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

'94 JUL 21 AM 8 50

July 15, 1994

William J. Lemay, Director
New Mexico Water Quality Control Commission
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to your agency's public notice dated July 6, 1994, regarding the State of New Mexico's proposal to renew the discharge plan for the applicant listed below.

(GW-58) - GPM Gas Corporation, Vincent Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa Texas, 79762

The applicant has submitted an application for a discharge plan for their Dagger Draw Compressor Station located in the SE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. No discharges are anticipated from this facility.

The U.S. Fish and Wildlife Service has no objection to the Oil Conservation Division granting approval for the discharge plan application outlined above.

Thank you for the opportunity to review and comment on this discharge plan application. If you have any questions, please contact Mark Wilson at (505) 883-7877.

Sincerely,

R. Mark Wilson

fw/Jennifer Fowler-Propst
State Supervisor

cc: Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico

NOTICE OF PUBLICATION

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

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

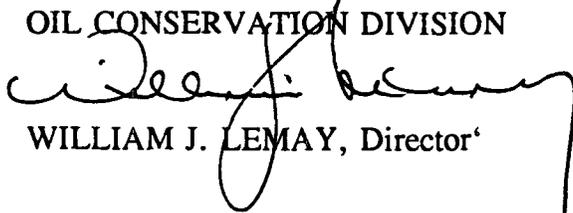
(GW-168) - GPM Gas Corporation, Vincent Bernard, Safety and Environmental Supervisor, 4044 Penbrook, Odessa, Texas, 79762, has submitted an application for a discharge plan for their Dagger Draw Compressor Station located in the SE/4 SW/4, Section 31, Township 19 South, Range 25 East, NMPM, Eddy County, New Mexico. There are no anticipated waste discharges from this facility . Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth ranging from 30 to 130 feet with a total dissolved solids concentration ranging from 1720 to 5100 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 6th day of July, 1994.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L



OIL CONSERVATION DIVISION
RECEIVED

June 10, 1994

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

INTER-OFFICE CORRESPONDENCE / SUBJECT:

Nearburg Compressor Station
Ownership and Operator Notification

William J. LeMay
Director, State of New Mexico
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. LeMay:

This letter is to serve as notification to the Oil Conservation Division that effective June 1, 1994, Feagan Gathering Company relinquished ownership and operation of its Nearburg Compressor Station located in Township 19 S., Range 25 E., Section 31, Eddy County, New Mexico. The subsequent contact and address of the new owner and operator is:

Vince Bernard
Environmental Supervisor
GPM Gas Corporation
4044 Penbrook
Odessa, Texas 79762

This notification is provided as per my telephone conversation of June 5, 1994 with Roger Anderson of your office.

Please contact me at (915) 368-1085 should you have any questions regarding this notification.

Sincerely,

Vince Bernard
Environmental Supervisor
New Mexico Region

Won-Tou Booster DP
Malajama 1g CS



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

STATE OF
 NEW MEXICO
 OIL
 CONSERVATION
 DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 1030 AM	Date 6-7-94
-----------------------------------------------	-----------------------------------	-----------------	----------------

<u>Originating Party</u> CHRIS EUSTICE	<u>Other Parties</u> Alice DAWSON FEAGAN GATHERING
-------------------------------------------	----------------------------------------------------------

Subject DISCHARGE PLAN APPLICATION FOR DAGGER DRAW CS
 Application had the wrong location

Discussion
 I asked Alice if she could give me the accurate location
 because apparently the Township & Range is wrong.
 Township 4 (Range 4 East seems wrong)

Conclusions or Agreements
 Alice agreed, it should be Range 25 East

<u>Distribution</u> File	<u>Signed</u>
-----------------------------	-------------------

Feagan Gathering Company
P.O. Box 50307
Midland, TX 79710-0307

May 25, 1994

Mr. William J. LeMay
Director, State of New Mexico
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

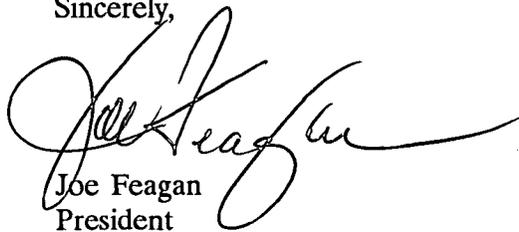
RE: DISCHARGE PLAN FOR DAGGER DRAW (NEARBURG) COMPRESSOR
STATION, EDDY COUNTY, NEW MEXICO

Dear Mr. LeMay:

Feagan Gathering Company is pleased to submit a discharge plan application for the Dagger Draw (Nearburg) Compressor Station located in Eddy County, New Mexico, 21 miles northwest of the town of Carlsbad. The site is owned and operated by Feagan Gathering Company of Midland, Texas.

If you have any questions regarding the contents of the attached discharge plan, please contact me at (915) 683-8442. We await your response concerning this application.

Sincerely,



Joe Feagan
President

Attachment

54030/NEARDP.LTR

**GROUNDWATER DISCHARGE PLAN
DAGGER DRAW (NEARBURG) COMPRESSOR STATION
EDDY COUNTY, NEW MEXICO**

I. TYPE OF OPERATION

The Dagger Draw (Nearburg) Compressor Station compresses approximately 7 MMSCFD of gathered sour natural gas from surrounding oil and gas wells. The station consists of two compressor packages. Each package includes a natural gas-fired compressor engine driving a compressor.

2600 hp

II. OPERATOR/LEGALLY RESPONSIBLE PARTY

Mike Feagan
Feagan Gathering Company
P.O. Box 50307
Midland, Texas 79710-0307

III. LOCATION OF FACILITY

The U.S. public land survey description for this site is Township 19 south, Range 4 east, Section 31, Eddy County, New Mexico. The site is located approximately 21 miles northwest of Carlsbad, New Mexico. Figure 1 is a location map of the site.

IV. LANDOWNER

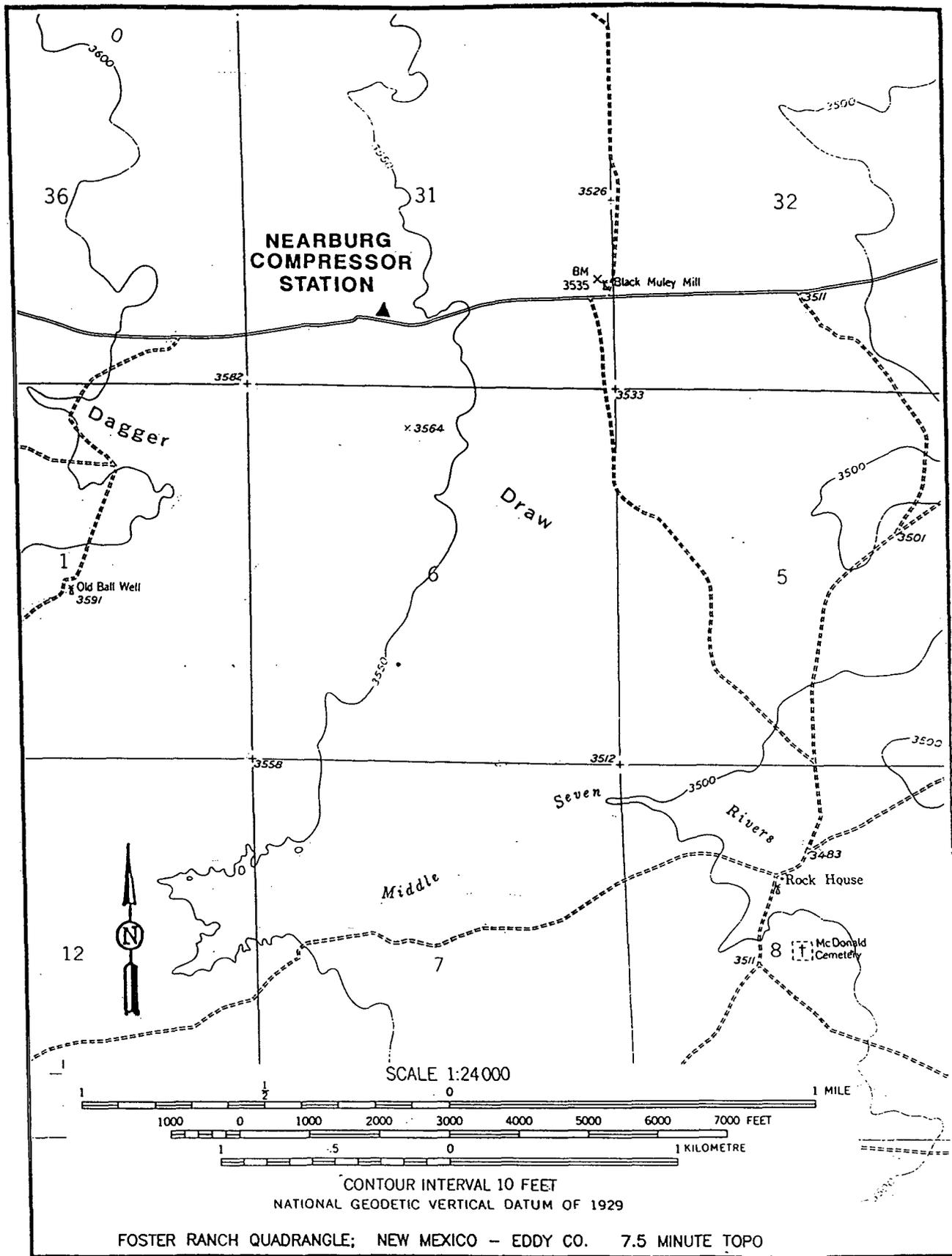
Carl Foster
P.O. Box 193
Artesia, New Mexico 88210

V. FACILITY DESCRIPTION

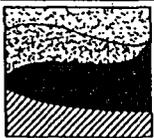
Figure 2 is a layout of the compressor station. The facility is on a 2.2-acre fenced site. The station consists of two natural gas-fired compressor engines powering one compressor each. Other equipment onsite includes one inlet scrubber, two elevated 550-gallon lube oil tanks, two 400-barrel oil storage tanks, two electronic gas meters, one chart-type meter, and associated process piping.

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

There is no water supply at the compressor station. Potable water for drinking is transported to the compressor station via the operator. There is no septic system, and there are no water or wastewater discharges to surface.

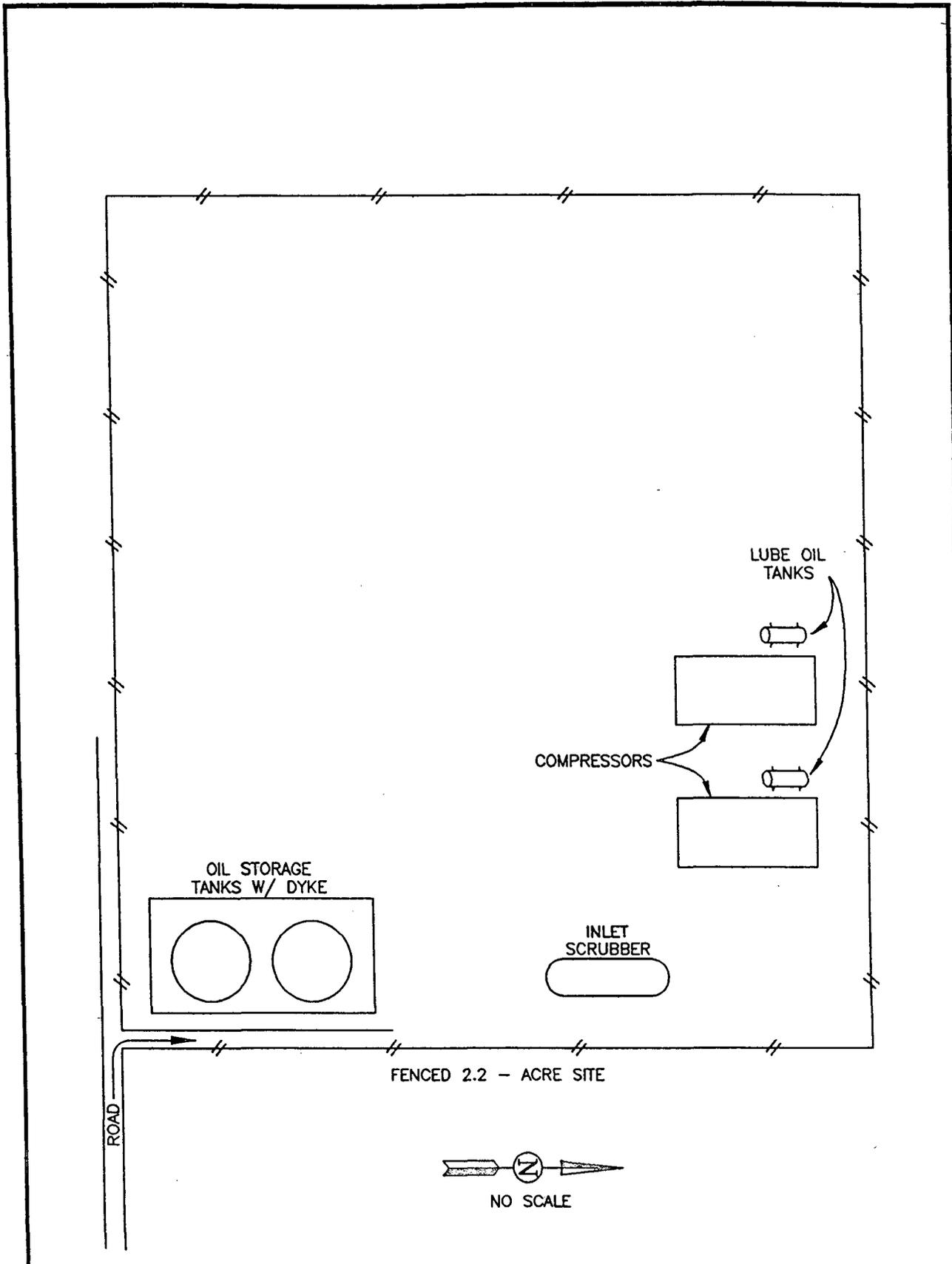


GCL

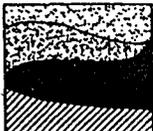


CLIENT: FEAGAN	
DATE: 5/25/94	REV. NO.: 0
AUTHOR: M.G.	DRAWN BY: HCC
CK'D BY: M.G.	FILE:

**FIGURE 1
DAGGER DRAW (NEARBURG)
COMPRESSOR
STATION
LOCATION MAP**



GCL



CLIENT: FEAGAN	
DATE: 5/25/94	REV. NO.: 0
AUTHOR: M.G.	DRAWN BY: HCC
CK'D BY: M.G.	FILE: NRBRG.DWG

**FIGURE 2
SITE MAP
DAGGER DRAW (NEARBURG)
COMPRESSOR STATION
EDDY COUNTY, NM**

A. Waste lubrication and motor oil

Compressor Systems Incorporated (CSI), located in Midland, Texas, performs maintenance on one compressor every other month (alternating monthly between the two compressors). Waste lubrication oil is removed from the compressor engines and placed in 55-gallon drums for storage. Within 1 to 10 days, Eddis-Walcher, located in Artesia, New Mexico, collects the drums of spent lube oil for transport to an oil recycler.

B. Waste and slop oil

Leaking engine and compressor operating liquids are contained and collected on concrete pads and piped to the oil storage tanks. Liquids exiting the inlet scrubber are also piped to these tanks. When full, contents of the these tanks are sold to an oil recycler.

C. Used filters

CSI, Inc., removes the spent oil filters during monthly maintenance, and packages and transports the filters offsite to an oil recycler.

D. Quality characteristics

There are no sources of major effluent (e.g. salt water, hydrocarbons, sewage, etc.) onsite.

E. Commingled waste streams

Produced and process fluids are not commingled within the facility.

VII. TRANSFER AND STORAGE OF PROCESS FLUIDS AND EFFLUENTS

A. The following is a summary of the transfer and storage procedures for process fluids and effluents present onsite:

- **Waste lubrication oil** - Spent lube oil is collected in 55-gallon steel drums and stored onsite until Eddis-Walcher collects the drums for shipment to an oil recycler.
- **Waste and slop oil** - Leaking engine oil and compressor fluids collect on the concrete pad under the compressor engines and drain to a depression in the pad where a two-inch pipe carries the waste oil to the oil storage tanks.
- **Used filters** - The spent oil filters are removed, drummed and transported immediately offsite by CSI for delivery to an oil recycler.

B. There is no water supply, or water or wastewater discharges onsite.

C. The status of transfer and storage collection units with regard to present or potential discharges to groundwater include below-ground pressurized process piping (transfer piping for natural gas) and drain lines from the engine pads to the oil storage tanks. As discussed previously, leaking engine and compressor operating liquids drain on the concrete pads underneath the compressor engines and are piped to the oil storage tanks. The oil storage tanks and lube oil tanks are aboveground.

D. The following design has have been incorporated into the facility storage system:

- The oil storage tanks are surrounded by an earthen dike designed to contain a volume of one-third more than the largest tank.

E. The compressor station including associated piping was built in 1992. No specifications exist on the process piping.

F. The following designs are proposed for the existing storage systems to provided adequate groundwater protection:

- Gravel pads will be placed beneath the lube oil tanks so that leaks can be readily identified. Construction of the gravel pads will take place by the third quarter of 1994.

VIII. EFFLUENT DISPOSAL

A. All effluents are shipped offsite. Refer to section VIII. B.

B. The following provides information on off-site disposal for the identified effluent sources (see section VI.):

1. **Waste lubrication oil**

Composition:	Waste oil
Shipping agent:	Eddis-Walcher Artesia, New Mexico
Final disposition:	ENE Recycling Plant P. O. Box 683 Brownsfield, Texas 79316

2. **Waste and slop oil**

Composition:	Engine oil and compressor operating liquids
Shipping agent:	No shipment to date
Final disposition:	None to date

3. Used filters

Composition:	Spent engine oil filters
Shipping agent:	CSI
Final disposition:	Brewer Oil Company Artesia, New Mexico

C. Proposed Modifications

None are planned at this time for the site.

IX. INSPECTION, MAINTENANCE, AND REPORTING

A. The compressor packages, lube oil tanks, oil storage tanks and drum storage area are inspected on a weekly basis for signs of spillage and leaks. In the event of a leak or spill of a reportable quantity with the potential to reach a navigable water, the operator will immediately notify Mike or Joe Feagan of Feagan Gas Gathering Company who in turn will notify the New Mexico Oil Conservation Division (NMOCD).

B. The compressor station is in a remote area. The topography is relatively flat and there is minimal potential for storm water runoff to reach a navigable water. Drain pads underneath the compressor engines provide containment for storm water in the event of accumulation.

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

A. On a weekly basis, the earthen berm surrounding the oil storage tanks will be inspected to ensure structural integrity. In addition, once gravel pads are placed at the lube oil tanks, weekly inspection will ensure integrity of these structures. Monthly maintenance on the compressor packages provides assurance that the compressors and engines are functioning properly and minimizes the possibility of spills or leaks.

Weekly inspection of the compressor site allows for early detection of leaks and spills. The aboveground tanks are visually inspected by operating personnel to observe any signs of deterioration, leaks which might cause a spill, or accumulation of recovered water or hydrocarbons inside the bermed area around the oil storage tanks.

B. In the event of a spill or leak discovered by an employee (or reported to an employee by an outside person), such employee will immediately notify the spill response coordinator of Feagan Gas Gathering Company (or designee) of the full details of the spill, including:

- Location of the spill or leak.

- Estimated:
 - 1) Quantity spilled and area covered.
 - 2) Rate of spill or leak.
 - 3) Time before spill would be carried off the compressor station site.
 - 4) Other factual information to assist in determining corrective action to be taken.

The coordinator, after being notified of details of the spill or leak, will determine the appropriate response based upon the magnitude and seriousness of the spill. If the coordinator determines that it is necessary, he or she will immediately dispatch a spill clean-up crew. If outside assistance is required, such as furnishing heavy equipment, a local contractor will be contacted by the coordinator. If the spill is deemed significant by the coordinator, he or she will be responsible for orally notifying the OCD Director within twenty-four hours of the spill and reporting the following information:

- Name and address of the facility,
- Fate, time, location and duration of the discharge,
- Source and cause of the discharge,
- Chemical composition of the discharge,
- Estimated volume of the discharge, and
- Any action taken to mitigate immediate damage from the discharge.

In the event of a reportable quantity, the coordinator will send written notification to the OCD Director verifying the prior oral notification and providing any appropriate additions or corrections. Within fifteen days after learning of the discharge, the coordinator will send a written report to the same official describing any corrective actions taken, or to be taken, relating to the discharge.

XI. SITE CHARACTERISTICS

A. Hydrologic Features

There are no perennial water bodies, streams or arroyos located within one mile of the outside perimeter of the Daggar Draw (Nearburg) Compressor Station. Daggar Draw and Middle Seven Rivers are intermittent arroyos located approximately 0.5 and 1 mile, respectively, south of the compressor station (see figure 1). Two small unnamed dry arroyos are located to the north of the facility. The North Seven Rivers, located further north of the compressor station, is also an intermittent arroyo. All of the arroyos in this area traverse longitudinally from east to west and drain towards the Pecos River basin. The Pecos River travels southeast to Lake Avalon, located 3.3 miles north of Carlsbad, New Mexico.

Black Muley Mill was identified as the only well within the study area. This well is believed to be used for agricultural purposes only.

Total dissolved solids (TDS) for the Pecos River below Brantley Dam near Carlsbad, New Mexico, ranges between 1720 and 5100 mg/l. TDS of groundwater within the study area was not determined. Depth to groundwater within the area ranges between 30 and 130 feet (USGS, 1990).

B. Geologic Description of Discharge Site

The site is believed to be underlain by the Valley Fill aquifer. According to the U.S. Department of Agriculture (1971), soils within a one-mile perimeter of the compressor station are made up of the Reagan-Upton association (45 percent) and the Reeves-Gypsum land-Cottonwood association (45 percent). The Reagan-Upton association is loamy, deep soils and soils that are shallow to caliche and have been formed by old alluvium. They are well-drained, moderately dark-colored, calcareous loams derived from sedimentary rock. The Reeves-Gypsum land-Cottonwood association is light-colored, well-drained, calcareous loamy soils that are very shallow to moderately deep which lie over gypsiferous earths and rocks. Both associations form gently undulating plains and low hills. The land in the vicinity of the station (within a 1 mile radius) is gently sloping with grades of zero to 3 percent; small areas (approximately 10 percent of the study area) to the north and south of the site experience a grade of 3 to 9 percent.

C. Flood Protection

Average precipitation for Carlsbad, New Mexico (located approximately 21 miles southeast of the station) is 12.67 inches (NM Dept. of Agriculture, 1984). The North Seven Rivers arroyo experienced no flow during the period of August 1989 to September 1990 (USGS, 1990). The South Seven Rivers, an intermittent arroyo feeding into the Middle Seven Rivers arroyo, had no flow for the period of August 1989 to September 1990. Average discharge for this arroyo over a 27 year period was 4.50 cfs or 3,260 acre-ft/yr. Flat topography at the site and lack of precipitation indicates that the potential for flooding at the site is minimal.

References

- U.S. Geological Survey, Open File Report, Summary of Basin and Flood Characteristics for Unregulated Basins in New Mexico, August 1981, pp. 18, 27.
- U. S. Department of Agriculture, Temperature and Precipitation Summaries for Selected New Mexico Locations, December 1984, pp. 39.
- U.S. Department of Agriculture, Soil Conservation Service, March 1971, Soil Survey, Eddy Area, New Mexico, sheet 71.
- U.S. Geological Survey, Water-Data Report NM-90-1, 1990, Water Resources Data Water Year 1990, Albuquerque, NM, pp. 253-257.