

GW - 197

**PERMITS,
RENEWALS,
& MODS
Application**



ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

RECEIVED OCD

2010 AUG 12 A 11:10

August 11, 2010

UPS Tracking No.: 1Z 875 525 03 4738 1767

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St. Francis
Santa Fe, New Mexico 87505

Re: Transwestern Pipeline Company, Monument Compressor Station, Renewal of
Discharge Plan GW-197, Lea County, New Mexico

Dear Mr. Lowe:

The Discharge Plan for the Transwestern Pipeline Company Monument Compressor Station expires on December 20, 2010. Therefore, by this letter, Transwestern is requesting renewal of GW-197 as required by Section 3106.F. There have been no process or construction changes at the facility since issuance the last discharge plan on December 22, 2005.

As required, a tear sheet of the public notice in English and Spanish as displayed in the local Carlsbad newspaper and the filing fee check (no. 541014384) in the amount of \$100.00 accompanies this letter request. Because the facility has experienced no process or construction changes, Transwestern used the same format and information in this public notice that was submitted in the public notices that were approved by your office for the December 2005 plan approval.

Should you have any questions or require any additional information concerning this renewal request, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022. Thank you very much for your assistance in this matter.

Sincerely,

Larry Campbell
Sr. Environmental Specialist

cc: Gallup Compressor Station
Envision 205.1.20
File

6381 N. Main
Roswell, NM 88201

Lowe, Leonard, EMNRD

From: Campbell, Lawrence (Larry) [Larry.Campbell@energytransfer.com]
Sent: Friday, July 02, 2010 11:07 AM
To: Lowe, Leonard, EMNRD
Subject: Public Notice Approval GW-197 and GW-325
Attachments: public notice 2010 english.doc; public notice 2010 english.doc

Leonard, please review the attached public notices and forward with comments. These two discharge plans expire this year.

Thanks

Larry Campbell

Transwestern
GW-197 Monument
12.20.10 Turbine C.S.
GW-325, Gallup C.S.
11.13.10
07.15.10 Larry Campbell will resend
Applications
08.11.10 Larry C. Notified of sending
& other bills late #

PUBLIC NOTICE

Transwestern Pipeline Company, 6381 North Main Street, Roswell, New Mexico 88201, has submitted a renewal application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan (GW-197) for their Monument Turbine Compressor Station located in Section 6 Township 21 South, Range 34 East NMPM, Lea County, New Mexico. The physical location of this remote facility is on highway 529 approximately 15 miles south of the intersection of highway 62-180. The mailing address of the facility is 6381 North Main Street, Roswell, New Mexico, 88201.

Materials generated or used at the facility include pipeline condensate liquid generated from the removal of entrained liquids in the natural gas, new and used compressor lubrication oil generated from the operation of the engine compressors, gear oil and oily waste water from engine or scrubber wash down. The wash down water amounts to approximately 10 gallons per week. All liquids utilized at the facility are stored in dedicated above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. All storage tanks are within properly engineered and OCD approved secondary containments. No onsite discharges are intentionally allowed to contact or enter surface or groundwater. The volume of discharges is zero and therefore, the quality of the discharges is not applicable. The aquifer most likely to be affected is 120 feet in depth.

Any interested person or persons may obtain information, submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.



ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

RECEIVED OOD

2010 SEP 13 A 8:31

September 8, 2010

Mr. Leonard Lowe
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87504

Re: Submittal of Discharge Plan Renewal Application, Transwestern Pipeline
Company, Monument Compressor Station, Lea County New Mexico, Discharge
Plan GW-197

Dear Mr. Lowe:

By this letter, Transwestern Pipeline Company is submitting the attached discharge
renewal application for the Monument Compressor Station.

Should you require any additional information concerning this renewal, contact the
undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell
Sr. Environmental Specialist

xc: envisions file no. 205.1.20
Carlsbad Team
file

**Transwestern Pipeline Company
Monument Compressor Station (GW-197)
Discharge Plan Renewal Application**

1. Type of Operation

The facility is a field natural gas pipeline compressor station with the following site rated horsepower: two (2) 1000 hp Solar Saturn turbines.

2. Name of Operator

The facility owner and operator is Transwestern Pipeline Company, 6381 North Main Street, Roswell, New Mexico, 88201. Facility contact is Randy Smith, (575) 885-8525. Larry Campbell is the Sr. Environmental Specialist, (575) 625-8022.

3. Location of the Discharge Plan Facility

The facility is located in the SE /4, section 6, T.21S, R.34 E, Lea County. GPS coordinates are N32 30.479 and W103.30 071. A USGS 7.5 minute map is presented in **Attachment A**.

4. Landowner

Refer to item no. 2 above.

5. Facility Description

A facility map accompanies this submittal in **Attachment A**.

6. Materials Stored or Used at the Facility

The following chemical volumes represent the storage capacities of the tanks at the facility. This may or may not represent the actual volume of liquids stored.

<u>Chemical</u>	<u>Solid/liquid</u>	<u>Container type</u>	<u>Volume</u>	<u>Location</u>
Turbine oil	Liquid	Tank	495 gal.	Between turbines
Condensate	Liquid	Tank	210 bbl	South corner of yard
Oily wastewater	Liquid	Tank	50 bbl	South corner of yard
Used Trubine oil	Liquid	Tank	50 bbl	South corner of yard
Hydraulic oil	liquid	Drum	55 gal.	South corner of yard

7A.Sources and Quantities of Effluent and Waste Solids Generated at the Facility

<u>Source</u>	<u>Mo. Generation Rate</u>	<u>Material</u>
<u>WASTES</u>		
Scrubbers/mist extractor/filter separators	0 gal	Pipeline condensate
Used Oil filters	0 lb	Used filters
Pipeline sludge	0 lb	Waste sludge
Oily wastewater	0 gal	Oily wastewater
Office and domestic wastes	0 lb	Waste Mgt. SE New Mexico
<u>CHEMICALS</u>		
Turbine oil	0 gal	Used oil

7B.(1-2) Quality Characteristics

Presented in **Attachment B** are the analytical reports for the waste streams which are listed above. Due to the infrequent operation of this facility, the analytical reports for the waste streams are historic in nature or not analyzed. In **Attachment C** find the MSDS for the above listed chemicals.

(3).This facility is currently inactive. Because of this fact, the compressor station generates extremely small quantities or no quantities of the above listed used or spent materials. All chemicals and or waste materials are stored in segregated containers (drums and or tanks) with concrete secondary containments.

(4).Transwestern does not use chemicals that are defined as toxic or will generate a hazardous waste.

(5).Because Transwestern collects all waste materials in dedicated drums and or tanks, grab samples are the collection methodology Transwestern employs to obtain sample collections for liquids and solids.

(6).Because Transwestern employs the grab method of sample collection, the normal variation of this sample methodology is expected.

7C.All waste streams at this facility have been segregated and contents are stored in dedicated drums and tanks.

8A.Description of Current Liquid and solid Waste Collection /Storage/Disposal Procedures

(B1). All new and or spent liquid chemicals and wastes are directed through underground piping and stored in dedicated above ground tanks. Pipeline liquids, oily wastewater and used turbine oil are transferred via underground piping to

dedicated above ground tanks. All solid wastes are stored in above ground dedicated drums or containers. The transfer of liquids in the underground lines are completed via pressurized natural gas which moves the liquids into dedicated above ground tanks.

(B2). All drum and tanks at the facility which store chemicals or wastes are contained in impermeable concrete secondary containment.

(B3). For the current discharge plan requirements, testing of process and drainlines at the facility was completed in June 2009. The drainline testing methodology employed for this test was previously approved by the OCD and incorporated an internal pressure of 3 pounds per sq. inch on each underground line. Refer to **Attachment D** for the approval letter from the OCD approving of Transwestern's testing procedure and the results of the drainline testing completed in 2009.

All underground drain and process lines are designed and constructed according to Transwestern's specifications. They are made of coated carbon steel rated at schedule 80 grade B and are seamless. Wall thickness is 0.25". All process and drain pipelines are connected to the facility rectifier for corrosion control. The existing underground pipes were installed in 1993.

(C)1. Transwestern does not dispose of any wastes onsite into a surface impoundment, leachfield, injection well, drying bed, pit or landfarm.

(C)2. Transwestern Pipeline Company incorporates the service of Gandy Corporation in Lovington, NM for all offsite non hazardous waste recycling and disposal activities. All waste materials are transported via truck to the disposal/recycling facility in Lovington. The facility address is:

Gandy Corporation
P.O. Box 2140
Lovington, NM 88260

The Gandy Corporation disposal landfill and landfarm has been previously permitted by the OCD.

9.(A-B). Non applicable.

10. Inspection, Maintenance and Reporting

10(A-B). Not applicable. Transwestern does not discharge wastes into any surface impoundments or unit that has leak detection systems or ground water monitoring.

10(C). The direction of flow at the facility is in an easterly direction to an offsite arroyo. Concrete curbing and berms have been constructed at the facility to direct and surface runoff from leaving the facility. This water is then allowed to evaporate.

11. Spill/Leak Prevention and Reporting Procedures (Contingency Plans)

An SPCC (Spill Prevention Control and Countermeasure) Plan has been prepared for the Monument Compressor Station as the facility when active, stores more than 1320 gallons of oil or liquid hydrocarbons. The plan has been activated and annual employee training is completed. The Plan addresses notification, spill response and contingency's to be employed in the event a spill or release has occurred.

11.(A). In addition to compliance with the SPCC plan, Transwestern is also committed to the requirements of OCD Rule 116 and WQCC 1203 for notification reporting and mitigation of spills and releases. Refer to **Attachment E** for Transwestern's approach to compliance with Rule 116 and WQCC 120.

11(B). Transwestern has no below grade tanks at this facility. As an internal requirement, Transwestern conducts monthly visual tank and containment inspections for all tanks that are storing chemical or hydrocarbon liquids at the facility. This applies to tanks other than domestic water. Should a leak occur at a tank or in a containment (failure of the SPCC plan), immediate measures are taken to stop the leak and or repair the containment area. Liquids released into the containment area are transferred into a waste tank and properly disposed.

For the integrity of the underground piping, Transwestern conducts the five (5) year drainline testing program for all process and waste drain lines as required by the NMOCD.

In the event chemical or hydrocarbon liquids contact the soil, Transwestern immediately excavates the contaminated soil and performs the appropriate analytical testing to determine disposition. The contamination soil is excavated and confirmation sampling/excavation is continued until the contamination in the soil has been removed. Transwestern employs the 1993 NMOCD document entitled "GUIDELINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES" (**Attachment F**) for sampling and cleanup of all chemical and hydrocarbon spills and releases which have occurred on Transwestern property. The contaminated soil is then taken to the Gandy Corporation commercial landfill in Tatum, NM for proper disposition.

11(C). Not applicable. Transwestern does not use an injection well for onsite effluent disposal.

12. Site characteristics

12(A)(1). The approximate 1.0 ac. site is presently fenced for security measures. There is approximately 6 inches of relief access across the extent of the property, sloping towards the east. The closest existing resident is approximately 2 miles southwest of the facility. The closest town is Monument, New Mexico and is located 16 miles to the northeast of the facility.

12(A)(2). Potable groundwater is found in the Dockum Group⁰, the Ogallala Formation and the Quaternary Alluvium. The Santa Rosa Sandstone is the principal aquifer in the western third of the county. This unit recharged by precipitation on the sand dunes directly overlying the sandstone, precipitation and runoff on to out crops and groundwater flow down through the overlying Ogallala and alluvium. Wells completed in the Dockum Group generally have low yields because fo the low permeability of the formations.

The Ogallala Formation produces higher yields and better quality water, however, is unsaturated in most areas. If present, ground water is limited to the basal few feet of the formation. Groundwater flow is to the south and southeast. Water wells situated in the same township and range as the Compressor Station are producing from both the Ogallala and Chinle Formations. Ground water levels in the Ogallala Formation were measured between 63 and 137 feet below ground surface and from 88 and 101 feet below ground surface in the Chinle Formation.

12(A)(3). The soil types and geology in and around the immediate vicinity of the facility are positioned in the High Plains subdivision of the Great Plains Physiographic Province. The area is depicted by a hard caliche surface with numerous shallow depressions. The depressions are dissected by deep gullies, most trending southeastward.

12(A)(4). There is no record of flooding onsite. Flood protection is achieved by the use of curbs and berms at the facility. There has been on onsite hydrocarbon releases to the adjacent undisturbed soils. There are no permanent bodies of water located within one mile of the facility.

13. Other Compliance Information

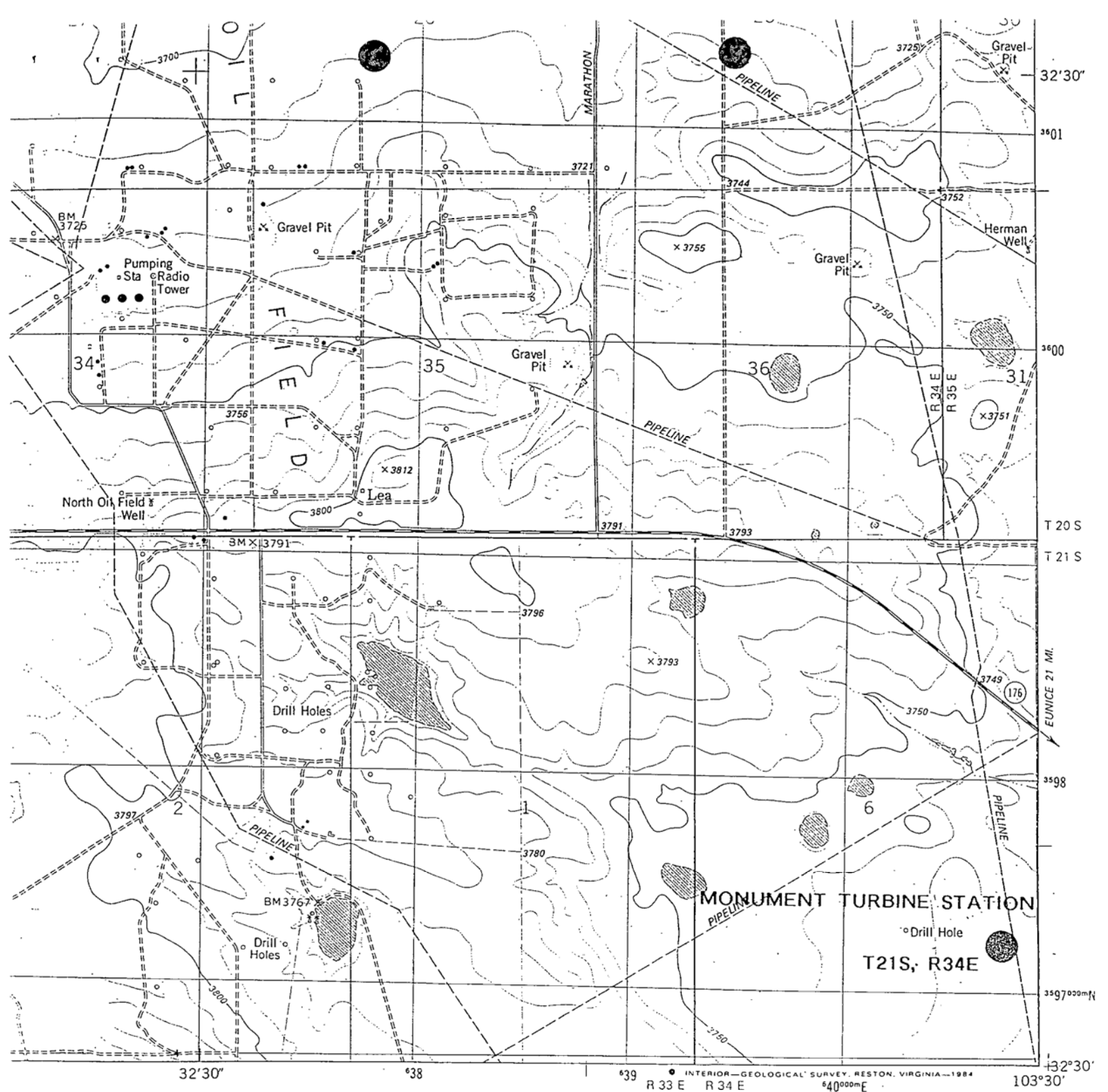
The Monument Compressor Station uses the documents presented in **Attachments D through F** and the Corporate Environmental Policy and Guidelines to demonstrate and ensure compliance with all applicable rules administrated by the NMOCD. The Roswell Compressor Station is committed to complying with NMOCD Rule 116 and WQCC Section 1203 for reporting spills, leaks and releases.

Upon facility closure, Rule 116 and WQCC Section 1203 will be employed to ensure that the abandonment and closure of the facility will not violate WQCC standards of Section 3103.

Because it is impossible to predict and develop a future plan which will address all contingencies and requirements related to site closure at a future date, at such time that the facility ceases operation, Transwestern will present to the NMOCD a post closure plan which addresses site abandonment and soil cleanup activities. This plan will include maintenance and monitoring of the site to ensure that all Rule 116 and

Section 1203 standards have been achieved or that all future Rules and Sections to be implemented will be adhered to and followed.

ATTACHMENT A
(7.5 Minute USGS Map of Area and Facility Map)



1 MILE
7000 FEET
KILOMETER



ROAD CLASSIFICATION

Primary highway, hard surface ——— Light-duty road, hard or improved surface ———

Secondary highway, hard surface ——— Unimproved road ———

○ Interstate Route ○ U. S. Route ○ State Route

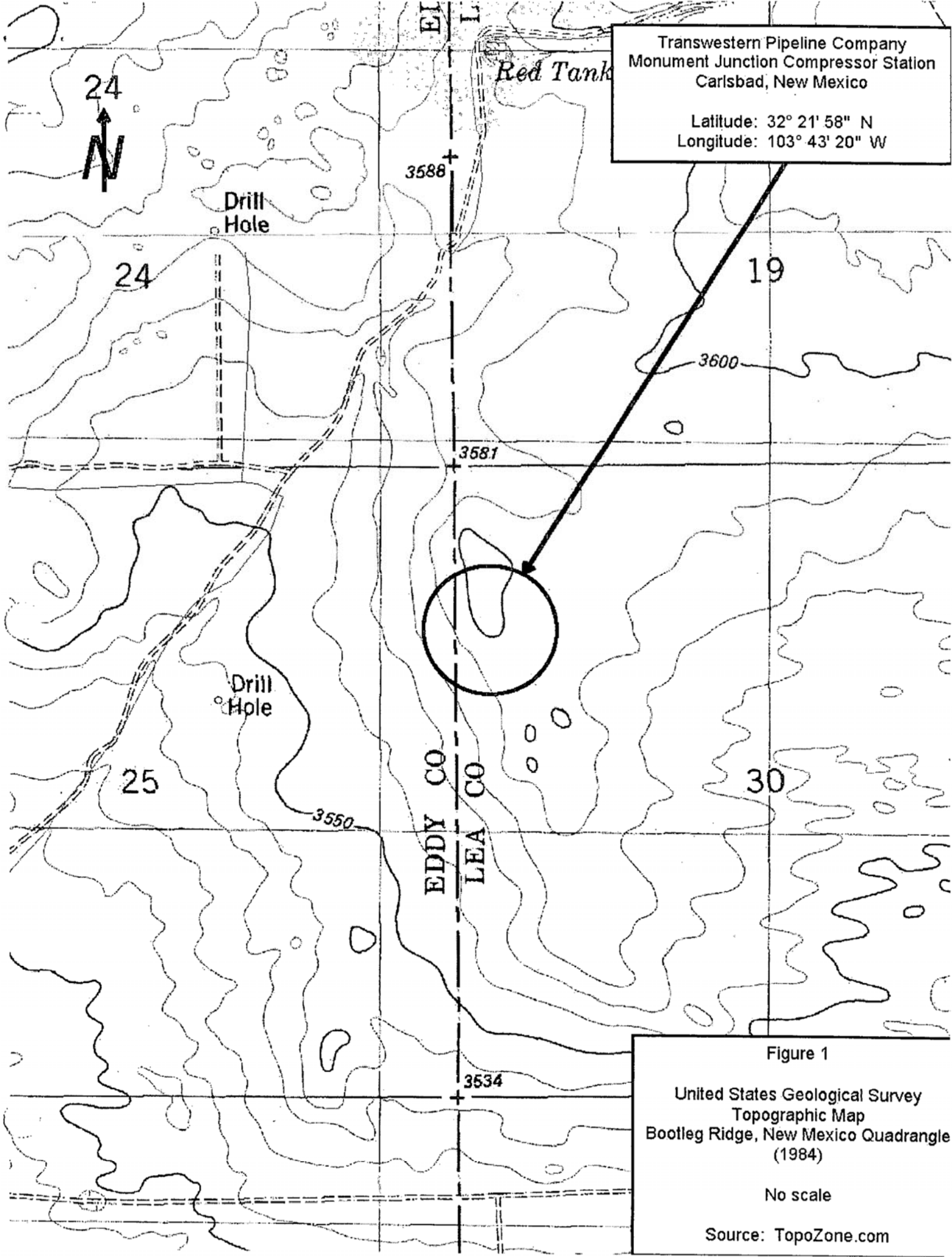
LEA, N. MEX.

SE/4 LAGUNA GATUNA 15' QUADRANGLE
32103-E5-TF-024

1984

DMA 5249 II SE-SERIES V881

IN, VIRGINIA 22092
REQUEST



Transwestern Pipeline Company
Monument Junction Compressor Station
Carlsbad, New Mexico

Latitude: 32° 21' 58" N
Longitude: 103° 43' 20" W

Figure 1

United States Geological Survey
Topographic Map
Bootleg Ridge, New Mexico Quadrangle
(1984)

No scale

Source: TopoZone.com

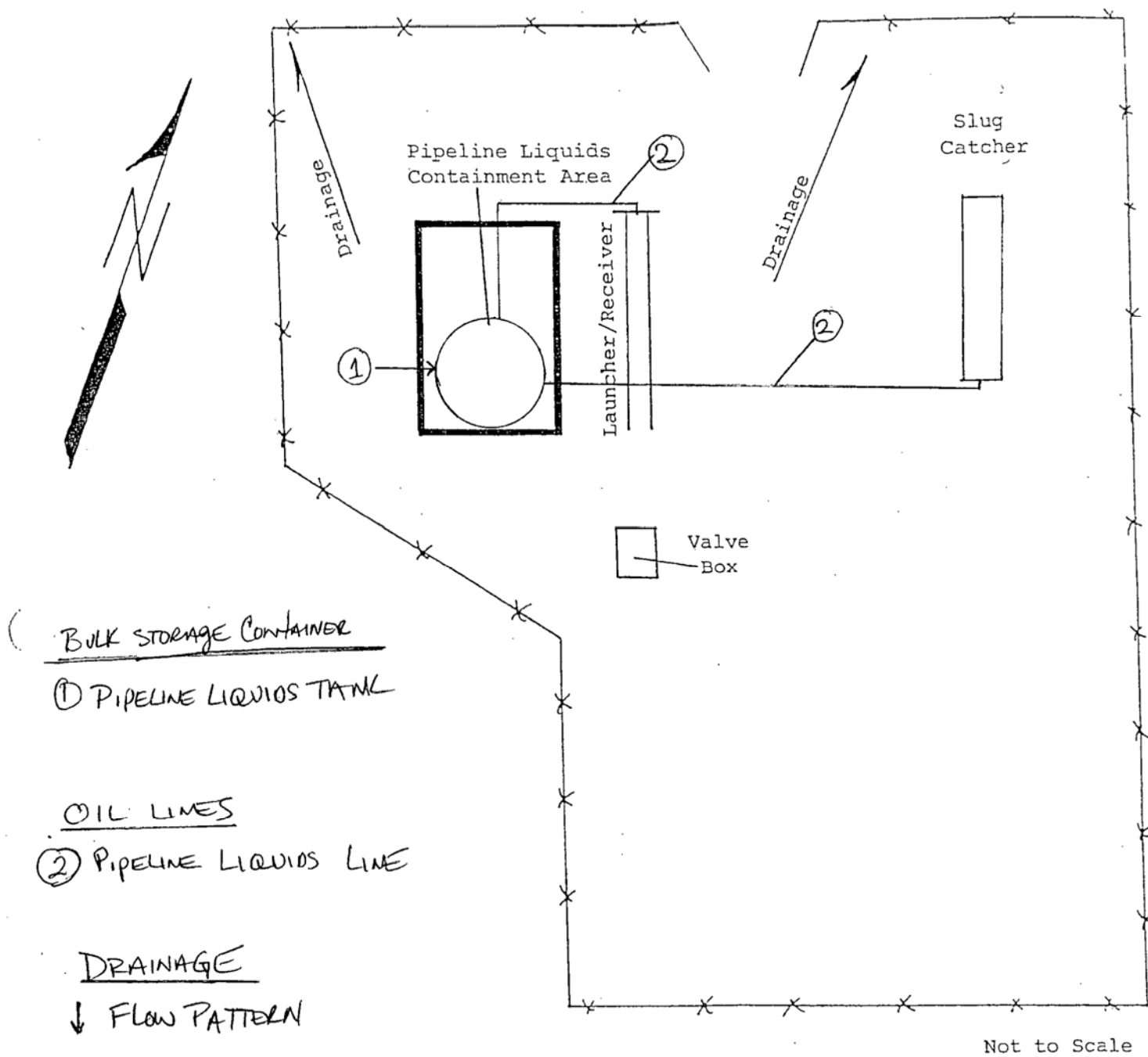


FIGURE 2

APPROXIMATE LOCATION OF SECONDARY CONTAINMENT
30-INCH MONUMENT JUNCTION RECEIVER

ATTACHMENT B
(Analytical Reports)

TERRA LABORATORIES, LTD.
2525 SOUTH SHORE BLVD, SUITE 100 LEAGUE CITY, TX 77573
713/334-5052 FAX 713/334-3116

LAB ANALYSIS REPORT

Report Date: SEPT 28 1995

Page # 1

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad , NM 88220
Attn: Youngblood, Shane
Sample Number: 95005173
Project Name:

Reviewed by:DKP

Job Number:
Date Collected:09/10/95
Time Collected:0
Sample Type: GRAB

Sample ID: 054 MON TUR USED OIL

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
OX'D	TOX Analysis (Date/Time)	09/25 1300	init.		TMG
OX'S	Total Organic Halogen	240	mg/kg	6-9020A	TMG
CBX'D	Waste Dilution (D/T)	09/21 1100	init.	6-3580A	SAK
CBO'D	PCB Analysis (Date/Time)	09/23 1006	init.	1-D4059	SAK
CB10160	Aroclor-1016	< 2	mg/kg	1-D4059	SAK
CB12210	Aroclor-1221	< 2	mg/kg	1-D4059	SAK
CB12320	Aroclor-1232	< 2	mg/kg	1-D4059	SAK
CB12420	Aroclor-1242	< 2	mg/kg	1-D4059	SAK
CB12480	Aroclor-1248	< 2	mg/kg	1-D4059	SAK
CB12540	Aroclor-1254	< 2	mg/kg	1-D4059	SAK
CB12600	Aroclor-1260	< 2	mg/kg	1-D4059	SAK
CBPo	DCBP (surr)	65.	%	40-110	SAK
CMXo	TCMX (surr)	80.	%	25-140	SAK
LSHPT'D	Flashpoint Analysis (Date/Time)	09/28 1400	init.		DPP
MFLSHPT	Flashpoint, Pensky-Marten	158	deg. F	6-1010	DPP
ICPS'D	ICP Acid Digest. (D/T)	09/21 1430	init.	6-3050	RR
CP'S1'D	ICP1 Analysis (Date/Time)	09/22 0939	init.	6-6010	EMJ
sICPs	Arsenic	< 5.4	mg/kg	6-6010	EMJ
dICPs	Cadmium	< 0.33	mg/kg	6-6010	EMJ
rICPs	Chromium	< 0.33	mg/kg	6-6010	EMJ

LAB ANALYSIS REPORT

Report Date: SEPT 28 1995

Page # 2

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
621 S. Main
Carlsbad , NM 88220
Attn: Youngblood, Shane
Sample Number: 95005173
Project Name:

Reviewed by:DKP
Job Number:
Date Collected:09/10/95
Time Collected:0
Sample Type: GRAB

Sample ID: 054 MON TUR USED OIL

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
PbICPs	Lead	< 1.1	mg/kg	6-6010	EMJ

COMMENTS:

FOOTNOTES: MI - Surrogate recovery is not reportable due to matrix interferences
Dil.Fx.- Minimum dilution required to allow acceptable quantitation
ppm = mg/L(Liquid), mg/kg(Solid) ppb = ug/L(Liquid), ug/kg(Solid)
init = date & time initiated B=found in blank J=>mdl< reporting limit

Preparation and Analysis Method References:

1. ASTM: American Society for Testing and Materials, 1984.
 2. EPA-600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1978 (revised 1983).
 3. EPA-600/4-82-057, Methods for Organic Chemical Analysis of Municipal & Industrial Wastewater, 1982.
 4. HACH: Test Methods, accepted by EPA in November, 1983.
 5. SM: Standard Methods for the Examination of Water and Wastewater, 18th edition.
 6. SW: SW-846, Test Methods for Evaluation of Solid Waste, Third edition. Update I, July 1992.
- L: EPA/SW references followed by L refer to accepted minor modifications made to the methods for use with Lachat QuikChem 8000 Autoanalyzer.

LAB ANALYSIS REPORT

Port Date: SEPT 26 1995

Page # 1

NSWESTERN PIPELINE-CARLSBAD NEW MEXIC

Reviewed by: NSH

S. Main

Carlsbad, NM 88220

Job Number:

Analyst: Youngblood, Shane

Date Collected: 09/10/95

Sample Number: 95005169

Time Collected: 0000

Project Name:

Sample Type: GRAB

Sample ID: 050 MON, TUR. PIPELINE LQ

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
VW'D	Volatile Target Compounds	09/15 1736	init.	6-8260	JBP
AcetoneW	Acetone	.12	mg/L	6-8260	JBP
260W	Benzene	< 0.005	mg/L	6-8260	JBP
ClMW	Bromodichloromethane	< 0.005	mg/L	6-8260	JBP
BrmW	Bromoform	< 0.005	mg/L	6-8260	JBP
BraneW	Bromomethane	< 0.010	mg/L	6-8260	JBP
MEK	MEK (2-Butanone)	.076	mg/L	6-8260	JBP
CSW	Carbon disulfide	< 0.005	mg/L	6-8260	JBP
CClW	Carbon tetrachloride	< 0.005	mg/L	6-8260	JBP
ZW	Chlorobenzene	< 0.005	mg/L	6-8260	JBP
ChethanW	Chloroethane	< 0.005	mg/L	6-8260	JBP
ChormW	Chloroform	< 0.005	mg/L	6-8260	JBP
ChaneW	Chloromethane	< 0.005	mg/L	6-8260	JBP
ClMeW	Dibromochloromethane	< 0.005	mg/L	6-8260	JBP
1,1-DichloroethaneW	1,1-Dichloroethane	< 0.005	mg/L	6-8260	JBP
1,2-DichloroethaneW	1,2-Dichloroethane	< 0.005	mg/L	6-8260	JBP
1,1-DichloroetheneW	1,1-Dichloroethene	< 0.005	mg/L	6-8260	JBP
cis-1,2-DichloroetheneW	cis-1,2-Dichloroethene	< 0.005	mg/L	6-8260	JBP
trans-1,2-DichloroetheneW	trans-1,2-Dichloroethene	< 0.005	mg/L	6-8260	JBP
1,2-DichloropropaneW	1,2-Dichloropropane	< 0.005	mg/L	6-8260	JBP

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 2

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXICO
11 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005169
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0000
Sample Type: GRAB

Sample ID: 050 MON, TUR. PIPELINE LQ

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
3dClPW	cis-1,3-Dichloropropene	< 0.005	mg/L	6-8260	JBP
3dClPW	trans-1,3-Dichloropropene	< 0.005	mg/L	6-8260	JBP
EBZW	Ethylbenzene	< 0.005	mg/L	6-8260	JBP
HexnonW	2-Hexanone	.007	mg/L	6-8260	TMG
IBKW	Methyl isobutyl ketone	.006	mg/L	6-8260	TMG
ClMeanW	Methylene chloride	< 0.005	mg/L	6-8260	JBP
StyreneW	Styrene	< 0.005	mg/L	6-8260	JBP
1,1,2,2-ClEtW	1,1,2,2-Tetrachloroethane	< 0.005	mg/L	6-8260	JBP
1,1,2,2-ClEtW	Tetrachloroethene	< 0.005	mg/L	6-8260	JBP
ToluenW	Toluene	< 0.005	mg/L	6-8260	JBP
1,1,1-ClEW	1,1,1-Trichloroethane	< 0.005	mg/L	6-8260	JBP
1,1,2-ClEW	1,1,2-Trichloroethane	< 0.005	mg/L	6-8260	JBP
1,1,2-ClEW	Trichloroethene	< 0.005	mg/L	6-8260	JBP
VAcetW	Vinyl Acetate	< 0.010	mg/L	6-8260	JBP
VClW	Vinyl chloride	< 0.010	mg/L	6-8260	JBP
XLTLW	Xylenes, Total	< 0.017	mg/L	6-8260	TMG
XLSPW	Xylenes, meta¶	0.012	mg/L	6-8260	TMG
XLW	Xylenes, ortho	< 0.005	mg/L	6-8260	JBP
BrFMetW	dBrFMethane (surr)	88.	%	86-111	JBP
d8Wsu	Toluene-d8 (surr)	101.	%	92-110	JBP

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 3

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC

Reviewed by: NSH

21 S. Main

Carlsbad, NM

88220

Attn: Youngblood, Shane

Job Number:

Sample Number: 95005169

Date Collected: 09/10/95

Project Name:

Time Collected: 0000

Sample Type: GRAB

Sample ID: 050 MON, TUR. PIPELINE LQ

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
3FBWsur	4-BFB (surr)	112.	%	87-113	JBP
NAXW'D	Base/neutral/acid Extraction(09/15 0600	init.	6-3510	BKW
CLSVW'D	Semivolatle Target Compounds	09/21 1509	init.	6-8270A	MSB
cenpheW	Acenaphthene	< 3.3	mg/L	6-8270	MSB
cenphyW	Acenaphthylene	< 3.3	mg/L	6-8270	MSB
ithrcnW	Anthracene	< 3.3	mg/L	6-8270	MSB
zaAnthW	Benzo(a)anthracene	< 3.3	mg/L	6-8270	MSB
zbFAnTW	Benzo(b)fluoroanthene	< 3.3	mg/L	6-8270	MSB
zkFAnTW	Benzo(k)fluoroanthene	< 3.3	mg/L	6-8270	MSB
zghipeW	Benzo(g,h,i)perylene	< 3.3	mg/L	6-8270	MSB
zaPyrnW	Benzo(a)pyrene	< 3.3	mg/L	6-8270	MSB
zAcidW	Benzoic acid	< 3.3	mg/L	6-8270	MSB
zylOHW	Benzyl alcohol	< 3.3	mg/L	6-8270	MSB
isMeanW	Bis(2-chloroethoxy)methane	< 3.3	mg/L	6-8270	MSB
sEtherW	Bis(2-chloroethyl)ether	< 3.3	mg/L	6-8270	MSB
2ClPEtW	Bis(2-chloroisopropyl)ether	< 3.3	mg/L	6-8270	MSB
sPhthlW	Bis(2-ethylhexyl)phthalate	< 3.3	mg/L	6-8270	MSB
3rPhPhW	4-Bromophenyl phenyl ether	< 3.3	mg/L	6-8270	MSB
1BzPhtW	Butyl benzyl phthalate	< 3.3	mg/L	6-8270	MSB
1AnilW	4-Chloroaniline	< 3.3	mg/L	6-8270	MSB

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 4

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005169
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0000
Sample Type: GRAB

Sample ID: 050 MON, TUR. PIPELINE LQ

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
Cl3MePW	4-Chloro-3-methylphenol	< 3.3	mg/L	6-8270	MSB
ClNaphW	2-Chloronaphthalene	< 3.3	mg/L	6-8270	MSB
ClPhnlW	2-Chlorophenol	< 3.3	mg/L	6-8270	MSB
ClPhPhW	4-Chlorophenyl phenyl ether	< 3.3	mg/L	6-8270	MSB
ChrysenW	Chrysene	< 3.3	mg/L	6-8270	MSB
resolTW	Total Cresols	< 6.6	mg/L	6-8270A	NSH
MEPHNLW	Cresol, ortho	< 3.3	mg/L	6-8270	MSB
4MEPHLW	Cresol, meta¶	< 3.3	mg/L	6-8270	MSB
BzahAnW	Dibenz(a,h)anthracene	< 3.3	mg/L	6-8270	MSB
BzFuraW	Dibenzofuran	< 3.3	mg/L	6-8270	MSB
nBuPhtW	Di-n-butylphthalate	< 3.3	mg/L	6-8270	MSB
2dClBZW	1,2-Dichlorobenzene	< 3.3	mg/L	6-8270	MSB
3dClBZW	1,3-Dichlorobenzene	< 3.3	mg/L	6-8270	MSB
4dClBZW	1,4-Dichlorobenzene	< 3.3	mg/L	6-8270	MSB
3dClBzW	3,3-Dichlorobenzidine	< 3.3	mg/L	6-8270	MSB
4dClPhW	2,4-Dichlorophenol	< 3.3	mg/L	6-8270	MSB
EtPhthW	Diethylphthalate	< 3.3	mg/L	6-8270	MSB
4dMePlW	2,4-Dimethylphenol	< 3.3	mg/L	6-8270	MSB
MePhthW	Dimethylphthalate	< 3.3	mg/L	6-8270	MSB
6dNitPW	4,6-Dinitro-2-methylphenol	< 3.3	mg/L	6-8270	MSB

LAB ANALYSIS REPORT

port Date: SEPT 26 1995

Page # 5

ANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
1 S. Main
rlsbad , NM 88220
tn: Youngblood, Shane
mple Number: 95005169
object Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0000
Sample Type: GRAB

mple ID: 050 MON, TUR. PIPELINE LQ

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
dNitPW	2,4-Dinitrophenol	< 3.3	mg/L	6-8270	MSB
dNitTW	2,4-Dinitrotoluene	< 3.3	mg/L	6-8270	MSB
dNitTW	2,6-Dinitrotoluene	< 3.3	mg/L	6-8270	MSB
OctPhW	Di-n-octylphthalate	< 3.3	mg/L	6-8270	MSB
tPrAmW	N-Nitroso-di-n-propylamine	< 3.3	mg/L	6-8270	MSB
nthenW	Fluoranthene	< 3.3	mg/L	6-8270	MSB
uorenW	Fluorene	< 3.3	mg/L	6-8270	MSB
ClBzW	Hexachlorobenzene	< 3.3	mg/L	6-8270	MSB
ClButW	Hexachlorobutadiene	< 3.3	mg/L	6-8270	MSB
ClPCyW	Hexachlorocyclopentadiene	< 3.3	mg/L	6-8270	MSB
ClEtaW	Hexachloroethane	< 3.3	mg/L	6-8270	MSB
dnPyrW	Indeno(1,2,3-cd)pyrene	< 3.3	mg/L	6-8270	MSB
ophrnW	Isophorone	< 3.3	mg/L	6-8270	MSB
etNapW	2-Methylnaphthalene	< 3.3	mg/L	6-8270	MSB
phthlW	Naphthalene	< 3.3	mg/L	6-8270	MSB
itrAnW	2-Nitroaniline	< 3.3	mg/L	6-8270	MSB
itrAnW	3-Nitroaniline	< 3.3	mg/L	6-8270	MSB
itAniW	4-Nitroaniline	< 3.3	mg/L	6-8270	MSB
troBzW	Nitrobenzene	< 3.3	mg/L	6-8270	MSB
itPhlW	2-Nitrophenol	< 3.3	mg/L	6-8270	MSB

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 6

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005169
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0000
Sample Type: GRAB

Sample ID: 050 MON, TUR. PIPELINE LQ

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
NitPhlW	4-Nitrophenol	< 3.3	mg/L	6-8270	MSB
NitdPAW	N-Nitrosodiphenylamine	< 3.3	mg/L	6-8270	MSB
NtClPhW	Pentachlorophenol	< 3.3	mg/L	6-8270	MSB
hnAnthW	Phenanthrene	< 3.3	mg/L	6-8270	MSB
henolW	Phenol	< 3.3	mg/L	6-8270	MSB
pyreneW	Pyrene	< 3.3	mg/L	6-8270	MSB
24tCBzW	1,2,4-Trichlorobenzene	< 3.3	mg/L	6-8270	MSB
45tClPW	2,4,5 Trichlorophenol	< 3.3	mg/L	6-8270	MSB
46tClPW	2,4,6-Trichlorophenol	< 3.3	mg/L	6-8270	MSB
FPhenlW	2Fluorophenol (surr)	MI	%	21-100	MSB
henld5W	Phenol-d5 (surr)	MI	%	10-94	MSB
itBzd5W	Nitrobenzene-d5 (surr)	MI	%	35-114	MSB
FbiPhnW	2Fluorobiphenyl (surr)	MI	%	43-116	MSB
riBrPhW	2,4,6Tribromophenol (surr)	MI	%	10-123	MSB
rPhdl4W	Terphenyl-d14 (surr)	MI	%	33-141	MSB

COMMENTS: DILUTION FACTOR FOR SEMI-VOA = X100, SURROGATES DILUTED OUT

NOTES: MI - Surrogate recovery is not reportable due to matrix interferences
Dil.Fx.- Minimum dilution required to allow acceptable quantitation
ppm = mg/L(Liquid), mg/kg(Solid) ppb = ug/L(Liquid), ug/kg(Solid)
init = date & time initiated B=found in blank J=>mdl< reporting limit

Preparation and Analysis Method References:

1. ASTM: American Society for Testing and Materials, 1984.
 2. EPA-600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1978 (revised 1983).
 3. EPA-600/4-82-057, Methods for Organic Chemical Analysis of Municipal & Industrial Wastewater, 1982.
 4. HACH: Test Methods, accepted by EPA in November, 1983.
 5. SM: Standard Methods for the Examination of Water and Wastewater, 18th edition.
 6. SW: SW-846, Test Methods for Evaluation of Solid Waste, Third edition. Update I, July 1992.
- L: EPA/SW references followed by L refer to accepted minor modifications made to the methods for use with Lachat QuikChem 8000 Autoanalyzer.

TLR LABORATORIES, LTD.
2525 SOUTH SHORE BLVD, SUITE 100 LEAGUE CITY, TX 77573
713/334-5052 FAX 713/334-3116

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 1

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005170
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0
Sample Type: GRAB

Sample ID: 051 MON, TUR. PIPELINE LQ OP

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
CLVW'D	Volatile Target Compounds	09/15 1138	init.	6-8260	JBP
etoneW	Acetone	< 10	mg/L	6-8260	JBP
Z8260W	Benzene	< 1.0	mg/L	6-8260	JBP
rdClMW	Bromodichloromethane	< 1.0	mg/L	6-8260	JBP
rFormW	Bromoform	< 1.0	mg/L	6-8260	JBP
rMeaneW	Bromomethane	< 2.0	mg/L	6-8260	JBP
EKW	MEK (2-Butanone)	< 10	mg/L	6-8260	JBP
dSulfW	Carbon disulfide	< 1.0	mg/L	6-8260	JBP
PetClW	Carbon tetrachloride	< 1.0	mg/L	6-8260	JBP
LBZW	Chlorobenzene	< 1.0	mg/L	6-8260	JBP
lEthanW	Chloroethane	< 1.0	mg/L	6-8260	JBP
lFormW	Chloroform	< 1.0	mg/L	6-8260	JBP
lMeaneW	Chloromethane	< 1.0	mg/L	6-8260	JBP
BrClMeW	Dibromochloromethane	< 1.0	mg/L	6-8260	JBP
dClEtaW	1,1-Dichloroethane	< 1.0	mg/L	6-8260	JBP
dClEtaW	1,2-Dichloroethane	< 1.0	mg/L	6-8260	JBP
dClEteW	1,1-Dichloroethene	< 1.0	mg/L	6-8260	JBP
12dClEW	cis-1,2-Dichloroethene	< 1.0	mg/L	6-8260	JBP
12dClEW	trans-1,2-Dichloroethene	< 1.0	mg/L	6-8260	JBP
dClPraW	1,2-Dichloropropane	< 1.0	mg/L	6-8260	JBP

TEARRA LABORATORIES, LTD.
2525 SOUTH SHORE BLVD, SUITE 100 LEAGUE CITY, TX 77573
713/334-5052 FAX 713/334-3116

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 2

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Contact: Youngblood, Shane
Sample Number: 95005170
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0
Sample Type: GRAB

Sample ID: 051 MON, TUR. PIPELINE LQ OP

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
13dClPW	cis-1,3-Dichloropropene	< 1.0	mg/L	6-8260	JBP
13dClPW	trans-1,3-Dichloropropene	< 1.0	mg/L	6-8260	JBP
EBZW	Ethylbenzene	< 1.0	mg/L	6-8260	JBP
HexnonW	2-Hexanone	< 1.0	mg/L	6-8260	JBP
IBKW	Methyl isobutyl ketone	< 1.0	mg/L	6-8260	JBP
ClMeanW	Methylene chloride	< 1.0	mg/L	6-8260	JBP
StyreneW	Styrene	< 1.0	mg/L	6-8260	JBP
1,1,2,2-TetClEtW	1,1,2,2-Tetrachloroethane	< 1.0	mg/L	6-8260	JBP
1,1,2,2-TetClEtW	1,1,2,2-Tetrachloroethane	< 1.0	mg/L	6-8260	JBP
ToluenW	Toluene	< 1.0	mg/L	6-8260	JBP
1,1,1-TrichClEW	1,1,1-Trichloroethane	< 1.0	mg/L	6-8260	JBP
1,1,2-TrichClEW	1,1,2-Trichloroethane	< 1.0	mg/L	6-8260	JBP
1,1,2-TrichClEW	1,1,2-Trichloroethane	< 1.0	mg/L	6-8260	JBP
1,1,2-TrichClEW	1,1,2-Trichloroethane	< 1.0	mg/L	6-8260	JBP
VinylAcetW	Vinyl Acetate	< 2.0	mg/L	6-8260	JBP
VinylClW	Vinyl chloride	< 2.0	mg/L	6-8260	JBP
Xylenes, Total	Xylenes, Total	< 2.0	mg/L	6-8260	TMG
Xylenes, meta¶	Xylenes, meta¶	< 1.0	mg/L	6-8260	JBP
Xylenes, ortho	Xylenes, ortho	< 1.0	mg/L	6-8260	JBP
dBrFMethane (surr)	dBrFMethane (surr)	102.	%	86-111	JBP
Toluene-d8 (surr)	Toluene-d8 (surr)	101.	%	92-110	JBP

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 3

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005170
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0
Sample Type: GRAB

Sample ID: 051 MON, TUR. PIPELINE LQ OP

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
3FBWsur	4-BFB (surr)	101.	%	87-113	JBP
JAXW'D	Base/neutral/acid Extraction(09/15 0600	init.	6-3510	BKW
CLSVW'D	Semivolatle Target Compounds	09/21 1559	init.	6-8270A	MSB
penpheW	Acenaphthene	< 3.3	mg/L	6-8270	MSB
penphyW	Acenaphthylene	< 3.3	mg/L	6-8270	MSB
ithrcnW	Anthracene	< 3.3	mg/L	6-8270	MSB
zaAnthW	Benzo(a)anthracene	< 3.3	mg/L	6-8270	MSB
zbFANTW	Benzo(b)fluoroanthene	< 3.3	mg/L	6-8270	MSB
zkFANTW	Benzo(k)fluoroanthene	< 3.3	mg/L	6-8270	MSB
zghipeW	Benzo(g,h,i)perylene	< 3.3	mg/L	6-8270	MSB
zaPyrnW	Benzo(a)pyrene	< 3.3	mg/L	6-8270	MSB
zAcidW	Benzoic acid	< 3.3	mg/L	6-8270	MSB
zyLOHW	Benzyl alcohol	< 3.3	mg/L	6-8270	MSB
lsMeanW	Bis(2-chloroethoxy)methane	< 3.3	mg/L	6-8270	MSB
sEtherW	Bis(2-chloroethyl)ether	< 3.3	mg/L	6-8270	MSB
2ClPETW	Bis(2-chloroisopropyl)ether	< 3.3	mg/L	6-8270	MSB
sPhthlW	Bis(2-ethylhexyl)phthalate	< 3.3	mg/L	6-8270	MSB
3rPhPhW	4-Bromophenyl phenyl ether	< 3.3	mg/L	6-8270	MSB
1BzPhtW	Butyl benzyl phthalate	< 3.3	mg/L	6-8270	MSB
1lAnilW	4-Chloroaniline	< 3.3	mg/L	6-8270	MSB

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 4

RANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Atttn: Youngblood, Shane
Sample Number: 95005170
Project Name:

Reviewed by: NSH
Job Number:
Date Collected: 09/10/95
Time Collected: 0
Sample Type: GRAB

Sample ID: 051 MON, TUR. PIPELINE LQ OP

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
Cl3MePW	4-Chloro-3-methylphenol	< 3.3	mg/L	6-8270	MSB
ClNaphW	2-Chloronaphthalene	< 3.3	mg/L	6-8270	MSB
ClPhn1W	2-Chlorophenol	< 3.3	mg/L	6-8270	MSB
ClPhPhW	4-Chlorophenyl phenyl ether	< 3.3	mg/L	6-8270	MSB
ChrysenW	Chrysene	< 3.3	mg/L	6-8270	MSB
resolTW	Total Cresols	< 6.6	mg/L	6-8270A	NSH
MEPHNLW	Cresol, ortho	< 3.3	mg/L	6-8270	MSB
4MEPHLW	Cresol, meta¶	< 3.3	mg/L	6-8270	MSB
BzahAnW	Dibenz(a,h)anthracene	< 3.3	mg/L	6-8270	MSB
BzFuraW	Dibenzofuran	< 3.3	mg/L	6-8270	MSB
nBuPhtW	Di-n-butylphthalate	< 3.3	mg/L	6-8270	MSB
2dClBZW	1,2-Dichlorobenzene	< 3.3	mg/L	6-8270	MSB
3dClBZW	1,3-Dichlorobenzene	< 3.3	mg/L	6-8270	MSB
4dClBZW	1,4-Dichlorobenzene	< 3.3	mg/L	6-8270	MSB
3dClBzW	3,3-Dichlorobenzidine	< 3.3	mg/L	6-8270	MSB
4dClPhW	2,4-Dichlorophenol	< 3.3	mg/L	6-8270	MSB
EtPhthW	Diethylphthalate	< 3.3	mg/L	6-8270	MSB
4dMePlW	2,4-Dimethylphenol	< 3.3	mg/L	6-8270	MSB
MePhthW	Dimethylphthalate	< 3.3	mg/L	6-8270	MSB
6dNitPW	4,6-Dinitro-2-methylphenol	< 3.3	mg/L	6-8270	MSB

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 5

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005170
Project Name:

Reviewed by: NSH

Job Number:
Date Collected: 09/10/95
Time Collected: 0
Sample Type: GRAB

Sample ID: 051 MON, TUR. PIPELINE LQ OP

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
1dNitPW	2,4-Dinitrophenol	< 3.3	mg/L	6-8270	MSB
1dNitTW	2,4-Dinitrotoluene	< 3.3	mg/L	6-8270	MSB
5dNitTW	2,6-Dinitrotoluene	< 3.3	mg/L	6-8270	MSB
1OctPhW	Di-n-octylphthalate	< 3.3	mg/L	6-8270	MSB
1tPrAmW	N-Nitroso-di-n-propylamine	< 3.3	mg/L	6-8270	MSB
1nthenW	Fluoranthene	< 3.3	mg/L	6-8270	MSB
1luorenW	Fluorene	< 3.3	mg/L	6-8270	MSB
1ClBzW	Hexachlorobenzene	< 3.3	mg/L	6-8270	MSB
1ClButW	Hexachlorobutadiene	< 3.3	mg/L	6-8270	MSB
1ClPCyW	Hexachlorocyclopentadiene	< 3.3	mg/L	6-8270	MSB
1ClEtaW	Hexachloroethane	< 3.3	mg/L	6-8270	MSB
1dnPyrW	Indeno(1,2,3-cd)pyrene	< 3.3	mg/L	6-8270	MSB
1sophrnW	Isophorone	< 3.3	mg/L	6-8270	MSB
1etNapW	2-Methylnaphthalene	< 3.3	mg/L	6-8270	MSB
1aphthlW	Naphthalene	< 3.3	mg/L	6-8270	MSB
1itrAnW	2-Nitroaniline	< 3.3	mg/L	6-8270	MSB
1itrAnW	3-Nitroaniline	< 3.3	mg/L	6-8270	MSB
1itAniW	4-Nitroaniline	< 3.3	mg/L	6-8270	MSB
1itroBzW	Nitrobenzene	< 3.3	mg/L	6-8270	MSB
1itPhlW	2-Nitrophenol	< 3.3	mg/L	6-8270	MSB

LAB ANALYSIS REPORT

Report Date: SEPT 26 1995

Page # 6

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXICO
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005170
Project Name:

Reviewed by: NSH
Job Number:
Date Collected: 09/10/95
Time Collected: 0
Sample Type: GRAB

Sample ID: 051 MON, TUR. PIPELINE LQ OP

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
NitPhlW	4-Nitrophenol	< 3.3	mg/L	6-8270	MSB
NitdPAW	N-Nitrosodiphenylamine	< 3.3	mg/L	6-8270	MSB
NtClPhW	Pentachlorophenol	< 3.3	mg/L	6-8270	MSB
hnAnthW	Phenanthrene	< 3.3	mg/L	6-8270	MSB
henolW	Phenol	< 3.3	mg/L	6-8270	MSB
pyreneW	Pyrene	< 3.3	mg/L	6-8270	MSB
24tCBzW	1,2,4-Trichlorobenzene	< 3.3	mg/L	6-8270	MSB
45tClPW	2,4,5 Trichlorophenol	< 3.3	mg/L	6-8270	MSB
46tClPW	2,4,6-Trichlorophenol	< 3.3	mg/L	6-8270	MSB
FPhenlW	2Fluorophenol (surr)	MI	%	21-100	MSB
henld5W	Phenol-d5 (surr)	MI	%	10-94	MSB
itBzd5W	Nitrobenzene-d5 (surr)	MI	%	35-114	MSB
FbiPhnW	2Fluorobiphenyl (surr)	MI	%	43-116	MSB
riBrPhW	2,4,6Tribromophenol (surr)	MI	%	10-123	MSB
rPhdl4W	Terphenyl-d14 (surr)	MI	%	33-141	MSB
GNIT'D	Ignitability (Date/Time)	09/20 0700	init.		JMR
FFLSHPT	Ignitability (Setaflash)	> 140	deg. F	6-1020	JMR

COMMENTS: Voa Dil.Fx. X 200; Semi-Voa Dil. FX = x100, surr. diluted out

NOTES: MI - Surrogate recovery is not reportable due to matrix interferences
Dil.Fx.- Minimum dilution required to allow acceptable quantitation
ppm = mg/L(Liquid), mg/kg(Solid) ppb = ug/L(Liquid), ug/kg(Solid)
init = date & time initiated B=found in blank J=>mdl< reporting limit

Preparation and Analysis Method References:

1. ASTM: American Society for Testing and Materials, 1984.
 2. EPA-600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1978 (revised 1983).
 3. EPA-600/4-82-057, Methods for Organic Chemical Analysis of Municipal & Industrial Wastewater, 1982.
 4. HACH: Test Methods, accepted by EPA in November, 1983.
 5. SM: Standard Methods for the Examination of Water and Wastewater, 18th edition.
 6. SW: SW-846, Test Methods for Evaluation of Solid Waste, Third edition. Update I, July 1992.
- L: EPA/SW references followed by L refer to accepted minor modifications made to the methods for use with Lachat QuikChem 8000 Autoanalyzer.

ATTACHMENT C
(MSDS of Chemicals at Facility)

PRODUCT: SF1154

METHYLPHENYLPOLYSILOXANE FLUID

PAGE: 001

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

MANUFACTURED BY:
GE SILICONES
260 HUDSON RIVER ROAD
WATERFORD, NY 12188

SUPPLIED BY:
GE SILICONES
260 HUDSON RIVER ROAD
WATERFORD, NY 12188

EMERGENCY PHONE (24 HRS)
(518) 237-3330

EMERGENCY PHONE (24 HRS)
(518) 237-3330

REVISED: 02/11/93
PREPARER: DA POLSINELLI

CHEMICAL FAMILY/USE: SILICONE FLUID
FORMULA: POLYMER

2. COMPOSITION/INFORMATION ON INGREDIENTS

PRODUCT COMPOSITION/ CAS REG NO.	APPROX. WGT. %	ACGIH TLV TWA	OSHA PEL STEL	UNITS
1 HAZARDOUS				
N e Found				
B. NON-HAZARDOUS				
METHYLPHENYLPOLYSILOXANE				
68083-14-7	80-99	NA	NE	NA

See Section 15 for description of any WHMIS Trade Secret(s).

3. HAZARDS IF

EMERGENCY OVERVIEW:

This section not in use

POTENTIAL HEALTH EFFECTS:

INGESTION:

None known

SKIN CONTACT:

None known.

INHALATION:

None Known.

EYE CONTACT:

May cause mild eye irritation.

MEDICAL CONDITIONS AGGRAVATED:

*** CONTINUED ON NEXT PAGE ***

None known.

SUBCHRONIC (TARGET ORGAN) EFFECTS:

None known.

CHRONIC EFFECTS/CARCINOGENICITY:

This product or one of its ingredients present 0.1% or more is NOT listed as a carcinogen or suspected carcinogen by NTP, IARC, or OSHA.

PRODUCTS/INGREDIENTS

This space reserved for special use.

PRINCIPLE ROUTES OF EXPOSURE:

None known.

OTHER:

Attention: Not for injection into humans.

This product contains Methylpolysiloxanes which can generate Formaldehyde at approximately 300 degrees fahrenheit (150'C) and above, in atmospheres which contain oxygen. Formaldehyde is a skin and respiratory sensitizer, eye and throat irritant, acute toxicant, and potential cancer hazard. An MSDS for Formaldehyde is available from GE Silicones.

4. FIRST AID MEASURES

INGESTION:

Rinse mouth with water several times.

SKIN:

Wash with soap and water.

IRRITATION:

None known.

EYES:

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation persists.

NOTE TO PHYSICIAN:

None known.

5. FIRE FIGHTING MEASURES

FLASH POINT:

>204

(C) >400

(F)

METHOD :

PMCC

IGNITION TEMP :

NA

(C) NA

(F)

FLAMMABLE LIMITS IN AIR - LOWER (%): NA

FLAMMABLE LIMITS IN AIR - UPPER (%): NA

SENSITIVITY TO MECHANICAL IMPACT (Y/N): NO

SENSITIVITY TO STATIC DISCHARGE:

Sensitivity to static discharge is not expected.

EXTINGUISHING MEDIA:

*** CONTINUED ON NEXT PAGE ***

All standard firefighting media
SPECIAL FIREFIGHTING PROCEDURES:
None known.

6. ACCIDENTAL RELEASE MEASURES

ACTION TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED:
Wipe, scrape or soak up in an inert material and put in a
container for disposal.
Wash walking surfaces with detergent and water to reduce slip-
ping hazard.

7. HANDLING AND STORAGE

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
None known.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS:
Eyewash stations.
RESPIRATORY PROTECTION:
None known.
PROTECTIVE GLOVES:
Cloth gloves.
EYE AND FACE PROTECTION:
Safety glasses.
OTHER PROTECTIVE EQUIPMENT:
None known.
VENTILATION:
None known.

9. PHYSICAL AND CHEMICAL PROPERTIES

PRODUCT INFORMATION:			
BOILING POINT	:	>600	(C) >500 (F)
VAPOR PRESSURE(20 C)(MM HG):	:	NONE	
VAPOR DENSITY (AIR=1)	:	NEG.	
FREEZING POINT	:	UNK	(C) UNK (F)
MELTING POINT	:	UNK	(C) UNK (F)

*** CONTINUED ON NEXT PAGE ***

PHYSICAL STATE	:	LIQUID
ODOR	:	ODORLESS
COLOR	:	CLEAR
ODOR THRESHOLD (PPM)	:	UNK
% LATILE BY VOLUME	:	<1.0
EVAP. RATE(BUTYL ACETATE=1):	:	<1
SPECIFIC GRAVITY (WATER=1)	:	0.97
DENSITY (KG/M3)	:	958.6
ACID/ALKALINITY (MEQ/G)	:	NEUTRAL
PH	:	NA
VOC (EPA METH.24) (G/L)	:	<5
SOLUBILITY IN WATER (20 C)	:	INSOLUBLE
SOLUBILITY IN ORGANIC SOLVENT (STATE SOLVENT):	:	SOLUBLE, TOLUENE

10. STABILITY AND REACTIVITY

STABILITY: STABLE
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR
HAZARDOUS THERMAL DECOMPOSITION/COMBUSTION PRODUCTS:
Carbon monoxide.
Carbon dioxide.
Silicon dioxide.
Formaldehyde.
INCOMPATIBILITY (MATERIALS TO AVOID):
None known.
CONDITIONS TO AVOID:
None known.

11. TOXICOLOGICAL INFORMATION

PRODUCT INFORMATION:
ACUTE ORAL LD50 (MG/KG): NONE FOUND
ACUTE DERMAL LD50 (MG/KG): NONE FOUND
ACUTE INHALATION LC50 (MG/L): NONE FOUND
OTHER:
None.
AMES TEST: UNKNOWN

12. ECOLOGICAL INFORMATION

ECOTOXICOLOGICAL INFORMATION: No data at this time

*** CONTINUED ON NEXT PAGE ***

CHEMICAL FATE INFORMATION:

No data at this time

13. DISPOSAL CONSIDERATIONS

DISPOSAL METHOD:

Disposal should be made in accordance with federal, state and local regulations.

14. TRANSPORT INFORMATION

DOT SHIPPING NAME: NONE
DOT HAZARD CLASS: NONE
DOT LABEL(S): NONE
UN/NA NUMBER: NONE
PLACARDS: NONE
IATA:
NA
IMO IMDG-code: NONE
EUROPEAN CLASS:
RID (OCTI): NONE
ADR (ECE) : NONE
RAR (IATA): NONE

15. REGULATORY INFORMATION

SARA SECTION 302:

None Found

SARA (311,312) HAZARD CLASS:

NONE

SARA (313) CHEMICALS:

NONE

CPSC CLASSIFICATION:

NONE

WHMIS HAZARD CLASS:

NON-CONTROLLED

WHMIS TRADE SECRET:

None

EXPORT:

SCHDLE B/HTSUS:

3910.00 Silicones in Primary Form

ECCN:

1C96G

HAZARD RATING SYSTEMS

HMIS

FLAMMABILITY 0 , REACTIVITY 0 , HEALTH 0

NFPA

FLAMMABILITY 0 , REACTIVITY 0 , HEALTH 0

CALIFORNIA PROPOSITION 65:

NONE

*** CONTINUED ON NEXT PAGE ***

16. OTHER INFORMATION

This product or its components are on the European inventory of existing commercial chemicals (EINECS).....

.....

These data are offered in good faith as typical values and not as a product specification. No warranty, either expressed or implied, is made. The recommended handling procedures are believed to be generally applicable. However, each user should review these recommendations in the specific content of the intended use.....

.....

This product or its components are on the Australian inventory (ACQIN).....

.....

C = ceiling limit	NEGL = negligible
EST= estimated	NF = none found
NA = not applicable	UNKN = unknown
NE = none established	REC = recommended
ND = none determined	V = recomm. By vendor
By-product = reaction by-product, TSCA inventory status not required under 40 CFR part 720.30(h-2)	SKN = skin
STEL = short term exposure limit	TS = trade secret
	R = recommended
	MST = mist
	NT = not tested

.....

DATE PRINTED: 08/21/94

*** END OF MSDS ***

MATERIAL SAFETY DATA BULLETIN

1. PRODUCT AND COMPANY IDENTIFICATION

APPROVAL DATE: 01/01/95

PRODUCT NAME: MOBIL DTE 13M
SUPPLIER: MOBIL OIL CORP.
PRODUCTS AND TECHNOLOGY DEPT.
3225 GALLOWS RD.
FAIRFAX, VA 22037

24 - Hour Emergency (call collect): 609-737-4411
Product and MSDS Information: 800-662-4525 703-849-3265
CHEMTREC: 800-424-9300 202-483-7616

2. COMPOSITION/INFORMATION ON INGREDIENTS

INGREDIENTS CONSIDERED HAZARDOUS TO HEALTH:

This product is not formulated to contain ingredients which have exposure limits established by regulatory agencies. It is not hazardous to health as defined by the European Union Dangerous Substances/Preparations Directives. See Section 15 for a regulatory analysis of the ingredients.

See Section 8 for exposure limits (if applicable).

3. HAZARDS IDENTIFICATION

US OSHA HAZARD COMMUNICATION STANDARD: Product assessed in accordance with OSHA 29 CFR 1910.1200 and determined not to be hazardous.
EFFECTS OF OVEREXPOSURE: No significant effects expected.
EMERGENCY RESPONSE DATA: Amber Liquid. Note: Pressurized mists may form a flammable mixture. DOT ERG No. - NA

4. FIRST AID MEASURES

EYE CONTACT: Flush thoroughly with water. If irritation occurs, call a physician.
SKIN CONTACT: Wash contact areas with soap and water. High pressure accidental injection through the skin requires immediate medical attention for possible incision, irrigation and/or debridement.
INHALATION: Not expected to be a problem.
INGESTION: Not expected to be a problem. However, if greater than 1/2 liter(pint) ingested, immediately give 1 to 2 glasses of water and call a physician, hospital emergency room or poison control center for assistance. Do not induce vomiting or give anything by mouth to an unconscious person.

5. FIRE-FIGHTING MEASURES

EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.
SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing.

Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

SPECIAL PROTECTIVE EQUIPMENT: For fires in enclosed areas, fire fighters must use self-contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Note: Pressurized mists may form a flammable mixture. Flash Point C(F): > 166(331) (ASTM D-92).

Flammable limits - LEL: NA, UEL: NA.

NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide. Metal oxides.
Elemental oxides.

6. ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES: Report spills as required to appropriate authorities. U. S. Coast Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard toll free number (800) 424-8802. In case of accident or road spill notify CHEMTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: Adsorb on fire retardant treated sawdust, diatomaceous earth, etc. Shovel up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.

ENVIRONMENTAL PRECAUTIONS: Prevent spills from entering storm sewers or drains and contact with soil.

PERSONAL PRECAUTIONS: See Section 8

7. HANDLING AND STORAGE

HANDLING: High pressure injection under the skin may occur due to the rupture of pressurized lines. Always seek medical attention.

STORAGE: Do not store in open or unlabelled containers. Store away from strong oxidizing agents or combustible material.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

VENTILATION: No special requirements under ordinary conditions of use and with adequate ventilation.

RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate ventilation.

EYE PROTECTION: Normal industrial eye protection practices should be employed.

SKIN PROTECTION: No special equipment required. However, good personal hygiene practices should always be followed.

EXPOSURE LIMITS: This product does not contain any components which have recognized exposure limits. However, a threshold limit value of 5.00 mg/m3 is suggested for oil mist.

9. PHYSICAL AND CHEMICAL PROPERTIES

Typical physical properties are given below. Consult Product Data Sheet for specific details.

APPEARANCE: Liquid

COLOR: Amber

ODOR: Mild

ODOR THRESHOLD: NA

pH: NA

BOILING POINT C(F): > 316(600)

MELTING POINT C(F): NA

FLASH POINT C(F): > 166(331) (ASTM D-92)

FLAMMABILITY: NA

AUTO FLAMMABILITY: NE

EXPLOSIVE PROPERTIES: NA

OXIDIZING PROPERTIES: NA

VAPOR PRESSURE-mmHg 20 C: < 0.1

VAPOR DENSITY: > 2.0

EVAPORATION RATE: NA

RELATIVE DENSITY, 15/4 C: 0.877

SOLUBILITY IN WATER: Negligible

PARTITION COEFFICIENT: > 3.5

VISCOSITY AT 40 C, cSt: > 29.8

VISCOSITY AT 100 C, cSt: 6.5

POUR POINT C(F): < -39(-38)

FREEZING POINT C(F): NE

VOLATILE ORGANIC COMPOUND: EXEMPT IN U.S.

NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES

FOR FURTHER TECHNICAL INFORMATION, CONTACT YOUR MARKETING REPRESENTATIVE

10. STABILITY AND REACTIVITY

STABILITY (THERMAL, LIGHT, ETC.): Stable.

CONDITIONS TO AVOID: Extreme heat.

INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide. Metal oxides.
Elemental oxides.

HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL DATA

---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Not applicable ---Harmful concentrations of mists and/or vapors are unlikely to be encountered through any customary or reasonably foreseeable handling, use, or misuse of this product.

EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: greater than 6 but 15 or less). ---Based on testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): Practically non-irritating. (Primary Irritation Index: greater than 0.5 but less than 3). ---Based on testing of similar products and/or the components.

OTHER ACUTE TOXICITY DATA: The acute toxicological results summarized above are based on testing of representative Mobil products.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

Representative Mobil formulations have been tested at the Mobil Environmental and Health Sciences Laboratory by dermal applications to rats 5 days/week for 90 days at doses significantly higher than those expected during normal industrial exposure. Extensive evaluations, including microscopic examination of internal organs and clinical chemistry of body fluids, showed no adverse effects.

---REPRODUCTIVE TOXICOLOGY (SUMMARY)---

Dermal exposure of pregnant rats to representative formulations did not cause adverse effects in either the mothers or their offspring.

---CHRONIC TOXICOLOGY (SUMMARY)---

The base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of severely treated oils showed no evidence of carcinogenic effects. These results are confirmed on a continuing basis using the Mobil Modified Ames Test.

---SENSITIZATION (SUMMARY)---

Representative Mobil formulations have not caused skin sensitization in guinea pigs.

12. ECOLOGICAL INFORMATION

ENVIRONMENTAL FATE AND EFFECTS: Not established.

13. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL: Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by supervised incineration. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at any government approved waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

14. TRANSPORT INFORMATION

USA DOT: NOT REGULATED BY USA DOT.

RID/ADR: NOT REGULATED BY RID/ADR.

IMO: NOT REGULATED BY IMO.

IATA: NOT REGULATED BY IATA.

15. REGULATORY INFORMATION

Governmental Inventory Status: All components comply with TSCA, EINECS/ELINCS, and DSL.

EU Classification and Labeling: EU labeling not required.

U.S. Superfund Amendments and Reauthorization Act (SARA) Title III:
This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".

SARA (311/312) REPORTABLE HAZARD CATEGORIES: None.

This product contains no chemicals reportable under
SARA (313) toxic release program.

The following product ingredients are cited on the lists below:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
ZINC (ELEMENTAL ANALYSIS) (0.10%)	7440-66-6	22
PHOSPHORODITHOIC ACID, O,O-DI	68649-42-3	22
C1-14-ALKYL ESTERS, ZINC SALTS (2:		
1) (ZDDP) (0.54%)		

--- REGULATORY LISTS SEARCHED ---

1 = ACGIH ALL	6 = IARC 1	11 = TSCA 4	17 = CA P65	22 = MI 293
2 = ACGIH A1	7 = IARC 2A	12 = TSCA 5a2	18 = CA RTK	23 = MN RTK
3 = ACGIH A2	8 = IARC 2B	13 = TSCA 5e	19 = FL RTK	24 = NJ RTK
4 = NTP CARC	9 = OSHA CARC	14 = TSCA 6	20 = IL RTK	25 = PA RTK
5 = NTP SUS	10 = OSHA Z	15 = TSCA 12b	21 = LA RTK	26 = RI RTK

Code key: CARC = Carcinogen; SUS = Suspected Carcinogen

16. OTHER INFORMATION

CHEMICAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES

USE: HYDRAULIC OIL

NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBS.

See container label for ingredient information.

For Mobil Use Only: MHC: 1* 1* NA 1* 1*, MPPEC: A, REQ: US -
MARKETING, SAFE USE: L

INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

Prepared by: Mobil Oil Corporation
Environmental Health and Safety Department, Princeton, NJ

MATERIAL SAFETY DATA SHEET

MAXUS
Exploration Company

MSDS NUMBER: M7747

MSDS DATE: 12-20-87

PRODUCT NAME: **NATURAL GAS CONDENSATE**

24 HOUR EMERGENCY PHONE: (214) 953-2700

I. PRODUCT IDENTIFICATION

2 HEALTH, 3 FLAMMABILITY, 0 REACTIVITY & (Blank) INSTABILITY based on "Standard System for the Identification of the Fire Hazards of Materials, NFPA No. 704, 1985 Edition"

MANUFACTURER'S: Maxus Exploration Company
NAME AND : c/o Maxus Energy Corporation (Rm 2901)
ADDRESS : 717 North Harwood Street
: Dallas, Texas 75201

CHEMICAL NAME: Raw Natural Gas Liquid CAS NUMBER: 64741-48-6
Mix (Petroleum)
Drip condensate, Gas Oil

SYNONYMS/COMMON NAMES: Natural Gasoline

CHEMICAL FORMULA: C₂-C₈ Hydrocarbons, Aliphatic

DOT PROPER SHIPPING NAME: Flashpoint <100°F Gasoline Flashpoint 100°F <200 Combustible Liquid NOS

DOT HAZARD CLASS: Flammable Liquid Combustible Liquid

DOT I.D. NUMBER: UN 1203 NA 1993

HAZARDOUS SUBSTANCE: NA NA

II. HAZARDOUS INGREDIENTS

MATERIAL OR COMPONENT	HAZARD DATA	CAS NUMBER	%
Drip Condensate *	PEL = None established TLV = None established	64741-48-6	100
May be similar to gasoline	PEL = None established TLV = 300 ppm 8 hr. TWA		

(See Section V)

The materials in this product are listed in the TSCA Inventory. Not listed as carcinogenic by IARC, NTP, OSHA, ACGIH; See Section V. The product may contain benzene; when in excess of 0.1% and not contained in a pipe or container, the exposure is covered by OSHA 29 CFR 1910.1028 & .1000.

* The composition and water content varies significantly with the geographic source of the product.

CAS = Chemical Abstract Service Number
PEL = OSHA Permissible Exposure Limit
TLV = TLV^{ACGIH} Threshold Limit Value, Current

N/A = No relevant information found or not available
NA = Not applicable

Maxus Exploration Company

This Material Safety Data Sheet was prepared in accordance with 29 CFR 1910.1200. All information, recommendations and suggestions appearing herein concerning our product are based upon tests and data believed to be reliable, however, it is the user's responsibility to determine the safety, toxicity and suitability for his own use of the product described herein. Since the actual use by others is beyond our control, no guarantee expressed or implied is made by Maxus Exploration Company as to the effects of such use the results to be obtained or the safety and toxicity of the product nor does Maxus Exploration Company assume any liability arising out of use by others of the product referred to herein. Nor is the

III. PHYSICAL DATA

BOILING POINT @ 760 mm Hg: Variable VAPOR DENSITY (Air=1): ~3.4
% VOLATILES BY VOL.: Essentially 100 MELTING POINT: NA
VAPOR PRESSURE: 15-25 psi EVAPORATION RATE (BuAc=1): N/A
SPECIFIC GRAVITY (H₂O=1): 0.5-0.6 @ 60°F
SOLUBILITY IN H₂O % BY WT: Negligible
APPEARANCE AND ODOR: Colored liquid with pungent odor; odor
threshold 0.1ppm and is not an index of
exposure
pH: NA

IV. FIRE AND EXPLOSION DATA

FLASH POINT: 78 to 105°F AUTOIGNITION TEMPERATURE: N/A
FLAMMABLE LIMITS IN AIR, % BY VOLUME-UPPER: ~8 varies slightly
LOWER: ~1 with exact specification
EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide; water
spray may be ineffective on fighting fires of liquids with low
flash points, but water spray should be used to keep fire exposed
containers cool. If a leak has not ignited, use water spray to
disperse the vapors and to protect the persons attempting to stop a
leak.
UNUSUAL FIRE AND EXPLOSION HAZARD: Clothing, rags or similar organic
material contaminated with the product and stored in a closed space
may undergo spontaneous combustion. Transfer product to and from
commonly grounded containers. Product spreads easily and can flash
back along vapor trails.

V. HEALTH HAZARD INFORMATION

HEALTH HAZARD DATA:

The major effect of exposure to this product is central nervous
system depression.
Studies have shown that repeated exposure of laboratory animals to
high concentrations of whole refined gasoline vapors at 67, 262
and 2056 ppm has caused kidney damage and cancer of the kidney in
rats and liver cancer in mice.

MEDICAL CONDITION GENERALLY AGGRAVATED BY EXPOSURE:
Conditions which have the same symptoms or effects as stated below.

MEDICAL LIMITATION: N/A

ROUTES OF EXPOSURE

INHALATION: Irritation of the upper respiratory tract with central
nervous system stimulation, possibly followed by depression,
dizziness, headache, incoordination, anesthesia, coma and
respiratory arrest.

SKIN CONTACT: Defatting may occur with continued or prolonged
contact. Irritation and burning sensation may occur on exposure to
liquid or vapor phase.

SKIN ABSORPTION: Not significant.

V. HEALTH HAZARD INFORMATION

...continued

EYE CONTACT: Liquid will cause severe burning sensation with temporary irritation and swelling of lids.

INGESTION: Irritation of mucous membranes of throat, esophagus and stomach may result in nausea and vomiting. Depression may occur if absorbed. (See Inhalation above.)

EFFECTS OF OVEREXPOSURE

ACUTE: Central nervous system depression with extreme overexposure; effects may include anesthesia, coma, respiratory arrest, and irregular heart rate. Oxygen deprivation is possible if working in confined spaces.

CHRONIC: Experience has shown no major cumulative or latent effects to have resulted from exposure to this product. (See Health Hazard Data above.)

EMERGENCY AND FIRST AID PROCEDURES

EYES: Object is to flush material out then seek medical attention. Immediately flush eyes with large amounts of water for at least 15 minutes holding lids apart to ensure flushing of the entire eye surface. SEEK MEDICAL ATTENTION IMMEDIATELY.

SKIN: Wash contaminated areas with plenty of soap and water. A soothing ointment may be applied to irritated skin after thoroughly cleansing. Remove contaminated clothing and footwear. Seek medical attention if symptoms result.

INHALATION: Get person out of contaminated area to fresh air. If breathing has stopped, resuscitate and administer oxygen if readily available. SEEK MEDICAL ATTENTION IMMEDIATELY.

INGESTION: Never give anything by mouth to an unconscious person. If swallowed, do not induce vomiting. If vomiting occurs spontaneously, keep airway clear. SEEK MEDICAL ATTENTION IMMEDIATELY.

NOTES TO PHYSICIAN: Gastric lavage should be considered. Guard against aspiration into lungs which may result in chemical pneumonitis. Irregular heart beat may occur; use of adrenalin is not advisable. Treat symptomatically.

VI. REACTIVITY DATA

CONDITIONS CONTRIBUTING TO INSTABILITY: Under normal conditions, the material is stable. Avoid sources of ignition such as flames, hot surfaces, electrical or functional sparks, etc.

INCOMPATIBILITY: Avoid contact with oxidizers.

HAZARDOUS DECOMPOSITION PRODUCTS: This material may decompose at high temperatures to form carbon monoxide and other organic compounds.

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION: Material is not known to polymerize.

VII. ENVIRONMENTAL PROCEDURES

SPILLS OR RELEASES: If material is spilled or released to the atmosphere, steps should be taken to contain liquids and prevent discharges to streams or sewer systems; and control or stop the loss of volatile materials to the atmosphere. Spills or releases should be reported, if required, to the appropriate local, state and federal regulatory agencies.

VII. ENVIRONMENTAL PROCEDURES

...continued

DISPOSAL: Clean-up action should be carefully planned and executed. Shipment, storage, and/or disposal of waste materials are regulated and action to handle or dispose of spilled or released materials must meet all applicable local, state and federal rules and regulations. If any question exists, the appropriate agencies should be contacted to assure proper action being taken. Waste product and contaminated material will be considered a hazardous waste if the flash point is less than 140°F requiring disposal at an approved hazardous waste facility.

STORAGE: Protect against physical damage. Outside or detached storage is preferred. Separate from oxidizing materials. Store in cool, well ventilated area of non-combustible construction away from possible sources of ignition.

VIII. INDUSTRIAL HYGIENE CONTROL MEASURES

VENTILATION REQUIREMENTS: Work in well ventilated areas. Special ventilation is not required under normal use. Use engineering controls to minimize exposure.

SPECIFIC PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY: Respiratory protection is not required under normal use. Use NIOSH/MSHA approved respiratory protection following manufacturer's recommendations where spray, mists, or vapor may be generated. Supplied air respiratory protection is required for IDLH areas.

EYE: Face shield and goggles or chemical goggles should be worn where mists, or spray may be generated.

GLOVES: Impervious gloves should be worn during routine handling of this product.

OTHER CLOTHING AND EQUIPMENT: Standard work clothing. Shoes contaminated with this product that can not be decontaminated should be discarded. Clothing contaminated with this product should be removed, washed in soap and water and dried before reuse. Contaminated clothing should be stored in well ventilated areas. Shower and eyewash facilities should be accessible.

MONITORING EXPOSURE

BIOLOGICAL: No applicable procedure; breath analysis for hydrocarbons has been suggested.

PERSONAL/AREA: Both active and passive monitor employing charcoal absorption followed by gas chromatography-A molecular weight of 72.5 has been suggested as the most conservative average value to convert the determined weight of hydrocarbons to ppm. Direct reading indicating tubes are available to evaluate short term exposure.

THIS MSDS IS EQUIVALENT TO US DOL OSHA'S NON-MANDATORY FORM

ATTACHMENT D
(Approval Letter from OCD for Drainline Testing)
And 2009 Test Report



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

July 16, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-636

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company (TWPC)
6381 North Main
Roswell, NM 88201

**RE: Approval of Methods for Underground Drain Line Testing
TWPC(New Mexico Facilities) Compressor Stations**

Dear Mr. Campbell:

The OCD has received the letter dated July 8, 1997 from TWPC titled "Approval Methodology Request for Underground Drain Line Testing." Based on the testing method proposed the OCD hereby approves of this procedure for TWPC facilities that are currently permitted under discharge plans by the OCD.

This approval is subject to the condition that the OCD Santa Fe Office be notified 72 hours in advance of any testing.

Please note, OCD approval of this test procedure does not relieve TWPC from liability should groundwater contamination result from this procedure. OCD approval also does not relieve TWPC from responsibility to comply with other federal, state, and local rules and regulations that may apply.

If TWPC has any questions regarding this matter please feel free to contact me at (505)-827-7152.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief - OCD

c: OCD District Offices.

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

July 8, 1997

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

Re: Approval Methodology Request for Underground Drain Line Testing

Dear Mr. Anderson:

Transwestern Pipeline Company (Transwestern), presents the following methodology to test the integrity of underground process /wastewater line drain testing at compressor station facilities currently under approved OCD discharge plans. This proposed testing methodology, if approved by your agency, will be implemented at all compressor stations which are owned and operated by Transwestern which are currently under an approved OCD discharge plan drain line testing requirement.

Under this testing program, Transwestern proposes to conduct a thirty minute pressure testing of each drain line at a testing pressure of 3 pounds per square inch (psi) above normal or ambient operating pressure. Each underground drain line to be tested will be isolated from all other drain lines. The test will be conducted at its origination or at the point where the drain line exits the building foundation or secondary containment. A plug or stopper will be inserted at one end of the drain line and sealed to prevent water leakage. The other end of the drain line will be engineered and designed with a water tight 90 degree piping elbow. A vertical pipe extension will be constructed and tap water added to fill the drain line and vertical pipe to a height which will allow a 3 psi pressure on the drain line system. The following equation was used to determine the height of water to be placed into the system

$$\text{Feet of head} = \text{Pressure (psi)} \times 2.31 / \text{specific gravity}$$

$$\text{specific gravity of water} = 1.0$$

$$(3 \times 2.31) / 1 = 6.95 \text{ feet}$$

This equation was taken from the Pipeline Rule of Thumb Book, 3rd edition, Gulf Publishing Company, page 293.

Transwestern proposes to conduct pressure testing on each underground drain line at each compressor station covered under an approved discharge plan. At the beginning of each thirty minute time period, Transwestern will mark on the vertical pipe at the 6.95 foot water level. Upon conclusion the thirty minute period, Transwestern will record the water level height. A report will be prepared and submitted to the OCD within 45 days of completing the study at each compressor station, depicting the results of the pressure testing.

Transwestern requests favorable consideration and approval of this pressure testing study proposal. Should you require any additional information, contact the undersigned at our Roswell Technical Operations office at (505) 625-8022.

Sincerely,

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

Larry Campbell
Division Environmental Specialist

xc: Rich Jolly
Butch Russell
file

Gandy Corp.

1621 S. Main Ave.

Lovington, NM 88260

(575) 396-0522

June 10, 2009

Attention: Larry Campbell

Re: Underground Drain Line Testing Roswell Compressor Station No.9, Transwestern Pipeline Company, OCD Renewal Discharge Plan No. GW-016.

The following report presents the results of the underground drain line testing at the Transwestern Pipeline Company (Transwestern) Compressor Station # 9 Roswell, New Mexico. This station is currently operating under the OCD Renewal Discharge plan GW-016, which requires drain line testing to be conducted on all underground drain lines once every five years. The testing program was conducted using the methodology submitted by letter on May 19th 2009.

Methodology

The testing program was initiated on June 3rd 2009. The following drain line systems at the facility were hydrostatically tested:

<u>Drain Line System</u>	<u>Length of Line (ft.)</u>	<u>Size of pipe (in.)</u>
Ambitrol tank to Comp. Bldg.	324	2.0
Electric oil pump to used oil tank	60	2.0
Gear oil tank to Comp. Bldg.	324	2.0
New lube oil tank to Comp. Bldg.	324	2.5
Comp. Bldg. to used oil tank	240	2.0
Selexol Sump to Selexol OWW (1) Tank	105	2.0
Scrubber dump to Selexol PLL (2) tank	100	2.0

Mist Extractor to PLL (2)	63	2.0
West Texas Pig Receiver Sump to PLL (2)	195	2.0
Wash Bay to West Texas Pig Trap Sump	90	4.0
PLL (2) Tank to Truck Loading Point	111	4.0
OWW (1) Tank to Truck Loading Point	111	4.0
Panhandle 24" Pig Receiver sump to OWW (1)	375	4.0
Comp. Bldg. OWW (1) Sump to OWW (1) Tank	1,230	2.0
Comp. Bldg. OWW (1) Sump	426	"4 drain lines to 8" header

(1) Oily Waste Water (OWW)

(2) Pipe Line Liquids (PLL)

Note: Length of lines are approximated

For each drain line tested, the following tactic was engaged. A test header was constructed by isolating each drain line and attaching and sealing a 90 degree elbow of the same pipe diameter to one of the two drain pipe ends. A seven (7) ft, vertical pipe of the same pipe diameter was attached and sealed to the exposed vertical end of the 90 degree elbow. At the horizontal terminal end of the exposed drain pipe a test plug was temporarily inserted and sealed. The drain line and attached test header were then filled with water to a marked level on the vertical pipe of 6.95 ft. above the horizontal elevation of the drain line. This water level head created a positive pressure of 3.0 psi on the existing piping system. This pressure was then allowed to equilibrate in the line and standpipe and the test was conducted for a period of thirty minutes, with no more than 1% loss/gain of pressure in the line. Any water leakage will be indicated by a drop on the water level of the vertical standpipe below the 6.95 ft mark. Also same procedure was used for gear oil, lube oil, and ambitrol.

Results and Conclusions

All drain lines referenced in the methodology section were tested according to the tactic presented above. For every underground process and wastewater line, there were no instances where the water level in the vertical standpipe receded below the water level mark of 6.95 ft., as well as, for the gear oil, and lube oil pipes. Based upon the result of this study, Gandy Corp. concludes that the integrity of the underground drain line system at Transwestern facility # 9 in Roswell New Mexico, are intact and that no further actions are required on these lines.

Lines not tested

Length of Line (ft.) Size of Pipe (in.)

Main Line Block Valve S-1

340

2.0

Loop Line S-2

340

2.0

Engine Fuel Skid

1,130

2.0

West Texas Pig Receiver Main Loop Line

420

2.0

Lines to Mist Extractor

1,500

1" 2" 3" and 4"

Lines all connected

If there are any questions or additional information regarding this testing procedure or report, please not hesitate to contact me at our Lovington office (575) 396-0522. Salvador Cano (915) 873-2101

ATTACHMENT E
(Reporting Protocol for Spills and Releases)

Subject: New Mexico Energy Minerals and Natural Resources
Department, OCD, Amended Rule 116 - Release Reporting

Date: April 17, 1997

Reference: February 13, 1997 Order No. R-10766

Status: Amended Rule

Effective Date: February 13, 1997

SUMMARY: The New Mexico Oil Conservation Division (OCD) amended Rule 116 that covers "Notification of Fires, Breaks, Leaks, Spills and Blowouts." The amended Rule requires reporting of all *unauthorized* releases of any oil and gas product, produced water, oil field waste (including Regulated NORM), and oil field chemicals. New Mexico's existing rules require an entity to report releases that are anticipated, such as those from scheduled maintenance activities (e.g., pipeline blowdown). When prior notice is given under these existing rule, the releases are "authorized." Rule 116 also requires reporting of *any* release (even authorized releases) that may "with reasonable probability be detrimental to water or cause an exceedance of" the state water quality standards (e.g., hydrostatic test water discharge that is of a poorer quality than expected and could be detrimental to the receiving stream's water quality). The Rule categorizes releases into "Major" and "Minor." Major releases require "immediate verbal notification" and "timely written notice," whereas, Minor releases require "timely written notice." Lastly, when appropriate, the responsible person must remediate the release according to an OCD-approved action plan. **Impact:** Enron companies conducting business in New Mexico will have to report more releases. The main increase in reporting is likely to be for releases of natural gas. Also, the spill response procedure manual must be updated. **Recommended Action:** The Environmental Team must update the spill response procedure manual. Division Environmental Specialists and other appropriate environmental staff that are responsible for activities in New Mexico should familiarize themselves with the amended Rule so that appropriate notifications will be made until the revised procedure is completed.

NOTIFICATION Amended Rule 116 requires that the OCD be notified whenever an *unauthorized* release of virtually any material related to oil and gas "drilling, producing, storing, disposing, injecting, transporting, servicing or processing," including "Regulated NORM," occurs. (See definitions of "Major" and "Minor" releases below for further clarification.) Generally, *authorized* releases are those that are permitted (e.g., NPDES) or those for which the appropriate agency has received prior notification, such as for air to releases associated with scheduled maintenance activities, are not reportable under Rule 116. However, even *authorized* releases must be reported if the *authorized* release is of "oil or other water contaminant" that "may with reasonable probability be detrimental to water or cause an exceedance of the" State water quality standards. Since the New Mexico Environment Department has prime jurisdiction over air pollution, reporting of unanticipated problems or amounts of *air* pollutants is also regulated by them at NMAQCR §801.

DEFINITIONS OF MAJOR AND MINOR RELEASES Rule 116 divides releases into two categories.

Major Releases are defined as:

- a. an unauthorized release (excluding natural gases) in excess of 25 barrels;
- b. an unauthorized release of any quantity that:
 1. results in a fire;
 2. will reach a water course;

- 3. may with reasonable probability endanger public health; or
- 4. results in substantial damage to property or the environment;
- c. an unauthorized release of natural gases in excess of 500 mcf; or
- d. a release of any volume that will likely be detrimental to water or cause an exceedance of State water quality standards.

Minor Releases are defined as:

- a. an unauthorized release (excluding natural gases) in excess of 5 barrels but not more than 25 barrels or
- b. an unauthorized release of natural gases exceeding 50 mcf but less than 500 mcf.

REPORTING OF MAJOR AND MINOR RELEASES

Major Releases must be reported by giving immediate verbal notice and timely written notice, as described below.

Minor Releases must be reported by giving timely written notice, as described below.

Immediate Verbal Notification indicates those situations that must be reported within 24 hours of discovery to the Division District Office for the area where the release took place. Also, if the release may be detrimental to water or cause an exceedance of the State water quality standards, immediate verbal notification must be provided to the Division's Environmental Bureau Chief. When providing this verbal notification, the information required on Division Form C-141 must be provided. A copy of Form C-141 is attached.

Timely Written Notification consists of reporting within 15 days to the Division District Office and, where the release may have been detrimental to water or caused an exceedance of the State water quality standards, to the Division's Environmental Bureau Chief. Timely written notification is accomplished by completing Form C-141. The written notification should verify the prior verbal notification along with updating and/or correcting information contained in the verbal notification.

CORRECTIVE ACTION The entity responsible for the release must take appropriate corrective action when public health or the environment are endangered. The corrective action must be done according to a remediation plan or an abatement plan that has been approved by the Division.

The SUMMARY has been distributed to appropriate management personnel. If there are any questions concerning this regulation, contact Joe Kolb at 713/646-6180.

Attachments

Distribution List:

Terraso, Mike
Environmental Team
Reg Tech Team
Nutt, David
Smith, Frank
Soldano, Lou
Bonstetter, Mike
Campbell, Larry
Russell, Butch

District I - (505) 393-6161
P.O. Box 1940
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 South First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

State of New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Form C- 141
Originated 2/13/97

Submit 2 copies to
Appropriate District
Office in accordance
with Rule 116 on
back side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.
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LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
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NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

Describe General Conditions Prevailing (Temperature, Precipitation, etc.).*

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

Signature:

Printed Name:

Title:

Date:

Phone:

OIL CONSERVATION DIVISION

Approved by
District Supervisor:

Approval Date:

Expiration Date:

Conditions of Approval:

Attached ☐

* Attach Additional Sheets If Necessary

ATTACHMENT F
(OCD Guidelines for Remediation of Leaks, spills and Releases)

GUIDELINES

FOR

REMEDIATION

OF

LEAKS, SPILLS AND RELEASES

(AUGUST 13, 1993)

New Mexico Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

TABLE OF CONTENTS

INTRODUCTION

- I. NOTICE OF LEAK, SPILL OR RELEASE
 - A. RESPONSIBLE PARTY AND LOCAL CONTACT
 - B. FACILITY
 - C. TIME OF INCIDENT
 - D. DISCHARGE EVENT
 - E. TYPE OF DISCHARGE
 - F. QUANTITY
 - G. SITE CHARACTERISTICS
 - H. IMMEDIATE CORRECTIVE ACTIONS
- II. INITIAL RESPONSE ACTIONS
 - A. SOURCE ELIMINATION AND SITE SECURITY
 - B. CONTAINMENT
 - C. SITE STABILIZATION
- III. SITE ASSESSMENT
 - A. GENERAL SITE CHARACTERISTICS
 - 1. Depth To Ground Water
 - 2. Wellhead Protection Area
 - 3. Distance To Nearest Surface Water Body
 - B. SOIL/WASTE CHARACTERISTICS
 - 1. Highly Contaminated/Saturated Soils
 - 2. Unsaturated Contaminated Soils
 - C. GROUND WATER QUALITY
- IV. SOIL AND WATER REMEDIATION ACTION LEVELS
 - A. SOILS
 - 1. Highly Contaminated/Saturated Soils
 - 2. Unsaturated Contaminated Soils
 - a. Ranking Criteria
 - b. Recommended Remediation Level
 - B. GROUND WATER

- V. SOIL AND WATER SAMPLING PROCEDURES
 - A. HIGHLY CONTAMINATED OR SATURATED SOILS
 - 1. Physical Observations
 - B. UNSATURATED CONTAMINATED SOILS
 - 1. Soil Sampling Procedures for Headspace Analysis
 - 2. Soil Sampling Procedures For Laboratory Analysis
 - a. Sampling Procedures
 - b. Analytical methods
 - C. GROUND WATER SAMPLING
 - 1. Monitor Well Installation/Location
 - 2. Monitor Well Construction
 - 3. Monitor Well Development
 - 4. Sampling Procedures
 - 5. Ground Water laboratory Analysis
 - a. Analytical Methods
- VI. REMEDIATION
 - A. SOIL REMEDIATION
 - 1. Contaminated Soils
 - 2. Soil Management Options
 - a. Disposal
 - b. Soil Treatment and Remediation Techniques
 - i. Landfarming
 - ii. Insitu Soil Treatment
 - iii. Alternate Methods
 - B. GROUND WATER REMEDIATION
 - 1. Remediation Requirements
 - a. Free Phase Contamination
 - b. Dissolved Phase Contamination
 - c. Alternate Methods
- VII. TERMINATION OF REMEDIAL ACTION
 - A. SOIL
 - B. GROUND WATER
- VIII. FINAL CLOSURE
- IX. FINAL REPORT

INTRODUCTION

The following document is to be used as a guide on all federal, state and fee lands when remediating contaminants resulting from leaks, spills and releases of oilfield wastes or products. The New Mexico Oil Conservation Division (OCD) requires that corrective actions be taken for leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property. These guidelines are intended to provide direction for remediation of soils and fresh waters contaminated as a result of leaks, spills or releases of oilfield wastes and products in a manner that assures protection of fresh waters, public health and the environment.

Fresh waters (to be protected) includes the water in lakes, playas, surface waters of all streams regardless of the quality of the water within any given reach, and all underground waters containing 10,000 milligrams per liter (mg/l) or less of total dissolved solids (TDS) except for which, after notice and hearing, it is found that there is no present or reasonably foreseeable beneficial use which would be impaired by contamination of such waters. The water in lakes and playas shall be protected from contamination even though it may contain more than 10,000 mg/l of TDS unless it can be shown that hydrologically connected fresh ground water will not be adversely affected.

Procedures may deviate from the following guidelines if it can be shown that the proposed procedure will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted. Specific constituents and/or requirements for soil and ground water analysis and/or remediation may vary depending on site specific conditions. Deviations from approved plans will require OCD notification and approval.

****** Note:** Notification to OCD of leaks, spills and releases does not relieve an operator of responsibility for compliance with any other federal, state or local law and/or regulation regarding the incident. Other agencies (ie. BLM, Indian Tribes, etc) may also have guidelines or requirements for remediation of leaks spills and releases.

I. NOTIFICATION OF LEAK, SPILL OR RELEASE

Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to the OCD pursuant to OCD Rule 116 (Appendix A) or New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Appendix B). Appendix C contains the phone numbers and addresses for reporting incidents to the OCD district and Santa Fe offices. Notification will include all information required under the respective rule or regulation. Below is a description of some of the information required:

A. RESPONSIBLE PARTY AND LOCAL CONTACT

The name, address and telephone number of the person/persons in charge of the facility/operation as well as the owner and/or operator of the facility/operation and a local contact.

B. FACILITY

The name and address of the facility or operation where the incident took place and the legal location listed by quarter-quarter, section, township and range, and by distance and direction from the nearest town or prominent landmark so that the exact site location can be readily located on the ground.

C. TIME OF INCIDENT

The date, time and duration of the incident.

D. DISCHARGE EVENT

A description of the source and cause of the incident.

E. TYPE OF DISCHARGE

A description of the nature or type of discharge. If the material leaked, spilled or released is anything other than crude oil, condensate or produced water include its chemical composition and physical characteristics.

F. QUANTITY

The known or estimated volume of the discharge.

G. SITE CHARACTERISTICS

The relevant general conditions prevailing at the site including precipitation, wind conditions, temperature, soil type, distance to nearest residence and population centers and proximity of fresh water wells or watercourse (ie. any river, lake, stream, playa, arroyo, draw, wash, gully or natural or man-made channel through which water flows or has flowed).

H. IMMEDIATE CORRECTIVE ACTIONS

Any initial response actions taken to mitigate immediate threats to fresh waters, public health and the environment.

II. INITIAL RESPONSE ACTIONS

Upon learning of a leak, spill or release of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property, the responsible party (RP) should take the following immediate actions unless the actions could create a safety hazard which would result in a threat to personal or public injury:

A. SOURCE ELIMINATION AND SITE SECURITY

The RP should take the appropriate measures to stop the source of the leak, spill or release and limit access to the site as necessary to reduce the possibility of public exposure.

B. CONTAINMENT

Once the site is secure, the RP should take steps to contain the materials leaked, spilled or released by construction of berms or dikes, the use of absorbent pads or other containment actions to limit the area impacted by the event and prevent potential fresh water contaminants from migrating to watercourses or areas which could pose a threat to public health and safety.

C. SITE STABILIZATION

After containment, the RP should recover any products or wastes which can be physically removed from the surface within the containment area. The disposition of all wastes or products removed from the site must be approved by the OCD.

III. SITE ASSESSMENT

Prior to final closure (Section VIII), soils into which nonrecoverable products or wastes have infiltrated and which have a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property should be assessed for their potential environmental impacts and remediated according to the procedures contained in the following sections. Assessment results form the basis of any required remediation. Sites will be assessed for severity of contamination and potential environmental and public health threats using a risk based ranking system.

The following characteristics should be determined in order to evaluate a sites potential risks, the need for remedial action and, if necessary, the level of cleanup required at the site:

A. GENERAL SITE CHARACTERISTICS

1. Depth To Ground Water

The operator should determine the depth to ground water at each site. The depth to ground water is defined as

the vertical distance from the lowermost contaminants to the seasonal high water elevation of the ground water. If the exact depth to ground water is unknown, the ground water depth can be estimated using either local water well information, published regional ground water information, data on file with the New Mexico State Engineer Office or the vertical distance from adjacent ground water or surface water.

2. Wellhead Protection Area

The operator should determine the horizontal distance from all water sources including private and domestic water sources. Water sources are defined as wells, springs or other sources of fresh water extraction. Private and domestic water sources are those water sources used by less than five households for domestic or stock purposes.

3. Distance To Nearest Surface Water Body

The operator should determine the horizontal distance to all downgradient surface water bodies. Surface water bodies are defined as perennial rivers, streams, creeks, irrigation canals and ditches, lakes, ponds and playas.

B. SOIL/WASTE CHARACTERISTICS

Soils/wastes within and beneath the area of the leak, spill or release should be evaluated to determine the type and extent of contamination at the site. In order to assess the level of contamination, observations should be made of the soils at the surface and samples of the impacted soils should be taken in the leak, spill or release area. Observations should note whether previous leaks, spills or releases have occurred at the site. Additional samples may be required to completely define the lateral and vertical extent of contamination. Soil samples should be obtained according to the sampling procedures in Sections V.A. and V.B. This may be accomplished using a backhoe, drill rig, hand auger, shovel or other means.

Initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A.

Varying degrees of contamination described below may co-exist at an individual site. The following sections describe the degrees of contamination that should be documented during the assessment of the level of soil contamination:

1. Highly Contaminated/Saturated Soils

Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.

2. Unsaturated Contaminated Soils

Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated, as described above, but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release. Action levels and sampling and analytical methods for determining contaminant concentrations are described in detail in Sections IV. and V.

(NOTE: Soils contaminated as a result of spills, leaks or releases of non-exempt wastes must be evaluated for all RCRA Subtitle C hazardous waste characteristics. The above definitions apply only to oilfield contaminated soils which are exempt from federal RCRA Subtitle C hazardous waste provisions and nonexempt oilfield contaminated soils which are characteristically nonhazardous according to RCRA Subtitle C regulations. Any nonexempt contaminated soils which are determined to be characteristically hazardous cannot be remediated using this guidance document and will be referred to the New Mexico Environment Department Hazardous Waste Program.)

C. GROUND WATER QUALITY

If ground water is encountered during the soil/waste characterization of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality. Ground water samples should be obtained using the sampling procedures in Section V.C. Monitor wells may be required to assess potential impacts on ground water and the extent of ground water contamination, if there is a reasonable probability of ground water contamination based upon the extent and magnitude of soil contamination defined during remedial activities.

IV. SOIL AND WATER REMEDIATION ACTION LEVELS

A. SOILS

The sections below describe the OCD's recommended remediation action levels for soils contaminated with petroleum hydrocarbons. Soils contaminated with substances other than petroleum hydrocarbons may be required to be remediated based upon the nature of the contaminant and it's potential to impact fresh waters, public health and the environment.

1. Highly Contaminated/Saturated Soils

All highly contaminated/saturated soils should be remediated insitu or excavated to the maximum extent practicable. These soils should be remediated using techniques described in Section VI.A to the contaminant specific level listed in Section IV.A.2.b.

2. Unsaturated Contaminated Soils

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

<u>Depth To Ground Water</u>	<u>Ranking Score</u>
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source, or; <200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

<200 horizontal feet	20
200 - 1000 horizontal feet	10
>1000 horizontal feet	0

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	<u>Total Ranking Score</u>		
	<u>>19</u>	<u>10 - 19</u>	<u>0 - 9</u>
<u>Benzene (ppm) *</u>	10	10	10
<u>BTEX (ppm) *</u>	50	50	50
<u>TPH (ppm) **</u>	100	1000	5000

* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

** The contaminant concentration for TPH is the concentration above background levels.

B. GROUND WATER

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

V. SOIL AND WATER SAMPLING PROCEDURES

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional

constituents may be required based upon the nature of the contaminant which was leaked, spilled or released.

A. HIGHLY CONTAMINATED OR SATURATED SOILS

The following method is used to determine if soils are highly contaminated or saturated:

1. Physical Observations

Study a representative sample of the soil for observable free petroleum hydrocarbons or immiscible phases and gross staining. The immiscible phase may range from a free hydrocarbon to a sheen on any associated aqueous phase. A soil exhibiting any of these characteristics is considered highly contaminated or saturated.

B. UNSATURATED CONTAMINATED SOILS

The following methods may be used for determining the magnitude of contamination in unsaturated soils:

1. Soil Sampling Procedures for Headspace Analysis

A headspace analysis may be used to determine the total volatile organic vapor concentrations in soils (ie. in lieu of a laboratory analysis for benzene and BTEX but not in lieu of a TPH analysis). Headspace analysis procedures should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD procedures are as follows:

- a) Fill a 0.5 liter or larger jar half full of sample and seal the top tightly with aluminum foil or fill a one quart zip-lock bag one-half full of sample and seal the top of the bag leaving the remainder of the bag filled with air.
- b) Ensure that the sample temperature is between 15 to 25 degrees Celsius (59-77 degrees Fahrenheit).
- c) Allow aromatic hydrocarbon vapors to develop within the headspace of the sample jar or bag for 5 to 10 minutes. During this period, the sample jar should be shaken vigorously for 1 minute or the contents of the bag should be gently massaged to break up soil clods.
- d) If using a jar, pierce the aluminum foil seal with the probe of either a PID or FID organic vapor meter (OVM), and then record the highest (peak) measurement. If using a bag, carefully open one end of the bag and insert the probe of the OVM into the bag and re-seal the bag around the probe as much as possible to prevent vapors from escaping. Record the peak measurement. The OVM must be calibrated to assume a benzene response factor.

2. Soil Sampling Procedures For Laboratory Analysis

a. Sampling Procedures

Soil sampling for laboratory analysis should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD soil sampling procedures and laboratory analytical methods are as follows:

- i) Collect samples in clean, air-tight glass jars supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier.
- ii) Label the samples with a unique code for each sample.
- iii) Cool and store samples with cold packs or on ice.
- iv) Promptly ship sample to the lab for analysis following chain of custody procedures.
- v) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

b. Analytical Methods

All soil samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are laboratory analytical methods commonly accepted by OCD for analysis of soil samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or released has been anything other than petroleum based fluids or wastes.

- i) Benzene, toluene, ethylbenzene and xylene
 - EPA Method 602/8020
- ii) Total Petroleum Hydrocarbons
 - EPA Method 418.1, or;
 - EPA Method Modified 8015

C. GROUND WATER SAMPLING

If an investigation of ground water quality is deemed necessary, it should be conducted according to OCD approved industry standards or other OCD-approved procedures. The following methods are standard OCD accepted methods which

should be used to sample and analyze ground water at RCRA Subtitle C exempt sites (Note: The installation of monitor wells may not be required if the OCD approves of an alternate ground water investigation or sampling technique):

1. Monitor Well Installation/Location

One monitor well should be installed adjacent to and hydrologically down-gradient from the area of the leak, spill or release to determine if protectable fresh water has been impacted by the disposal activities. Additional monitor wells, located up-gradient and down-gradient of the leak, spill or release, may be required to delineate the full extent of ground water contamination if ground water underlying the leak, spill or release has been found to be contaminated.

2. Monitor Well Construction

- a) Monitor well construction materials should be:
 - i) selected according to industry standards;
 - ii) chemically resistant to the contaminants to be monitored; and
 - iii) installed without the use of glues/adhesives.
- b) Monitor wells should be constructed according to OCD approved industry standards to prevent migration of contaminants along the well casing. Monitor wells should be constructed with a minimum of fifteen (15) feet of well screen. At least five (5) feet of the well screen should be above the water table to accommodate seasonal fluctuations in the static water table.

3. Monitor Well Development

When ground water is collected for analysis from monitoring wells, the wells should be developed prior to sampling. The objective of monitor well development is to repair damage done to the formation by the drilling operation so that the natural hydraulic properties of the formation are restored and to remove any fluids introduced into the formation that could compromise the integrity of the sample. Monitoring well development is accomplished by purging fluid from the well until the pH and specific conductivity have stabilized and turbidity has been reduced to the greatest extent possible.

4. Sampling Procedures

Ground water should be sampled according to OCD accepted standards or other OCD approved methods. Samples should be collected in clean containers supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier. Samples for

different analyses require specific types of containers. The laboratory can provide information on the types of containers and preservatives required for sample collection. The following procedures are accepted by OCD as standard sampling procedures:

- a) Monitor wells should be purged of a minimum of three well volumes of ground water using a clean bailer prior to sampling to ensure that the sample represents the quality of the ground water in the formation and not stagnant water in the well bore.
- b) Collect samples in appropriate sample containers containing the appropriate preservative for the analysis required. No bubbles or headspace should remain in the sample container.
- c) Label the sample containers with a unique code for each sample.
- d) Cool and store samples with cold packs or on ice.
- e) Promptly ship sample to the lab for analysis following chain of custody procedures.
- f) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

5. Ground Water Laboratory Analysis

Samples should be analyzed for potential ground water contaminants contained in the waste stream, as defined by the WQCC Regulations. All ground water samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are OCD accepted laboratory analytical methods for analysis of ground water samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or release has been anything other than a petroleum based fluid or waste.

a. Analytical Methods

i.) Benzene, Toluene, Ethylbenzene and Xylene

- EPA Method 602/8020

ii.) Major Cations and Anions

- Various EPA or standard methods

iii.) Heavy Metals

- EPA Method 6010, or;

- Various EPA 7000 series methods

VI. REMEDATION

The following discussion summarizes recommended techniques for remediation of contaminated soil and ground water as defined in Section IV.A. and IV.B. OCD approval for remediation of an individual leak, spill or release site is not required if the company is operating under an OCD approved spill containment plan. All procedures which deviate from the companies spill containment plan must be approved by OCD.

A. SOIL REMEDIATION

When RCRA Subtitle C exempt or RCRA nonhazardous petroleum contaminated soil requires remediation, it should be remediated and managed according to the criteria described below or by other OCD approved procedures which will remove, treat, or isolate contaminants in order to protect fresh waters, public health and the environment.

In lieu of remediation, OCD may accept an assessment of risk which demonstrates that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh waters, public health and the environment.

1. Contaminated Soils

Highly contaminated/saturated soils and unsaturated contaminated soils exceeding the standards described in Section IV.A. should be either:

- a) Excavated from the ground until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level listed in Section IV.A.2.b or an alternate approved remediation level, or;
- b) Excavated to the maximum depth and horizontal extent practicable. Upon reaching this limit a sample should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants, or;
- c) Treated in place, as described in Section VI.A.2.b.ii. - Treatment of Soil in Place, until a representative sample is below the contaminant specific remediation level listed in Section IV.A.2.b, or an alternate approved remediation level, or;
- d) Managed according to an approved alternate method.

2. Soil Management Options

All soil management options must be approved by OCD. The following is a list of options for either on-site treatment or off-site treatment and/or disposal of contaminated soils:

a. Disposal

Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

b. Soil Treatment and Remediation Techniques

i. Landfarming

Onetime applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lift within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary, upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation.

In some high risk areas an impermeable liner may be required to prevent leaching of contaminants into the underlying soil.

Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation.

ii. Insitu Soil Treatment

Insitu treatment may be accomplished using vapor venting, bioremediation or other approved treatment systems.

iii. Alternate Methods

The OCD encourages alternate methods of soil remediation including, but not limited to, active soil aeration, composting, bioremediation, solidification, and thermal treatment.

B. GROUND WATER REMEDIATION

1. Remediation Requirements

Ground water remediation activities will be reviewed and approved by OCD on a case by case basis prior to commencement of remedial activities. When contaminated

ground water exceeds WQCC ground water standards, it should be remediated according to the criteria described below.

a. Free Phase Contamination

Free phase floating product should be removed from ground water through the use of skimming devices, total-fluid type pumps, or other OCD-approved methods.

b. Dissolved Phase Contamination

Ground water contaminated with dissolved phase constituents in excess of WQCC ground water standards can be remediated by either removing and treating the ground water, or treating the ground water in place. If treated waters are to be disposed of onto or below the ground surface, a discharge plan must be submitted and approved by OCD.

c. Alternate Methods

The OCD encourages other methods of ground water remediation including, but not limited to, air sparging and bioremediation. Use of alternate methods must be approved by OCD prior to implementation.

VII. TERMINATION OF REMEDIAL ACTION

Remedial action may be terminated when the criteria described below have been met:

A. SOIL

Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level for a particular site as specified in Section IV.A.2.b.

If soil action levels cannot practicably be attained, an evaluation of risk may be performed and provided to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

B. GROUND WATER

A ground water remedial action may be terminated if all recoverable free phase product has been removed, and the concentration of the remaining dissolved phase contaminants in the ground water does not exceed New Mexico WQCC water quality standards or background levels. Termination of remedial action will be approved by OCD upon a demonstration of completion of remediation as described in above.

VIII. FINAL CLOSURE

Upon termination of any required remedial actions (Section VII.) the area of a leak, spill or release may be closed by backfilling any excavated areas, contouring to provide drainage away from the site, revegetating the area or other OCD approved methods.

IX. FINAL REPORT

Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

APPENDIX A

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity

APPENDIX B

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required:

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

- a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;
- b. the name and address of the facility;
- c. the date, time, location, and duration of the discharge;
- d. the source and cause of discharge;
- e. a description of the discharge, including its chemical composition;
- f. the estimated volume of the discharge; and
- g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the notification/and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASE

I hereby acknowledge receipt of check No. _____ dated 6/8/10

or cash received on _____ in the amount of \$ 100⁰⁰

from Transwestern Pipeline Co.

for GW-197

Submitted by: Lawrence Romero Date: 8/13/10

Submitted to ASD by: James Roman Date: 8/13/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal ☒

Modification _____ Other Discharge Plan

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____



ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

August 11, 2010

RECEIVED OCD

2010 AUG 12 A 11:10

UPS Tracking No.: 1Z 875 525 03 4738 1767

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St. Francis
Santa Fe, New Mexico 87505

Re: Transwestern Pipeline Company, Monument Compressor Station, Renewal of
Discharge Plan GW-197, Lea County, New Mexico

Dear Mr. Lowe:

The Discharge Plan for the Transwestern Pipeline Company Monument Compressor Station expires on December 20, 2010. Therefore, by this letter, Transwestern is requesting renewal of GW-197 as required by Section 3106.F. There have been no process or construction changes at the facility since issuance the last discharge plan on December 22, 2005.

As required, a tear sheet of the public notice in English and Spanish as displayed in the local Carlsbad newspaper and the filing fee check (no. 541014384) in the amount of \$100.00 accompanies this letter request. Because the facility has experienced no process or construction changes, Transwestern used the same format and information in this public notice that was submitted in the public notices that were approved by your office for the December 2005 plan approval.

Should you have any questions or require any additional information concerning this renewal request, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022. Thank you very much for your assistance in this matter.

Sincerely,

Larry Campbell
Sr. Environmental Specialist

cc: Gallup Compressor Station
Envision 205.1.20
File

Payment Date: 06/08/2010

Vendor: NEW MEXICO ENERGY MINERALS AND
Vendor ID: 4000001384

Check No.: 541014384
Check Date: 06/08/2010

Invoice Number	Invoice Date	Document Number	Reference	Gross Amount	Discount	Net Amount
			The items listed below are managed on the following account: STATE OF NEW MEXICO ENVIRONMENT DEP 2905 RODEO PARK DRIVE EAST SANTE FE			
GW197	05/18/2010	3100032818	Overnight to Larry Campbe	100.00	0.00	100.00
			Check Total.....			\$ 100.00

Transwestern Pipeline

6381 North Main Street
Roswell, NM 88201

505.625.8022 Fax: 505.627.8172

Larry Campbell
Division Environmental Specialist

January 27, 2006

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

Re: Discharge Plan Renewal and Filing Fee, Transwestern Pipeline Company,
Monument Compressor Station, OCD Discharge Plan GW-197

Dear Mr. Anderson:

Enclosed find check no. 8000003819 in the amount of \$1800.00 issued by Transwestern Pipeline Company to cover the required renewal and filing fee for the above referenced facility's OCD Discharge Plan.

Should you require additional information concerning this submittal, contact the undersigned at our Roswell Technical Operations office at (505) 625-8022.

Sincerely,



Larry Campbell
Division Environmental Specialist

Xc: envisions file no. 205.1.20
Carlsbad Team

NEW MEXICO, MINERALS AND NATURAL RE
OIL CONSERVATION DIVISION
1220 SOUTH ST FRANCIS DRIVE
SANTA FE NM 87505

VENDOR NO.	CHECK NO.	DATE
47056	8000003819	01/23/2006

INVOICE NUMBER	INVOICE DATE	VOUCHER ID	GROSS AMOUNT	DISCOUNT TOTAL	PAID AMOUNT
GW-197 WATER QUALITY	01/09/2006 MANAGEMENT FUND	593063	\$1,800.00	\$0.00	\$1,800.00
		TOTAL	\$1,800.00	\$0.00	\$1,800.00

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-197
TRANSWESTERN PIPELINE COMPANY
MONUMENT TURBINE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
December 22, 2005

1. Payment of Discharge Plan Fees: The \$100 filing fee has not been received as of this date. There is a required flat fee for natural gas compressor stations with a horsepower rating of greater than 1,000 horsepower of \$1,700. Both the filing fee and the renewal fee are due and payable upon receipt of this approval.
2. Commitments: Transwestern will abide by all commitments submitted in the discharge plan renewal application letter dated November 20, 2004 and these conditions of approval.
3. Waste Disposal: All wastes will be disposed of at an NMOCD-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 NMOCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by NMOCD on a case-by-case basis.
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 NMOCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every five (5) years. The operator 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 NMOCD. The NMOCD 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 NMOCD regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to NMOCD Rule 116 and WQCC 1203 to the NMOCD Hobbs District Office.
14. Transfer of Discharge Plan: The NMOCD 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 NMOCD prior to transfer.
15. Storm Water Plan: N/A
16. Closure: The NMOCD will be notified when operations at the Monument Turbine Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Monument Turbine Compressor Station, the Director will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Conditions accepted by: Transwestern Pipeline Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change these conditions and requirements of this permit administratively.

Transwestern Pipeline Company

Print Name: Don Hawkins
Signature: Don Hawkins
Title: Vice President - Operations
Date: 1/16/06



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

December 22, 2005

Mr. Larry Campbell
Transwestern Pipeline Company
6381 North Main
Roswell, New Mexico 88201

RE: Discharge Plan Renewal GW-197
Transwestern Pipeline Company
Monument Turbine Compressor Station
Lea County, New Mexico

Dear Mr. Campbell

The ground water discharge plan renewal application GW-197 for the Transwestern Pipeline Company (Transwestern) Monument Turbine Compressor Station located in Section 6, Township 21 South, Range 34 East, NMPM, Lea 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 (NMOCD) Santa Fe office within 10 working days of receipt of this letter.

The original discharge plan application was submitted on May 9, 1995 and approved December 20, 1995. The discharge plan renewal application letter, dated November 20, 2004, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Transwestern of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Transwestern of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open tanks (exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered non-hazardous 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, Transwestern is required to notify the Director of any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on December 20, 2010, and Transwestern 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

Transwestern Pipeline Co.

GW-197

December 22, 2005

Page 2 of 4

discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan renewal application for the Transwestern Monument Turbine Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application will be assessed a filing fee of \$100. There is a renewal flat fee assessed for gas compressor station facilities with a horsepower rating of 1,000 horsepower of \$1,700.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long horizontal flourish extending to the right.

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

Copy: NMOCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-197
TRANSWESTERN PIPELINE COMPANY
MONUMENT TURBINE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
December 22, 2005

1. Payment of Discharge Plan Fees: The \$100 filing fee has not been received as of this date. There is a required flat fee for natural gas compressor stations with a horsepower rating of greater than 1,000 horsepower of \$1,700. Both the filing fee and the renewal fee are due and payable upon receipt of this approval.
2. Commitments: Transwestern will abide by all commitments submitted in the discharge plan renewal application letter dated November 20, 2004 and these conditions of approval.
3. Waste Disposal: All wastes will be disposed of at an NMOCD-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 NMOCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by NMOCD on a case-by-case basis.
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 NMOCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every five (5) years. The operator 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 NMOCD. The NMOCD 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 NMOCD regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to NMOCD Rule 116 and WQCC 1203 to the NMOCD Hobbs District Office.
14. Transfer of Discharge Plan: The NMOCD 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 NMOCD prior to transfer.
15. Storm Water Plan: N/A
16. Closure: The NMOCD will be notified when operations at the Monument Turbine Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Monument Turbine Compressor Station, the Director will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Conditions accepted by: Transwestern Pipeline Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change these conditions and requirements of this permit administratively.

Transwestern Pipeline Company

Print Name: _____

Signature: _____

Title: _____

Date: _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 902 dated 1/31/01,
or cash received on 2/16/01 in the amount of \$ 345.00
from TRANSWESTERN PIPELINE CO.
for MONUMENT C.S. GW-197

Submitted by: _____ Date: _____
(Family Name) (DP No.)

Submitted to ASD by: Ed Martin Date: 2/16/01

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal ☒

Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____

**NEW MEXICO ENVIRONMENT DEPARTMENT
REVENUE TRANSMITTAL FORM**

Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1 CY Reimbursement Project _____ Tax _____	064	01						1
5 Gross Receipt Tax	064	01		2329	900000	2329134		2
3 Air Quality Title V	092	13	1300	1896	900000	4169134		3
4 PRP Prepayments	248	14	1400	9696	900000	4989014		4
2 Climax Chemical Co.	248	14	1400	9696	900000	4989015		5
6 Circle K Reimbursements	248	14	1400	9696	900000	4989248		6
7 Hazardous Waste Permits	339	27	2700	1696	900000	4169027		7
8 Hazardous Waste Annual Generator Fees	339	27	2700	1896	900000	4169339		8
10 Water Quality - Oil Conservation Division	341	29		2329	900000	2329029		10
11 Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4189029	345.00	11
12 Air Quality Permits	631	31	2500	1696	900000	4169031		12
13 Payments under Protest	651	33		2919	900000	2919033		13
*14 Xerox Copies	652	34		2349	900000	2349001		*14
15 Ground Water Penalties	652	34		2349	900000	2349002		15
16 Witness Fees	652	34		2349	900000	2439003		16
17 Air Quality Penalties	652	34		2349	900000	2349004		17
18 OSHA Penalties	652	34		2349	900000	2349005		18
19 Prior Year Reimbursement	652	34		2349	900000	2349006		19
20 Surface Water Quality Certification	652	34		2349	900000	2349009		20
21 Jury Duty	652	34		2349	900000	2349012		21
22 CY Reimbursements (i.e. telephone)	652	34		2349	900000	2349014		22
*23 UST Owner's List	783	24	2500	9696	900000	4969201		*23
*24 Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
*25 UST Maps	783	24	2500	9696	900000	4969203		*25
*26 UST Owner's Update	783	24	2500	9696	900000	4969205		*26
*28 Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
*29 Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
*30 Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
31 Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
32 Smoking School	783	24	2500	9696	900000	4969214		32
*33 SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
*34 Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
*35 Sale of Equipment	783	24	2500	9696	900000	4969301		*35
*36 Sale of Automobile	783	24	2500	9696	900000	4969302		*36
*37 Lost Recoveries	783	24	2500	9696	900000	4969814		*37
*38 Lost Repayments	783	24	2500	9696	900000	4969815		*38
39 Surface Water Publication	783	24	2500	9696	900000	4969801		39
40 Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
41 Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
42 Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
44 Ust Permit Fees	989	20	3100	1696	900000	4169020		44
45 UST Tank Installers Fees	989	20	3100	1696	900000	4169021		45
46 Food Permit Fees	991	28	2600	1696	900000	4169026		46
43 Other								43

* Gross Receipt Tax Required

** Site Name & Project Code Required

TOTAL 345.00

Contact Person:

Ed Martin

Phone:

3492

Date:

2/16/01

Received in ASD By:

Date:

RT #:

ST #:



**Enron Transportation
& Storage**

*Services Provided by Northern
Natural Gas Company and
Transwestern Pipeline Company*

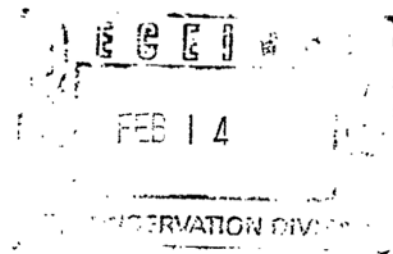
6381 North Main Street

Roswell, NM 88201

(505) 623-2761

Fax (505) 625-8060

February 9, 2001



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

Re: Discharge Plan Renewal Flat Fee, Monument Turbine Compressor Station,
GW 197

Dear Mr. Anderson:

Enclosed find check no. 100000902 in the amount of \$345.00 issued by Transwestern Pipeline Company to cover the required fee for renewal of the above referenced facility's OCD Discharge Plan.

Sincerely,

Larry Campbell
Division Environmental Specialist

Transwestern Pipeline Co
P.O. Box 1188
Houston, TX 77251-1188



NEW MEXICO OIL CONSERVATION
DIVISION
1220 S ST FRANCIS DR
SANTA FE NM 87505

01/31/2001

PAGE 1 OF 1

VENDOR NO: 5000068281

REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
	01/31/2001	GW-197 FEE		345.00		345.00
					TOTAL	345.00

SPECIAL INSTRUCTIONS:

TO: L. CAMPBELL 6381 N. MAIN, ROSWELL, NM 88201

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS. CHECK # 1000000902 ATTACHED BELOW



Transwestern Pipeline Co
P.O. Box 1188
Houston, TX 77251-1188

No. [REDACTED]

01/31/2001

PAY TO THE
ORDER OF

NEW MEXICO OIL CONSERVATION
DIVISION
1220 S ST FRANCIS DR
SANTA FE NM 87505

*****\$345.00

NOT VALID AFTER 1 YEAR

Three hundred forty five and 00/100 Dollars

J. Maushon

AUTHORIZED SIGNATURE

CITIBANK

THE FACE OF THIS DOCUMENT HAS A BLUE BACKGROUND ON WHITE PAPER • THE BACK CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenberg

Director

Oil Conservation Division

January 22, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 3771-6968

Mr. Larry Campbell
Transwestern Pipeline Company
6381 North Main
Roswell, New Mexico 88201

RE: Discharge Plan Renewal GW-197
Transwestern Pipeline Company
Monument Turbine Compressor Station
Lea County, New Mexico

Dear Mr. Campbell

The ground water discharge plan renewal application **GW-197** for the **Transwestern Pipeline Company Monument Turbine Compressor Station** located in Section 6, Township 21 South, Range 34 East, NMPM, Lea 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 9, 1995 and approved December 20, 1995. The discharge plan renewal application letter, dated May 30, 2000, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Transwestern Pipeline Company of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Transwestern Pipeline Company of its responsibility to comply with any other governmental authority's rules and regulations.

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

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

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 3.77	
Recipient's Name (Please Print Clearly) (To be completed by mailer) LARRY CAMPBELL / TRANSWESTERN PIPELINE		
Street, Apt. No., or PO Box No. 6381 N. MAIN		
City, State, ZIP+4 ROSWELL, NM 88201		
PS Form 3800, February 2000 See Reverse for Instructions		

GW-197

Mr. Larry Campbell
GW-197
January 22, 2001
Page 2

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, Transwestern Pipeline 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.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on **December 20, 2005**, and Transwestern Pipeline 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.

The discharge plan renewal application for the Transwestern Pipeline Company Monument Turbine 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 \$50.00. There is a renewal flat fee assessed for gas compressor station facilities with a horsepower rating of 2,200 horsepower equal to one-half of the original flat fee or 345.00. The OCD has 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/eem
Attachment

Xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-197
TRANSWESTERN PIPELINE COMPANY
MONUMENT TURBINE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
January 22, 2001

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with a horsepower rating of 2,200 horsepower. The renewal flat fee required for this facility is \$345.00 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. The filing fee is payable at the time of application and is due upon receipt of this approval.
2. Commitments: Transwestern Pipeline Company will abide by all commitments submitted in the discharge plan renewal application letter dated May 30, 2000 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.
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.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every five (5) years. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results for this facility dated February 18, 1998 have been received.
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 Hobbs 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.

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

June 17, 1996

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

Re: Discharge Plan Filing Fee, Monument Turbine Compressor Station

Dear Mr. Anderson:

Enclosed find check no. 0602015971 in the amount of \$50.00 issued by Transwestern Pipeline Company to cover the required filing fee for the above referenced facility's discharge plan.

Sincerely,



Larry Campbell
Division Environmental Specialist

file

0023811 SD

7673

EMSA3

06/06/96

NMED WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
2040 SOUTH PACHECO ST
SANTA FE, NM
87504

PG 1 OF 1

VENDOR NO. #B22134121

REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NUMBER	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
9606000453	06/05/96	INVMONUMENT		50.00	0.00	50.00
			LARRY CAMPBELL MONUMNENT OCD FEE			
						TOTAL 50.00

SPECIAL INSTRUCTIONS:

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 6/6/96
or cash received on _____ in the amount of \$ 50.00
from ENRON

for Monument C.S. GW-197

Submitted by: _____ Date: _____
(Facility Name) (OP No.)

Submitted to ASD by: R. Anderson Date: 7/2/96

Received in ASD by: James Salazar Date: 7-2-96

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 _____

**ENRON
CORP**

TRANSWESTERN PIPELINE COMPANY
P.O. BOX 1188
HOUSTON, TEXAS 77251-1188

62-20
311

No. [REDACTED]

06/06/96

PAY TO THE
ORDER OF NMED-WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
2040 SOUTH PACHECO ST
SANTA FE, NM
87504

SSSSSSSSSSSSSSSS50.0

NOT VALID AFTER 90 DAYS

Fifty and 00/100 Dollars

KML
AUTHORIZED SIGNATURE

CITIBANK DELAWARE, A SUBSIDIARY OF CITICORP
ONE PENN'S WAY, NEW CASTLE, DE 19720

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 5/13/96
or cash received on _____ in the amount of \$ 690.00
from ENRON

for Monument C.S. GW-197
(Filing Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R. Chudman Date: 5/31/96

Received in ASD by: Dianne Salazar Date: 5/31/96

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 _____

**ENRON
CORP**

TRANSWESTERN PIPELINE COMPANY
P.O. BOX 1188
HOUSTON, TEXAS 77251-1188

62-20
311

No. [REDACTED]

05/13/96

PAY TO THE
ORDER OF

NMED WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
2040 SOUTH PACHECO ST
SANTA FE, NM
87504

SSSSSSSSSSSSSS690.00

NOT VALID AFTER 90 DAYS

Six Hundred Ninety and 00/100 Dollars

KML

AUTHORIZED SIGNATURE

CITIBANK DELAWARE, A SUBSIDIARY OF CITICORP
ONE PENN'S WAY, NEW CASTLE, DE 19720

0029537

SD

7656

EMSA3

05/13/96

NMED-WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
2040 SOUTH PACHECO ST
SANTA FE, NM
87504

PG 1 OF 1

VENDOR NO. #B22134121

REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NUMBER	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
9605001270	05/13/96	INVMONUMENT		690.00	0.00	690.00
			LARRY CAMPBELL MONUMENT TURBINE		DISCHARGE PLAN FEE	
					TOTAL	690.00

SPECIAL INSTRUCTIONS:



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

December 20, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-737

Mr. Larry Campbell
Transwestern Pipeline Company
6381 North Main Street
Roswell, New Mexico 88201

**RE: Discharge Plan Approval GW-197
Monument Turbine Compressor Station
Lea County, New Mexico**

Dear Mr. Campbell:

The discharge plan GW-197 for the Transwestern Pipeline Company, Monument Turbine Compressor Station located in Section 6, Township 21 South, Range 34 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The application consists of the discharge plan dated May 9, 1995, and additional information dated December 15, 1995.

The discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F. which provide for possible future amendments or modifications of the plan. Please be advised the approval of this plan does not relieve you of liability should your operation 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.

Mr. Larry Campbell
December 20, 1995
Page 2

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

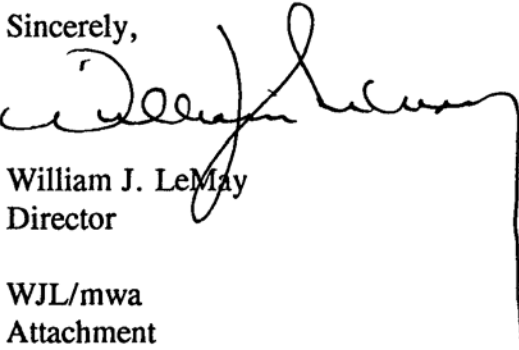
Pursuant to Section 3109.G.4., this plan is for a period of five (5) years. This approval will expire on December 20, 2000, and you should submit an application for renewal in ample time before this date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the Transwestern Pipeline Company, Monument Turbine Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus the flat fee of \$690 for compressor stations with a combined horsepower of 1001 to 3000. The New Mexico Oil Conservation Division (OCD) has not received your filing fee or your flat fee. The \$50 filing fee shall be submitted upon receipt of this approval. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

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

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,

A handwritten signature in black ink, appearing to read 'William J. LeMay', with a long, sweeping vertical line extending downwards from the end of the signature.

William J. LeMay
Director

WJL/mwa
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-197 APPROVAL
TRANSWESTERN PIPELINE COMPANY
MONUMENT TURBINE
DISCHARGE PLAN REQUIREMENTS
(December 20, 1995)

1. Payment of Discharge Plan Fees: The \$50 filing fee and the \$690 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
2. Transwestern Commitments: Transwestern will abide by all commitments submitted in the application letter dated May 9, 1995, and the additional information letter dated December 15, 1995.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad (i.e. concrete, asphalt, or other suitable containment) with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad with curbing.
4. Below Grade Tanks/Sump: 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 or sumps.
5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable type pad and curb containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure. No berms are required for saddle tanks.
7. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and Hobbs District Offices pursuant to WQCC Rule 1203 and OCD Rule 116.
8. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

9. **Transfer of Discharge Plan:** Prior to any transfer of ownership, control, or possession of your facility, the OCD will be notified. A written request must be submitted and approved by the OCD prior to the transaction.
10. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

Z 765 962 737



**Receipt for
Certified Mail**

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

PS Form 3800, March 1993

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	

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

December 15, 1995

RECEIVED

DEC 18 1995

Mr. Mark Ashley
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Re: Discharge Plan Application Resubmittal, Monument Turbine Compressor Station

Dear Mr. Anderson:

Enclosed find three (3) copies of a discharge plan application for the above referenced facility. This document is being resubmitted to your agency on behalf of Transwestern Pipeline Company, pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. **RECEIVED**
DEC 19 1995
Environmental Bureau
Oil Conservation Division

This discharge plan application resubmittal includes figures and attachments accidentally omitted from the original submittal of May 9, 1995. Please discard the previously submitted plan applications and replace them with the enclosed.

I apologize for any inconveniences caused by this resubmittal. If you require any additional information or clarification concerning this discharge plan application, please contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,



Larry Campbell
Division Environmental Specialist

xc: file

I. GENERAL INFORMATION

A. Discharger/Legally Responsible Party

Name: Transwestern Pipeline Company
Attn: Merlyn Coffman, Team Leader

Mailing Address: Transwestern Pipeline Company
6381 North Main Street
Roswell, New Mexico 88201
(505) 625-8022

B. Local Representative or Contact Person

Larry Campbell, Division Environmental Specialist

C. Location of Discharge

Legal Description: Township 21 South, Range 34 East, Section 6, Lea County
UTM Zone 13
UTMH 640.779 km East
UTMV 3597.286 km North

A state of New Mexico USGS map of the immediate site area and a plot plan showing location of the compressor station layout and equipment are presented in APPENDIX A.

Note: All onsite routine operational discharges are directed to sumps or above-ground tanks with subsequent transfer offsite for appropriate disposal and/or recycling. This activity is conducted by an appropriate disposal company. No onsite discharges of any liquid or solid are intentionally performed at this location. All waste streams at this facility are segregated and directed into dedicated tanks.

D. Type of Natural Gas Operation

This field compressor station provides compression for the transmission of natural gas in the collected from producing wells in the area. Once compressed at the facility, the natural gas is transported to the 24" mainline system and is delivered to Transwestern's Wt-1 compressor station located approximately 25 miles west of Eunice, New Mexico.

E. Copies

Three copies of the discharge plan application are enclosed.

F. Affirmation

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

Sincerely,

Larry Campbell
Division Environmental Specialist

II. PLANT FACILITIES

A. Sources and quantities of effluent and plant fluids. For each source, primary quality type (e.g., high TDS water, hydrocarbons, washwater, sewage), estimated quantities, and major additives, if any are provided.

1. Scrubbers. The incoming gas stream to this facility contains liquids in the form of natural gas pipeline liquids, or condensate. These entrained liquids are then removed by the operation of the onsite inlet scrubbers. These liquids are then transferred for collection in a 100 bbl. pipeline liquids tank. Liquids which are received during pigging operations are temporarily collected in a small 5 gallon sump and transferred to the pipeline liquids tank. The volume of pipeline liquids collected on a daily basis is determined by operation of the two onsite turbines and the liquids received during a pigging operation. However, as a general rule, approximately six gallons/day of pipeline liquids are collected by this system.

2. Engines and cooling waters. The turbines present at this facility not use liquid coolants in their operational processes.

3. Domestic Sewage. Domestic sewage is collected in a portable system which is transferred from the site periodically.

4. Engine Wash Down Water and Floor Drains: Not generated. Small quantities of wastewater collected within containment areas from cleaning and washdown operations is allowed to evaporate. Small quantities of water collecting within the containments from rain or snow melt is also allowed to evaporate.

5. Waste engines Oils: Lubricative oil changeouts from the two onsite turbines do not normally require oil changes. Only when the units are being taken down for repair or maintenance might the oil be removed from the engines. During periods when this activity occurs, the used oil is removed from the turbines and transferred to series of 55 gallon drums and transported to an offsite used oil tank for recycling. Prior to removal from this facility oil samples are collected and analyzed from the tank for proper recycling or recovered as boiler fuel makeup. Sample results are presented in APPENDIX B.

Chemical materials stored onsite in excess of 55 gallons may include: gear and engine oil, methanol, biodegradable soap and solvent, steam cleaner degreaser.

B: Quality Characteristics

Presented below are the characteristics of the individual waste streams which are generated on site. All waste streams have been separated and are segregated into dedicated sumps and tanks.

1. Pipeline Liquids: Exempt. This material is marketed for burner fuel or recycled into a fuel product.
2. Used Engine Oil: Prior to removal from the facility for recycling, this material is sampled as per 40 CFR 266. Analytical testing results are presented in APPENDIX B.
3. Oily Wastewater. Not generated.

C. Transfer and Storage of Fluids and Effluent

1. Water and wastewater plan schematics are not applicable as there is no individual water treatment units onsite. Liquid wastes are not discharged onsite. All liquids and liquid wastes are temporarily stored in sumps and tanks until they are transferred offsite for recycling and/or disposal.

2. Potential surface and groundwater contaminants, which may be discharged within the compressor station would be associated with sumps, above ground storage tanks and connecting ground pipes. Sumps and tanks are visually inspected periodically. All tanks have been engineered to be visually inspected for tank leakage and contained in concrete secondary containment of capacities which equal 150%. This surpasses the OCD requirement for 130 % containment storage.

a. Pipeline liquids tank - 100 bbl. capacity , steel walled; contains liquids received from scrubber, and pig receiver. Liquids are tested periodically and removed from the tank at scheduled intervals for offsite recycling.

b. Oil storage tank - 750 gallon capacity, containing Citgo NGL.

3. Underground wastewater pipes, their age and specification are: Piping materials are constructed of 0.25 inch steel schedule 80 grade B and are seamless.

a. All underground pipes are designed and constructed according to Transwestern's specifications. They are made of coated steel and connected to the facility rectifier system for corrosion control. The existing underground pipes were installed in 1993.

D. Spill/Leak Prevention and Housekeeping Procedures

1. SPCC Plan: Procedures addressing spill containment and cleanup, including proposed schedule for OCD notification of spills will be described in the facility's Spill Prevention Control and Countermeasures (SPCC) plan. This document is permanently filed onsite at the facility. The following contractors are presently used for disposal of the following liquid waste streams:

a. Used lubrication and gear oil:

Mesa Oil Co.
4701 Broadway SE
Albuquerque, New Mexico 87105
(505) 877-8855

b. Used Oil filters:

Waste Management of Southeast New Mexico
2608 Lovington Highway
Hobbs, New Mexico 88240
(505) 392-6571

c. Other solid waste:

Waste Management of Southeast New Mexico
2608 Lovington Highway
Hobbs, New Mexico
(505) 392-6571

Monument Turbine Compressor Station Discharge Plan
Page 6

2. Housekeeping: Precipitation runoff is directed from the station facility. All chemicals and products are contained in concrete secondary containment. Containments have also been constructed around the engine
3. Leak Detection: All aboveground tank systems are visually inspected monthly to detect leaks and ensure tank integrity. Visual sump inspections are performed annually.
4. Well System: There is no onsite well system.

IV. SITE CHARACTERISTICS

a. Site Features

The approximate 0.25 acre site is presently fenced for security measures. There is approximately 6 inches of relief across the extent of the property, sloping towards the east. Permanent buildings which are present on the site include: the office, and maintenance shop.

The closest existing residential development is the town of Monument, New Mexico located 16 miles to the northeast of the facility.

1. Geology. The Monument Lateral Compressor Station is located in southern Lea County in section 6, T. 21 S., R. 34 E. This area lies within the High Plains subdivision of the Great Plains Physiographic Province. The facility is located on a high area called the Grama Ridge that is named after a southwestward facing scarp bordering the northeast side of the San Simon Swale. The area is depicted by a hard caliche surface with numerous shallow depressions. The depressions are dissected by deep gullies, most trending southeastward.

This region in southern Lea County is within the back reef or shelf area of the Permian Basin and is underlain by a thick (more than 17,000 feet) stratigraphic sequence containing units ranging in age from Paleozoic through Quaternary. Table 1 shows the units of significance and their general lithologic character:

Table 1. Stratigraphic Units in Southern Lea County, New Mexico (1)

Geologic Age	Geologic Unit	General Character
(Quaternary) Pleistocene	Alluvium	Channel and lake deposits; alternating thickbedded calcareous silt, fine sand, and clay; less than 100 feet thick in most places.
(Tertiary) Pliocene	Ogallala Formation	Semiconsolidated fine-grained calcareous sand capped with thick layer of caliche; contains some clay, silt, and gravel.
(Triassic) Dockum Group	Chinle Formation	Claystone, red and green; minor fine-grained sandstones and siltstones; underlies all of eastern part of southern Lea County area; thins westward; absent in extreme west.
(Triassic) Dockum Group	Santa Rosa Sandstone	Sandstone, chiefly red but locally white, gray, or greenish-gray; fine- to coarse-grained; exposed in extreme west; underlies Cenozoic rocks in western part of area, and is present at depth in eastern part.

The Quaternary alluvium sediments are generally found in the depressions and gullies in the Ogallala formation. The Ogallala Formation underlies the Grama Ridge. The thickness of the flat lying formation is dependent on the irregular erosional surface cut into the Triassic rocks. Underlying the Grama Ridge, the Ogallala thickness ranges from a few inches to more than 100 feet thick.

Monument Turbine Compressor Station Discharge Plan
Page 7

Beneath the terrestrial sediments of the Ogallala is the Dockum Group of Triassic age. The Dockum Group is mainly a sequence of red beds that is divided into the Chinle Formation and the Santa Rosa Sandstone. The uppermost Chinle Formation ranges in thickness from zero to 1,270 feet. The Chinle is missing in the western portion of the county due to erosion after deposition. The Santa Rosa Sandstone ranges in thickness from 140 to more than 300 feet. In the western portion of the county these Triassic rocks generally dip toward the southeast or east.

Potable ground water is found in the Dockum Group, the Ogallala Formation, and the Quaternary Alluvium. The Santa Rosa Sandstone is the principal aquifer in the western third of the county. This unit is recharged by precipitation on the sand dunes directly overlying the sandstone, precipitation and runoff on to out crops, and ground water flow down through the overlying Ogallala and alluvium. Wells completed in the Dockum Group generally have low yields because of the low permeability of the formations.

The Ogallala Formation produces higher yields and better quality water. In the Grama Ridge area the Ogallala Formation is present but is unsaturated in most areas. If present, ground water is limited to the basal few feet of the formation. Ground water is also produced from Quaternary fill in Triassic surface depressions.

Ground water flow in the Dockum Group appears to be away from recharge areas, which in this area is to the south and southeast. Ground water flow in the Ogallala Formation generally follows the surface contour of the Triassic rocks. Water wells, situated in the same township and range as the Compressor Station, are producing

from both the Ogallala and the Chinle Formations. Ground water levels were measured between 63 and 137 feet below ground surface in wells producing from the Ogallala Formation and between 88 and 101 feet below ground surface in wells producing from the Chinle Formation.

2. Soils: Refer to Geology Section, above.

3. Vegetation: The vegetation of the area is typical for the climate and site aspect present at the facility. The potential plant community on this unit is short and mid grasses and shrubs.

Monument Turbine Compressor Station Discharge Plan
Page 6

A. Hydrologic features

1. Bodies of Water: There are no permanent bodies of water located within one mile of the facility.
2. Depth to Groundwater: Refer to Geology section, above.
3. Water Chemistry: Potable water for the facility is received from bottled water which is brought onsite.

B. Flood Protection

1. Flood Potential: There is no known record or indication of flooding onsite.
2. Flood Protection: Curbs, secondary containments and culverts have been constructed to retain all rainwater collected in tank areas. There have been no onsite hydrocarbon releases to the adjacent undisturbed soils.

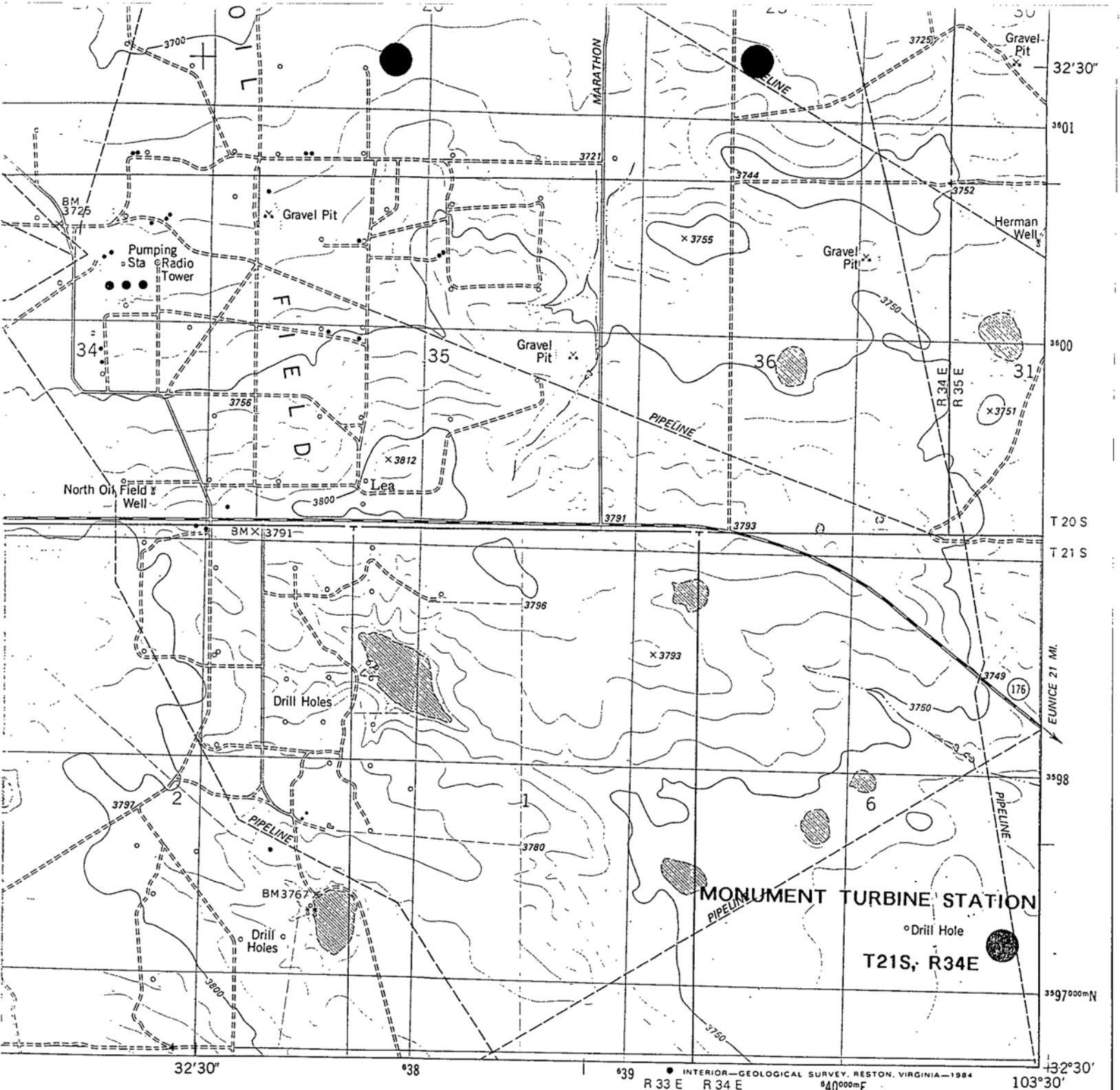
V ADDITIONAL INFORMATION

To be supplied upon request from the Oil Conservation Division.

References

1. Geology and Ground Water Conditions in Southern Lea County, New Mexico, by A. Nicholson, Jr. and A. Clebsch Jr., 1961, 123p.
2. Mineral and Water Resources of New Mexico, compiled in cooperation with U. S. Geological Survey, State Engineer of New Mexico, New Mexico Oil Conservation Commission, and U.S. Bureau of Mines, 1965, reprinted 1982, 437 p.
3. Roadside Geology of New Mexico, by Halka Chronic, 5th printing 1992, 255 p.
4. New Mexico State Engineers Office, Roswell, New Mexico.

APPENDIX A
MAP AND FACILITY LAYOUT



1 MILE
7000 FEET
KILOMETER



QUADRANGLE LOCATION

ROAD CLASSIFICATION

Primary highway, hard surface	Light-duty road, hard or improved surface
Secondary highway, hard surface	Unimproved road
Interstate Route	U. S. Route
	State Route

LEA, N. MEX.

SE/4 LAGUNA GATUNA 15' QUADRANGLE
32103-E5-TF-024

1984

DMA 5249 II SE-SERIES V881

ON, VIRGINIA 22092
REQUEST

APPENDIX B
WASTE/USED OIL SAMPLE RESULTS

TERRELL LABORATORIES, LTD.
2525 SOUTH SHORE BLVD, SUITE 100 LEAGUE CITY, TX 77573
713/334-5052 FAX 713/334-3116

LAB ANALYSIS REPORT

Report Date: SEPT 28 1995

Page # 1

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
21 S. Main
Carlsbad, NM 88220
Attn: Youngblood, Shane
Sample Number: 95005173
Project Name:

Reviewed by:DKP

Job Number:
Date Collected:09/10/95
Time Collected:0
Sample Type: GRAB

Sample ID: 054 MON TUR USED OIL

Date Received: 09/14/95

Test Code	Analyte	Result	Units	Method	Analyst
OX'D	TOX Analysis (Date/Time)	09/25 1300	init.		TMG
OX'S	Total Organic Halogen	240	mg/kg	6-9020A	TMG
CBOX'D	Waste Dilution (D/T)	09/21 1100	init.	6-3580A	SAK
CBO'D	PCB Analysis (Date/Time)	09/23 1006	init.	1-D4059	SAK
CB10160	Aroclor-1016	< 2	mg/kg	1-D4059	SAK
CB12210	Aroclor-1221	< 2	mg/kg	1-D4059	SAK
CB12320	Aroclor-1232	< 2	mg/kg	1-D4059	SAK
CB12420	Aroclor-1242	< 2	mg/kg	1-D4059	SAK
CB12480	Aroclor-1248	< 2	mg/kg	1-D4059	SAK
CB12540	Aroclor-1254	< 2	mg/kg	1-D4059	SAK
CB12600	Aroclor-1260	< 2	mg/kg	1-D4059	SAK
CBPo	DCBP (surr)	65.	%	40-110	SAK
CMXo	TCMX (surr)	80.	%	25-140	SAK
LSHPT'D	Flashpoint Analysis (Date/Time)	09/28 1400	init.		DPP
MFLSHPT	Flashpoint, Pensky-Marten	158	deg. F	6-1010	DPP
ICPS'D	ICP Acid Digest. (D/T)	09/21 1430	init.	6-3050	RR
CP'S1'D	ICP1 Analysis (Date/Time)	09/22 0939	init.	6-6010	EMJ
sICPs	Arsenic	< 5.4	mg/kg	6-6010	EMJ
dICPs	Cadmium	< 0.33	mg/kg	6-6010	EMJ
rICPs	Chromium	< 0.33	mg/kg	6-6010	EMJ

LAB ANALYSIS REPORT

Report Date: SEPT 28 1995

Page # 2

TRANSWESTERN PIPELINE-CARLSBAD NEW MEXIC
621 S. Main
Carlsbad , NM 88220
Attn: Youngblood, Shane
Sample Number: 95005173
Project Name:

Reviewed by:DKP

Job Number:
Date Collected:09/10/95
Time Collected:0
Sample Type: GRAB

Sample ID: 054 MON TUR USED OIL

Date Received: 09/14/95

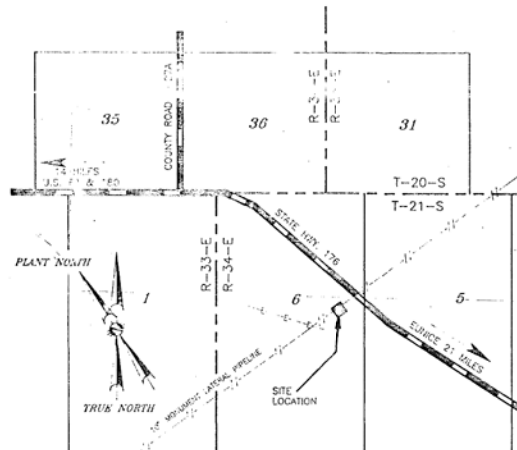
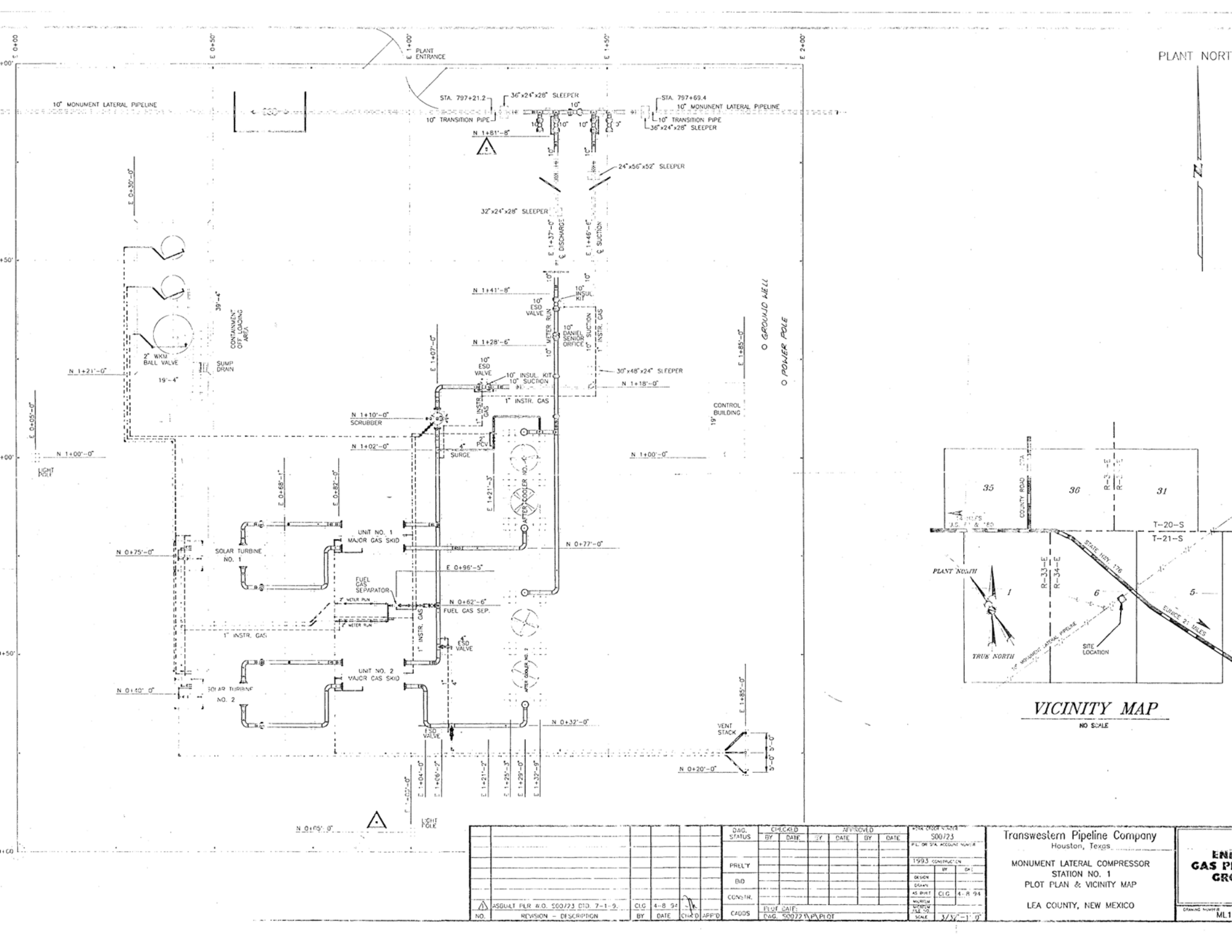
Test Code	Analyte	Result	Units	Method	Analyst
PbICPs	Lead	< 1.1	mg/kg	6-6010	EMJ

COMMENTS:

FOOTNOTES: MI - Surrogate recovery is not reportable due to matrix interferences
Dil.Fx.- Minimum dilution required to allow acceptable quantitation
ppm = mg/L(Liquid), mg/kg(Solid) ppb = ug/L(Liquid), ug/kg(Solid)
init = date & time initiated B=found in blank J=>mdl< reporting limit

Preparation and Analysis Method References:

1. ASTM: American Society for Testing and Materials, 1984.
 2. EPA-600/4-79-020, Methods for Chemical Analysis of Water and Wastes, 1978 (revised 1983).
 3. EPA-600/4-82-057, Methods for Organic Chemical Analysis of Municipal & Industrial Wastewater, 1982.
 4. HACH: Test Methods, accepted by EPA in November, 1983.
 5. SM: Standard Methods for the Examination of Water and Wastewater, 18th edition.
 6. SW: SW-846, Test Methods for Evaluation of Solid Waste, Third edition. Update I, July 1992.
- L: EPA/SW references followed by L refer to accepted minor modifications made to the methods for use with Lachat QuikChem 8000 Autoanalyzer.



VICINITY MAP
NO SCALE

NO.	ASBUILT PER W.O. 500723 DTD. 7-1-92. REVISION - DESCRIPTION	CLG BY	4-B 92 DATE	CHG APP'D	CAUS	DWG. STATUS	CHECKED		APPROVED		PLANT OR STA. ACCOUNT NUMBER	1993 CONSTRUCTION	DESIGN BY	DATE	AS BUILT CLG	4-B 94	NORTH SHEET	JAL:DL SCALE	1/2" = 1'-0"	DRAWING NUMBER	ML1
							BY	DATE	BY	DATE											
						PRELIM															
						END															
						CONSTR.															
						CAUS															
						ELUV. DATE DWG. 500723 V.P. & PLOT															

Transwestern Pipeline Company	
Houston, Texas	
MONUMENT LATERAL COMPRESSOR	
STATION NO. 1	
PLOT PLAN & VICINITY MAP	
LEA COUNTY, NEW MEXICO	

Transwestern Pipeline Company
Houston, Texas
MONUMENT LATERAL COMPRESSOR
STATION NO. 1
PLOT PLAN & VICINITY MAP
LEA COUNTY, NEW MEXICO

ENR
GAS P
CR