



ENTERPRISE PRODUCTS PARTNERS L.P.  
ENTERPRISE PRODUCTS HOLDINGS LLC  
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

March 8 2016

7014 1200 0002 0906 3810  
Return Receipt Requested

State of New Mexico  
Energy Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**Re: Enterprise Field Services LLC  
Below Grade Tank Registrations**

To Whom It May Concern:

Enterprise Field Services LLC is submitting Below Grade Tank Registrations for the following facilities:

- Poker Lake Compressor Station
- Nash Compressor Station
- Lost Tank Compressor Station
- Sand Dunes Compressor Station
- Corazon Compressor Station
- Trunk C Compressor Station
- Turkey Track Compressor Station
- Cedar Canyon Compressor Station

If you have questions or require additional information, please contact our area environmental representative, Alena Polk at (575) 706-4926, or me directly at (713) 381-6684.

Sincerely,

Jon E. Fields  
Director, Field Environmental

cc: Oil Conservation Division, District II, 811 S. First Street, Artesia, NM 88210



AMARILLO  
921 North Bivins  
Amarillo, Texas 79107  
Phone 806.467.0607  
Fax 806.467.0622

ARTESIA  
408 W. Texas Ave  
Artesia, New Mexico 88210  
Phone 575.746.8768  
Fax 575.746.8905

HOBBS  
318 East Taylor Street  
Hobbs, New Mexico 88240  
Phone 575.393.4261  
Fax 575.393.4658

MIDLAND  
2901 State Highway 349  
Midland, Texas 79706  
Phone 432.522.2133  
Fax 432.522.2180

OKLAHOMA CITY  
430 West Wilshire Blvd, Suite 10  
Oklahoma City, Oklahoma 73116  
Phone 405.486.7033

SAN ANTONIO  
13111 Lookout Way  
San Antonio, Texas 78223  
Phone 210.265.8025  
Fax 210.568.2191

ENVIRONMENTAL CONSULTING  
ENGINEERING  
DRILLING  
CONSTRUCTION  
EMERGENCY RESPONSE

Toll Free: 866.742.0742  
[www.talonlpe.com](http://www.talonlpe.com)

## **Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan**

### **Trunk C Compressor Station**

**Owned/Operated:  
Enterprise Field Services, LLC  
PO Box 4324  
Houston, TX 77210-4324**

**Prepared by: Talon/LPE  
October 2015**

## **TABLE OF CONTENTS**

### **Table of Contents**

#### **1. INTRODUCTION**

#### **2. HYDROGEOLOGIC REPORT**

#### **3. SITING CRITERIA COMPLIANCE DEMONSTRATIONS**

#### **4. DESIGN PLAN**

#### **5. OPERATION AND MAINTENANCE PLAN**

#### **6. CLOSURE PLAN**

#### **Appendix 1**

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

#### **Appendix 2**

Tank Design Drawing

#### **Appendix 3**

Photographs

#### **Appendix 4**

Maps

#### **Appendix 5**

Operating and Maintenance Plan

#### **Appendix 6**

Closure Plan

## **1. INTRODUCTION**

Enterprise Field Services, LLC is pleased to submit this application for a below-grade tank with secondary containment and leak detection. The proposed tank will be owned and operated by Enterprise Field Services, LLC and is proposed to be installed on federally owned land. The existing facility, Trunk C Compressor Station, is located at 32.144985, -103.878085 (NAD 1983), on the southeast  $\frac{1}{4}$  of the northeast  $\frac{1}{4}$  of section 9, township 25 south, range 30 east, in Eddy county. The metal tank will have the capacity to hold 100 bbl of water, used lube oil, and used antifreeze. The existing six foot, chain link fence with barbed wire surrounds the existing facility and will include the proposed tank.

Form C-144, *Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application* is included in **Appendix 1**.

## **2. HYDROGEOLOGIC REPORT**

According to the New Mexico Office of the State Engineer Water Column/Average Depth to Water report there are two groundwater wells, C 01379 (New Mexico Office of the State Engineer, 2015) and CP 03716 POD1 (New Mexico Office of the State Engineer, 2015), located within three miles of the site. C 01379 is located 0.69 miles to the southeast with no water to 400 feet. CP 03716 POD1 is located 2.45 miles northeast with water at 425 feet. There are no additional state wells located in township 25S, range 30E.

A 1962 report entitled "Ground-water investigations of the project Gnome area, Eddy and Lea Counties, New Mexico" prepared on the behalf of the U.S. Atomic Energy Commission (now the Department of Energy) (Cooper 1962) encompasses the area where the facility is situated and appears to be the best available data. In 1962, approximately 70 wells in the area showed water depth with a minimum of 6.5 feet and a maximum of 445 feet. (Cooper, 1962)

In 2005, the EPA Waste Isolation Pilot Plant (WIPP) Recertification Fact Sheet No. 5 (EPA June 2005) (Environmental Protection Agency, 2005) showed that 15 monitoring wells were drilled in the area of the Plant. Water was encountered at 50-60 feet below ground surface (bgs) in 14 of the 15 wells. The 15<sup>th</sup> well was dry.

Based on the above data, it is assumed conservatively that groundwater will be found at 58 feet bgs at the facility.

## **3. SITING CRITERIA COMPLIANCE DEMONSTRATIONS**

Based on topographic maps and aerial views of the site, there are no flowing or significant watercourses, lakebeds, sinkholes, wetlands, playa lakes, springs, public-use fresh water wells, or fresh water wells used for livestock consumption within a 200 foot radius of the proposed site. These maps can be found in **Appendix 4** of this report.

The bottom of the tank's outer wall will rest five feet below grade. Since data shows that groundwater levels are at approximately 58 feet, the bottom of the tank will be greater than 25 feet above groundwater.

#### **4. DESIGN PLAN**

A sign of at least 12 inches by 24 inches is currently posted upright in a conspicuous place on the surrounding fence, with lettering at least two inches in height. The sign includes the operator's name, the specific location of the site, and all necessary emergency telephone numbers. A photograph of the sign on site is included in **Appendix 3**.

A surrounding chain link perimeter fence is currently in place around the facility that will include the below-grade tank. This fence is six feet in height with three strands of barbed wire at the top. A photograph of the fence on site is included in **Appendix 3**.

The 100 bbl tank will be constructed of metal and will be resistant to sunlight damage, and to its contents of water, condensate, used lube oil, and used antifreeze. It will have a cone-shaped top to prevent damage from snow or water puddling, and it will be double-walled with leak detection capabilities. The foundation will have a level base free of anything that could damage the liner or tank bottom. Drawings of the tank design are included in **Appendix 2**.

#### **5. OPERATION AND MAINTENANCE PLAN**

The operation and maintenance plan will follow what is required by NMAC 19.15.17.12, and can be found in **Appendix 5** of this report.

#### **6. CLOSURE PLAN**

The closure plan will follow what is required by Subsection C of NMAC 19.15.17.9, and can be found in **Appendix 6**.

Cooper. (1962). *Ground-water investigations of the project Gnome area, Eddy and Lea Counties, New Mexico*. U.S. Atomic Energy Commission.

Environmental Protection Agency. (2005, June). EPA Waste Isolation Pilot Plant (WIPP) Recertification Fact Sheet No. 5. New Mexico, USA.

New Mexico Office of the State Engineer. (2015, 08 25). Point of Diversion Summary, POD 01379. New Mexico, USA.

New Mexico Office of the State Engineer. (2015, August 25). Point of Diversion Summary, C 03716 POD1. New Mexico, USA.

## **Appendix 1**

**Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan  
Application**

**Form C-144**

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

State of New Mexico  
Energy Minerals and Natural Resources  
Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-144  
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.  
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☒ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
☐ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions:** Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Enterprise Field Services, LLC OGRID #: \_\_\_\_\_  
Address: P O Box 4324, Houston, TX 77210-4324  
Facility or well name: Trunk C Compressor Station  
API Number: N/A OCD Permit Number: N/A  
U/L or Qtr/Qtr SE 1/4 of NE 1/4 of Section 9 Township 25S Range 30E County: Eddy  
Center of Proposed Design: Latitude 32.144985 Longitude -103.878085 NAD: ☐ 1927 ☒ 1983  
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 100 bbl Type of fluid: used lube oil, water, antifreeze  
Tank Construction material: steel  
☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other \_\_\_\_\_  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)  
☒ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☐ Alternate. Please specify \_\_\_\_\_

6.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

☐ Screen ☐ Netting ☐ Other \_\_\_\_\_

☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers **Appendix 3**

☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variances and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

*Please check a box if one or more of the following is requested, if not leave blank:*

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

**General siting**

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☒ NM Office of the State Engineer - iWATERS database search; ☒ USGS; ☐ Data obtained from nearby wells

☐ Yes ☒ No  
☐ NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**  
NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☒ No

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☒ No

Within an unstable area. (**Does not apply to below grade tanks**)

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☒ No

Within a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

☐ Yes ☒ No

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site **Appendix 4**

☐ Yes ☒ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site **Appendix 4**

☐ Yes ☒ No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (**Applies to low chloride temporary pits.**)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300 feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- ☒ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC **Appendix 4**
- ☒ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC **Appendix 2**
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC **Appendix 5**
- ☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC **Appendix 6**

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Climatological Factors Assessment  
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Quality Control/Quality Assurance Construction and Installation Plan  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☒ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ Alternative
- Proposed Closure Method: ☒ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC **Appendix 6**  
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC **Appendix 6**  
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) **Appendix 6**  
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC **Appendix 6**  
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC **Appendix 6**  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC **Appendix 6**

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

- |   |   |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site                        | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

**Operator Application Certification:**

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

Name (Print): Jen Fields

Title: Director Field Environmental

Signature: 

Date: 03/01/2016

e-mail address: snolan@eprod.com

Telephone: 713-381-6595

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: \_\_\_\_\_

Approval Date: \_\_\_\_\_

Title: \_\_\_\_\_

OCD Permit Number: \_\_\_\_\_

19.

**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☐ Closure Completion Date: \_\_\_\_\_

20.

**Closure Method:**

- ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
- ☐ If different from approved plan, please explain.

21.

**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☐ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☐ Soil Backfilling and Cover Installation
- ☐ Re-vegetation Application Rates and Seeding Technique
- ☐ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_

Longitude \_\_\_\_\_

NAD: ☐ 1927 ☐ 1983

22.

**Operator Closure Certification:**

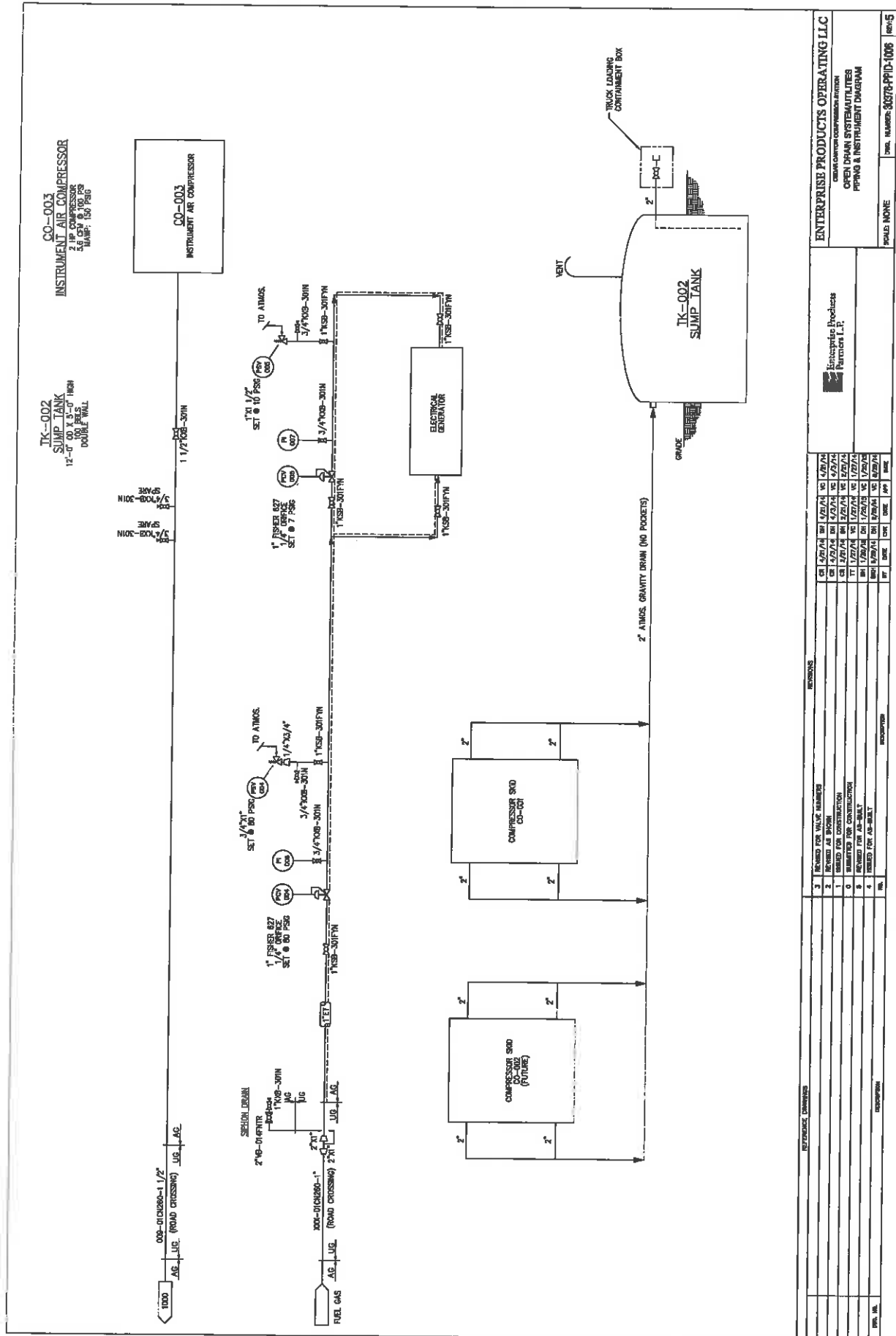
I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

**Appendix 2**  
**Tank Design Drawing**

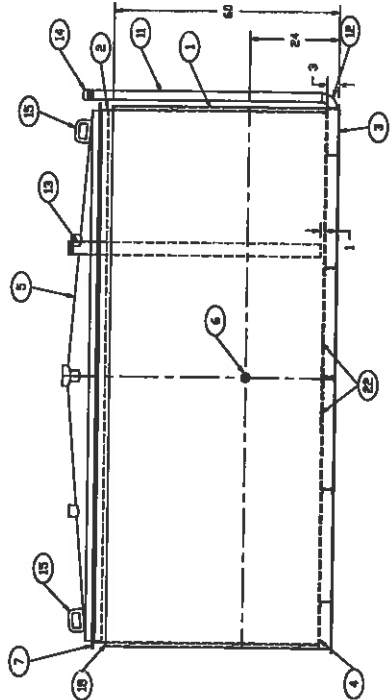
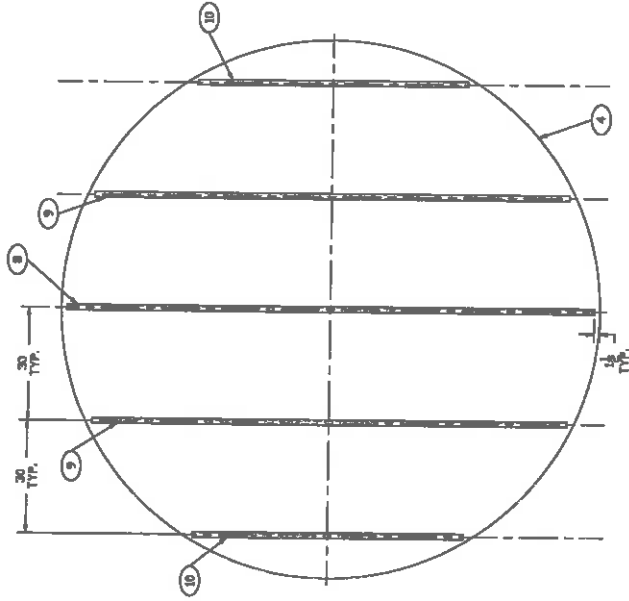
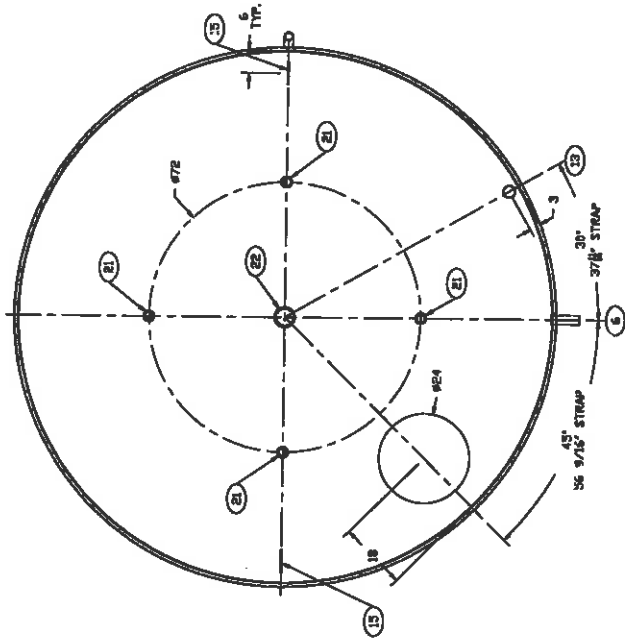
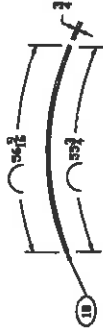


# MATERIAL SPECIFICATION

ITEM	QTY.	ITEM #	DESCRIPTION	GRADE
1	1	IN-10512	WELDED RING 3/16" X 12" OD	SA-50
2	1	IN-10511	WELDED RING 3/16" X 8" X 12" OD	SA-50
3	1	807-1412	CS PL. 1/2" X 12" X 11'-0" CD	SA-50
4	1	807-3112	CS PL. 3/16" X 11'-0" CD	SA-50
5	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
6	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
7	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
8	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
9	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
10	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
11	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
12	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
13	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
14	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
15	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
16	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
17	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
18	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
19	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
20	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
21	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
22	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
23	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
24	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
25	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
26	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50
27	1	IN-3112	CS PL. 3/16" X 11'-0" CD	SA-50

## GENERAL NOTES

GENERAL NOTES:  
1. ALL DIMENSIONS ARE 1/8" EXTERNAL PROJECTION.  
2. ALL DIMENSIONS ARE HELD UNLESS OTHERWISE NOTED.



REV.	DESCRIPTION	BY	DATE
------	-------------	----	------

CUSTOMER: BENCHMARK EQUIPMENT & TANK  
320 N. BERGIN LANE  
BLOOMFIELD, N.M. 87413  
(505)-632-9030

ALL INFORMATION CONTAINED IN THIS DRAWING IS THE PROPERTY OF BENCHMARK EQUIPMENT & TANK. IT IS TO BE USED FOR THE PRODUCTION OF EQUIPMENT ONLY. NO OTHER REPRODUCTION OR USE IS PERMITTED WITHOUT THE WRITTEN CONSENT OF BENCHMARK EQUIPMENT & TANK.

DATE: 06-17-14  
DRAWING: 1

TITLE: 100 IN. DIA. TANK  
DOUBLE BOTTOM DOUBLE WALL  
CORE 100

SCALE: 1" = 12"

SHEET: 1 OF 1

BET PART #PTT00BBLDWBCT

**Appendix 3**  
**Photographs**



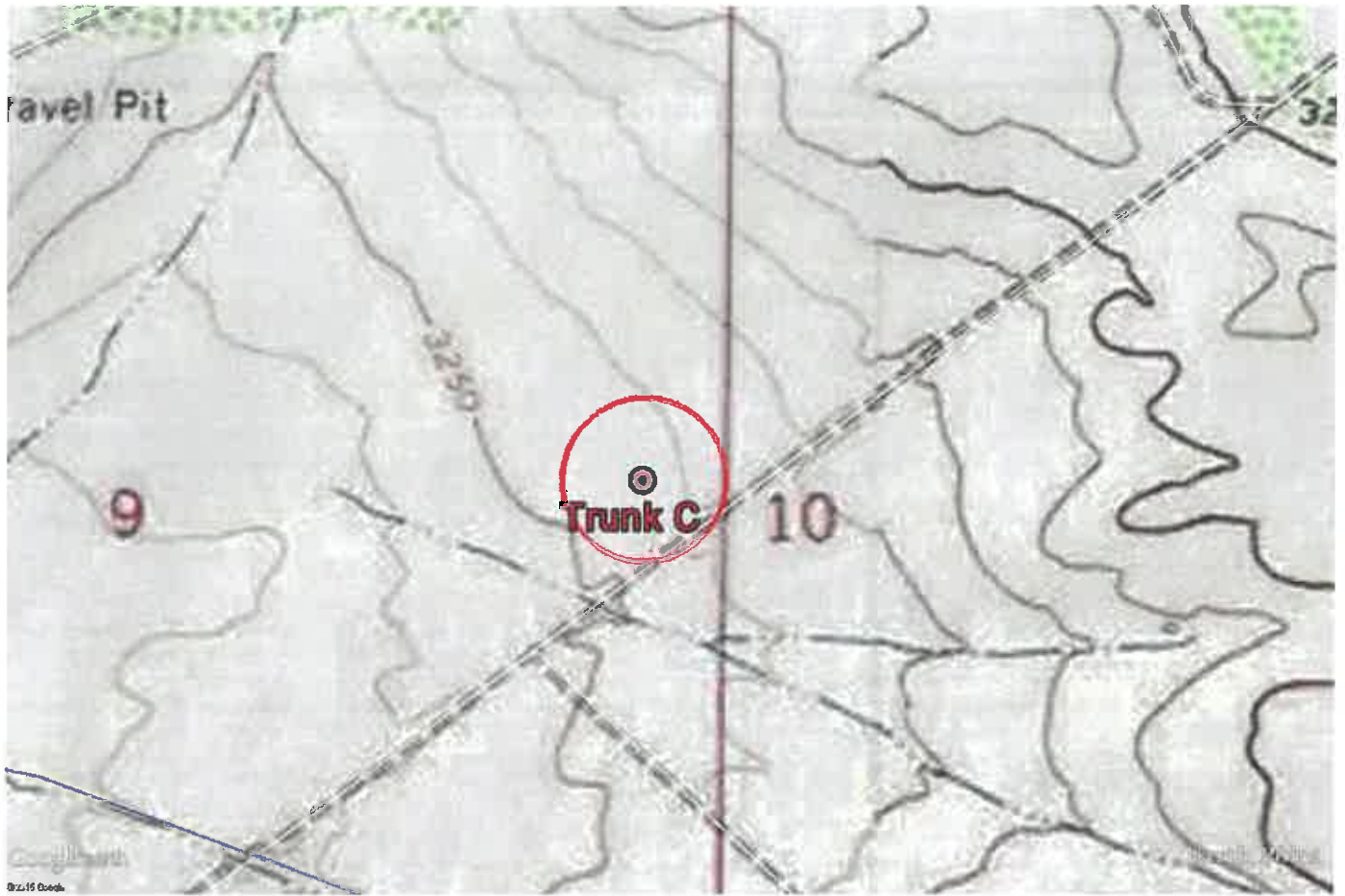
Fencing – 6 foot, 3-strand barbed wire



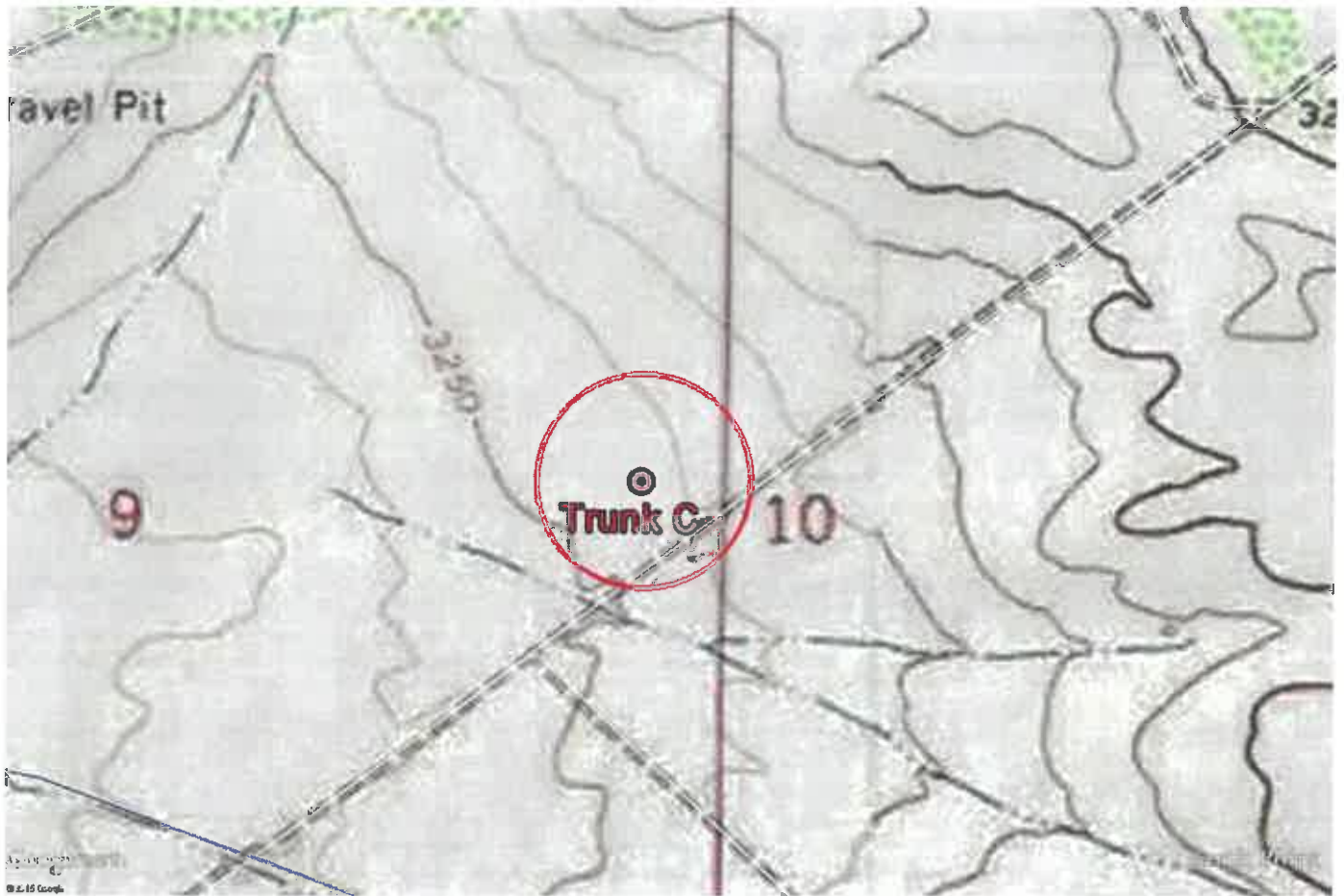
Trunk C Compressor Station Sign

## **Appendix 4**

### **Maps**



Trunk C Compressor Station – 100 foot radius



Trunk C Compressor Station Topographic Map within 200 feet



Trunk C Compressor Station – 100 feet



Trunk C Compressor Station 200 foot radius



Trunk C Compressor Station 1,000 foot radius

**Appendix 5**  
**Operating and Maintenance Plan**

## Operational Plan

NMAC 19.15.17.12

### OPERATIONAL REQUIREMENTS

Enterprise will operate and maintain the below-grade tank to contain liquids and solids and maintain the secondary containment system to prevent contamination of fresh water and protect public health and the environment.

Enterprise shall not discharge into or store any hazardous waste in the below-grade tank.

If the below-grade tank develops a leak, Enterprise shall remove all liquid above the damage or leak within 48 hours of discovery, notify the appropriate division office and repair the damage or replace the below-grade tank as applicable.

Enterprise shall operate and install the below-grade tank to prevent the collection of surface water run-on.

Enterprise shall maintain on site an oil absorbent boom or other device to contain an unanticipated release.


Enterprise shall not allow a below-grade tank to overflow or allow surface water run-on to enter the below-grade tank.

Enterprise shall remove any measurable layer of oil from the fluid surface of a below-grade tank.

Enterprise shall inspect the below-grade tank for leakage and damage at least monthly.

Enterprise shall document the integrity of each tank at least annually and maintain a written record of the integrity for five years.

Enterprise shall maintain adequate freeboard to prevent overtopping of the below-grade tank.

 <b>Enterprise Products</b>	System/Location: <div style="text-align: center;"><b>Carlsbad - Compressor Stations</b></div>	Procedure No. <div style="text-align: center;"><b>CARLS-COMPSTA-350</b></div>		
		Revision No: <div style="text-align: center;"><b>0</b></div>	Revision Date: <div style="text-align: center;"><b>4/06/15</b></div>	Page: <div style="text-align: center;"><b>1 of 2</b></div>
Procedure Title: <div style="text-align: center;"><b>Inspection of Sump Tank Interstitial Space</b></div>				

**Procedure Description:** Provide clear instructions to safely inspect sump tank interstitial space to ensure tank integrity.

**Procedure Requirements:** Personal Protective Equipment (PPE) must be worn including but not limited to the following: Company approved Fire Retardant Clothing (FRC) and the following ANSI / ASTM approved equipment; safety glasses, hard hat, safety shoes and hearing protection (high noise areas or activities). For additional PPE requirements, refer to the workplace Hazard Assessment (SF19).

**Procedure Preparation:** **BEFORE** performing this procedure, read and understand all steps.

**Warning:** NATURAL GAS CONDENSATE is an OSHA/NFPA Class-1A Extremely Flammable liquid. Releases flammable vapors at well below ambient temperatures and readily forms flammable mixtures with air. Exposed to an ignition source, it will burn in the open or be explosive in confined spaces. Keep away from heat, sparks and open flame. May cause irritation to eyes, skin, and respiratory system. May be harmful if inhaled or absorbed through skin and harmful or fatal if swallowed. Avoid liquid, mist, and vapor contact. Refer to SDS for proper PPE and additional information.

**COMPLETION STEPS:**

1. REMOVE cap on Nozzle 13.
2. Visually INSPECT interstitial space for liquids.
  - If liquids ARE OBSERVED then,**
    - Replace cap on Nozzle 13.
    - Contact management immediately.
  - If liquids ARE NOT OBSERVED then,**
    - Replace cap on Nozzle 13.


**Nozzle 13**



**\*\*\* End of Procedure \*\*\***

## Revision Log

[illegible]

 <b>Enterprise Products</b>	System/Location: <div style="text-align: center;"><b>Carlsbad - Compressor Stations</b></div>	Procedure No. <div style="text-align: center;"><b>CARLS-COMPSTA-351</b></div>		
		Revision No: <div style="text-align: center;"><b>0</b></div>	Revision Date: <div style="text-align: center;"><b>4/06/15</b></div>	Page: <div style="text-align: center;"><b>1 of 27</b></div>
Procedure Title: <div style="text-align: center;"><b>Emptying Station Sump Tank</b></div>				

**Procedure Description:** Provide clear instructions to safely remove liquid level from station sump tank.

**Procedure Requirements:** Personal Protective Equipment (PPE) must be worn including but not limited to the following: Company approved Fire Retardant Clothing (FRC) and the following ANSI / ASTM approved equipment; safety glasses, hard hat, safety shoes and hearing protection (high noise areas or activities). For additional PPE requirements, refer to the workplace Hazard Assessment (SF19).

**Procedure Preparation:** **BEFORE** performing this procedure, read and understand all steps.

**SYSTEM BACKGROUND INFORMATION:**

**Warning:** NATURAL GAS CONDENSATE is an OSHA/NFPA Class-1A Extremely Flammable liquid. Releases flammable vapors at well below ambient temperatures and readily forms flammable mixtures with air. Exposed to an ignition source, it will burn in the open or be explosive in confined spaces. Keep away from heat, sparks and open flame. May cause irritation to eyes, skin, and respiratory system. May be harmful if inhaled or absorbed through skin and harmful or fatal if swallowed. Avoid liquid, mist, and vapor contact. Refer to SDS for proper PPE and additional information.

**COMPLETION STEPS:**

3. REMOVE cap on Nozzle 13.
4. Visually INSPECT interstitial space for liquids.
  - If liquids ARE OBSERVED then,
    - Replace cap on Nozzle 13.
    - Contact management immediately.
  - If liquids ARE NOT OBSERVED then,
    - Replace cap on Nozzle 13.
    - Continue to next step.
5. OPEN access hatch and visually verify liquid level in sump tank.
6. SPOT truck near sump tank.
7. ATTACH ground cable to truck frame.

Nozzle 13



Access Hatch

Ground Cable



8. CONNECT truck hose to N14.
9. OPEN loading line valve.
10. START truck pump.
11. VERIFY liquid level via access hatch.
12. STOP truck pump when sump empty.

**Loading Line Valve**



13. CLOSE loading line valve.
14. CLOSE truck hose valve
15. OPEN Loading Line Drain Valve to drain any residual liquids from the hose into the catch basin.
16. DISCONNECT truck hose from N14.
17. REMOVE any liquids from catch basin and dispose of properly.

**Loading Line Drain Valve      N 14**



**\*\*\* End of Procedure \*\*\***

## Revision Log

[illegible]

**Appendix 6**  
**Closure Plan**

## CLOSURE REQUIREMENTS

### Site Rankings

Although Site Rankings are no longer required, Enterprise has chosen to include them in this report.  
Criteria:

Depth to ground water (vertical distance from bottom of pit to seasonal high water elevation of ground water.)	Less than 50 feet	(20 points)	
	50 feet or more, but less than 100 feet	(10 points)	10
	100 feet or more	(0 points)	
Wellhead protection area: (Less than 200 feet from a private domestic water source, or less than 1000 feet from all other water sources.)	Yes	(20 points)	
	No	(0 points)	0
Distance to surface water: (Horizontal distance to all wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Less than 200 feet	(20 points)	
	200 feet to 1,000 feet (Appendix 4)	(10 points)	10
	Great than 1,000 feet	(0 points)	0
Ranking Score (TOTAL POINTS):		20	

Enterprise shall not commence closure without first obtaining approval of the closure plan submitted with the permit application or registration pursuant to 19.15.17.13 NMAC.

Enterprise shall close the below-grade tank by first removing all contents and transferring the materials to a division approved facility.

Enterprise shall test the soils beneath the below-grade tank as follows:

A minimum of five point composite sample to include any obvious stained or wet soils, or other evidence of contamination shall be taken under the below-grade tank and that sample shall be analyzed for the constituents listed in Table I of 19.15.17.13 NMAC below.

Table I Closure Criteria for Soils Beneath Below-Grade Tanks where contents are Removed			
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1***	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg

	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet -100 feet	Chloride	EPA 300.0	10,000 mg/kg
	TPH	EPA SW-846 Method 418.1 ***	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8021B or 8260B***	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8015M	50 mg/kg
	Benzene	EPA 300.0	10 mg/kg
> 100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1 ***	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8021B or 8260B***	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8015M	50 mg/kg
	Benzene	EPA 300.0	10 mg/kg

\*Or other test methods approved by the division

\*\*Numerical limits or natural background level, whichever is greater

\*\*\* Or Method 8015 with GRO, DRO, & MRO

If any contaminant concentration is higher than the above parameters, the division may require additional delineation upon review of the results and Enterprise must receive approval before proceeding with closure.

If all contaminant concentrations are less than or equal to the parameters listed above, Enterprise can proceed to backfill the excavation with non-waste containing, uncontaminated, earthen material.

### CLOSURE NOTICE

Enterprise shall notify the appropriate division district office verbally, and in writing, at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Enterprise name and the location to be closed, including the unit letter, section, township, and range.

Enterprise shall notify the surface owner by certified mail (return receipt requested) that Enterprise plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement.

## CLOSURE REPORT AND BURIAL IDENTIFICATION

Within 60 days of closure completion, Enterprise shall submit a closure report on form C-144, with necessary attachments to document all closure activities including sampling results, information required by 19.15.17 NMAC, and details on back-filling, capping and covering, where applicable. In the closure report, Enterprise shall certify that all information in the report and attachments is correct and that Enterprise has complied with all applicable closure requirements and conditions specified in the approved closure plan.

## TIMING REQUIREMENTS FOR CLOSURE

Within 60 days of cessation of operations, Enterprise shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility.

Within six months of cessation of operations, Enterprise shall remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves. If there is any equipment associated with a below-grade tank, Enterprise shall remove the equipment, unless the equipment is required for some other purpose.

## SOIL COVER DESIGNS FOR BELOW-GRADE TANKS

The soil cover for closures after site contouring (where Enterprise has removed the below-grade tank and, if necessary, remediated the soil beneath the below-grade tank to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0) shall consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.

Enterprise shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.

## RECLAMATION AND RE-VEGETATION

### RECLAMATION OF AREAS NO LONGER IN USE

All areas disturbed by the closure of the below-grade tanks, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.

Enterprise shall replace topsoils and subsoils to their original relative positions and shall be contoured to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the below-grade tank.

Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

## OTHER REGULATORY REQUIREMENTS

The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of any operations

subject to those provisions, provided the other requirements provide equal or better protection of fresh water, human health and the environment.

Enterprise shall notify the division when reclamation and re-vegetation are complete.

#### BUREAU OF LAND MANAGEMENT (BLM) REQUIREMENTS

The long-term objective of final reclamation is to establish the course for eventual ecosystem restoration, including the restoration of the natural vegetation community, hydrology, and wildlife habitats. Enterprise shall return the land to a condition approximating or equal to that which existed prior to the disturbance. It shall involve salvaging and reusing all available topsoil in a timely manner, revegetation disturbed areas to native species, controlling erosion, controlling invasive non-native plants and noxious weeds, and monitoring results. With proper reclamation measures, over time, local native species will become re-established on the site and the area will regain its original productive and scenic potential.

Reclamation generally can be judged successful when a self-sustaining, vigorous, diverse, native (or otherwise approved) plant community is established on the site, with a density sufficient to control erosion and non-native plant invasion and to re-establish wildlife habitat or forage production. Enterprise shall use native perennial species or other plant materials specified by the surface management agency or private surface owner. Seeding shall be accomplished by drilling on the contour whenever practical or by other approved methods such as dozer track walking followed by broadcast seeding. Seeding or planting may need to be repeated until revegetation is successful, as determined by the surface management agency. Erosion control is generally sufficient when adequate groundcover is reestablished, water naturally infiltrates into the soil, and gullying, headcutting, slumping, and deep or excessive rilling is not observed.

Enterprise shall insure the site is free of State or county listed noxious weeds, oil field debris, contaminated soil, and equipment.

Enterprise should inform the surface management agency that reclamation has been completed and that the site is ready for final inspection when these requirements have been met. Enterprise must file a Final Abandonment Notice (FAN) upon completion of reclamation operations, which indicates that the site meets reclamation objectives and is ready for inspection. Upon receipt of the Final Abandonment Notice, the surface management agency will inspect the site to ensure reclamation is fully successful.

The BLM must approve the Final Abandonment Notice, even when the surface is managed by another surface management agency. Final abandonment will not be approved by the BLM until the surface reclamation work has been completed and the required reclamation is acceptable to the surface management agency. Enterprise is responsible for monitoring reclamation progress and taking the necessary actions to ensure success.