



CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

December 8<sup>th</sup>, 2025

Joel Stone  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Subject: New Mexico Gas Company, Inc Request for Renewal of 120-day Temporary  
Permission (HBP-22) to Discharge Hydrostatic Test Water

Dear Mr. Stone,

The New Mexico Gas Company, Inc (NMGC) is requesting a 120-day Temporary Permission (HBP-22) to discharge hydrostatic test water from new natural gas pipelines. The current permit expires January 27<sup>th</sup>, 2026, and renewal request is due December 13<sup>th</sup>, 2025. Discharges will occur within NMGC's right-of-way and will be done in a manner to control erosion and prevent sediment discharging from the site. Methods of controlling sediment include: filter bags, detention basins, utilizing a water truck to spray test waters for dust suppression on the right-of-way, working the test water into the trench spoils to aid with compaction, or placing water in the trench and allowing it to soak or evaporate.

The 120-day temporary permission authorizes NMGC to discharge hydrostatic test waters throughout the state of New Mexico under the following conditions:

- a) The volume does not exceed 25,000 gallons per hydrostatic test;
- b) Only water from a public/municipal water supply or other OCD approved sources, by written request and analytical results, is be used for each hydrostatic test;
- c) NMGC will provide email or written notification to the OCD 72 hours prior to each hydrostatic discharge event. Each notice shall contain the following information:
  - i. The proposed location of hydrostatic test discharge (Section/Township/range or GPS coordinates)
  - ii. The date of the proposed discharge
  - iii. The volume of the proposed discharge; and
  - iv. The source of hydrostatic test water
- d) Test water will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
- e) No discharge shall occur:
  - i. where ground water is less than 10 feet below ground surface.
  - ii. within 200 feet of a watercourse (defined in 19.15.2.7.W(4) NMAC), lakebed, sinkhole or playa lake (defined in 19.15.2.7.P(4) NMAC);
  - iii. within an existing wellhead protection area (defined in 19.15.2.7.W(8) NMAC);
  - iv. within, or within 500 feet of a wetland (defined in 19.15.2.7.W(9) NMAC); or



- v. within 500 feet from the nearest permanent residence, school, hospital, institution or church;
- f) Best management practices will be implemented to contain the discharge onsite to ensure it does not impact adjacent property, and to control erosion;
- g) The discharge will not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC;
- h) The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location will be properly notified of the activities prior to each proposed hydrostatic test event; and
- i) NMGC will submit a report, summarizing all hydrostatic test wastewater discharges with less than 25,000 gallons per hydrostatic test event, to the OCD within 45 days after the temporary permission expiration date. The report shall contain the following information:
  - i. location of each hydrostatic test (Section, Township and Range or GPS coordinates);
  - ii. date of each discharge;
  - iii. volume of each discharge; and
  - iv. source and quality of test water (laboratory analysis, if necessary).

A discharge report was submitted on November 6<sup>th</sup>, 2025, for the previous permit. Attached is a check for \$150 to cover the filing and temporary permission fees. Please feel free to call me at (505) 895-2549 if you have any questions. I appreciate your timely review of this application.

Sincerely,

Kasey Anderson  
Environmental Scientist  
NMGC

New Mexico Gas Company, Inc  
7120 Wyoming Blvd NE, Suite 20  
Albuquerque, NM 87109

Check Date 12/04/2025  
Check Number 000083333  
Check Amount \$ \*\*150.00\*\*  
Vendor Number 10041927  
Our Account

WATER QUALITY MANAGEMENT FUND  
1220 S ST FRANCIS DR  
SANTA FE, NM 87505

Invoice Date	Invoice Number	Document No	Description	Gross Amount	Discount	Net Amount
12/02/2025	FEES	1900003749		150.00	0.00	150.00

THE BACK OF THIS CHECK CONTAINS A SECURITY MARK® - DO NOT ACCEPT WITHOUT HOLDING AT AN ANGLE TO VERIFY SECURITY MARK®

New Mexico Gas Company, Inc  
7120 Wyoming Blvd NE, Suite 20  
Albuquerque, NM 87109

JPMorgan Chase Bank, NA  
Syracuse, NY

50-937/213 12/04/2025  
000083333

\*\*\* ONE HUNDRED FIFTY USD\*\*\*

Check Amount

\$ \*\*150.00\*\*

NOT VALID AFTER 180 DAYS

PAY TO THE ORDER OF

WATER QUALITY MANAGEMENT FUND  
1220 S ST FRANCIS DR  
SANTA FE, NM 87505

*Ryan SL*

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan-Grisham**  
Governor

**Melanie A. Kenderdine**  
Cabinet Secretary

**Ben Shelton**  
Deputy Secretary

**Erin Taylor**  
Deputy Secretary

**Albert C.S. Chang**  
Division Director  
Oil Conservation Division



**BY ELECTRONIC MAIL**

December 18, 2025

Mr. Kasey Anderson  
New Mexico Gas Company, Inc.  
P.O. Box 97500  
Albuquerque, New Mexico 87199  
[Kasey.Anderson@nmgco.com](mailto:Kasey.Anderson@nmgco.com)

**Re: Request for Temporary Permission to Discharge Hydrostatic Test Water  
New Mexico Gas Company, Inc. - OGRID 277930  
Permit: HBP – 22**

Dear Mr. Anderson:

The New Mexico Oil Conservation Division (OCD) has completed its review of New Mexico Gas Company, Inc.'s (NMGC) renewal request, dated December 8, 2025, for approval of a 120-day temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new transmission pipelines of oil and gas or products thereof throughout the State of New Mexico, which expires on January 27, 2026. OCD acknowledges receipt of the filing fee (\$100.00) and temporary permission fee (\$50.00) within a separately mailed submittal received by OCD on December 17, 2025.

Based on the information provided in the request, *temporary permission is hereby granted to NMGC for the discharge of the hydrostatic test wastewater generated from all new pipeline hydrostatic tests* an operator may perform during the approved 120-day period with the following provisions and conditions:

1. The volume of the discharge is less than 25,000 gallons per hydrostatic test;
2. Water from a public/municipal water supply or other OCD approved sources, by written request and analytical results, is used for each hydrostatic test;
3. Email or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event. The notice shall contain the following information:

1220 South St. Francis Drive, 3<sup>rd</sup> Floor ■ Santa Fe, New Mexico 87505  
Phone (505) 476-3441 ■ [www.emnrd.state.nm.us/ocd](http://www.emnrd.state.nm.us/ocd)

State of New Mexico  
Energy, Minerals and Natural Resources Department

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- a. the proposed location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
  - b. the date of the proposed discharge;
  - c. the volume of the proposed discharge; and
  - d. the source of hydrostatic test water.
4. No discharge shall enter any lake, perennial stream, river, or their respective tributaries that may be seasonal;
5. No discharge shall occur:
  - a. where ground water is less than 10 feet below ground surface;
  - b. within 200 feet of a watercourse (19.15.2.7.W(4) NMAC), lakebed, sinkhole, or playa lake (19.15.2.7.P(4) NMAC);
  - c. within an existing wellhead protection area (19.15.2.7.W(8) NMAC);
  - d. within 500 feet of a wetland (19.15.2.7.W(9) NMAC); or
  - e. within 500 feet from the nearest permanent residence, school, hospital, institution, or church.
6. No discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED, and OCD prior to the discharge;
7. Best management practices must be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
8. The discharge does not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the Water Quality Regulations);
9. NMGC shall report all unauthorized discharges, spills, leaks, and releases of hydrostatic test wastewater and conduct corrective action pursuant to the Water Quality Regulations of 20.6.2.1203 NMAC and release notification pursuant to OCD Rule 29 (19.15.29 NMAC);
10. The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event; and
11. A report, summarizing each test of new pipeline with less than 25,000 gallons per hydrostatic test per discharge event performed within the approved 120-day period, shall be submitted to OCD within 45 days after the temporary permission expiration date and shall contain the following information:
  - a. the location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
  - b. the date of each discharge;
  - c. the volume of each discharge; and
  - d. the source and quality of test water (laboratory analysis, if necessary).

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**This 120-day temporary permission will expire on May 27, 2026.** Renewal requests for a 120-day temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date. A 120-day temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of this approval.

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

Please do not hesitate to contact me at (505) 709-5149 or via email should you have any questions or concerns regarding this temporary permission.

Respectfully,



Joel Stone  
Senior Environmental Scientist  
[joel.stone@emnrd.nm.gov](mailto:joel.stone@emnrd.nm.gov)

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/oed/contact-us>

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

CONDITIONS

Action 532842

CONDITIONS

Operator: NEW MEXICO GAS COMPANY, INC. P.O. Box 97500 Albuquerque, NM 87199	OGRID: 277930
	Action Number: 532842
	Action Type: [UF-HP] HBP Permission (HBP)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	OCD emailed the renewal approval of HBP-22 to the operator on December 18, 2025. The emailed approval is attached to this renewal request.	12/18/2025