GW - 147

GENERAL CORRESPONDENCE

YEAR(S): 2008 - 2010



RECEIVED 2009 NOU 13 AM 11 59

November 11, 2009

UPS No. 1ZR173A30293634254

Mr. Leonard Lowe Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505

Subject : El Paso Natural Gas Company's Deming Station Discharge Permit GW-147 Deming Compressor Station (SW/4 of SE/4 of Sec 32, T23S, R11 W) Luna County, New Mexico

Dear Mr. Lowe:

Attached is information regarding our recent hydrostatic testing of the (3) below-grade tanks at Deming Station.

I will be out of the office from November 13, 2009 to December 6, 2009. If you have any questions during that time period, please contact Richard Duarte at (505) 831-7763. After December 6, 2009, please contact me at (520) 663-4222.

Sincerely,

Ann Pundan

Anu Pundari Principal Engineer

El Paso Natural Gas Company Deming Compressor Station HYDROSTATIC TESTING OF THREE BELOW GRADE TANKS

Background:

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There are (3) below grade tanks at Deming Station.

- Tank 1 One 4,250 gallon below-grade fiberglass reinforced plastic (FRP) receives oil/water from "A" Plant basement and "B" Plant basement(Tank V-9126).
- Tank 2 One 4,250 gallon below-grade fiberglass reinforced plastic (FRP) receives oil fraction from oil/water separator (Tank V-9127)
- Tank 3 One 4,250 gallon below-grade fiberglass reinforced plastic (FRP) natural gas stream scrubber liquids (Tank V-9128)

Recently, you suggested that EPNG fill each tank with water, wait 24 hours, and monitor the water level.

<u>Results:</u>

Earlier, all (3) tanks were pumped out and cleaned with a hot water power washer. Then, the tanks were ready for the test. Inlet valves into the tank and outlet valves from the tank were closed during the test.

The neck of each tank is 22 inches in height from the top of tank and 24 inches diameter.

October 29, 2009 – Tank 1 and neck of Tank 1 was filled with water.

October 30, 2009 – After 24 hours, there was a 17 inches drop of water level in the neck of Tank 1. This equates to approximately 33 gallons of water lost.

November 2, 2009 - Water was transferred from Tank 1 to Tank 2 and neck of Tank 2.

November 3, 2009 – After water was in tank 24 hours, there was a 5 inches drop of water level in the neck of Tank 2. This equates to approximately 1.3 gallons of water lost. Water was transferred to Tank 3 and neck of Tank 3.

November 4, 2009 – After water was in tank 24 hours, there was a 19 inches drop of water level in the neck of Tank 3. This equates to approximately 38 gallons of water lost.

November 5, 2009 – After water was in Tank 3 for 24 hours, there was a 1 inch drop of water level.

November 9. 2009 – After the 96 hours, there was a 2 inch drop of water level in Tank 3.

November 10, 2009 – After 24 hours, there was a ½ inch drop of water level in Tank 3.

Tank	Maximum Starting Volume	Water Lost During Test	Water Loss as Percentage of Total Tank Volume
Tank V-9126 – Feed Tank to Oil/Water Separator	Tank Volume + Neck Volume = Total Volume 4250 gallons + 13.7 gallons = 4263.7 gallons	33 gallons	0.77 percent
Tank V-9127 – Oil Tank from Oil/Water Separator Tank V-9128 – Scrubber	4263.7 gallons	1.3 gallons	0.03 percent
Liquids Blowdown Tank	4263.7 gallons	38 gallons	0.89 percent

In EPA's Introduction to Statistical Inventory Reconciliation Guidance document published in September 1995, it states that the "... an estimated leak rate is rarely, if ever, zero. All tanks, whether leaking or tight, will generally show a leak rate. The question is, is this leak rate significant?"

A vendor who is familiar with tank testing indicated from his experience the following:

Sometimes:

- There is a loss of water level due to water going into the air pockets of the tank
- Tank might be leaking at a level that is atypical. An example of the concept is if the tank height is 10 feet, then, during the hydrostatic test, there may be a small leak at the 9 foot level but the tank level under normal operation is always below a 6 foot level since it is pumped out on a periodic basis and never reaches the 9 foot level. Therefore, tank leakage may not be an indicator of soil contamination.
- Inlet valve to tank or outlet valve from tank may not be tight and allow liquids to leak out of the tank and into the wastewater line.

Actions Taken:

- The line from the "A" Plant basement and "B" Plant basement has been capped so that liquids will not enter Tank 1. The tank is empty.
- The oil water separator operation has been shut down. The valve to the oil tank, Tank 2 has been closed. The tank is empty.
- There is a manual valve that must be opened for scrubber liquids to enter Tank 3. The valve has been closed. The valve has a Lock-Out-Tag-Out (LOTO) tag and locked so that it will not be opened. The tank currently has water. The tank water will be tested for Table 1 constituents as mandated by Mr. Brad Jones of NMOCD. Once results are received, the tank contents will be disposed.

Interim Next Steps:

- For now, do not allow liquids to enter all (3) below-grade tanks.
- Obtain cost estimates to remove all (3) tanks.
- Budget to remove all (3) tanks.
- Remove (3) tanks. Visually assess if there is any hydrocarbon impacted soils around and beneath tanks.
- Excavate (as feasible) and properly dispose hydrocarbon impacted soils and obtain confirmation samples.
- Analyze soil samples.
- Submit report of sample results to NMOCD.

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• Obtain approval for No Further Action or discuss further action at site.



October 12, 2009

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UPS No. 1ZR173A30296620441

Mr. Leonard Lowe Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505

Subject : El Paso Natural Gas Company's Deming Station Discharge Permit GW-147 Deming Compressor Station (SW/4 of SE/4 of Sec 32, T23S, R11 W) Luna County, New Mexico RECEIVED OCD

Dear Mr. Lowe:

The Deming Discharge Plan Item 16 notes "The OCD performed an inspection of this facility on December 2, 2008. As a result of this inspection OCD noted: Liquids in the secondary containment leak detection system for the pond. The Owner/Operation shall verify the integrity of the overall pond and shall submit a work plan for this investigation by October 15, 2009". This letter serves as a work plan for the investigation.

The pond was designed with vent holes between the primary and secondary liner. Due to condensation of moist air, water may accumulate within the area between the liners and accumulate within the secondary leak detection system. The Deming Station has been in an inactive status. There has been no wastewater discharged to the pond for many years. During the site visit last year, water accumulation in the pond was due to rainwater.

In Arizona, the Arizona Department of Environmental Quality (ADEQ) regulates wastewater ponds that contain industrial discharge. ADEQ utilizes an equation to determine an "Alert Level". Each month or each week, the leak detection well is pumped out. The volume of water pumped from the leak detection well is monitored. If the amount of water pumped within a 24 hour period exceeds the Alert Level, then there is an indication that the top liner may be leaking. Attached is a calculation of the Alert Level for the Deming pond.

Our investigation plan is the following:

- 1. The pond leak detection well be pumped out and the amount of water pumped will be monitored. Our laboratory technician indicated that approximately 25 gallons of water was pumped out of the leak detection well. A photo of the liquids pumped from the leak detection well and photos of the pond were taken and sent via email to you. The water from the leak detection will be analyzed for benzene, ethylbenzene, toluene, xylene, anions, and cations. The information will be provided to NMOCD
- 2. If there is discharge of wastewater into the pond from activities at the station, EPNG will begin monthly inspections of the leak detection well during the discharge period and two months following cessation of discharge activities. If the amount of water pumped from the leak detection well over a 24 hour period exceeds 500 gallons, EPNG will notify NMOCD and submit a plan to verify the integrity of the pond.

If you have any questions, please contact me at (520) 663-4222.

Sincerely,

Ann Pundan

Anu Pundari Principal Engineer

El Paso Natural Gas Company Deming Compressor Station Alert Level Calculation for Waste Water Disposal Pond

> Conversion Factors: 1 ft = 0.3048 m 1 m³ = 264.2 gal 1 day = 86,400 sec

Design Elevation = 4454.00 ft Bottom of Pond Elev. = 4448.08 ft Pond Average = 2.636 Acres

Alert Level Calculation

(Maximum Liquid Level with 2 feet freeboard = 3.92 ft = 1.19 m)

$$Q_1 = C_B a_1 \sqrt{2gh_w}$$

Q = Leakage rate through a geomembrane hole (m^3/s) C_B = dimensionless coefficient, related to the shape of the edges of the hole = 0.6 for sharp edges. a = hole area (m^3) = 3.14 * (diameter = 2.0mm)²/4 g = acceleration due to gravity (m/s^2)

 h_w = liquid depth on top of the geomembrane (m)

$$Q_1 = \frac{(0.6)(3.14mm^2)(1m^2)\sqrt{2(9.8m/s^2)(1.19m)}}{1*10^6 mm^2}$$

Q1 = (1.884*10⁻⁶m²)(4.829m/s) Q1 = 9.099 * 10⁻⁶m³/s Q1 = 205.97 gal / day

.

For 2.636 acre impoundment: =

Q1 = 2.636 * 205.97 = 542.93 gal / day

<u>Alert Level = 500 gal / day</u>

Lowe, Leonard, EMNRD

From: Sent:	Lowe, Leonard, EMNRD Thursday, October 08, 2009 12:09 PM
То;	'Pundari, Anu N'
Cc:	Duarte, Ricardo (Richard); Thompson, Glen D; Richardson, James D (JD); Campbell, David
•	W (Dave)
Subject:	RE: Deming Station Discharge Plan Additional Information

Ms. Anu Pundari,

ι.

As discussed this morning on the submitted discharge plan renewal application revisions, these are my conclusions.

- There are THREE below-grade tanks at this facility: V-9126, V-9127, V-9128. These tanks are single wall and have a linear underneath them, that may not act as a secondary containment with a leak detection system. EPNG intends to clean out these tanks and perform a hydrostatic test on them. What does EPNG intend to do with the test water once completed? These tanks receive: used oil and pipe liquids.
- To reiterate: a sump is "an impermeable vessel, or a collection device incorporated within a secondary containment system, with a capacity less than 500 gallons, which remains predominantly empty, serves as a drain or receptacle for de minimis releases on an intermittent basis and is not used to store, treat, dispose of or evaporate products or wastes". A below-grade tank has fluids within them indefinitely. According to the list (Revise Item 5: Addition to bullets) of BGT/AST there are 6 sumps as describe by (liquids in tank 72 hours or less).
- <u>Revision Item 5: Underground Drain Lines and Compressor Building Basement/Item 10: Routine inspection and maintenance to ensure permit compliance/Item 11: Contingency Plan for reporting and clean up of spills or releases</u>. The word *periodic* is used for hydrostatic testing throughout several areas within the submittal. The facility should stay within the 5 year period realm of testing. If the facility has not been testing, as the OCD was informed this morning, do not reflect that in the application. The application should reflect what the facility INTENDS TO DO in compliance with the discharge permit.
- A failed hydrostatic test: OCD was informed that a hydrostatic test had failed at the facility and the release was
 not addressed. All releases, no matter the quantity, shall be addressed and not left in place. Please forward the
 information on what happen during this failed line test. What did EPNG do with all the tested water? The line
 drained what type of fluids?

Please respond.

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

From: Pundari, Anu N [mailto:Anu.Pundari@ElPaso.com]
Sent: Friday, September 25, 2009 3:58 PM
To: Lowe, Leonard, EMNRD
Cc: Duarte, Ricardo (Richard); Thompson, Glen D; Richardson, James D (JD); Campbell, David W (Dave)
Subject: Deming Station Dicharge Plan Additional Information

Dear Mr. Lowe,

Attached is a letter that will be sent via UPS today. The letter includes additional information/revisions to the Discharge Plan application.

On September 21st, our EPNG Laboratory technician began pumping water out of the leak detection well of the Deming Station double lined pond. After pumping for a short time, the pump failed. He will be obtaining a new pump next week . and try again. Once we have the information you requested, I will send photos and the information to you.

For the (3) below-grade tanks, we plan to conduct the hydrostatic test once the tanks are cleaned out. Our technicians will fill the tank with water, wait 24 hours, and monitor the water level. It is our understanding that a 3d party is not needed for the testing.

We appreciate your assistance. If you have any questions, please feel free to contact me or Richard Duarte.

Thanks, Anu Pundari (520) 663-4222

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Lowe, Leonard, EMNRD

From: Sent: To: Cc: Subject: Lowe, Leonard, EMNRD Thursday, October 08, 2009 12:03 PM 'Pundari, Anu N' Campbell, David W (Dave); Richardson, James D (JD) RE: Deming Discharge Plan

Request granted.

I shall expect the SIGNED permit no later than November 6. Or sooner.

Please inform the OCD permit holder (me) if such scenarios arise.

llowe

Leonard Lowe

Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505 Office: 505-476-3492 Fax: 505-476-3462 E-mail: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>

From: Pundari, Anu N [mailto:Anu.Pundari@ElPaso.com]
Sent: Thursday, October 08, 2009 11:58 AM
To: Lowe, Leonard, EMNRD
Cc: Campbell, David W (Dave); Richardson, James D (JD)
Subject: Deming Discharge Plan

Mr. Lowe,

As we discussed today, Mr. Richard Duarte received the discharge plan on October 6, 2009. The El Paso Natural Gas (EPNG) Albuquerque office address on the original letter was incorrect.

EPNG will sign and return one copy within 30 days of October 6, 2009 including permit fees.

We appreciate your assistance.

Anu Pundari (520) 663-4222 office (520) 349-0611 cell

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Email Security.

Griswold, Jim, EMNRD

From: Sent: To: Cc: Subject: Attachments: Marco Wikstrom [MWikstrom@kleinfelder.com] Tuesday, December 16, 2008 10:38 AM Ricardo.Duarte@ElPaso.com; Griswold, Jim, EMNRD David Janney Newspaper Ad for Deming Public Notice Affidavit.pdf

Gentlemen,

Attached is a copy of the newspaper ad published in the Deming Headlight last week, and an affidavit from the newspaper manager.

Please let me know if anything else is needed.

Thank you, Marco

Marco Wikstrom Staff Geologist

<u>wikstrom@kleinfelder.com</u> (505) 344-7373 Office (505) 344-1711 Fax

8300 Jefferson NE Suite B Albuquerque, NM 87113



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LEGAL NOTICE

•:

CERTIFICATE OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF LUNA I, Wayne Barnard do solemnly swear that I am the General Manager of the Deming Headinght published at Deming, Luna County. New Mexico, and that the article, a copy of which is hereto attached, has been published in said Deming Headlight I time. Publication being on the 11th day of December 2008

Japa

DEMING HEADLIGHT

6 Cant By___

Sworn to and subscribed before me the 11th day of Dopenber 2008 My Administion expires 4112/2010



Jas. La estación del compresor de Deming se utiliza para la compresión del gas intural de la cardiad de la tubería, y es para la colarista de ENG California A* V* 15: Estas lu-gitas berías transportan-rel gas naurar la los tuberías de ENG California A* V* 15: Estas lu-las dericas transmotarias o intervista de ENG California ano expensión del gas intural de la cardiad de la tubería y es para auto-re descargas intervionales o interventidas que pocifiran fectar al suporticio e al gua sub-la la traindata Las doscargas potenciales en la estación de límitan a gorcoimade. A la trainda al facilidad Las doscargas potenciales en la estación de límitan a gorcoimada-al mente 8.820 galores de nuevo aceire a partir de los cuatro tanques de almacinaje sóbre suelo y a 4.250 galores de nuevo aceire a partir de los cuatro tanques de almacinaje sóbre la ques de anaccanja bajo del grado. Estos tanques se equipan de la controlici o sobre processo tilano y de indicadores lianos líquidos para parvenir de terranemientos. Los dinates de la controlició sectin processo des nuevo aceite a partir de los cuatro tanques de almacinaje sóbre la processo talas como gual quedo cara preventir de terranemientos. La partir de los contencientos a la processo talas como gual quedos para terventir de terranemientos. La guados de la processo talas como gual unaciona section de state y de indicadores lianos liquidos para perventir de terranemientos de almacentaje subferraneos, después reciciados e dispuestos por una tacilidad aprobada del New Mexido Oli Conservation Dividion (NMOCO). grade can take part in next.year's program, but ine parents nave been very supportive of the program and are disappointed that it won't be child from Pre-k to eighth she is unsure how many since it depends on the Kim added that any students will be accepted number of graduate stu-El Paso Natural Gas (EFNG), 3801 Atrisco Bivd. NW, Albuquerque New Mexico, 87102 ha presentado una soliculor de la ranovación para o lipan previsameia aprobado dei la presentado una soliculor de la compresor de Deming (GW #117) siluada en el SEA, SWM, SEA, WZ de la sección X2 el municipio 22 del trus, es oxielment 1 del osege, en el con-ficado de Luna, New México. La facialidad está locatizada de una (1) milla hacia del none del Interstatu U.S. daz (US10), 11 millas al ocasi de Deming, New Mexico. La dirección del nerestatu LS. daz (US10), 11 millas al ocesi de Deming, New Mexico. La dirección del focardo para la estación del compresor de Deming es El Paso Natural Gas. 1900 Station ficada SW, Deming, New México. Bogodo. La primera agua sublerránea probabiemente que se alectará por un escapo, una descarga accidential, o un derramentento existe en una prutorindidad que excede 200 pres debajo de la prepricioa de la terra. Este sistema del acuífero tiema una concentración total de los sóli-dos en suspensión entre aproximadamente 366 y 395 mg/r. El plan de la descarga sometió esquemas cómo el agua y la basura producidas serán manejadas correctamente, mcuyendo la dirección, almacentaje, y la disposición fintel. El plan micuye los procedimientos para la gerencia apropiada de escapes, de descargas ec-cidentales, y de derramamientos para proteger las aguas del estado de New Mexico. Para la información adicional, ser colocado en una lista de personas a quienes se mandan propaganda facilidad-especifica para los avisos futuros, o sométer los comentarios satis-per entran an en contacto son: Uso para una renovación del permiso de la descarga para la estación del compresor de Deming (GW-147), condado de Luna, New México El Paso Natural Gas Company (EPNd) da por este medio el aviso que el uso siguiente la renovación del permaso de la descarga se an sometido de acuerdo con la subdivisión (- y E ciel ocidio administrativo de 20.02.31 08 New Máxico. La energia da New México, los minerales y el departemento de los recursos naturales aceptarán comentarios y declaraciones del interés con respecto a este uso y propor-cionarán los avisos futuros çara la facilidad del compresor de Deming a pelición. dents in the course. held next semester. NIM. Lim Gliswood Hydrologist New Maxico Energy, Minorals and Natural Resources Department Oil Conservation Division 1220 South ST: Francis Drive Santa Fe, NM 97505 Center and Housing and advertise the program, which is free to families Å coordinator of special projects in the Strategie. E i. helped Kim on campus and NMSU, said he entered sending- out- applications Hamid Mansouri Rad, living on campus a NMSU employees. Office L.F. Residential Initiative and flyers. NMSU Notice "It is critical to pro-vide more access to litermunity because we need to value literacy." Kim Chavez. "It gives them something to talk to their home connection," said Kim said the program parents to form a schoolacy programs to the comalso was formed as a way to reach out to the com-Telétono: (505) 476-3465 parents about. munity. The Deming compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG calibrinal X^a and T^a pipelines. These prelimes transport natural gas to the western United States. No imparional or inadvertion dischargos that could affect sur-face or groundwater are known at the facility. Potential dischargos at the station are limited to Ei Paso Natural Cas Company (EPNG), 3801 Atrisco Blvd. NW, Albuquerque New Mexico. B1702 has submitted a neweal application for the previously approved discrigange plan for the Deming compression station (3W #147) located in the SEA, SWA, SEA, WI2 of Section 32, Towning 23, South, Range 11, West, in Luna County, New Mexico. The facility is located 1 initie north of US Interstate 10, 11 miles west of Deming, New Mexico. The facility is located 1 for the Deming compressor station is El Paso Natural Gas. 1900 Station Road SW, Deming, New Mexico. B030 equipped with secondary containment and liquid level indicators to prevent spills. Process flu-ds such as water and used oll associated with daily operations are contained by a facility EI Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit renewal application has been submitted in accordance with Subsection B, C, and E of 20.6.2.3108 For additional information, to be placed on a facility-specific mailing list for future notices, or to The New Mexico Energy, Minerals and Natural Resources Department will accept comments Each tutor is responsible for creating their lesson ized for each child. After dren, the tutors meet with Kim to evaluate what they needs ю involving parents in their children's learning experi-Irain system, transferred to the below ground storage tanks, then recycled or disposed of by aged, including handling, storage, and final disposition. The plan includes procedures for the proper management of leaks, accidental discharges, and spills to protect the waters of the The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a approximately 8.820 gallons of new oil from four aboveground storage tanks and 4.250 gal-tions of used oil and gas liquids from two below grade storage tanks. These tanks are plans that are individualtheir lessons with the chil-The discharge plan submitted outlines how produced water and waste will be properly man-Application for a Discharge Permit Renewal for the Deming Compressor Station (GW-147), the Japth exceeding 200 feet below the ground surface. This aquiler system has a total dis-solved solids concentration between approximately 366 and 395 mg/t. connections to things." improvement. The tutors focus and statements of interest regarding this application and will provide future notices for t Deming compressor facility upon request. did and what ences. New Mexico Oil Conservation Division (NMOCD) approved facility. New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division working with someone who is in Pre-k because J teach fifth grade." said Chavez. "One of my stualso with age groups she hasn't other is 6 years old. It is instruction with an emphasis in literacy, being a tutor gives her a chance to work different dents is 4 years old, and the curriculum and student experienced before. "lt's been graduate studying submit comments, please contact: New Mexico Administrative Code. 220 South St. Francis Drive This semester, the pro-gram has about 20 chil-dren, from Pre-k to seventh because i wanted to pro-vide real hands-on experiwith the community mem-bers here at NMSU," Kim grade, who attend every Monday, and 10 graduate students who serve as their program ence for my students while the partnership una County, New Mexico Jim Griswold, Hydrologist hone: (505) 476-3465 State of New Mexico. anta Fe NM 87505 "I started the valuing said.

Griswold, Jim, EMNRD

From:	Duarte, Ricardo (Richard) [Ricardo.Duarte@ElPaso.com]
Sent:	Tuesday, December 09, 2008 1:14 PM
То:	Griswold, Jim, EMNRD
Cc:	Marco Wikstrom
Subject:	Deming Discharge Plan - Public Notice Posters
Attachments:	SD530139.JPG; SD530140.JPG

Jim:

Attached are two photos showing the Deming Station public notice posters. They are accessible to the public from the road that passes in front of the station, County Road 1900. The newspaper clippings will be in today as well, and will send you that later in the week.

This inbound email has been scanned by the MessageLabs Email Security System.



Public Notice

Application for a Discharge Permit Renewal for the Deming Compressor Station (GW-147), Luna County, New Mexico

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit renewal application has been submitted in accordance with Subsection B, C, and E of 20623108 New Mexico Administrative Code.

ElPaso Natural Gas Company (EPNG), 3801 Atrisco Blvd. NW, Albuquerque New Mexico, 87102 has submitted a renewal application for the previously approved discharge plan for the Deming compressor station (GW #147) located in the SE/4, SW/4, SE/4, W/2 of Section 32. Township 23 South, Range 11 West, in Luna County, New Mexico. for the Deming compressor station is El Paso Natural Gas, 1900 Station Road SW, Deming 1 mile north of US Interstate 10, 11 miles west of Deming, New Mexico. The mailing address New Mexico, 88030 The facility is located

The Deming compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG California "A" and "B" pipelines. These pipelines transport natural gas to the western United States. No intentional or inadvertent discharges that could affect surface or groundwater are known at the facility. Potential discharges at the station and 4,250 gallons of used oil and gas liquids from two below grade storage tanks. These are limited to approximately 8,820 gallons of new oil from four aboveground storage tanks disposed of by a New Mexico Oil Conservation Division (NMOCD) approved facility a facility drain system, transferred to the below ground storage tanks, then recycled or disposed of her at the storage tanks, then recycled or Process fluids such as water and used oil associated with daily operations are contained by Tanks are equipped with secondary containment and liquid level indicators to prevent spills

depth exceeding 200 feet below the ground surface. This aquifer system has a total dissolved solide and the ground surface. The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth exceeding on a postern has a total dissolved solids concentration between approximately 366 and 395 mg/L

The discharge plan submitted outlines how produced water and waste will be properly managed, including handling, storage, and final disposition. The plan includes procedures for the proper management, storage, and final disposition. The plan includes procedures and spills to protect the waters .

of the State of New Mexico for the proper management of leaks, accidental disposition, and spills to protect the waters of the State of New Years of the State of New Years and State of Ne

For additional information, to be placed on a facility-specific mailing list for future notices, or to submit comments, placed on a facility-specific mailing list for future notices. to submit comments, please contact,

Oil Conservation Division 1220 South St. Francis Drive Santa Fe NM 87505 Oil Conservation Energy, Minerals and Natural Resources Department Jim Griswold, Hydrologist

Phone: (505) 476-3465

The New Mexico Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future

Aviso publico

Uso para una reno del permiso de la descarga para la estación del compresor de Deming (GW-147), condado de Luna, New México

código administrativo de 20.6.2.31 08 New México El Paso Natural Gas Company (EPNG) da por este medio el aviso que el uso siguiente de la renovación del permiso de la descarga se ha sometido de acuerdo con la subdivisión B, C, y E del renovación del permiso de la des

está localizada de una (1) milla hacia del norte del Interstatal U.S. diez (US10), 11 millas al oeste de Deming, New Mexico. La dirección del correo para la estación del compresor de Deming es El Paso Noticiono del compresor de Deming es El Paso el município 23 del sur, se extiende 11 del oeste, en el condado de Luna. New Mexico. La facilidad estación del compresor de Deming (GW #147) situada en el SE/4, SW/4, SE/4, W/2 de la sección 32, n Natural Gas, 1900 Station Road SW, Deming, New Mexico 88030. Paso Natural Gas (EPNG), 3801 Atrisco Blvd. NW, Albuquerque New Mexico, ntado una solicitud de la renovación para el plan previamente aprobado de la descarga para la 87102 ha

natural a los Estados Unidos occidentales. No se sabe ningunas descargas intencionales tubería, y es parte de las tuberías de EPNG California "A" y "B". Estas tuberías transportan el gas un sistema del dren de la facilidad, transferidos a los tanques de almacenaje subterraneos, después reciclados o dispuestos por una facilidad aprobada del New Mexico Oil Conservation División (NMCCC). de proceso tales como agua y aceite usado se asociaron a operaciones diarias son contendos por un sistema del duor a de la contra gas a partir de los dos tanques de almacenaje abajo del grado. Estos tanques se equipan de la contención entre la traudos los cuatro tanques de almacenaje sobre el suelo y a 4.250 galones de líquidos usados de aceite y del potenciales en la estación se limitan a aproximadamente 8.820 galones de nuevo aceite a partir de inadvertidas que podrían afectar a la superficie o al agua subterránea en la facilidad. Las descargas La estación del compresor de Deming se utiliza para la compresión del gas natural de la calidad de la contención secundaria y de indicadores llanos líquidos para prevenir derramamientos. Los líquidos nor (NMOCD)

La primera agua subterránea probablemente que se afectará por un escape, una descarga accidental, o un derramamiento existe en una profundidad que excede 200 pies debajo de la superficie de la forma de las solidos en superficie de la tierra. Este sistema del acuifero tiene una concentración total de los sólidos en suspensión para suspensión entre aproximadamente 366 y 395 mg/l

El plan de la descarga sometió esquemas cómo el agua y la basura producidas serán manejadas correctamente, incluyendo la dirección, almacenaje, y la disposición final. El plan incluye los procedimientos para la gerencia apropiada de escapes, de descargas accidentales y de derramamientos para la gerencia apropiada de escapes, de descargas accidentales y derramamientos para proteger las aguas del estado de New Mexico.

Para la información adicional, ser colocado en una lista de personas a quienes se mandan propaganda facilidad-específica para los avisos futuros, o someter los comentarios satisfacen entran en contacto-

entran en contacto con:

New Mexico Energy, Minerals and Natural Resources Departu Oil Conservation Division Jim Griswold, Hydrologist Santa Fe, NM 87505 1220 South St. Francis Drive

La energia de New México, los minerales y el departamento de los recursos naturales aceptarán comentarios y declaraciones del interés con respecto a este uso y proporcionarán los avisos futuros para la facilidad data para la facilidad del compresor de Deming a petición

Jones, Brad A., EMNRD

From:	Jones, Brad A., EMNRD
Sent:	Thursday, January 31, 2008 10:25 AM
То:	'Duarte, Ricardo (Richard)'
Subject:	EPNG Upcoming Discharge Plan Renewals - 2008
Attachments	: Renewal WQCC Notice Regs.pdf; Discharge Plan App Form.pdf; Guidelines For Discharge Plans.pdf; PN Flow Chart.20.6.2renewal.pdf

Richard:

The Oil Conservation Division's (OCD) records indicate that the following discharge plans will expire this year:

GW-147 Deming Compressor Station (Luna County)	Expiration Date: 8/19/2008
GW-46 Eunice Compressor Station (Lea County)	Expiration Date: 10/11/2008
GW-151 Eunice B Compressor Station (Lea County)	Expiration Date: 11/05/2008

New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that 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. Please submit a permit renewal application, identifying any changes and updates, with a filing fee (20.6.2.3114 NMAC) of \$100.00 at least 120 days before the discharge plan expires. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. An application form and guidance document is attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Please contact me by phone 505-476-3487 or email <u>brad.a.jones@state.nm.us</u> if you have any questions regarding this matter.

Sincerely,

Forest Floor

Brad

Brad A. Jones Environmental Engineer Environmental Bureau NM Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, New Mexico 87505 E-mail: brad.a.jones@state.nm.us Office: (505) 476-3487 Fax: (505) 476-3462