

**GW - 379**

**GENERAL  
CORRESPONDENCE**

**2008 - 2010**

## Griswold, Jim, EMNRD

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**From:** Thompson, Glen D [Glen.Thompson@ElPaso.com]  
**Sent:** Wednesday, December 10, 2008 2:08 PM  
**To:** Griswold, Jim, EMNRD  
**Subject:** RE: Eunice C Discharge Permit #GW-379

Jim:

Per our discussion, we are going to transport this material using CTI to FCC for recycling. Thanks for your prompt response. That should happen next week. Let me know if you need any additional information.

*Glen Thompson*  
Principal Environmental Representative  
El Paso Natural Gas

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**From:** Thompson, Glen D  
**Sent:** Thursday, December 04, 2008 4:57 PM  
**To:** 'Griswold, Jim, EMNRD'  
**Subject:** Eunice C Discharge Permit #GW-379

New Mexico Oil Conservation Division

Mr. Jim Griswold:

Per our discussions over the last few days, I am forwarding the following information to you for your review and approval. Under the "Hydrostatic Test Discharge – Temporary Permission" correspondence from the NMOCD dated October 21, 2008, Condition 9 states that "if the waste is determined to be non-hazardous, El Paso Natural Gas Company (EPNG) will transport the spent cleaning solution and rinse wastewater via rail car to Seaboard Inc., located in Hugo, Oklahoma or via tanker trucks to an OCD-approved facility in New Mexico for disposal. EPNG is requesting the NMOCD's approval to take the N-Spec 120 and rinse water mix from the frac tank located on the Eunice C property to a recycler in Texas. I have included the recycler's contact information and EPA ID number below.

FCC Environmental Services  
315 Pronto Ave.  
Odessa TX 79762  
EPA-ID TXR000015610

EPNG will utilize the transportation services of CTI to transport the N-Spec 120 and rinse water. CTI's information is listed below.

Chemical Transportation Inc  
400 Inglewood dr. El Paso TX 79927  
EPA ID TXR000033175  
TX ID # 86215

If this request meets with your approval, please confirm at your earliest convenience.

*Glen Thompson*  
Principal Environmental Representative  
El Paso Natural Gas  
(432) 686-3268

## Griswold, Jim, EMNRD

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**From:** Griswold, Jim, EMNRD  
**Sent:** Friday, December 05, 2008 1:56 PM  
**To:** 'Thompson, Glen D'  
**Subject:** RE: Eunice C Discharge Permit #GW-379

Glen,

EPNG may use CTI to transport the fluids in question to FCC Environmental Services for recycling/disposal. If EPNG wishes to analyze the wastewater for all possible constituents for which there is a WQCC groundwater standard, and that analysis determines the liquid meets those standards, then the water can be discharged on surface at the Eunice C facility in an appropriate manner. However, the water cannot be allowed to flow off the Eunice C property. If the analysis is undertaken, please forward those lab results to me.

Jim

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**From:** Thompson, Glen D [mailto:Glen.Thompson@ElPaso.com]  
**Sent:** Thursday, December 04, 2008 3:57 PM  
**To:** Griswold, Jim, EMNRD  
**Subject:** Eunice C Discharge Permit #GW-379

New Mexico Oil Conservation Division

Mr. Jim Griswold:

Per our discussions over the last few days, I am forwarding the following information to you for your review and approval. Under the "Hydrostatic Test Discharge – Temporary Permission" correspondence from the NMOCD dated October 21, 2008, Condition 9 states that "if the waste is determined to be non-hazardous, El Paso Natural Gas Company (EPNG) will transport the spent cleaning solution and rinse wastewater via rail car to Seaboard Inc., located in Hugo, Oklahoma or via tanker trucks to an OCD-approved facility in New Mexico for disposal. EPNG is requesting the NMOCD's approval to take the N-Spec 120 and rinse water mix from the frac tank located on the Eunice C property to a recycler in Texas. I have included the recycler's contact information and EPA ID number below.

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EPA ID TXR000033175  
TX ID # 86215

If this request meets with your approval, please confirm at your earliest convenience.

*Glen Thompson*  
Principal Environmental Representative  
El Paso Natural Gas  
(432) 686-3268

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**From:** Thompson, Glen D  
**Sent:** Wednesday, December 03, 2008 3:09 PM  
**To:** 'Griswold, Jim, EMNRD'  
**Subject:** FW: LSR-Eunice "C" Plant/Frac Tank of Wash Water 2008111621

Jim:

Attached you'll find the lab results from the frac tank at Eunice C that contains the N-Spec 120 and the rinse water (approximately 15,000 gallons). The permit says we'll get Safety-Kleen to dispose of it. I would like to be able to discharge it on the ground as part of the Hobbs Lateral Hydrotest Permit HP-113. Can you discuss with Brad and see if we could do this based on the lab results. If not, I would like to change the transporter from Safety-Kleen to CTI.

*Glen Thompson*  
Principal Environmental Representative  
El Paso Natural Gas  
(432) 686-3268

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**From:** Romero, Teresa (Contractor)  
**Sent:** Wednesday, December 03, 2008 7:49 AM  
**To:** Morrow, Kenneth L (Kenny)  
**Cc:** Haveman, Billy W; Howell, Timothy G (Tim); Thompson, Glen D; Whitney, Mark P  
**Subject:** LSR-Eunice "C" Plant/Frac Tank of Wash Water 2008111621

\*\*\*\*\*  
This email and any files transmitted with it from the El Paso Corporation are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.  
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This inbound email has been scanned by the MessageLabs Email Security System.

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## LABORATORY SERVICE REPORT

REQUESTOR: Morrow, Kenny  
Hobbs, NM  
(505) 492-2380

REPORT DATE: 12/2/2008  
REQUEST NO: 2008111621  
APPROVED BY: Campbell, Darrell  
PENDING REQ. ID: 2008111621

DEPARTMENT: Midland Division  
DISTRIBUTION: Haveman, Billy; Howell, Timothy G.; Thompson, Glen; Whitney, Mark P.  
PERFORMED BY: Columbia Analytical Services

Request Description: Frac tank of wash water @ Eunice "C" Plant.  
Date Received: 11/14/2008  
Date Completed: 12/2/2008

Sample No: 1      Sampled By: Mark Whitney      Sample Date: 11/13/2008 3:30:00 PM  
Received Vol.:      Received Date: 11/14/2008  
Description:  
Analysis: WP TCLP Anal (Aqueous)  
Purpose: Disposal/Environmental Concerns  
Matrix: Water  
Location: EPNG - Midland - Plains - Eunice "C" Construction Site - 0000+0 - Frac Tank - Wash Water

Data: See attached sheet(s).

Comments:

**Sample:** 1

### TCLP Characteristics

#### Ignitability

Flash Point (°F) > 200

#### Corrosivity

pH 7.6

#### Reactivity

Total Sulfide (mg/l) 0.14

### TCLP Metals

Arsenic (mg/l) < 1.0  
Barium (mg/l) < 5.0  
Cadmium (mg/l) < 0.50  
Chromium (mg/l) < 1.0  
Lead (mg/l) < 1.0  
Mercury (mg/l) < 0.0020  
Selenium (mg/l) < 0.50  
Silver (mg/l) < 1.0

This report has been prepared for the private and exclusive use of El Paso Corporation and its affiliates and its delivery to any other person is upon the expressed understanding and condition that no representations or warranties, expressed or implied, are contained herein with respect to any of the information set forth in the report. If the purpose of this sample(s) is "External Corrosion", "Internal Corrosion", and/or "Pigging Samples", the interpretation of this report is the responsibility of Pipeline Services. Field Operations will only be contacted by Pipeline Services if the results require any action to be taken.

Request: 2008111621

Sample:

1

TCLP 8260

1,1 Dichloroethene (mg/l)	< 0.58
1,2 Dichloroethane (mg/l)	< 0.29
1,4-Dichlorobenzene (mg/l)	< 0.29
Benzene (mg/l)	< 0.29
Carbon Tetrachloride (mg/l)	< 0.29
Chlorobenzene (mg/l)	< 0.29
Chloroform (mg/l)	< 0.29
2-Butanone (mg/l)	< 2.9
Tetrachloroethene (mg/l)	< 0.29
Trichloroethene (mg/l)	< 0.29
Vinyl Chloride (mg/l)	< 2.9

TCLP 8270

2,4,5-Trichlorophenol (mg/l)	< 0.50
2,4,6-Trichlorophenol (mg/l)	< 0.50
2,4-Dinitrotoluene (mg/l)	< 0.50
o-Cresol (mg/l)	< 0.50
m,p-Cresol (mg/l)	< 1.0
Hexachlorobenzene (mg/l)	< 0.50
Hexachlorobutadiene (mg/l)	< 0.50
Hexachloroethane (mg/l)	< 0.50
Nitrobenzene (mg/l)	< 0.50
Pentachlorophenol (mg/l)	< 0.50
Pyridine (mg/l)	< 1.0

PCB Analysis

Aroclor 1016 (µg/l)	< 100.0
Aroclor 1221 (µg/l)	< 300.0
Aroclor 1232 (µg/l)	< 200.0
Aroclor 1242 (µg/l)	< 100.0
Aroclor 1248 (µg/l)	< 100.0
Aroclor 1254 (µg/l)	< 100.0
Aroclor 1260 (µg/l)	< 100.0
Aroclor 1268 (µg/l)	< 40

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ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No \_\_\_\_\_ dated 10/27/08

or cash received on \_\_\_\_\_ in the amount of \$ 250<sup>00</sup>

from El Paso Natural Gas

for GW-379

Submitted by: Lawrence Romero Date: 11/5/08

Submitted to ASD by: Lawrence Romero Date: 11/5/08

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee ☒ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other Temporary Permission Fee

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

EL PASO NATURAL GAS COMPANY  
P.O. BOX 4430  
HOUSTON, TX 77210-4430

**REMITTANCE ADVICE**

CHECK DATE 10/29/2008  
CHECK NUMBER 07569174  
VENDOR NUM 0000002667

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

**RETAIN FOR YOUR RECORDS**

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00355060	CKREQ081027A FILLING & TEMPORARY PERMISSION FEES	10/27/2008	0.00	250.00
TOTAL			\$0.00	\$250.00





October 31, 2008

UPS Tracking# 1Z8010391346615979

New Mexico Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
(505) 476-3487 office  
(505) 476-3462 fax

**Re: Hydrostatic Test Discharge – Temporary Permission  
El Paso Natural Gas Company  
Eunice C Compressor Station – GW-379  
Lea County, New Mexico**

Mr. Brad Jones:

Per our discussion on October 27, 2008, I am forwarding you the enclosed check for \$250.00 to cover the \$100.00 filing fee and the temporary permission fee of \$150.00 for the requested amendment to the Eunice C Discharge Permit GW-379. As requested, the check is made out to the Water Quality Management Fund. Please let me know if you have any additional questions in regards to this check or the Discharge Permit GW-379.

Respectfully,

**El Paso Natural Gas Company**

Glen Thompson  
Principal Environmental Representative

Enc

Cc: Kenny Morrow – Plains Area Operations Manager  
Sandra Miller – Manager of Western Pipelines Environmental Dept.



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**  
Governor

**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



October 21, 2008

Mr. Glen Thompson  
El Paso Natural Gas Company  
3300 North "A" Building Two, Suite 200  
Midland, Texas 79705

**Re: Hydrostatic Test Discharge - Temporary Permission**  
**El Paso Natural Gas Company**  
**Eunice C Compressor Station - GW-379**  
**Location: SE/4 NW/4 of Section 5 of Township 21 South, Range 36 East, NMPM**  
**Lea County, New Mexico**

Dear Mr. Thompson:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) notice of intent, dated October 6, 2008, for the collection and temporary storage of 10,000 gallons of spent cleaning solution and 10,000 gallons of rinse wastewater at the Eunice C Compressor Station located within SE/4 NW/4 of Section 5 of Township 21 South, Range 36 East, NMPM, Lea County, New Mexico. This activity is associated with a hydrostatic test event (Permit HIP-113) of approximately 5.8 miles of a new 16-inch natural gas transmission pipeline L30131 and 7.3 miles of an existing 20-inch natural gas transmission pipeline L30148, approximately 11 miles southwest of Hobbs, New Mexico.

Based on the information provided in the request, temporary permission is hereby granted for the disposal of the spent cleaning solution and rinse wastewater generated from the cleaning of a used pipeline prior to a hydrostatic test with the following understandings and conditions:

1. no discharge will occur at the hydrostatic test wastewater collection/discharge location: Eunice C Compressor Station - GW-379: SE/4 NW/4 of Section 5 of Township 21 South, Range 36 East, NMPM, Lea County, New Mexico;
2. the pipeline will be cleaned prior to hydrostatic testing by a method of chemical cleanse utilizing "N-Spec 120". The cleaning methods will generate an approximately 10,000 gallons of spent cleaning solution. Prior approval from OCD is required regarding the any change to the chemical cleanse solution - "N-Spec 120";
3. fresh water will follow the N-Spec 120 chemical cleanse to remove any chemical cleanse residue. The cleaning methods will generate a approximately 10,000 gallons of rinse wastewater;
4. the source of the rinse water will be obtained from EPNG's Monument Well. Based the laboratory analytical results and on the information provided in the request; OCD identifies the Monument Well as an approved water source for this hydrostatic test;
5. approximately 10,000 gallons of spent cleaning solution and 10,000 gallons of rinse wastewater generated from the pipeline cleaning process will be slowly discharged and collected into two 21,000 gallon frac tanks for temporary storage, while awaiting testing, transfer and disposal;
6. best management practices will be implemented to prevent the release of any waste material.
7. the frac tanks shall have impermeable secondary containment (e.g., liners - visquene and berms - hay bales), which will contain a volume of at least one-third greater than the total volume of the tank;

Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462 \* <http://www.emnrd.state.nm.us>



8. no spent cleaning solution and rinse wastewater generated from the cleaning process will be discharged to the ground or within the permitted boundary of the compressor station;
9. if the waste is determined to be non-hazardous, EPNG will transport the spent cleaning solution and rinse wastewater via rail tank car to Seaboard Inc. located in Hugo, Oklahoma or via tanker trucks to an OCD approved facility in New Mexico for disposal;
10. if the waste is determined to be hazardous, EPNG will transport the spent cleaning solution and rinse wastewater via tanker trucks (Safety Kleen) to an EPA-approved hazardous waste facility for disposal;
11. all spent cleaning solution and rinse wastewater will be removed from the discharge and/or temporary collection/retention location within one month of the completion of the pipeline cleaning event;
12. any surface area impacted or disturb from the approved activities shall be restored.
13. no collection or retention of the spent cleaning solution and rinse wastewater shall occur:
  - a. within any lake, perennial stream, river or their respective tributaries that may be seasonal;
  - b. where ground water is less than 10 feet below ground surface.
  - c. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
  - d. within an existing wellhead protection area;
  - e. within, or within 500 feet of a wetland; or
  - f. within 500 feet from the nearest permanent residence, school, hospital, institution or church;
14. best management practices must be implemented to contain the collection/retention onsite and, not impact adjacent property;
15. the discharge and/or collection/retention 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 New Mexico Water Quality Control Commission Regulations);
16. the landowner(s) of the proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to the proposed hydrostatic test event; and
17. EPNG shall report all unauthorized discharges, spills, leaks and releases of the spent cleaning solution and rinse wastewater and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC).

It is understood that the pipeline cleaning event will occur sometime during the period of October 20, 2008 through December 31, 2008. This temporary permission **will expire in 120 calendar days** of the effective date of the letter.

This approval does not relieve EPNG of responsibility should its operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve EPNG of responsibility for compliance with other federal, state or local regulations.

If there are any questions regarding this matter, please do not hesitate to contact Brad A. Jones at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation.

Sincerely,



Wayne Price  
Environmental Bureau Chief

LWP/baj

cc: OCD District I Office, Hobbs



# CHECK REQUEST FORM

AP Business Unit <b>EPGTR</b>	AP Use Only Voucher ID
Pay By Date <b>Oct 28, 2008</b>	Vendor ID
Payment Amount <b>250.00</b>	Entered By

AP Business Unit Name

**EL PASO NATURAL GAS COMPANY**

This form should only be used when the payee does not provide an invoice.

**PAY:** Two Hundred Fifty and XX/00 Dollars.

( Written Amount )

**TO:** Water Quality Management Funds

1220 South St. Francis Drive

Santa Fe, NM 87505

**Reason for Payment:**

Filing fee (\$100.00) and temporary permission fee (\$150.00) for Hydrostatic Test Discharge for Eunice/Hobbs.

**Payment Message** WARNING - Payment Message is 4 Characters to long

Filing &amp; Temporary Permission Fees

**Location of Supporting Documentation:** Required if it cannot be attached

Requested by: <b>Glen Thompson 8-686-3268</b> (Printed Name and Phone Number)	Date: <b>10-27-2008</b>
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Approved by:

*Sandra D. Miller*  
(Signature)  
**Sandra D. Miller** 10/27/08  
(Printed Name)

**CHARGE TO THE CLASSIFICATION LISTED BELOW**

Required GL BU	Required ACCT	DEPT ID	PROD	PROJ ID	PROJECT ACTIVITY	TYPE	CAT	SUB	AM PROFILE	Required AMOUNT
EPGTR	724856	L6520	7	123092	Envir	Other	1060			250.00

This section can only be used if approved by a Director/Manager. No separate special handling form required. The amount coded matches the amount to be paid

<b>Special Handling</b>	Name (Pick-up): <b>Shirley Joyner</b>	Location (Bldg./Room No.): <b>Colorado Square</b>	Phone No: <b>719-520-4572</b>
	Reason for Exception: <b>Additional Paperwork to accompany check</b>	Federal Express (Street Address) <b>2 North Nevada Avenue</b>	
	<input type="checkbox"/> Please mail ATTACHED Document with check (separate copy required)	Colorado Springs, CO 80903	
	Special Handling Approved by <i>Sandra D. Miller</i> 10/27/08 (Director/Manager's Signature)		

**Joyner, Shirley S**

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**From:** Thompson, Glen D  
**Sent:** Monday, October 27, 2008 12:03 PM  
**To:** Joyner, Shirley S  
**Subject:** FW: GW-379 Temporary Permission  
**Importance:** High  
**Attachments:** EPNG Temp Permission GW-379.pdf

Shirley:

Can you get a check cut for me in regards to the fees detailed below? I need this check asap. I'm hoping Accounting can get it to you by end of week. . . I will write you a cover letter to go with it – there is certain information that needs to be included when the check is sent to Brad.

*Hobbs/Eunice*  
*PID- 123092*

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**From:** Jones, Brad A., EMNRD [mailto:brad.a.jones@state.nm.us]  
**Sent:** Monday, October 27, 2008 12:53 PM  
**To:** Thompson, Glen D  
**Subject:** GW-379 Temporary Permission

Glenn,

OCD anticipates the submittal of the filing fee (\$ 100.00) and temporary permission fee (\$ 150.00), a total \$ 250.00, made out to the Water Quality Management Funds for the attached temporary permission for GW-379.

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](mailto:brad.a.jones@state.nm.us)*  
*Office: (505) 476-3487*  
*Fax: (505) 476-3462*

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10/27/2008



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**  
Governor

**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



October 21, 2008

Mr. Glen Thompson  
El Paso Natural Gas Company  
3300 North "A" Building Two, Suite 200  
Midland, Texas 79705

**Re: Hydrostatic Test Discharge - Temporary Permission**  
**El Paso Natural Gas Company**  
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**Location: SE/4 NW/4 of Section 5 of Township 21 South, Range 36 East, NMPM**  
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6. best management practices will be implemented to prevent the release of any waste material.
7. the frac tanks shall have impermeable secondary containment (e.g., liners - visquene and berms - hay bales), which will contain a volume of at least one-third greater than the total volume of the tank;



8. no spent cleaning solution and rinse wastewater generated from the cleaning process will be discharged to the ground or within the permitted boundary of the compressor station;
9. if the waste is determined to be non-hazardous, EPNG will transport the spent cleaning solution and rinse wastewater via rail tank car to Seaboard Inc. located in Hugo, Oklahoma or via tanker trucks to an OCD approved facility in New Mexico for disposal;
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13. no collection or retention of the spent cleaning solution and rinse wastewater shall occur:
  - a. within any lake, perennial stream, river or their respective tributaries that may be seasonal;
  - b. where ground water is less than 10 feet below ground surface.
  - c. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
  - d. within an existing wellhead protection area;
  - e. within, or within 500 feet of a wetland; or
  - f. within 500 feet from the nearest permanent residence, school, hospital, institution or church;
14. best management practices must be implemented to contain the collection/retention onsite and, not impact adjacent property;
15. the discharge and/or collection/retention 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 New Mexico Water Quality Control Commission Regulations);
16. the landowner(s) of the proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to the proposed hydrostatic test event; and
17. EPNG shall report all unauthorized discharges, spills, leaks and releases of the spent cleaning solution and rinse wastewater and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC).

It is understood that the pipeline cleaning event will occur sometime during the period of October 20, 2008 through December 31, 2008. This temporary permission **will expire in 120 calendar days** of the effective date of the letter.

This approval does not relieve EPNG of responsibility should its operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve EPNG of responsibility for compliance with other federal, state or local regulations.

If there are any questions regarding this matter, please do not hesitate to contact Brad A. Jones at (505) 476-3487 or [brad.a.jones@state.nm.us](mailto:brad.a.jones@state.nm.us). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation.

Sincerely,



Wayne Price  
Environmental Bureau Chief

LWP/baj

cc: OCD District I Office, Hobbs

RECEIVED

October 6, 2008

2008 OCT 7 AM 10 36

UPS Tracking# 1Z 6R4 V49 01 5145 1260

New Mexico Energy, Minerals, and Natural Resources Dept.  
Oil Conservation Division  
1220 South Francis Drive  
Santa Fe, New Mexico 87505  
(505) 476-3465 office  
(505) 476-3462 fax

**Re: Submittal of an Amended NOI for Discharge Permit GW-379  
Temporary Permission to Store Cleaning Solution and Rinse Water @  
El Paso Natural Gas Company  
Eunice C Compressor Station  
Lea County, New Mexico**

Dear Mr. Jim Griswold:

El Paso Natural Gas Company (EPNG) is pleased to submit the signed attached Discharge Permit# GW-379 along with this request to amend the Discharge Permit# GW-379. This amendment is a request for temporary permission to store RCRA non-exempt natural gas pipeline-cleaning solution and rinse water within the proposed EPNG Eunice C Compressor Station property.

Under separate cover, EPNG is currently seeking approval through the New Mexico Oil Conservation Division (NMOCD) for a Hydrostatic Test Discharge Permit# HIP-113 for the temporary storage and discharge of hydrotest water related to EPNG pipelines L30148 and L30131.

In order to complete the above-mentioned hydrotest project (HIP-113), EPNG is requesting approval to amend Discharge Permit# GW-379 to include the two 21,000-gallon capacity temporary storage containers (frac tanks) which will be used to temporarily store the spent cleaning solution from pipeline L30148 consisting of approximately 10,000 gallons of N-Spec 120 cleaning solution with pipeline residue, and 10,000 gallons of rinse water used to clean the pipeline following the N-Spec 120. Please see the attached material safety data sheet for N-Spec 120. The rinse water is fresh water pumped from EPNG's well in Monument, NM. The frac tanks will reside within the boundaries of the proposed Eunice C Compressor Station near the valve where the pigs will come out of L30148. Duration of temporary storage is not expected to exceed two months. EPNG expects the frac tank to be filled on or around November 10, 2008.

A sample of the mixture of N-Spec cleaning fluid and rinse water will be analyzed for corrosivity, ignitability, reactivity, and toxicity. The mixture will be transported off-site by Safety Kleen via USDOT-approved tanker trucks for disposal at Safety Kleen in Midland, Texas.

Safety Kleen of Midland, Texas  
EPA #396090019  
Transporter #TXD 062287883  
Safety Kleen  
10607 West County Road 127  
PO Box 60756  
Midland, TX 79711  
(432) 563-2305 office

If analytical results indicate the solution is non-hazardous, the mixture will be transported by rail tank car to Seaboard Inc., located in Hugo, Oklahoma and disposed of in the sanitary sewer. If analytical results indicate the solution is hazardous, the mixture will be treated according to its hazard ranking and disposed of on site at Safety Kleen or at a Safety Kleen-contracted, EPA-approved hazardous waste

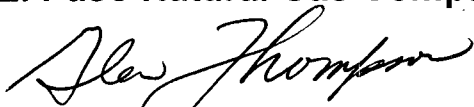


facility (as appropriate for the hazard). If the mixture is hazardous, it will be handled as hazardous waste and applicable EPA waste codes and methods will be used for transport and disposal and/or termination.

Should you have any questions regarding this request to amend Discharge Permit# GW-379, please contact me at (432) 686-3268.

Sincerely,

**El Paso Natural Gas Company**



Glen Thompson  
Principal Environmental Representative

atc: N-Spec 120 MSDS

CC: UPS Tracking# UPS Tracking# 1Z 6R4 V49 01 5145 1260  
Brad Jones  
NMOCD  
1220 South Francis Drive  
Santa Fe, New Mexico 87505

Mark Haag – Project Engineer, EPNG  
Kenny Morrow – Plains Area Operations Manager, EPNG  
Sandra Miller- Environmental Manager PWED, EPNG

# Material Safety Data Sheet

## Section 1. Chemical Product and Company Identification

Common Name	N-SPEC 120 Cleaner	Code	
Supplier	Coastal Chemical Co., L.L.C. 3520 Veterans Memorial Drive Abbeville, LA 70510 337-893-3862	MSDS#	Not available.
Synonym	Not available.	Validation Date	9/2/2004
Trade name	Not available.	Print Date	9/2/2004
Material Uses	Not available.	Responsible Name	Charles Toups
Manufacturer	Coastal Chemical Co., L.L.C. 3520 Veterans Memorial Drive Abbeville, LA 70510 337-893-3862	In Case of Emergency	Transportation Emergency Call CHEMTREC 800-424-9300 Other Information Call Charles Toups 337-261-0796

## Section 2. Composition and Information on Ingredients

Name	CAS #	% by Weight	Exposure Limits
Confidential information			

## Section 3. Hazards Identification

Physical State and Appearance	Liquid.
Emergency Overview	CAUTION! MAY CAUSE EYE IRRITATION. MAY CAUSE SKIN IRRITATION. MAY BE HARMFUL IF SWALLOWED.  Keep away from heat, sparks and flame. Avoid contact with eyes. Do not ingest. Avoid prolonged or repeated contact with skin. Keep container closed. Use only with adequate ventilation. Wash thoroughly after handling.
Routes of Entry	Eye contact. Inhalation. Ingestion.
Potential Acute Health Effects	<i>Eyes</i> Hazardous in case of eye contact (irritant). Inflammation of the eye is characterized by redness, watering, and itching.  <i>Skin</i> Irritation of the product in case of skin contact: Not available. Hazardous in case of skin contact  <i>Inhalation</i> Hazardous in case of inhalation.  <i>Ingestion</i> Hazardous in case of ingestion.
Potential Chronic Health Effects	CARCINOGENIC EFFECTS: Not available. MUTAGENIC EFFECTS: Not available. TERATOGENIC EFFECTS: Not available.
Medical Conditions Aggravated by Overexposure:	Repeated or prolonged exposure is not known to aggravate medical condition.
Overexposure /Signs/Symptoms	Not available.
See Toxicological Information (section 11)	

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**Section 4. First Aid Measures**

Eye Contact	Check for and remove any contact lenses. Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Cold water may be used. Get medical attention immediately.
Skin Contact	In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Cold water may be used. Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention.
Inhalation	If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention.
Ingestion	Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If large quantities of this material are swallowed, call a physician immediately. Loosen tight clothing such as a collar, tie, belt or waistband.
Notes to Physician	Not available.

**Section 5. Fire Fighting Measures**

Flammability of the Product	Not available
Auto-ignition Temperature	Not available.
Flash Points	Tested - No Flash present
Flammable Limits	Not available.
Products of Combustion	These products are carbon oxides (CO, CO <sub>2</sub> ), sulfur oxides (SO <sub>2</sub> , SO <sub>3</sub> ...).
Fire Hazards in Presence of Various Substances	Not available.
Explosion Hazards in Presence of Various Substances	Risks of explosion of the product in presence of mechanical impact: Not available. Risks of explosion of the product in presence of static discharge: Not available.
Fire Fighting Media and Instructions	SMALL FIRE: Use DRY chemical powder. LARGE FIRE: Use alcohol foam, water spray or fog. Cool containing vessels with water jet in order to prevent pressure build-up, autoignition or explosion.
Protective Clothing (Fire)	Be sure to use an approved/certified respirator or equivalent.
Special Remarks on Fire Hazards	No additional remark.
Special Remarks on Explosion Hazards	Not available.

**Section 6. Accidental Release Measures**

Small Spill and Leak	The concentrated form of this material is a cleaner. During application, hazardous material on the apparatus or structure being cleaned may become part of the cleaning solution. Check with all applicable regulations before disposing of the material created during application.
Large Spill and Leak	The concentrated form of this material is a cleaner. During application, hazardous material on the apparatus or structure being cleaned may become part of the cleaning solution. Check with all applicable regulations before disposing of the material created during application.

**Section 7. Handling and Storage**

Handling	Keep away from heat, sparks and flame. Keep container closed. Use only with adequate ventilation. To avoid fire or explosion, dissipate static electricity during transfer by grounding and bonding containers and equipment before transferring material. Use explosion-proof electrical (ventilating, lighting and material handling) equipment.
Storage	Keep container tightly closed and in a well-ventilated place.

**Section 8. Exposure Controls/Personal Protection**

Engineering Controls	Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.
Personal Protection	<p><i>Eyes</i> Safety glasses.</p> <p><i>Body</i> Lab coat.</p> <p><i>Respiratory</i> Wear appropriate respirator when ventilation is inadequate.</p> <p><i>Hands</i> Impervious gloves.</p> <p><i>Feet</i> Not applicable.</p>
Personal Protection in Case of a Large Spill	Splash goggles. Full suit. Boots. Gloves. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.
Product Name	Exposure Limits
Confidential information	
Consult local authorities for acceptable exposure limits.	

**Section 9. Physical and Chemical Properties**

Physical State and Appearance	Liquid.	Odor	Not available.
Molecular Weight	Not applicable.	Taste	Not available.
Molecular Formula	Not applicable.	Color	Blue. (Dark.)
pH (1% Soln/Water)	6 to 8 [Neutral.]		
Boiling/Condensation Point	The lowest known value is 100°C (212°F) (Water). Weighted average: 140.43°C (284.8°F)		
Melting/Freezing Point	May start to solidify at 0°C (32°F) based on data for: Water. Weighted average: -46.19°C (-51.1°F)		
Critical Temperature	Not available.		
Specific Gravity	0.9 to 0.98 (Water = 1)		
Vapor Pressure	The highest known value is 2.3 kPa (17.2 mm Hg) (at 20°C) (Water). Weighted average: 1.17 kPa (8.78 mm Hg) (at 20°C)		
Vapor Density	The highest known value is 5.11 (Air = 1). Weighted average: 2.93 (Air = 1)		
Volatility	Not available.		
Odor Threshold	The highest known value is 34.6 ppm		
Evaporation Rate	0.02 compared to Butyl acetate		
VOC	Not available.		

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Viscosity	Not available.
LogK <sub>ow</sub>	The product is much more soluble in water.
Ionicity (in Water)	Anionic.
Dispersion Properties	See solubility in water, methanol, diethyl ether.
Solubility	Easily soluble in cold water, hot water, methanol, diethyl ether. Insoluble in n-octanol.
Physical Chemical Comments	Not available.

### Section 10. Stability and Reactivity

Stability and Reactivity	The product is stable.
Conditions of Instability	Not available.
Incompatibility with Various Substances	Reactive with oxidizing agents, acids. Slightly reactive to reactive with reducing agents.
Hazardous Decomposition Products	Not available.
Hazardous Polymerization	Will not occur.

### Section 11. Toxicological Information

Toxicity to Animals	Acute oral toxicity (LD50): 1900 mg/kg [Rat]. Acute dermal toxicity (LD50): 9510 mg/kg [Rabbit].
Chronic Effects on Humans	No additional remark.
Other Toxic Effects on Humans	Hazardous in case of eye contact (irritant), of ingestion, of inhalation. Hazardous in case of skin contact (irritant). Slightly hazardous in case of skin contact (sensitizer).
Special Remarks on Toxicity to Animals	Not available.
Special Remarks on Chronic Effects on Humans	Not available.
Special Remarks on Other Toxic Effects on Humans	Material is irritating to mucous membranes and upper respiratory tract.

### Section 12. Ecological Information

Ecotoxicity	Not available.
BOD5 and COD	Not available.
Biodegradable/OECD	Not available.
Mobility	Not available.
	These products are carbon oxides (CO, CO <sub>2</sub> ) and water, nitrogen oxides (NO, NO <sub>2</sub> ...), sulfur oxides (SO <sub>2</sub> , SO <sub>3</sub> ...), phosphates. Some metallic oxides.
Toxicity of the Products of Biodegradation	The products of degradation are less toxic than the product itself.

Special Remarks on the  
Products of  
Biodegradation

Not available.

### Section 13. Disposal Considerations

Waste Information Waste must be disposed of in accordance with federal, state and local environmental control regulations.

Waste Stream Not available.

Consult your local or regional authorities.

### Section 14. Transport Information

Shipping Description Not a DOT controlled material (United States).

Not regulated.

Reportable Quantity 11061.8 lbs. (5016.7 kg)

Marine Pollutant Not regulated - Alkylaryl sulfonate amine salt - less than 10 %.

Special Provisions for  
Transport Contains alkylbenzenesulfonate

### Section 15. Regulatory Information

HCS Classification CLASS: Target organ effects.

U.S. Federal Regulations TSCA 8(a) PAIR: contains Alkylbenzenesulfonate  
SARA 302/304/311/312 extremely hazardous substances: No products were found.  
SARA 302/304 emergency planning and notification: No products were found.  
SARA 302/304/311/312 hazardous chemicals: No products were found.  
SARA 311/312 MSDS distribution - chemical inventory - hazard identification: No products were found.  
SARA 313 toxic chemical notification and release reporting: No products were found.  
Clean Water Act (CWA) 307: No products were found.  
Clean Water Act (CWA) 311: No products were found.  
Clean air act (CAA) 112 accidental release prevention: No products were found.  
Clean air act (CAA) 112 regulated flammable substances: No products were found.  
Clean air act (CAA) 112 regulated toxic substances: No products were found.

#### International Regulations

EINECS Not available.

#### DSCL (EEC)

Risk to eyes.  
May cause irritation by skin contact.  
R322- May be harmful if swallowed. R36/38- Irritating to eyes and skin.

International Lists No products were found.

#### State Regulations

Pennsylvania RTK: Dipropylene glycol monomethyl ether; Trade Secret; Glycol Ether PNB  
Florida: Dipropylene glycol monomethyl ether; Ethanol  
Minnesota: Dipropylene glycol monomethyl ether  
Massachusetts RTK: Dipropylene glycol monomethyl ether; Ethanol  
New Jersey: Ethanol; Glycol Ether PNB  
WARNING: This product contains the following ingredients for which the State of California has found to cause birth defects which would require a warning under the statute: Ethanol

## Section 16. Other Information

Label Requirements MAY CAUSE EYE IRRITATION.  
MAY CAUSE SKIN IRRITATION.  
MAY BE HARMFUL IF SWALLOWED.

Hazardous Material  
Information System  
(U.S.A.)

Flammable	*	1
Corrosive		0
Reactivity		0
Personal Protection		B

National Fire  
Protection  
Association  
(U.S.A.)



References Not available.

Other Special  
Considerations Not available.

Validated by Charles Toups on 9/2/2004.

Verified by Charles Toups.

Printed 9/2/2004.

**Notice to Reader**

*To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.*