

HBP - _____34_____

RENEWAL REQUEST AND APPROVAL

DATE:

____August 6, 2020_____

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Thursday, August 6, 2020 8:47 AM
To: 'Blythe, Amy M (Amy)'
Subject: RE: Checking in Regarding Status of Renewal for NGPL's Annual Hydrostatic Discharge Permit HBP-034
Attachments: 2020 0806 Natural Gas Pipeline Company of America HBP-034 renewal approval signed.pdf

Hey Amy,

I just got confirmation from the office regarding acceptance of the checks. Please see the attached renewal request approval. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Brad

Brad A. Jones
Environmental Engineer
EMNRD Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us

From: Blythe, Amy M (Amy) <Amy_Blythe@kindermorgan.com>
Sent: Tuesday, August 4, 2020 9:18 AM
To: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>
Subject: [EXT] Checking in Regarding Status of Renewal for NGPL's Annual Hydrostatic Discharge Permit HBP-034
Importance: High

Hey Brad,

Just want to confirm that you have received the renewal packet for NGPL's Permit HBP-034.

Our existing permit will expire on August 18th.

Hope you are doing well!

Amy

KINDER MORGAN

Amy Blythe
Environmental Specialist
Two North Nevada Ave
Colorado Springs, CO 80903
719.520.4813 or 575.644.3336

(Child Ambassador - www.worldvision.org)

From: Blythe, Amy M (Amy)

Sent: Monday, July 20, 2020 12:03 PM

To: 'Jones, Brad A., EMNRD' <brad.a.jones@state.nm.us>

Cc: Janak, Christopher <Christopher_Janak@kindermorgan.com>

Subject: Submittal of Renewal for NGPL's Annual Hydrostatic Discharge Permit HBP-034

Importance: High

Hello Brad,

Attached is a copy of the renewal submittal letter and check for [NGPL's Annual Temporary Discharge Permit HBP-034](#). It was sent "certified mail" today.

Thanks so much and hope you are doing well!

Thanks,
Amy

KINDER  MORGAN

Amy Blythe

Environmental Specialist

Two North Nevada Ave

Colorado Springs, CO 80903

719.520.4813 or 575.644.3336

(Child Ambassador - www.worldvision.org)

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Secretary

Adrienne Sandoval, Division Director
Oil Conservation Division



August 6, 2020

Ms. Amy M. Blythe
Natural Gas Pipeline Company of America, LLC
2 North Nevada Avenue
Colorado Springs, Colorado 80903

**Re: Request for Renewal of Annual Temporary Permission to Discharge Hydrostatic Test Wastewater
Natural Gas Pipeline Company of America, LLC
Permit: HBP-034**

Dear Ms. Blythe:

The Oil Conservation Division (OCD) has received Natural Gas Pipeline Company of America LLC's (NGPL) renewal request, dated July 20, 2020, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new natural gas pipelines throughout the State of New Mexico, which expires August 18, 2020. Also, OCD acknowledges receipt of the filing fee (\$100.00) and temporary permission fee (\$50.00) with the July 20, 2020 submittal.

Based on the information provided in the request, annual temporary permission is hereby granted to NGPL for the discharge of the hydrostatic test wastewater generated from all new pipeline hydrostatic tests an operator may perform during an approved one-year period with the following understandings and conditions:

1. the volume of the discharge does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources (upon a written request to OCD) is used for each 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:
 - 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. the discharge does not 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 (19.15.7.W(4) NMAC), lakebed, sinkhole, or playa lake (19.15.7.P(4) NMAC);
 - c. within an existing wellhead protection area (19.15.7.W(8) NMAC);
 - d. within 500 feet of a wetland (19.15.7.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. NGPL 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. an annual report, summarizing each test of new pipeline with less than 25,000 gallons per hydrostatic test per discharge event, will 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).

Annual temporary permissions shall expire one (1) year after issuance. **This temporary permission will expire August 18, 2021.** Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date. An annual

Natural Gas Pipeline Company of America, LLC
Permit: HBP-034
August 6, 2020
Page 3 of 3

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 NGPL of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve NGPL of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brad A. Jones', with a stylized flourish at the end.

Brad A. Jones
Environmental Engineer

BAJ/baj

Jones, Brad A., EMNRD

From: Blythe, Amy M (Amy) <Amy_Blythe@kindermorgan.com>
Sent: Monday, July 20, 2020 12:03 PM
To: Jones, Brad A., EMNRD
Cc: Janak, Christopher
Subject: [EXT] Submittal of Renewal for NGPL's Annual Hydrostatic Discharge Permit HBP-034
Attachments: NGPL Renewal Submittal to NMOCD (7-20-20).pdf

Importance: High

Hello Brad,

Attached is a copy of the renewal submittal letter and check for [NGPL's Annual Temporary Discharge Permit HBP-034](#). It was sent "certified mail" today.

Thanks so much and hope you are doing well!

Thanks,
Amy

KINDER  MORGAN

Amy Blythe
Environmental Specialist
Two North Nevada Ave
Colorado Springs, CO 80903
719.520.4813 or 575.644.3336
(Child Ambassador - www.worldvision.org)

Natural Gas Pipeline Company of America LLC

July 20, 2020

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Request for Renewal of NGPL's Annual Temporary Discharge Permit HBP-034

Dear Mr. Jones

Natural Gas Pipeline Company of America LLC (NGPL) is submitting the following request to renew our Annual Temporary Permit to discharge water from hydrostatic tests from new pipe. Kinder Morgan Inc. owns a 20% interest in NGPL, which is a limited liability company. Kinder Morgan is the "operator" for NGPL. This application was completed using the Oil Conservation Division's (OCD) Guidelines for Hydrostatic Test Dewatering, revised October 1, 2019. The current permit expires on August 18, 2020. A check for \$150.00, that covers the filing and permission fees, is enclosed within this submittal application.

In order to obtain coverage under the Annual Temporary Permit, NGPL will comply with the following conditions:

- 1) The volume will not exceed 25,000 gallons per hydrostatic test;
- 2) Water from a public/municipal water supply or other OCD-approved sources will be used for each test;
- 3) Written notification shall be provided to the OCD 72-hours prior to each hydrostatic discharge event;
- 4) The discharge will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
- 5) 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 discharge;
- 6) Best management practices shall be implemented to contain the discharge onsite, prevent impact to adjacent properties, and to control erosion;
- 7) 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 (the New Mexico Water Quality Control Commission Regulations)

- 8) The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location shall be properly notified of the activities prior to each proposed hydrostatic event; and
- 9) An annual report, summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - (a) The location of hydrostatic test (Section/Township/Range or GPS coordinates)
 - (b) The date of each test;
 - (c) The volume of each discharge; and
 - (d) The source and quality of test water (laboratory analysis, if necessary).

If you have any questions, please contact me at 719-520-4813 or amy_blythe@kindermorgan.com.

Respectfully,

A handwritten signature in cursive script that reads "Amy Blythe".

Amy M. Blythe
Environmental Specialist

Copy (with enclosure): Chris Janak – Environmental Project Permitting Manager

No. 12794

WATER QUALITY MANAGEMENT FUND, C/O OIL CONSERVATION DIVISION, 1220 S SAINT FRANCIS DR, SANTA FE NM 87505 (1000344470)

Description	Voucher #	Date	PO Number	Gross Amount	Discount Amount	Net Amount Paid
PMTREQNMOCD1 ***** Please send the check to Amy Blythe so she can submit payment with renewal letter to NMOCD	15840046	06/25/20		\$150.00	\$0.00	\$150.00
Totals				\$150.00	\$0.00	\$150.00

Detach at Perforation Before Depositing Check
100034470

JP Morgan Chase Bank, N.A.
Dallas, TX
88-88/1113

Check Date	07/17/2020
------------	------------

Check Amount	\$ **150.00
--------------	-------------

100034470

David M. Walsh