

HIP - 30

**PERMITS,  
RENEWALS, &  
MODS**



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

July 29, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-357-869-972**

Mr. Richard Favila  
El Paso Natural Gas Company  
P.O. Box 1492  
El Paso, Texas 79978-1492

**Re: Hydrostatic Test Water Discharge**  
**Sections 31 & 36, Township 6 South, Range 22 & 23 West, NMPM,**  
**Chaves County, New Mexico**

Dear Mr. Favila:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Co. (EPNG) analyses and request for approval to discharge approximately 280,000 gallons of waste water from the hydrostatic testing of Line 1300. The discharge location proposed is on the pipeline right of way in Sections 31 & 36, Township 6 South, Range 22 & 23 West, NMPM, Chaves County, New Mexico.

Based on the information provided in the request, the hydrostatic test water discharge is hereby approved subject to the following conditions:

1. The test water will be discharged into a the pipeline trench or along the right of way.
2. The fluids will not be allowed to migrate to a water of the State or a water of the U.S.
3. Any solids that accumulate as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.
4. The analytical results will be made available to the OCD along with a request for disposal of the accumulated solids.

Pursuant to WQCC Regulation 3-106.B, this approval will allow EPFS to discharge without an approved discharge plan for a period not to exceed 120 days. If the site is to be used for more than one test discharge, formal reapplication must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

Mr. Richard Favila  
July 29, 1998  
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Please be advised that this approval does not relieve EPFS of liability should their operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve EPFS of responsibility for compliance with other federal, state or local laws and/or regulations.

If there are any questions, please call Martyne Kieling at (505) 827-7153.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson  
Environmental Bureau Chief

xc: Artesia District Office



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

May 1, 1998

**CERTIFIED MAIL**

**RETURN RECEIPT NO. P-326-936-434**

Mr. Richard Favila  
El Paso Natural Gas Company  
P.O. Box 1492  
El Paso, Texas 79978-1492

Re: **Hydrostatic Test Water Discharge**  
**Sections 31 & 36, Township 6 South, Range 22 & 23 West, NMPM,**  
**Chaves County, New Mexico**

Dear Mr. Favila:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas (EPNG) request, dated April 23, 1998 for authorization to discharge approximately 280,000 gallons of waste water from the hydrostatic testing of a 30 inch, 7,929 foot section of used pipeline (Line 1300). The discharge location proposed is in Sections 31 & 36, Township 6 South, Range 22 & 23 West, NMPM, Chaves County, New Mexico.

Please note that used pipelines contain numerous contaminants that can pose potential environmental problems. Containment of the fluids in lined pits or tanks and analysis of waters will be required prior to discharge approval. Based on the information provided in the EPNG request, the hydrostatic test water discharge is subject to approval by the OCD upon completion and receipt of the following:

1. The test water and solids will be discharged and stored in tanks or lined pits pending full characterization of the test water;
2. The test water will be analyzed for major anions and cations (Ca, Mg, Na, K, HCO<sub>3</sub>, CO<sub>3</sub>, Cl, SO<sub>4</sub>), heavy metals (As, Ba, Cd, Pb, Hg, Se, Fe, Zn), aromatic and halogenated hydrocarbons, polynuclear aromatic hydrocarbons (PAH), TDS, Fe, Mn, pH and conductivity;
3. **Prior to discharge approval** the analytical results will be made available to the OCD Santa Fe office;

Mr. Richard Favila  
May 1, 1998  
Page 2

4. The exact test water discharge method and location, written permission from the landowner, depth to ground water, disposal method of the solids, and closure of any pits will be provided along with the discharge request and analytical results;
5. Any solids that accumulate in the tanks or lined pit as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.
6. Upon review of the analytical results and additional information the OCD will make a determination as to whether the test water can be discharged to the ground surface and whether a permit will be issued.

Please be advised that this does not relieve EPNG of liability should your operation result in actual pollution of surface water, ground water or the environment actionable under other laws and/or regulations.

If there are any questions, please call me at (505) 827-7153.

Sincerely,



Martyne Kielling  
Environmental Geologist

xc: Artesia District Office

## OIL CONSERVATION DIVISION

2040 S. Pacheco

Santa Fe, New Mexico 87505

September 26, 1995

**CERTIFIED MAIL****RETURN RECEIPT NO. P-176-012-193**

Mr. Martin Fong  
El Paso Natural Gas Company  
P.O. Box 1492  
El Paso, Texas 79978

Re: **Hydrostatic Test Water Discharge**  
**Chaves County, New Mexico**

Dear Mr. Fong:

The Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request dated September 6, 1995 and analytical information dated September 22, 1995 for authorization to discharge approximately 250,000 gallons of waste water from the hydrostatic test of a section of used pipeline (No.s 1300) near Roswell, New Mexico onto the ground.

Based on the information provided in the request, the hydrostatic test water discharge is hereby approved subject to the following conditions:

1. Permission will be obtained from the landowner prior to discharge.
2. The test water will be discharged onto the ground after first passing thru a spreader bar on the back of a tank truck.
3. The discharged water will not be allowed to enter any lakes, streams, rivers or any water course.

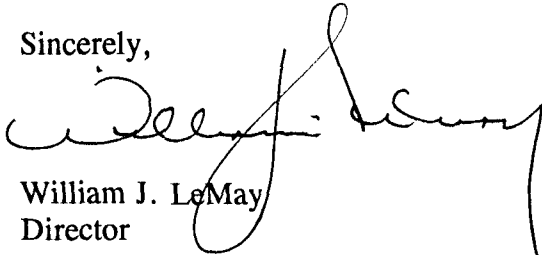
Pursuant to WQCC Regulation 3-106.B, this approval will allow you to discharge without an approved discharge plan for a period not to exceed 120 days. If the site is to be used for more than one test discharge, formal reapplication must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

Mr. Martin Fong  
September 26, 1995  
Pg. 2

Please be advised that this approval does not relieve EPNG of liability should their 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 laws and/or regulations.

If there are any questions, please call Chris Eustice at (505) 827-7153.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay". The signature is fluid and cursive, with a long, sweeping underline that extends downwards and to the right.

William J. LeMay  
Director

WJL/cee

xc: OCD Artesia Office

# MEMORANDUM OF CONVERSATION

✓ TELEPHONE \_\_\_ PERSONAL \_\_\_ TIME 405 pm DATE 9-22-95

ORIGINATING PARTY Martin Fong (EPNG)

OTHER PARTIES Chris Eustice (OCD-EB)

DISCUSSION EPNG wanted a verbal approval to discharge hydrostatic test water onto the ground. The water has been stored in 12 frac tanks. The OCD has all the necessary information needed to approve and Roger Anderson agrees with my recommendation for approval.

CONCLUSIONS I gave Martin a verbal "go-ahead" w/ 3 conditions:

1. Permission obtained from landowner.
2. EPNG will use spreader bar on truck to prevent erosion.
3. Water cannot enter any surface body of water or water course.

CHRIS EUSTICE Chris Eustice



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING  
GOVERNOR

May 24, 1991

POST OFFICE BOX 2088  
STATE LAND OFFICE BUILDING  
SANTA FE, NEW MEXICO 87504  
(505) 827-5800

CERTIFIED MAIL -  
RETURN RECEIPT NO. P-327-278-139

Mr. W. David Hall, Senior Engineer  
El Paso Natural Gas Company  
3801 Atrisco Northwest  
Albuquerque, New Mexico 87120

RE: Hydrostatic Test Water Disposal  
Plains San Juan line and loop

Dear Mr. Hall:

The Oil Conservation Division (OCD) has received your request, dated May 17, 1991, for authorization to discharge hydrostatic test water into a lined pond located in the NE/4, Section 24, Township 9 South, Range 28 East, NMPM, Chaves County, New Mexico.

The application was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3-106.B and is hereby approved pursuant to that regulation with the following condition:

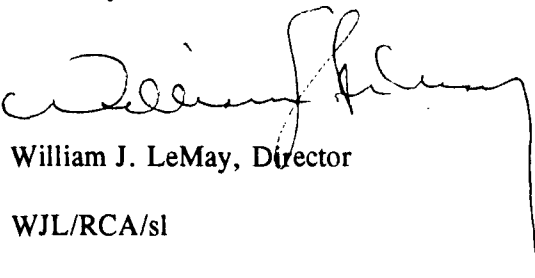
1. All water discharged from the line will be retained in the pit with adequate freeboard to prevent overtopping of the berm. No fluid will be allowed to be discharged or leaked onto the surrounding terrain.

Pursuant to WQCC Regulation 3-106.B, this approval will allow you to discharge without an approved discharge plan for a period not to exceed 120 days. If this site is to be used for more than one hydrotest, formal reapplication must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

If there are any questions, please call Roger Anderson at (505) 827-5884.

Sincerely,



William J. LeMay, Director

WJL/RCA/sl

cc: Aztec OCD Office