HIP - 33

PERMITS, RENEWALS, & MODS

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

March 24, 1999

CERTIFIED MAIL RETURN RECEIPT NO. P-326-936-523

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

Re: Hydrostatic Test Water Discharge Permit, Line No. 1103
El Paso Natural Gas Company
Rancho Rio Grande Units 1&2, Township 5 North, Range 1 East, NMPM,
Valencia County, New Mexico

Dear Mr. Favila:

The New Mexico Oil Conservation Division (OCD) has received the El Paso Natural Gas Company (EPNG) request dated March 3, 1999 for authorization to discharge approximately 8,640 gallons of waste water from the hydrostatic test of approximately 13,293 feet of 41/2 inch new pipeline at the above referenced location.

Based on the information provided in the request, and supplemental information dated March 4, 1999 the hydrostatic test water discharges are hereby approved subject to the following conditions:

- 1. The test water (8,640 gallons) will be discharged into frac tanks along the EPNG right of way and then will be discharged along the right of way or into the trench.
- 2. Only fresh water of less than 2,000 mg/l total dissolved solids from a water supply system or other potable source shall be used in the hydrostatic test.
- 3. The fluids will not be allowed to migrate to a water of the State or a water of the U.S.
- 4. Any solids that accumulate in the frac tanks as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.
- 5. The analytical results will be made available to the OCD along with a request for disposal of the accumulated solids.

Mr. Richard Favila March 24, 1999 Page 2

Pursuant to WQCC Regulation 3-106.B, this approval will allow EPNG 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 re-application must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

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 Martyne Kieling at (505) 827-7153.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

RCA/mjk

OIL CONSERVATION DIVISION 2040 South Pachece Street Santa Fe, New Mexice 87605 (505) 827-7134

March 24, 1999

CERTIFIED MAIL RETURN RECEIPT NO. P-326-936-522

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

Re: Hydrostatic Test Water Discharge Permit, Line No. 1300 El Paso Natural Gas Company Rio Grand Estates Unit 25 and Belen Claim, Casa Colorado Grant, T-3N, R-2E, NMPM, Valencia County, New Mexico

Dear Mr. Favila:

The New Mexico Oil Conservation Division (OCD) has received the El Paso Natural Gas Company (EPNG) request dated March 4, 1999 for authorization to discharge approximately 277,362 gallons of waste water from the hydrostatic test of approximately 15,409.3 feet of 30 inch new pipeline at the above referenced location.

Based on the information provided in the request, and supplemental information dated March 4, 1999 the hydrostatic test water discharges are hereby approved subject to the following conditions:

- 1. The test water (277,362 gallons) will be held in frac tanks along the EPNG right of waya and then will be discharged along the right of way or into the trench.
- 2. Only fresh water of less than 2,000 mg/l total dissolved solids from a water supply system or other potable source shall be used in the hydrostatic test.
- 3. The fluids will not be allowed to migrate to a water of the State or a water of the U.S.
- 4. Any solids that accumulate in the frac tanks as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.
- 5. The analytical results will be made available to the OCD along with a request for disposal of the accumulated solids.

Mr. Richard Favila March 24, 1999 Page 2

Pursuant to WQCC Regulation 3-106.B, this approval will allow EPNG 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 re-application must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

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 Martyne Kieling at (505) 827-7153.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief

RCA/mjk

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

December 23, 1998

CERTIFIED MAIL RETURN RECEIPT NO. P-326-936-496

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

Re: Hydrostatic Test Water Discharge, Line No. 1300

Unit 25, Township 4 North, Range 2 East, NMPM,

Valencia 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 231,000 gallons of waste water from the hydrostatic testing of Line 1300. The discharge location proposed is on the pipeline right of way in Unit 25, Township 4 North, Range 2 East, NMPM, Valencia 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 EPNG 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 December 23, 1998 Page 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 Martyne Kieling at (505) 827-7153.

Sincerely,

Roger C. Anderson

Environmental Bureau Chief



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 South Pachaco Street Santa Fe, New Mexico 87505 (805) 827-7131

October 27, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-474

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

TOCT 3 0 1998

Received

Re:

Hydrostatic Test Water Discharge, Line No. 1300 Unit 25, Township 4 North, Range 2 East, NMPM, Valencia County, New Mexico

Dear Mr. Favila:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request dated October 13, 1998, for authorization to discharge approximately 231,000 gallons of waste water from the hydrostatic testing of a 30 inch, 9,000 foot section of used pipeline (Line 1300) located in Unit 25, Township 4 North, Range 2 East, NMPM, Valencia 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 water 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, HCO3, CO3, Cl, SO4), 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. The analytical results will be made available to the OCD Santa Fe office along with your request for disposal of the accumulated test water;
- 4. Any solids that accumulate in the lined holding pond as a result of storage will be subject to full hazardous waste characterization testing to determine the proper means of disposal;
- 5. Information regarding 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;
- 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.



October 27, 1998

<u>CERTIFIED MAIL</u> <u>RETURN RECEIPT NO. P-326-936-474</u>

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

Re:

Hydrostatic Test Water Discharge, Line No. 1300 Unit 25, Township 4 North, Range 2 East, NMPM, Valencia County, New Mexico

Dear Mr. Favila:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request dated October 13, 1998, for authorization to discharge approximately 231,000 gallons of waste water from the hydrostatic testing of a 30 inch, 9,000 foot section of used pipeline (Line 1300) located in Unit 25, Township 4 North, Range 2 East, NMPM, Valencia 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 water 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, HCO3, CO3, Cl, SO4), 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. The analytical results will be made available to the OCD Santa Fe office along with your request for disposal of the accumulated test water;
- Any solids that accumulate in the lined holding pond as a result of storage will be subject to full hazardous waste characterization testing to determine the proper means of disposal;
- 5. Information regarding 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;
- 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 their operation result in pollution of surface water, ground water, or the environment actionable under other federal, state or local laws and/or regulations.

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

Sincerely,

Martyne J. Kieling

Environmental Geologist

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