

HIP - 54

**PERMITS,
RENEWALS, &
MODS**



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

March 15, 1993

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

CERTIFIED MAIL

RETURN RECEIPT NO.P-111-334-183

Mr. Michael J. McConnell
Sid Richardson Carbon and Gasoline Co.
First City Bank Tower
201 Main St., Suite 3000
Ft. Worth, Texas 76102

**RE: Application for Hydrostatic Test Water Discharge
Lea County, New Mexico**

Dear Mr. McConnell:

The Oil Conservation Division (OCD) has received your request, dated March 1, 1993, requesting authorization to discharge the hydrostatic test water from the test of your 6-5/8" pipeline from your Jal #4 plant that goes south into Texas. Your proposal is to dispose of this test water into Christie Gas Corporations' Shell State #13 disposal well (Class II). The application was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3-106.B. and is hereby **denied** pursuant to that regulation, and the proposed disposal method does not comply with Federal Underground Injection Control (UIC) Regulations.

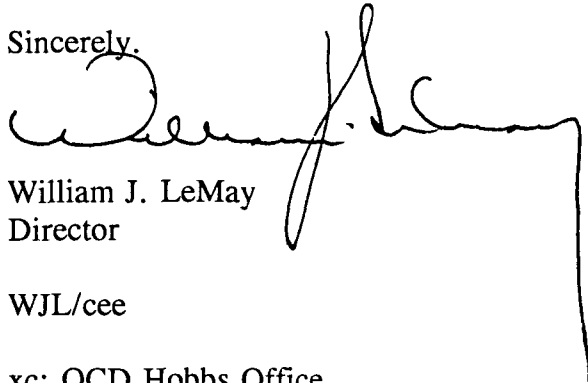
Federal Regulations (40 CFR 146.5) authorize the injection of exploration and production waste, and certain gas plant waste, into a Class II injection well. Waste water generated from the hydrostatic testing of mainline gas transmission systems are not in these categories. Furthermore this waste is not exempt from RCRA Subtitle C. This exemption is reserved for wastes from the exploration, development, and production of crude oil, natural gas, and geothermal energy. The test water discharge is subject to hazardous waste determination. This determination can be made by sampling and analyzing the test water discharge for toxic constituents, ignitability, corrositivity, and reactivity.

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Once you have determined if the waste water exhibits hazardous characteristics or not, you will be able to devise a method of disposal. The OCD Environmental Bureau staff is available to assist in helping advise you on this matter.

If you have any questions please call the Environmental Bureau at (505) 827-5812.

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay". The signature is fluid and cursive, with a long horizontal stroke extending to the right and a vertical line dropping down from the end.

William J. LeMay
Director

WJL/cee

xc: OCD Hobbs Office
UIC Director, OCD