## HIP - 54

## GENERAL CORRESPONDENCE

YEAR(S):



Subject: Request for Authorization to Reuse Hydrostatic Test Water Reference: Telecon on July 13, 1993

Dear Mr. Horst:

AGENETAL PROPERTY OF THE ST

This letter is in response to your request for information regarding our request to beneficially reuse hydrostatic test water.

Sid Richardson Gasoline Co. recently completed pressure testing an existing natural gas liquids products pipeline. The purpose of the test was to increase the maximum allowable operating pressure of the line from 1152 psi to 1480 psi. The line begins at Sid Richardson's Jal 4 gas plant and runs approximately sixty-three (63) miles to Odessa, Texas. Roughly 126,000 gallons (3,000 barrels) of fresh water from the Jal 4 well water supply system were used during the pressure test. The pipeline was pigged in order to remove hydrocarbons.

The used test water is now being stored in seven (7) frac tanks. The water was skimmed to remove immersible petroleum fractions which were then sold to a reclaimer. Lab analyses were performed in accordance with NMED Ground Water Quality Control test parameters to determine types and levels of remaining contaminants in the water. The test results are attached.

Sid Richardson intends to beneficially reuse the test water by introducing it into our Jal 3 gas plant water tower cooling system as part of the normal gas processing operation. Plant operations personnel have confirmed that the test water in its current condition can be utilized with no detrimental effects to plant products or equipment.

Request for Authorization to Reuse Hydrostatic Test Water MJM-82-93; 07/14/93 PAGE TWO

Approximately 4,500 barrels of fresh well water per day are introduced into the cooling tower as makeup. Our plan is to mix one (1) 500 barrel frac tank of used test water every other day as a portion of this total water makeup until all seven (7) tanks are emptied. Blowdown from the water cooling tower will then be disposed of in our Class II injection well as a production waste.

Our proposed disposal plan is justified by the "standard oil field exemption" at 40 CFR 461.4(5) which still exempts cooling tower blowdown from the hazardous waste category. At the very least, our proposed disposal plan would be justified by the conditionally exempt small generator provision at 40 CFR 261.5(g)(3)(v)(B) which allows disposal of hazardous waste in an on-site facility anywhere in the U.S. provided that the waste is beneficially reused and other applicable provisions of 40 CFR 261.5 and 262.11 are followed.

Sid Richardson is requesting authorization to proceed with the aforementioned plan to reuse the hydrostatic test water. We wish to emphasize that we view the test water as a recovered resource that can be reused for conservation of water without violating the purpose and intent of regulations.

Should more information be required, please do not hesitate to contact me. Your attention to this matter is greatly appreciated.

Yours very truly,

Muchael At Connell

Michael J. McConnell Compliance Coordinator Environmental Health & Safety (817) 338-8386

MJM:gad Attachments

cc: C. P. O'Farrell/E. F. Gunn - w/o attachments
W. J. Farley - w/o attachments
T. E. McElyea - w/o attachments
C. E. Adcock/M. A. Lopez - w/o attachments
Roger Anderson - (NMOCD) - w/attachments

6701 Aberdeen Avenue Lubbock, Texas 79424

806 • 794 • 1296

FAX 806 • 794 • 1298

ANALYTICAL RESULTS FOR SID RICHARDSON GASOLINE COMPANY Attention: Michael Lopez 201 Main Fort Worth, TX 76102

July 05, 1993 Receiving Date: 06/25/93 Sample Type: Water Project No: NA Project Location: Jal, NM Analysis Date: 06/25/93 Sampling Date: 06/25/93 Sample Condition: Intact & Cool Sample Received by: MS Project Name: Jal #4--Odessa Prod. Line

	T10297	Detection					
PARAMETERS (ppm)	J4P4HW-1A-F	Limit	õc	۶P	%ea	%IA	
ТЯРНС	8.059	0.2	82.314	97	95	100	
MTBE	<0.010	0.001	0.204	100	108	102	
BENZENE	9.518	0.001	0.211	100	105	106	
TOLUENE	4.827	0.001	0.213	100	104	107	
ETHYL-BENZENE	0.286	0.001	0.213	100	104	106	
M, P, O-XYLENE	1.189	0.001	0.623	100	101	103	
TOTAL BTEX	15.820						
рH	6.58		7.00	100		100	
F-	1.51	0.5	2.05	98	105	103	
N03-N	0.05	0.01	1.98	100	103	99	
CL-	649	20	498	100	97	99	
SO4-	187	5	20	84	97	98	
Na	389	0.1	9.9	99	92	99	
Са	112	0.1	9.7	99	98	97	
Мд	32	0.1	10.0	100	104	100	
Fe	2.9	0.1	5.0	97	96	100	
Mn	1.4	0.1	5.1	100	92	100	
Pb	<0.001	0.001	0.052	100	92	104	
TDS	1,589	50		99			
NAPHTHELENE	0.009	0.001		100	81	***	
EDB	<0.0001	0.0001		100	81		
EDC	<0.01	0.01		100	81		

METHODS: EPA 418.1, 601, 602, 200.7, 150.1, 340.2, 353.2, 325.2, 375.4, 160.1, 610, 504.

7-5-93 DATE

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Director, Dr. Blair Leftwich Director, Dr. Bruce McDonell

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Lubbock, Texas 79424 806 • 794 • 1296 FAX 805 • 794 • 1298

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ANALYTICAL RESULTS FOR SID RICHARDSON GASOLINE COMPANY Attention: Michael Lopez 201 Main Fort Worth, TX 76102

July 05, 1993 Receiving Date: 06/25/93 Sample Type: Water Project No: NA Project Location: Jal, NM

Analysis Date: 06/25/93 Sampling Date: 06/25/93 Sample Condition: Intact & Cool Sample Received by: MS Project Name: Jal #4--Odessa Prod. Line

PARAMETERS (ppm)	T10298 J4P4HW-2R-F	Detection				
		Limit	QC	₽₽	\$EA	%IA
TRPHC	12.877	0.2	82.314	97	95	100
MTBE	<0.010	0.001	0.204	100	108	102
BENZENE	18.176	0.001	0.211	100	105	106
TOLUENE	9.707	0.001	0.213	100	104	107
ethyl-benzene	0.586	0.001	0.213	100	104	106
M, P, O-XYLENE	1.796	0.001	0.623	100	101	103
TOTAL BTEX	30.265					
PH	6.06		7.00	100	<u></u>	100
<b>F-</b>	1.34	0.5	2.05	98	105	103
NO3-N	0.42	0.01	1.98	100	103	99
CL-	1,765	20	498	100	97	99
SO4-	349	5	20	.84	97	98
Na	1,030	0.1	9.9	99	92	99
Ca	254	0.1	9.7	99	98	<b>9</b> 7
мg	65	0.1	10.0	100	104	100
Fe	18	0.1	5.0	97	96	100
Mn	1.3	0.1	5.1	100	92	100
Pb	0.001	0.001	0.052	100	92	104
TDS	3,869	50		99		
NAPHTHELENE	11	0.001		100	79	
EDB	<0.0001	0.0001		100	79	
EDC	<0.01	0.01		100	79	

METHODE: EPA 418.1, 601, 602, 200.7, 150.1, 340.2, 353.2, 325.2, 375.4, 160.1, 610, 504.

Director, Dr. Blair Leftwich

Director, Dr. Bruce McDonell

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7-5-93

DATE



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SID RICHARDSON CARBON & GASOLINE CO.

FIRST CITY BANK TOWER 201 MAIN STREET FORT WORTH, TEXAS 76102 OIL CONSERVE OUN DIVISION RECEIVED

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THE REPORTED STREET

ELTON F. GUNN MANAGER ENVIRONMENTAL HEALTH & SAFETY

March 1, 1993 MJM-29-93 File: NM-9

## **<u>CERTIFIED MAIL - RETURN RECEIPT</u>**

<u>P 378 678 272</u> Mr. Roger Anderson New Mexico Energy, Minerals & Natural Resources Department Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504-2088

Subject: Application for Hydrostatic Test Water Discharge Permit

Dear Mr. Anderson:

Sid Richardson Carbon & Gasoline Co. is planning a hydrostatic test of a currently inactive 65/8" pipeline and hereby requests issuance of a discharge permit for test water disposal. The purpose of the test is to increase the maximum allowable operating pressure (MAOP) of the line from 1152 psi to 1480 psi.

## **Permit Application Data**

- 1) A map showing the pipeline location is available upon request. The pipeline begins at Sid Richardson's Jal 4 gasoline plant located approximately eleven (11) miles north of Jal, New Mexico on State Hwy. No. 18. The pipeline terminates at the Rexene Company's complex located on the southwest side of the city of Odessa, Texas. The pipeline length is approximately sixty-three (63) miles. The pipeline was previously used to transport natural gas liquids such as ethane and propane.
- 2) In order to increase the MAOP to the desired 1480 psi, the line will be hydrostatically tested to 1850 psi in various segments, with the largest section containing approximately 129,00 gallons of water. The entire line will be pigged in order to remove any hydrocarbons. No solids are expected to be produced as a result of the testing.
- 3) Fresh water for the hydrotest will be obtained from the Jal 4 well-water supply system.

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Application for Hydrostatic Test Water Discharge Permit MJM-29-93; 03/01/93 PAGE TWO

- 4) The point of discharge for the test water will be the Christie Gas Corporations (HQ Austin Texas (512) 327-9510) disposal well. The well (Shell State #13, API # (30-025-10920) is located in the Grayburg formation, Section 32, Township 235, Range 37E in Lea County, New Mexico.
- 5) All test water will be filtered prior to disposal into the well. The filter unit cartridges will be disposed of in accordance with applicable NMOCD or NMED regulations.
- 6) Since the greatest anticipated volume of test water is not expected to exceed 129,000 gallons at the largest segment of pipeline, a monitoring program has not been planned.
- 7) Ground water quality and depth information can be provided if desired. However, since the test water is being discharged into a disposal well, ground water data is not considered pertinent to this request.
- 8) Subsurface geological characteristics can be provided if desired. However, since the test water is being discharged directly into a disposal well, geological data is not considered pertinent to this request.
- 9) All hydrotest fluids will be disposed of in the approved Class II disposal well as described in #4 above.
- 10) Christie Gas Corporation is the owner of the discharge site disposal well.

Christie Gas Corporation Barton Oaks Plaza Two, Suite 515 901 MoPac Expressway South Austin, Texas 78746

11) A letter from Christie Gas which grants Sid Richardson permission to dispose filtered hydrostatic test water into their disposal well is attached.

If this application is approved, please send the discharge permit to my attention at the letterhead address, Suite 3000.

Application for Hydrostatic Test Water Discharge Permit MJM-29-93; 03/01/93 PAGE THREE

Should more information be required, please do not hesitate to contact me. Your attention to this matter is greatly appreciated.

Sincerely,

Latin Stan HISB

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Michael J. McConnell Compliance Coordinator Environmental Health & Safety (817) 338-8386

MJM:gad Attachment

cc: C. P. O'Farrell/E. F. Gunn - w/att.
W. J. Farley - w/att.
C. E. Adcock - w/att.
M. A. Lopez - w/att.
K. C. Clark - w/att.



February 19, 1993

Christie Gas Corporation does hereby grant Sid Richardson Carbon & Gasoline Company permission to dispose of hydrostatic test water from their Jal-Odessa Products line into our Shell State #13 well ALI #(30-025-10920). It is understood that this water will only be used to establish an MAOP on the line. Richardson will provide a filter unit prior to disposal of the water into our well. This permission will only be granted if approved by the Oil Conservation Division of the State of New Mexico.

Christie Gas Corporation

By:

Joé Christie, President Uler

Witness:

Susan Walker

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CHRISTIE GAS CORPORATION

Barton Oaks Plaza Two, Suite 515 901 MoPac Expressway South Austin, Texas 78746

> 512 327-9510 512 327-5272 FAX

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