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**PERMITS,  
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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

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**Lori Wrotenbery**

Director

**Oil Conservation Division**

August 23, 2000

**CERTIFIED MAIL**

**RETURN RECEIPT NO. 7099-3220-0000-5051-1057**

Mr. Tom J. Martinez  
El Paso Natural Gas Company  
3300 North A Street, Suite 200  
Midland, TX 79705

**Re: Hydrostatic Test Water Discharge  
Lines 1110, 1103 & 1100  
Eddy County, New Mexico**

Dear Mr. Martinez:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request, dated August 22, 2000, for authorization to discharge approximately 200,000 gallons of waste water from the hydrostatic test of approximately 1.25 miles of used pipeline (30-inch line, No. 1110, 1103 and 26-inch line No. 1100) in Eddy 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 (200,000 gallons) will be held in FRAC tanks located at the EPNG's Pecos River Station located in NE/4 Section 7, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico
2. Test water will be held in FRAC tanks and will be subject to full hazardous waste characterization testing to determine the proper means of disposal. Test water must receive separate authorization from the OCD prior to discharge and the request must be accompanied with laboratory analysis and chain of custody.
3. Only fresh water of less than 1,000 mg/l total dissolved solids from a water supply system or other potable source shall be used in the hydrostatic test.
4. Hydrostatic test water sample analysis will include 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 screens, PAH (Polynuclear Aromatic Hydrocarbons), TDS, Fe, Mn, ph and conductivity.

5. The analytical results from the hydrostatic test discharge will be made available to the OCD. Upon approval by the OCD Hydrostatic test water may be discharged along the pipeline right of way.
6. The fluids will not be allowed to migrate to a water of the State or a water of the U.S.
7. Any solids that accumulate in the FRAC tanks or sock filters as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.
8. 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.

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 regulations.

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

Sincerely,



Roger C. Anderson  
Environmental Bureau Chief

RCA/mjk

xc: OCD Artesia Office