HIP - 95

GENERAL CORRESPONDENCE

YEAR(S): 2005

TRANSWESTERN PIPELINE COMPANY
Capital Projects
660 A E. Broadway, Suite 2
Bloomfield, NM 87413
Phone: 505-634-0554
Fax: 505-634-0557

Toll Free 1-866-634-0554

April 11, 2005

HI-095

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Transwestern Pipeline Company, San Juan 2005 Expansion Project – Copies of Navajo Nation Environmental Protection Agency Discharge Permit, Discharge Monitoring Reports, Request for Termination Letters

Dear Mr. Martin,

Please find attached to this letter copy of the Transwestern Pipeline Company San Juan 2005 Expansion Project (Transwestern) Navajo Nation Environmental Protection Agency (NNEPA) NPDES Permit 0000001.

Additionally, please find copies of all Discharge Monitoring Reports for hydrostatic test water discharges conducted under either NNEPA NPDES Permit 0000001 and/or USEPA NPDES Permit NM0030708.

Lastly, please find copies of Request for Termination of USEPA NPDES permit NM0030708 and NNEPA NPDES Permit 0000001.

Should you have any questions or need for additional information, please contact me at 806/ 622-0137 or via email at jimt@caprockenvironmental.com.

Sincerely,

Jim Thompson, REM/CPESC
Caprock Environmental Services, LLC
for Transwestern Pipeline Company San Juan 2005 Expansion Project

Cc: Project File
John Steenberg, TW (w/out attachment)
Bill Osborne, TW (w/out attachment)

NNPDES Permit No. NN0000001

AUTHORIZATION TO DISCHARGE UNDER THE NAVAJO NATION POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Navajo Nation Clean Water Act and federal Clean Water Act, as amended (33 U.S.C. 1251 et. seq),

Transwestern Pipeline Company
Capital Projects
660 A E. Broadway, Suite 2
Bloomfield, NM 87413

is authorized to discharge hydrostatic test water from its San Juan 2005 Pipeline Expansion Project in San Juan and McKinley, New Mexico, from one (1) outfall and its respective receiving water, as follows:

Outfall	Latitude/Longitude	Receiving Water(s)
005	35° 57'43"N; 108° 22'29"W	Playa-like feature (Chaco River tributary)

in accordance with effluent limitations, monitoring requirements and in the attached 10 pages of the U.S. EPA Region 9 "Standard Federal NPDES Permit Conditions," dated June 3, 2002.

This permit shall become effective on February 23, 2005.

This permit and the authorization to discharge shall expire at midnight, February 23, 2010.

Signed this 23 day of February 2005

For the Navajo Nation

Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 6
To Transwestern	From P. Antonio
Co. Bloomfield OFC.	Co NNEPA
Dept.	Phone # 928-871-7185
Fax # 505/634-0557	Fax # 928-871-7592

SECTION A. EFFLUENT LIMITATION AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting through the date of the permit expiration, the permittee shall not discharge hydrostatic test water to receiving waters, except from the discharge point identified below, and in accordance with both the effluent limitations contained in Section A.3, and the narrative water quality standards cited in Section B below.

Outfall	Loop	Location ID	Coordinates (Longitude/Latitude)	Receiving Water(s)
005	A	ROW Control Structure (Mile Post 60)	35° 57' 43" North 108° 22' 29"West	Playa-like feature (Chaco River tributary)

2. To ensure that the discharge will not cause severe erosion at any discharge locations, and in accordance with the requirements set forth at § 402(e) of the NNPDES Program Regulations, the total combined volume of hydrostatic test water discharges at Outfall No. 005 shall not exceed 10 million gallons. In addition, the duration of each discharge shall not exceed 7 days.

3. Discharges resulting from hydrostatic testing shall be monitored and limited by the permittee as specified below:

Effluent Parameter	Units	Limit		Monitoring Frequency	Sample Type[1]
		Daily Max	Daily Avg		
Flow[2]	MGD	4.3	2.5	Continuous	Estimate
Oil and Grease	mg/L	10	5	Per discharge	Grab
Total Dissolved Solids[3]	mg/l	--	40	Per discharge	Grab
pH	S.U	between 6.5 to 9.0		Per discharge	Grab
Turbidity	NTU	--	50	Per discharge	Grab

Footnotes:

1. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge but prior to entry into the receiving water.
2. Flow shall be monitored and reported from the outfall.
3. Both the effluent (Outfall No. 005) and the intake cooling tower water supply shall be sampled. The incremental increase is the difference between the two sample analyses. The effluent value, cooling tower water supply value and incremental increase value shall be reported.

SECTION B. GENERAL DISCHARGE SPECIFICATIONS

1. All Waters of the Navajo Nation shall be free from pollutants in amounts or combinations that, for any duration:

   a. Cause injury to, are toxic to, or otherwise adversely affect human health, public safety, or public welfare.

   b. Cause injury to, are toxic to, or otherwise adversely affect the habitation, growth, or propagation of indigenous aquatic plant and animal communities or any member of these communities; of any desirable non-indigenous member of these communities; of waterfowl accessing the water body; or otherwise adversely affect the physical, chemical, or biological conditions on which these communities and their members depend.

   c. Settle to form bottom deposits, including sediments, precipitates and organic materials, that cause injury to, are toxic to, or otherwise adversely affect the habitation, growth, or propagation of indigenous aquatic plant and animal communities or any member of these communities; of any desirable non-indigenous member of these communities; of waterfowl accessing the water body; or otherwise adversely affect the physical, chemical, or biological conditions on which these communities and their members depend.

   d. Cause physical, chemical, or biological conditions that promote the habitation, growth or propagation of undesirable, non-indigenous species of plant or animal life in the water body.

   e. Cause solids, oil, grease, foam, scum, or any other form of objectionable floating debris on the surface of the water body; may cause a film or irridescent appearance on the surface of the water body; or that may cause a deposit on a shoreline, on a bank, or on aquatic vegetation.

   f. Cause objectionable odor in the area of the water body.

   g. Cause objectionable taste, odor, color, or turbidity in the water body.

   h. Cause objectionable taste in edible plant and animal life, including waterfowl, that reside in, on, or adjacent to the water body.

1. All waters of the Navajo Nation shall be free of toxic pollutants from other natural sources in amounts, concentrations, or combinations which affect the propagation of fish or which are toxic to humans, livestock or other animals, fish or other aquatic organisms, wildlife using aquatic environments for habitation or aquatic organisms for food, or which will or can reasonably be expected to bioaccumulate in tissue of fish, shellfish, or other aquatic

organisms to levels which will impair the health of aquatic organism or wildlife or result in unacceptable tastes, odor or health risks to human consumers.

SECTION C. NOTIFICATION

The permittee shall notify the Navajo EPA Water Quality/NNPDES Program (928 /871-7185) twenty-four (24) hours prior to commencing any discharge of hydrostatic test water.

SECTION D. PERMIT REOPENER

Should any of the monitoring indicate that the discharge causes, has the reasonable potential to cause, or contributes to excursions above water quality criteria, the permit may be reopened for the imposition of water quality based limits and/or additional monitoring, analytical, and reporting requirements as may be necessary. Also, this permit may be modified, in accordance with the requirements set forth at Section 402 of the NNPDES Program Regulations and Section 211 of the Uniform Regulations for Permit Review, Administrative Enforcement Orders, Hearings, and Rulemakings Under Navajo Nation Environmental Acts, to include appropriate conditions or limits to address demonstrated effluent toxicity based on newly available information, or to implement any U.S. EPA-approved new Tribal water quality standards.

SECTION E. MONITORING AND REPORTING

2. Reporting of Monitoring Results

Monitoring results shall be reported on Discharge Monitoring Report ("DMR") forms (EPA No. 3320-1) to be supplied by the U.S. EPA Regional Administrator, to the extent that the information reported may be entered on the forms. The results of all monitoring required by this permit shall be submitted in such a format as to allow direct comparison with the limitations and requirements of the permit.

Discharge data obtained during each hydrostatic test event shall be summarized and reported. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Navajo Nation EPA at the following address:

Navajo Nation EPA
NNPDES Program
P.O. Box 339
Window Rock, AZ 86515

2. Monitoring and Records

Records of monitoring information shall include:

b. Date, exact location, and time or sampling or measurements performed, preservatives used

c. Individual(s) who performed the sampling or measurements;
e. Date(s) analyses were performed;
f. Laboratory(ies) which performed the analyses;
g. Analytical techniques or methods used;
h. Any comments, case narrative or summary of results produced by the laboratory.

3. 24-Hour Reporting of Noncompliance

The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances to the following persons or their offices:

Navajo Nation EPA
Attn: NNPDES Program
(928) 871-7185

If the permittee is unsuccessful in contacting the person above, the permittee shall report by 9 a.m. on the first business day following the noncompliance. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including dates and times, and, if the noncompliance has not been corrected, the time it is expected to continue; and steps or planned to reduce, eliminate, and prevent reoccurence of the noncompliance.

SECTION E. INSPECTION AND ENTRY

The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and such other documents as may be required by law, to perform inspections under authority of Section 10: Inspection and Entry of the U.S. EPA Region 9 "Standard Federal NPDES Permit Conditions," dated June 3, 2002, as attached.

SECTION F. DEFINITIONS

The following definitions shall apply unless otherwise specified in this permit:

1. "Grab" sample, for monitoring requirements, is defined as a single "dip and take" sample collected at a representative point in the discharge stream.

2. "Daily discharge" means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar for purposes of sampling. For pollutants with limitations expressed in units of concentration, the "daily discharge" is calculated as the average measurement of the pollutant over the sampling day. "Daily discharge" determination of concentration made using a composite sample shall be the concentration of the composite sample. When grab samples are used, the "daily discharge" determination of concentration shall be the arithmetic average (weighted by flow value) of

all samples collected during that sampling day.

3. "Daily maximum" discharge limitation means the highest allowable "daily discharge" during the calendar month.

4. "Daily average" discharge limitation means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.

5. "Director" means the Executive Direction of Navajo Nation EPA.

6. "Navajo Nation EPA" means the Navajo Nation Environmental Protection Agency.

7. "U.S. EPA" means the United States Environmental Protection Agency.

8. "Regional Administrator" means EPA Region 9's Regional Administrator.

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*
NAME Transwestern Pipeline Company - San Juan 2005 Expansion Project
ADDRESS 660-A E. Broadway, Ste. 2
Bloomfield, NM 87413
FACILITY LOCATION Outfall 003 - Hunter Wash

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*
DISCHARGE MONITORING REPORT *(DMR)*

NM0030708	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	2005	02	19	TO	2005	02	19

LOOP A
WATERS OF US DISCHARGE
ORIG. TO US EPA

Form Approved.
OMB No. 2040-0004

NOTE: Read Instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUANTITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
FLOW	SAMPLE MEASUREMENT	3.02	3.02	MGD					Ø	CONT	EST
	PERMIT REQUIREMENT	2.5	4.3							CONT	EST
Oil & Grease	SAMPLE MEASUREMENT	4.48	4.48	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	5	10							Per Discharge	Grab
Total Dissolved Solids	SAMPLE MEASUREMENT	746	—						Ø	1	Grab
	PERMIT REQUIREMENT	40*	—							Per Discharge	Grab
pH	SAMPLE MEASUREMENT				8.0	—	8.3		Ø	2	Grab
	PERMIT REQUIREMENT				6.5	—	9.0	S.U.		Per Discharge	Grab
Turbidity	SAMPLE MEASUREMENT				—	12	—		Ø	2	Grab
	PERMIT REQUIREMENT				—	50	—	NTU		Per Discharge	Grab
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE	DATE		
Danny Tribble Vice President Operations	I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.		713 345-7162			
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE / NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

* TDS - 40 mg/l is incremental increase between intake & effluent values. Influent sample value - 1,670 mg/l

Transwestern Pipeline Company

Memo

To: Jim Thompson

From: Charlie Bertram

CC: Linda Koon

Date: 02/21/05

Re: 02/19/05 Hydrostatic test water discharge – Hunter's Wash

Hydro test discharge began at 10:15 am (02/19/05)

Water sample collected at 10:54 am

Turbidity meter calibration:

Orbeco-Hellige Model 966 Meter, S/N 3330

Adjusted to 0.0 from -0.4 (using zero calibration standard)

Adjusted from 39.9 to 40.0 (using 40 0 calibration standard)

Tubidity reading = 8.6 at 10:45 am; and (15.3 at 12:45)

Calibrated ISFET pH meter using 7 0 standard

IQ Scientific model BL66A, S/N 1Q120

pH reading = 8.3 at 10:45 am; and (8.0 at 12:45)

Discharge was completed at 6:40 pm (8 hours and 35 minutes or 515 minutes)

Water from approximately 4.1 miles of 36" O.D. pipe (1,082,400 gallons) was discharged

Average discharge rate = 2,102 gpm (gallons per minute)

Samples for oil and grease, and TDS were collected and delivered to lina ba lab.

Sample No. Location

SJL-LA-D1 = Hunters Wash

Samples were delivered to lina ba lab Monday (02/21/05) about 8:30 am

Discharge Sample

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

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P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *23-Feb-05*

CLIENT:	Transwestern Pipeline Co.	Client Sample Info:	SJL-LA
Work Order:	0502026	Client Sample ID:	SJL-LA-D1
Project:	SJL-LA	Collection Date:	2/19/2005 10:45:00 AM
Lab ID:	0502026-001	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease, Total Recoverable	4.48	1.57		mg/L	1	2/22/2005
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	746	40		mg/L	1	2/22/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit (PQL)
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

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Intake Sample

Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: 30-Apr-04

CLIENT:	Transwestern Pipeling Co.	Client Sample Info:	TW-1
Work Order:	0404025	Client Sample ID:	TW-1
Project:	TW-1	Collection Date:	4/15/2004 11:45:00 AM
Lab ID:	0404025-001	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: JEM
Benzene	ND	0.5		µg/L	1	4/19/2004
Ethylbenzene	ND	0.5		µg/L	1	4/19/2004
m,p-Xylene	ND	1.0		µg/L	1	4/19/2004
o-Xylene	ND	0.5		µg/L	1	4/19/2004
Toluene	ND	0.5		µg/L	1	4/19/2004
MERCURY, TCLP LEACHED		SW7470		(SW7470)		Analyst: JEM
Mercury	ND	0.0010		mg/L	1	4/29/2004
ICP METALS, TCLP LEACHED		SW1311/6010B		(SW3010A)		Analyst: HNR
Arsenic	ND	0.018		mg/L	1	4/29/2004
Barium	0.070	0.003		mg/L	1	4/29/2004
Cadmium	ND	0.003		mg/L	1	4/29/2004
Chromium	0.005	0.003		mg/L	1	4/29/2004
Lead	ND	0.005		mg/L	1	4/29/2004
Selenium	ND	0.011		mg/L	1	4/29/2004
Silver	ND	0.020		mg/L	1	4/29/2004
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease Total Recoverable	ND	1.6		mg/L	1	4/19/2004
PH		E150.1				Analyst: HNR
pH	7.53	2.00		pH units	1	4/16/2004
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1670	40		mg/L	1	4/19/2004
TOTAL SUSPENDED SOLIDS		E160.2				Analyst: JEM
Suspended Solids (Residue, Non-Filterable)	30	15		mg/L	1	4/19/2004

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit (PQL)
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*
NAME Transwestern Pipeline Company - San Juan 2005 Expansion Project
ADDRESS 660-A E. Broadway, Ste. 2
Bloomfield, NM 87413
FACILITY LOCATION Outfall 004 - Wash to Hard Ground Canyon

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*
DISCHARGE MONITORING REPORT *(DMR)*

NM0030708	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	2005	03	09	TO	2005	03	09

Form Approved.
OMB No. 2040-0004

LOOP B
WATERS OF US DISCHARGE
ORIG. TO NNEPA

NOTE: Read Instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUANTITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
Flow	SAMPLE MEASUREMENT	2.77	2.77	MGD					Ø	CONT	EST
	PERMIT REQUIREMENT	2.5	4.3							CONT	EST
Oil & Grease	SAMPLE MEASUREMENT	ND	ND	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	5	10							Per Discharge	Grab
Total Dissolved Solids	SAMPLE MEASUREMENT	1080	—	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	40*	—							Per Discharge	Grab
pH	SAMPLE MEASUREMENT				8.2	—	8.2	S.U.	Ø	1	Grab
	PERMIT REQUIREMENT				6.5	—	9.0			Per Discharge	Grab
Turbidity	SAMPLE MEASUREMENT				—	14.6	—	NTU	Ø	1	Grab
	PERMIT REQUIREMENT				—	50	—			Per Discharge	Grab
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE	DATE		
Danny Tribble Vice President Operations	I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	713 345-7162 AREA CODE NUMBER	YEAR	MO	DAY
TYPED OR PRINTED						

COMMENTS AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*
* - TDS - 40mg/l is incremental increase between intake & effluent value. Intake Sample value - 1,170 mg/l

Transwestern Pipeline Company

Memo

To: Jim Thompson

From: Charlie Bertram

CC: Linda Koon

Date: 03/10/05

Re: 03/09/05 Hydrostatic test water discharge - 1 – Hard Ground Canyon

Hydro test discharge began at 01:00 (03/09/05)

Water sample collected at 04:50

Turbidity meter calibration:

Orbeco-Hellige Model 966 Meter, S/N 3330

Meter read 0.0 using zero calibration standard (no calibration necessary)

Meter read 40.0 using 40.0 calibration standard (no calibration necessary)

Turbidity reading = 14.6 at 04:50

Calibrated ISFET pH meter (adjusted from 6.9 to 7.0) using 7.0 standard

IQ Scientific model BL66A, S/N 1Q120

pH reading = 8.2 at 04:50

Discharge was completed at 0900 (about 8 hours – or 480 minutes)

Water from approximately 3.5 miles of 36" O.D. pipe (924,000 gallons) was discharged

Average discharge rate = 1,925 gpm (gallons per minute)

Samples for oil and grease, and TDS were collected and delivered to Iina ba lab.

Sample No. Location

SJL-LB-D1 = Hard Ground Canyon

Samples were delivered to Iina ba lab Monday (03/09/05) about 11:35 am

Discharge Sample

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

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P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *15-Mar-05*

CLIENT:	Transwestern Pipeline Co	Client Sample Info:	McKinley County, NM
Work Order:	0503012	Client Sample ID:	SJL-LB-D1
Project:	McKinley County, NM	Collection Date:	3/4/2005 4:50:00 AM
Lab ID:	0503012-001	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
OIL AND GREASE, T/R		E413.2				Analyst: JLE
Oil & Grease, Total Recoverable	ND	1.59		mg/L	1	3/14/2005
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1080	40		mg/L	1	3/11/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit (PQL)
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

Intake Sample

612 E Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

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P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *14-Jan-05*

CLIENT:	Transwestern Pipeline Co	Client Sample Info:	Wells
Work Order:	0501007	Client Sample ID:	TW-CGWT-1
Project:	Wells	Collection Date:	1/10/2005 11:00:00 AM
Lab ID:	0501007-003A	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
PH		**E150.1**				Analyst: VDB
pH	7.67	2.00		pH units	1	1/10/2005
Temperature	21.7	0		pH units	1	1/10/2005
TOTAL DISSOLVED SOLIDS		**E160.1**				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1170	40		mg/L	1	1/11/2005
TURBIDITY		**E180.1**				Analyst: SUB
Turbidity	24	1.0		NTU	1	1/12/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
H - Parameter exceeded Maximum Allowable Holding Time
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

612 E Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

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P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *14-Jan-05*

CLIENT:	Transwestern Pipeline Co	Client Sample Info:	Wells
Work Order:	0501007	Client Sample ID:	TW-CGWT-1
Project:	Wells	Collection Date:	1/10/2005 11:00:00 AM
Lab ID:	0501007-003B	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease, Total Recoverable	ND	1.6		mg/L	1	1/14/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
H - Parameter exceeded Maximum Allowable Holding Time
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*
NAME Transwestern Pipeline Company - San Juan 2005 Expansion Project
ADDRESS 660-A E. Broadway, Suite 2
Bloomfield, NM 87413
FACILITY LOCATION Outfall 005 - Unnamed Playa

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*
DISCHARGE MONITORING REPORT *(DMR)*

NN0000001	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	2005	02	24	TO	2005	02	25

Form Approved.
OMB No. 2040-0004

LOOP A DISCHARGE #1
NON-WATERS OF US
ORIG. TO NNEPA

NOTE: Read Instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUANTITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
Flow	SAMPLE MEASUREMENT	2.45	2.45	MGD					Ø	Cont	EST
	PERMIT REQUIREMENT	2.5	4.3							Cont	EST
Oil & Grease	SAMPLE MEASUREMENT	ND	ND	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	5	10							Per Discharge	Grab
Total Dissolved Solids	SAMPLE MEASUREMENT	1130	—	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	40*	—							Per Discharge	Grab
pH	SAMPLE MEASUREMENT				8.0	—	8.0	S.U.	Ø	1	Grab
	PERMIT REQUIREMENT				6.5	—	9.0			Per Discharge	Grab
Turbidity	SAMPLE MEASUREMENT				—	3.9	—	NTU	Ø	1	Grab
	PERMIT REQUIREMENT				—	50	—			Per Discharge	Grab
	SAMPLE MEASUREMENT										~~Grab~~
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE	DATE		
Danny Tribble Vice President Operations	I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	713 345-7162	YEAR	MO	DAY
TYPED OR PRINTED			AREA CODE / NUMBER			

COMMENTS AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*
*- TDS - 40 mg/l is incremental increase between intake and effluent value. Intake sample value = 1,670 mg/l

Transwestern Pipeline Company

Memo

To: Jim Thompson

From: Charlie Bertram

CC: Linda Koon

Date: 02/28/05

Re: 02/24/05 Hydrostatic test water discharge - 2 – MP 60

Hydro test discharge began at 09:20 am (02/24/05)

Water sample collected at 10:54 am

Turbidity meter calibration:

Orbeco-Hellige Model 966 Meter, S/N 3330

Adjusted to 0.0 from -0.2 (using zero calibration standard)

Adjusted from 39.4 to 40.0 (using 40.0 calibration standard)

Turbidity reading = 3.9 NTU's at 10:20 am

Calibrated ISFET pH meter using 7.0 standard

IQ Scientific model BL66A, S/N 1Q120

pH reading = 8.0 at 10:20 am

Discharge was completed at 07:30 2/25/05 (22 hours and 35 minutes or 1,320minutes)

Water from approximately 8.5 miles of 36" O.D. pipe (2,244,000 gallons) was discharged

Average discharge rate = 1,700 gpm (gallons per minute)

Samples for oil and grease, and TDS were collected and delivered to Iina ba lab

Sample No. Location

SJL-LA-D1 = Playa near MP 60

Samples were delivered to Iina ba lab Friday (02/25/05) morning by Linda Koon.

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

Discharge Sample

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: 04-Mar-05

CLIENT:	Transwestern Pipeline Co.	Client Sample Info:	SJL-LA-D2
Work Order:	0502031	Client Sample ID:	SJL-LA-D2
Project:	SJL-LA-D2	Collection Date:	2/24/2005 10:20:00 AM
Lab ID:	0502031-001A	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1130	40		mg/L	1	3/2/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
H - Parameter exceeded Maximum Allowable Holding Time
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *04-Mar-05*

CLIENT:	Transwestern Pipeline Co	Client Sample Info:	SJL-LA-D2
Work Order:	0502031	Client Sample ID:	SJL-LA-D2
Project:	SJL-LA-D2	Collection Date:	2/24/2005 10:20:00 AM
Lab ID:	0502031-001B	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease, Total Recoverable	ND	1 57		mg/L	1	3/4/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
H - Parameter exceeded Maximum Allowable Holding Time
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

Intake Sample

Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: 30-Apr-04

CLIENT:	Transwestern Pipeling Co.	Client Sample Info:	TW-1
Work Order:	0404025	Client Sample ID:	TW-1
Project:	TW-1	Collection Date:	4/15/2004 11:45:00 AM
Lab ID:	0404025-001	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: JEM
Benzene	ND	0.5		µg/L	1	4/19/2004
Ethylbenzene	ND	0.5		µg/L	1	4/19/2004
m,p-Xylene	ND	1.0		µg/L	1	4/19/2004
o-Xylene	ND	0.5		µg/L	1	4/19/2004
Toluene	ND	0.5		µg/L	1	4/19/2004
MERCURY, TCLP LEACHED		SW7470		(SW7470)		Analyst: JEM
Mercury	ND	0.0010		mg/L	1	4/29/2004
ICP METALS, TCLP LEACHED		SW1311/6010B		(SW3010A)		Analyst: HNR
Arsenic	ND	0.018		mg/L	1	4/29/2004
Barium	0.070	0.003		mg/L	1	4/29/2004
Cadmium	ND	0.003		mg/L	1	4/29/2004
Chromium	0.005	0.003		mg/L	1	4/29/2004
Lead	ND	0.005		mg/L	1	4/29/2004
Selenium	ND	0.011		mg/L	1	4/29/2004
Silver	ND	0.020		mg/L	1	4/29/2004
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease Total Recoverable	ND	1.6		mg/L	1	4/19/2004
PH		E150.1				Analyst: HNR
pH	7.53	2.00		pH units	1	4/16/2004
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1670	40		mg/L	1	4/19/2004
TOTAL SUSPENDED SOLIDS		E160.2				Analyst: JEM
Suspended Solids (Residue, Non-Filterable)	30	15		mg/L	1	4/19/2004

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit (PQL)

J - Analyte detected below Practical Quantitation Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted precision limits

E - Value above Upper Quantitation Limit - UQL

PERMITTEE NAME/ADDRESS *(Include Facility Name/Location if Different)*
NAME Transwestern Pipeline Company - San Juan 2005 Expansion Project
ADDRESS 6660-A E. Broadway, Ste. 2
Bloomfield, NM 87413
FACILITY LOCATION Outfall 005 - Unnamed Playa

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*
DISCHARGE MONITORING REPORT *(DMR)*

NAI 000 0001	002
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	2005	02	25	TO	2005	02	25

Form Approved.
OMB No. 2040-0004

LOOP A
DISCHARGE #2
NON-WATERS OF US DISCHARGE
ORIG. TO NNEPA

NOTE: Read instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUANTITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
Flow	SAMPLE MEASUREMENT	4.30	4.30	MGD					Ø	CONT	EST
	PERMIT REQUIREMENT	2.6	4.3							CONT	EST
Oil & Grease	SAMPLE MEASUREMENT	ND	ND	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	5	10							Per Discharge	Grab
Total Dissolved Solids	SAMPLE MEASUREMENT	1120	—	mg/l					Ø	1	Grab
	PERMIT REQUIREMENT	40*	—							Per Discharge	Grab
pH	SAMPLE MEASUREMENT				7.9	—	7.9	S.U.	Ø	1	Grab
	PERMIT REQUIREMENT				6.5	—	9.0			Per Discharge	Grab
Turbidity	SAMPLE MEASUREMENT				—	2.0	—	NTU	Ø	1	Grab
	PERMIT REQUIREMENT				—	50	—			Per Discharge	Grab
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE	DATE		
Danny Pribble Vice President Operations TYPED OR PRINTED	I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE 713 NUMBER 345-7162	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

* - TDS - 40 mg/l is incremental increase between intake and effluent value. Intake sample value - 1,670 mg/l

Transwestern Pipeline Company

Memo

To: Jim Thompson

From: Charlie Bertram

CC: Linda Koon

Date: 02/28/05

Re: 02/25/05 Hydrostatic test water discharge - 3 – MP 60

Hydro test discharge began at 15:20 (02/25/05)

Water sample collected at 15:40

Turbidity meter calibration:

Orbeco-Hellige Model 966 Meter, S/N 3330

Adjusted to 0 0 from -0.3 (using zero calibration standard)

Adjusted from 39 8 to 40.0 (using 40.0 calibration standard)

Turbidity reading = 2.0 at 15:40

Calibrated ISFET pH meter (adjusted from 7 2 to 7.0) using 7.0 standard

IQ Scientific model BL66A, S/N 1Q120

pH reading = 7.9 at 15:40

Discharge was completed at 0800 (about 17 hours and 40 minutes – or 1060 minutes)

Water from approximately 12 miles of 36" O.D. pipe (3,168,000 gallons) was discharged

Average discharge rate = 2,989 gpm (gallons per minute)

Samples for oil and grease, and TDS were collected and delivered to lina ba lab

Sample No. Location

SJL-LA-D3 = MP 60

Samples were delivered to lina ba lab Monday (02/28/05) about 07:55 am

Discharge Sample

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: 04-Mar-05

CLIENT:	Transwestern Pipeline Co	Client Sample Info:	SJL-LA-D3
Work Order:	0502032	Client Sample ID:	SJL-LA-D3
Project:	SJL-LA-D3	Collection Date:	2/25/2005 3:40:00 PM
Lab ID:	0502032-001A	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1120	40		mg/L	1	3/2/2005

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
H - Parameter exceeded Maximum Allowable Holding Time
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

612 E Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *04-Mar-05*

CLIENT:	Transwestern Pipeline Co	Client Sample Info:	SJL-LA-D3
Work Order:	0502032	Client Sample ID:	SJL-LA-D3
Project:	SJL-LA-D3	Collection Date:	2/25/2005 3:40:00 PM
Lab ID:	0502032-001B	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease, Total Recoverable	ND	1.57		mg/L	1	3/4/2005

Qualifiers:

- ND - Not Detected at the Practical Quantitation Limit
- J - Analyte detected below Practical Quantitation Limit
- B - Analyte detected in the associated Method Blank
- H - Parameter exceeded Maximum Allowable Holding Time
- S - Spike Recovery outside accepted recovery limits
- R - RPD outside accepted precision limits
- E - Value above Upper Quantitation Limit - UQL

Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

• iiná bá •

Intake Sample

Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *30-Apr-04*

CLIENT:	Transwestern Pipeling Co.	Client Sample Info:	TW-1
Work Order:	0404025	Client Sample ID:	TW-1
Project:	TW-1	Collection Date:	4/15/2004 11:45:00 AM
Lab ID:	0404025-001	Matrix:	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		SW8021B				Analyst: JEM
Benzene	ND	0.5		µg/L	1	4/19/2004
Ethylbenzene	ND	0.5		µg/L	1	4/19/2004
m,p-Xylene	ND	1.0		µg/L	1	4/19/2004
o-Xylene	ND	0.5		µg/L	1	4/19/2004
Toluene	ND	0.5		µg/L	1	4/19/2004
MERCURY, TCLP LEACHED		SW7470		(SW7470)		Analyst: JEM
Mercury	ND	0.0010		mg/L	1	4/29/2004
ICP METALS, TCLP LEACHED		SW1311/6010B		(SW3010A)		Analyst: HNR
Arsenic	ND	0.018		mg/L	1	4/29/2004
Barium	0.070	0.003		mg/L	1	4/29/2004
Cadmium	ND	0.003		mg/L	1	4/29/2004
Chromium	0.005	0.003		mg/L	1	4/29/2004
Lead	ND	0.005		mg/L	1	4/29/2004
Selenium	ND	0.011		mg/L	1	4/29/2004
Silver	ND	0.020		mg/L	1	4/29/2004
OIL AND GREASE, T/R		E413.2				Analyst: JEM
Oil & Grease Total Recoverable	ND	1.6		mg/L	1	4/19/2004
PH		E150.1				Analyst: HNR
pH	7.53	2.00		pH units	1	4/16/2004
TOTAL DISSOLVED SOLIDS		E160.1				Analyst: JEM
Total Dissolved Solids (Residue, Filterable)	1670	40		mg/L	1	4/19/2004
TOTAL SUSPENDED SOLIDS		E160.2				Analyst: JEM
Suspended Solids (Residue, Non-Filterable)	30	15		mg/L	1	4/19/2004

Qualifiers:

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B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

TRANSWESTERN PIPELINE COMPANY
Capital Projects
660 A E. Broadway, Suite 2
Bloomfield, NM 87413
Phone: 505-634-0554
Fax: 505-634-0557

Toll Free—1-866-634-0554

March 25, 2005

U.S. EPA – Region 9
Water Division
CWA Compliance Office (WTR-7)
75 Hawthorne Street
San Franscisco, CA 94105

Re: Transwestern Pipeline Company, San Juan 2005 Expansion Project Discharge Monitoring Reports per US EPA Permit No. NM 0030708 and Request for Termination of US EPA Permit No. NM0030708.

To Whom It May Concern:

Transwestern Pipeline Company (Transwestern), San Juan 2005 Expansion Project respectfully submits the enclosed original signed copies of the Discharge Monitoring Report (DMR) forms in accordance with Section E, Part 1 of US EPA Permit No. NM 0030708.

Further Transwestern respectfully requests that US EPA Permit No. NM 0030708 be terminated upon receipt of this letter. There will be no further hydrostatic test water discharges from facilities associated with the San Juan 2005 Expansion Project.

Should you have any questions or need of additional information, please contact me at either 866/ 634-0554 or via email at thomsje@transedge.com.

Sincerely,

Jim Thompson
for Transwestern Pipeline Company, San Juan 2005 Expansion Prject

Cc: Bill Osborne, Cross Country Energy
John Steenberg, Transwestern
Linh Tran, US EPA - 9
Project File

Enclosures

TW-4-NNEPA-SJ

TRANSWESTERN PIPELINE COMPANY
Capital Projects
660 A E. Broadway, Suite 2
Bloomfield, NM 87413
Phone: 505-634-0554
Fax: 505-634-0557

Toll Free—1-866-634-0554

March 25, 2005

Mr. Patrick Antonio
Navajo Nation Environmental Protection Agency
Hydrologist
Old Resources Building, #W008-090
Window Rock Blvd.
Window Rock, AZ 86515

Re: Transwestern Pipeline Company, San Juan 2005 Expansion Project Discharge Monitoring Reports per US EPA Permit No. NM 0030708 and NN EPA Permit No. NN0000001 and Request for Termination of NN EPA Permit No. NN000000 1

Dear Mr. Antonio,

Transwestern Pipeline Company (Transwestern), San Juan 2005 Expansion Project respectfully submits the enclosed original signed copies of the Discharge Monitoring Report (DMR) forms in accordance with Section E, Part 2 of NN EPA Permit No. NN0000001 and Section E, Part 1 of US EPA Permit No. NM 0030708.

Further Transwestern respectfully requests that NN EPA Permit No. NN0000001 be terminated upon receipt of this letter. There will be no further hydrostatic test water discharges from facilities associated with the San Juan 2005 Expansion Project.

Should you have any questions or need of additional information, please contact me at either 866/ 634-0554 or via email at thomsje@transedge.com.

Sincerely,

Jim Thompson
for Transwestern Pipeline Company, San Juan 2005 Expansion Prject

Cc: Bill Osborne, Cross Country Energy
John Steenberg, Transwestern
Project File

Enclosures

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/18/05

or cash received on _____ in the amount of $ 250.00

from TRANSWESTERN PIPELINE COMPANY

for LOOP "A" HI-95
(Facility Name) (DP No.)

Submitted by: WAYNE PRICE for EM Date: 3-11-05

Submitted to ASD by: " " Date: " "

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility X Renewal ___

Modification ___ Other _____
(Specify)

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

☐ Florida Gas Transmission Company
☐ _____

☐ Northern Natural Gas Company
☒ Transwestern Pipeline Company

35-60 / 1130 No. [redacted]

PAY TO THE ORDER OF NEW MEXICO WATER QUALITY FUND DATE 2/18 2005

WHOSE ADDRESS IS 1220 S. ST. FRANCIS DRIVE SANTA FE NM 87505 $ 250.00

TWO HUNDRED FIFTY + NO/100 DOLLARS

STATE NM | COUNTY SANTA FE | LINE NO. LOOP A | ROW NO.

LEGAL DESCRIPTION NA HI-95

Description	GL Co. #	Tax Code	GL Account#	Cost Center	WBS Element	Material/ For Order	Amount
Right of Way (Easement)			53102000				
Damages, Services, Other	04		~~53102100~~		C.012710.01.02	900040	250 00
Real Property Purchase (Land Acquisition)			53102200 53508000				
Remarks: APPLICATION FEE FOR H2O TESTING					Sales Tax (if any)		
					Total		250 00

NOT VALID AFTER 180 DAYS
E.O.S.C.
P.O. Box 1188 Houston, Texas 77251-1188
Through JPMorgan Chase Bank
National Association
Houston, Texas

J Hill
AUTHORIZED SIGNATURE

SSN or Tax ID# [redacted]

TRANSWESTERN PIPELINE COMPANY
Capital Projects
660 A E. Broadway, Suite 2
Bloomfield, NM 87413
Phone: 505-634-0554
Fax: 505-634-0557

Toll Free—1-866-634-0554

August 26, 2004

Mr. Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505

HI-0095

Re: Transwestern Pipeline Company, San Juan 2005 Expansion Project Request for Authorization to Discharge Hydrostatic Test Waters

Dear Mr. Martin,

Please find attached to this letter the Transwestern Pipeline Company San Juan 2005 Expansion Project (Transwestern) Hydrostatic Testing Plan identifying the sources and discharge locations of test water.

As described in the Hydrostatic Testing Plan, Transwestern will obtain water from several sources and subsequently discharge spent water in various locations along the project. These discharges will be completed under controlled conditions including the use of energy dissipating devices and appropriate erosion control devices thus minimizing environmental impacts..

All discharges will be completed in accordance with all applicable agency requirements and any non-compliance will be reported as required.

Transwestern respectfully requests your timely review and approval of the attached Hydrostatic Testing Plan.

Should you have any questions or need for additional information, please contact me at 866/634-0554 or via email at thomsje@transedge.com

Sincerely,

Jim Thompson
Environmental Project Manager
for Transwestern Pipeline Company San Juan 2005 Expansion Project

Cc: Project File

Transwestern Pipeline Company

San Juan 2005 Expansion Project

Hydrostatic Testing Plan for Project Facilities

August 2004

Introduction

The proposal of Transwestern Pipeline Company's (Transwestern) San Juan 2005 Expansion Project (Project) is to construct and operate pipeline, compression, and ancillary facilities in order to provide natural gas pipeline capacity for gas volumes produced in the San Juan and Rocky Mountain basins to be transported and delivered primarily to other pipelines and distribution customers located in the southwestern and Midwestern United States. Transwestern's Expansion Project will provide natural gas to new and existing customers. Natural gas is the preferred energy alternative because it is a reliable; clean burning, and energy efficient fuel that requires lower facility and operation costs. Natural gas for electric power generation, commercial, and industrial use has environmental benefits over oil and coal fuels due to reduced air emissions.

The Project consists of various pipeline and compressor station modifications that will facilitate the transportation of these additional volumes of natural gas out of the San Juan and Rocky Mountain Basins. These modifications are summarized in Table 1 below.

Table 1
Summary of Proposed Facilities

Facility	Description	Location (milepost)	Location (County, State)
PIPELINE FACILITIES			
San Juan Lateral Loop A	New 36-inch Diameter Pipeline Loop	8.7 – 57.2[a] } 63.2	San Juan, NM
San Juan Lateral Loop A	New 36-inch Diameter Pipeline Loop	57.2 – 71.9[a] }	McKinley, NM
San Juan Lateral Loop B	New 36-inch Diameter Pipeline Loop	87.7 – 97.1[a] 9.4	McKinley, NM
ABOVEGROUND FACILITIES		72.6	
Bloomfield Compressor Station	Install new electric compressor unit (15,000 HP) and associated facilities	0.0 [a]	San Juan, NM
Bisti Compressor Station	Remove existing electric compressor unit (10,000 HP) and associated facilities; Install new electric compressor unit (15,000 HP)[b]	36.4 [a]	San Juan, NM
Gallup Compressor Station	Remove existing compressor unit (compressor only, existing motor remains) and install a new compressor unit	97.1[a]	McKinley, NM
Main Line Valves	Install new valves	8.7[a] 71.9[a] 87.7[a] 97.1[a]	San Juan, NM McKinley, NM McKinley, NM McKinley, NM

[a] Mileposts are existing San Juan Lateral mileposts.
[b] the new 15,000 HP unit would be de-rated and operated at 12,000 HP.
[c] Transwestern existing Mainline milepost

Transwestern must perform hydrostatic testing of the new facilities in compliance with 49 CFR, Part 192, U.S. Department of Transportation (DOT) requirements prior to placing these facilities in service.

These tests essentially consist of filling the facility with water and pressurizing it to a level 1.25 times above the maximum allowable operating pressure (MAOP) of the facility while in service for a pre-determined time frame. The facility is checked for pressure losses due to any leakage during this time. If no drop in pressure above the allowable occurs during the test, the facility can

be dried with air and filled with natural gas and then put into service. The water used during the test is discharged to a pre-determined and permitted location.

Transwestern would conduct the hydrostatic testing of the facilities during January through June 2005. Water would be up taken and discharged during this same time frame.

Sources of Hydrostatic Test Water

Because the proposed facilities are separated from each other in several instances, different sources of test water will be required. Table 2 summarizes these locations and the approximate volumes of water required to perform the required testing.

It should be noted that some of the water from the El Paso/Gulf Terra Chaco Plant evaporation ponds would be purchased from the San Juan Basin Water Haulers Association (SJBWHA), a regional company that buys and sells water for hydrostatic testing purposes to the oil and gas industry. This water is withdrawn from the San Juan River and will be "carriaged" along the Citizen's Ditch managed by the Bloomfield Irrigation District in Bloomfield, New Mexico to the existing El Paso/Gulf Terra withdrawal point. From here, the water will be pumped along existing pipelines to the Chaco Plant facilities located near Milepost 20 of the San Juan Lateral Loop A facility.

The Chaco Plant evaporation ponds receive non-contact cooling tower water from the plant itself and generally retain an estimated 8 to 9 million gallons of water. Transwestern would use this water first in its hydrostatic testing and refill the ponds as needed with water purchased from the SJBWHA to complete the testing.

A sample of the evaporation pond water was collected and analyzed in April 2004. A copy of these results is included in Appendix A. In summary, the water appears to be of good quality and supports a thriving aquatic ecosystem in the evaporation ponds.

Ultimately, approximately 19,610,000 gallons of water will be used for testing.

Table 2

Summary of Proposed Hydrostatic Test Water Source

Facility	Source	Withdrawal Location (milepost)	Approximate Volume (gallons)
PIPELINE FACILITIES			
San Juan Lateral Loop A – MP 8.9-71.9	El Paso/Gulf Terra Chaco Plant Evaporation Ponds	20.0[a/]	17,000,000
San Juan Lateral Loop B – MP 87.7-97.1	City of Gallup	N/A[a/]	2,500,000
ABOVEGROUND FACILITIES			
Bloomfield Compressor Station	City of Bloomfield	N/A	50,000
Bisti Compressor Station	Water Truck	N/A	40,000
Gallup Compressor Station	City of Gallup	N/A[a]	20,000

[a/] Mileposts are Transwestern Mainline mileposts
N/A - Not applicable
TBD – To be determined

Hydrostatic Test Water Discharge

Upon successful completion of a facility's hydrostatic test, the test water can either be reused in another facility or discharged to an approved and permitted location. Additional volumes may need to be acquired or volumes released depending upon the size of the subsequent segments (length and diameter). In other situations, especially where facilities are far removed from each other such as at compressor stations, hydrostatic test water is typically discharged near the facility being tested.

The Transwestern Hydrostatic test plan involves the filling of the pipeline in various segments, testing these segments and then discharging this volume. The spent test water will be discharged at different locations due to elevation changes and differing pipe classification testing requirements along the route. Minor volumes of water will be used for initial cleaning of the pipeline prior to the hydrostatic test.

Table 3 summarizes the hydrostatic test water discharge locations and volumes expected to be release at each location. National Wetland Inventory maps with Waters of the U.S. crossing locations are provided in Appendix B. Ground photos of the Waters of the U.S. discharge locations are provided in Appendix B.

Facility	Discharge Location (milepost)[a]	Approximate Volume Discharged (gallons)
PIPELINE FACILITIES		
San Juan Lateral Loop A – MP 8.9-71.9	Arroyo (SJL-SJ-028-x) (8.9)	3,008,400
	West Fork of Gallegos Canyon (SJL-SJ-032-x) (20.5)	3,447,150
	Hunter Wash (SJL-SJ-035-x) (37.5)	7,544,500
	Control Structure On Right-of-Way (61.7)	2,699,950
San Juan Lateral Loop B – MP 87.7-97.1	Hard Ground Canyon Arroyo (SJL-MC-120-x) (93.0)	2,500,000
ABOVEGROUND FACILITIES		
Bloomfield Compressor Station	Onsite (0.0)	50,000
Bisti Compressor Station	Onsite (36.5)	40,000
Gallup Compressor Station	Onsite (97.1)	20,000

Because all of the discharge locations for the pipeline facilities are located on Navajo Nation Tribal Lands, Transwestern will obtain National Pollutant Discharge Elimination System (NPDES) permits from the U.S. EPA Region 9 office for all discharges to Waters of the US.

In addition to the NPDES permits, Transwestern will obtain new State of New Mexico discharge permits from the New Mexico Oil Conservation Division (NMOCD) for all discharges greater than 100,000 gallons. Transwestern currently maintains a discharge permit for discharges less than 100,000 gallons in volume (Permit # HBP-NM-001) with the NMOCD.

All hydrostatic test water would be discharged per the NPDES and/or NMOCD permit requirements under controlled conditions

Appendix A

El Paso/Gulf Terra Cooling Tower Evaporation Pond Sample Results

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

April 30, 2004

Jim Thompson
Transwestern Pipeling Co.
660-A E. Broadway, Suite 4
Bloomfield, NM 87413

TEL: 505-634-0554
FAX 505-634-0557

RE: TW-I

Order No.: 0404025

Dear Jim Thompson:

iiná bá received 1 sample on 4/15/2004 for the analyses presented in the following report.

This certificate of analysis includes the Analytical Report(s) for the sample(s) received by the laboratory. A Quality Control Summary Report, the Sample Receipt Checklist and an executed Chain of Custody are included as an addendum to this report.

Should you have any questions regarding this certificate of analysis, please contact the laboratory at your convenience.

Report Approved By: _____

David Cox
Laboratory Manager

Heidi Reese
Quality Assurance Officer

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

iiná bá

Date: *30-Apr-04*

CLIENT: Transwestern Pipeling Co.
Project: TW-1
Lab Order: 0404025

CASE NARRATIVE

Samples were analyzed using the methods outlined in the following references:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW846, 3rd Edition.

Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, March 1983.

All method blanks, laboratory spikes, and/or matrix spikes met quality assurance objectives.

Any quality control and/or data qualifiers associated with this laboratory order will be flagged in the analytical result page(s), the quality control summary report(s) or the sample receipt checklist.

612 E. Murray Drive
Farmington, NM 87499

Off: (505) 327-1072
FAX: (505) 327-1496

iiná bá

P.O. Box 3788
Shiprock, NM 87420

Off: (505) 368-4065

ANALYTICAL REPORT

Date: *30-Apr-04*

CLIENT:	Transwestern Pipeling Co.	**Client Sample Info:**	TW-1
Work Order:	0404025	**Client Sample ID:**	TW-1
Project:	TW-1	**Collection Date:**	4/15/2004 11:45:00 AM
Lab ID:	0404025-001	**Matrix:**	AQUEOUS

Parameter	Result	PQL	Qual	Units	DF	Date Analyzed
AROMATIC VOLATILES BY GC/PID		**SW8021B**				Analyst: **JEM**
Benzene	ND	0.5		µg/L	1	4/19/2004
Ethylbenzene	ND	0.5		µg/L	1	4/19/2004
m,p-Xylene	ND	1.0		µg/L	1	4/19/2004
o-Xylene	ND	0.5		µg/L	1	4/19/2004
Toluene	ND	0.5		µg/L	1	4/19/2004
MERCURY, TCLP LEACHED		**SW7470**		**(SW7470)**		Analyst: **JEM**
Mercury	ND	0.0010		mg/L	1	4/29/2004
ICP METALS, TCLP LEACHED		**SW1311/6010B**		**(SW3010A)**		Analyst: **HNR**
Arsenic	ND	0.018		mg/L	1	4/29/2004
Barium	0.070	0.003		mg/L	1	4/29/2004
Cadmium	ND	0.003		mg/L	1	4/29/2004
Chromium	0.005	0.003		mg/L	1	4/29/2004
Lead	ND	0.005		mg/L	1	4/29/2004
Selenium	ND	0.011		mg/L	1	4/29/2004
Silver	ND	0.020		mg/L	1	4/29/2004
OIL AND GREASE, T/R		**E413.2**				Analyst: **JEM**
Oil & Grease, Total Recoverable	ND	1.6		mg/L	1	4/19/2004
PH		**E150.1**				Analyst: **HNR**
pH	7.53	2.00		pH units	1	4/16/2004
TOTAL DISSOLVED SOLIDS		**E160.1**				Analyst: **JEM**
Total Dissolved Solids (Residue, Filterable)	1670	40		mg/L	1	4/19/2004
TOTAL SUSPENDED SOLIDS		**E160.2**				Analyst: **JEM**
Suspended Solids (Residue, Non-Filterable)	30	15		mg/L	1	4/19/2004

Qualifiers:

ND - Not Detected at the Practical Quantitation Limit (PQL)
J - Analyte detected below Practical Quantitation Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted precision limits
E - Value above Upper Quantitation Limit - UQL

iiná bá

Sample Receipt Checklist

Client Name: TRA1003 | Date and Time Received: 4/15/2004

Work Order Number: 0404025 | Received by: HNR

Checklist completed by: Heidi M 4/15/04 (Signature / Date) | Reviewed by: JM 4/16/04 (Initials / Date)

Matrix: | Carrier name: Courier

Shipping container/cooler in good condition?	Yes ✓	No	Not Present
Custody seals intact on shippping container/cooler?	Yes	No	Not Present ✓
Custody seals intact on sample bottles?	Yes	No	Not Present ✓
Chain of custody present?	Yes ✓	No	
Chain of custody signed when relinquished and received?	Yes ✓	No	
Chain of custody agrees with sample labels?	Yes ✓	No	
Samples in proper container/bottle?	Yes ✓	No	
Sample containers intact?	Yes ✓	No	
Sufficient sample volume for indicated test?	Yes ✓	No	
All samples received within holding time?	Yes ✓	No	
Container/Temp Blank temperature in compliance?	Yes ✓	No	
Water - VOA vials have zero headspace?	No VOA vials submitted	Yes ✓	No
Water - pH acceptable upon receipt?	Yes ✓	No	

Adjusted? _____ Checked by: _____

Any No and/or NA (not applicable) response must be detailed in the comments section below.

Client contacted: Date contacted: Person contacted:

Contacted by: Regarding:

Comments:

Corrective Action:

TestAmerica
ANALYTICAL TESTING CORPORATION

2960 Foster Creighton Drive • Nashville, Tennessee 37204
800-765-0980 • 615-726-3404 Fax

ANALYTICAL REPORT

IINA BA, LTD 3130
DAVE COX
612 E. MURRAY DRIVE
FARMINGTON, NM 87401

Project:
Project Name:
Sampler:

Lab Number: 04-A60459
Sample ID: 0404025-001D
Sample Type: Water
Site ID:

Date Collected: 4/15/04
Time Collected: 11:45
Date Received: 4/22/04
Time Received: 8:30
Page: 1

Transwestern; TW-1 4/29/04

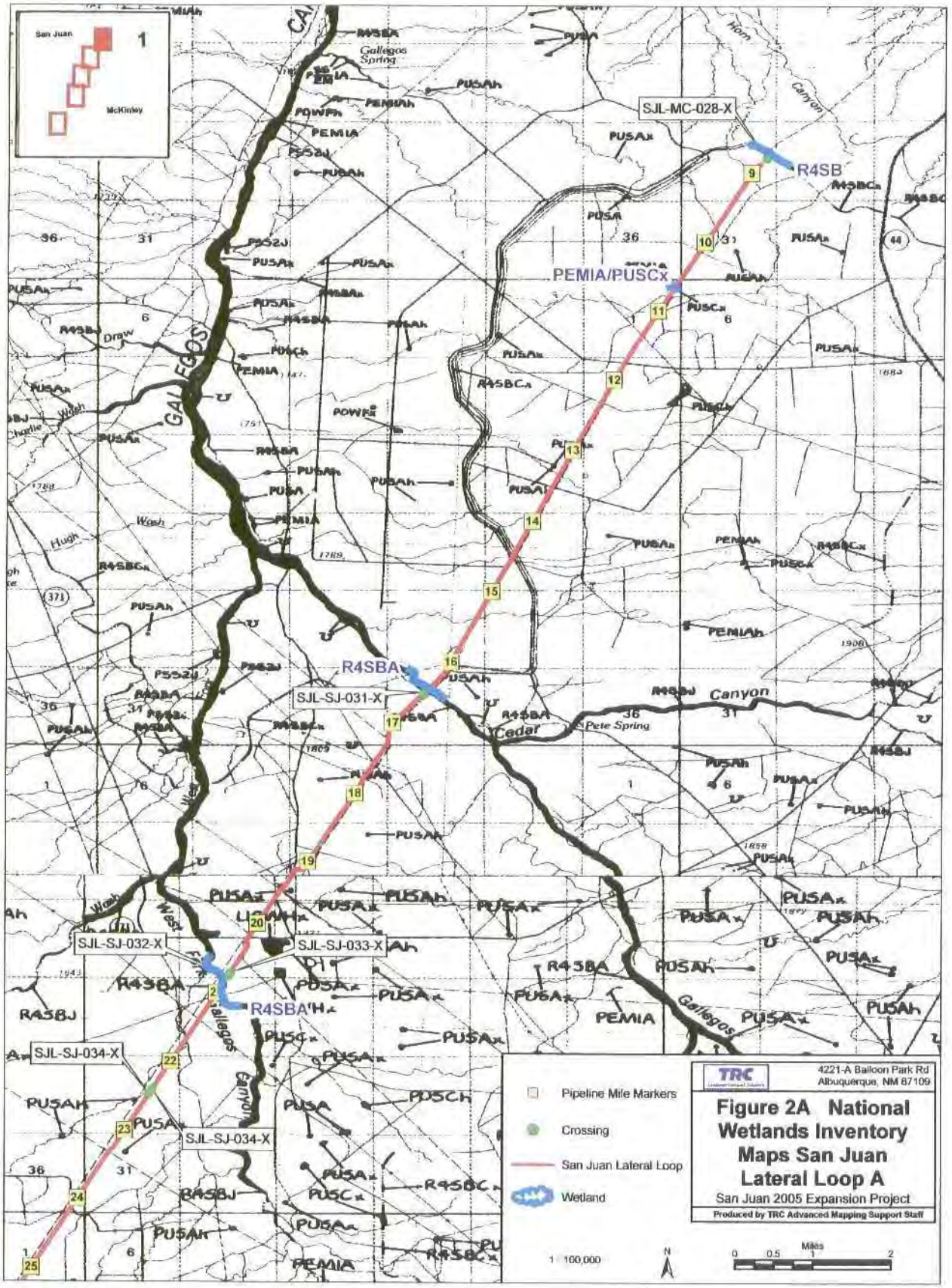
Analyte	Result	Units	Report Limit	Dil Factor	Analysis Date	Analysis Time	Analyst	Method	Batch
METALS									
Chromium, Hexavalent	ND	mg/l	0.0100	1	4/22/04	10:35	W. Choate	218.4	3261

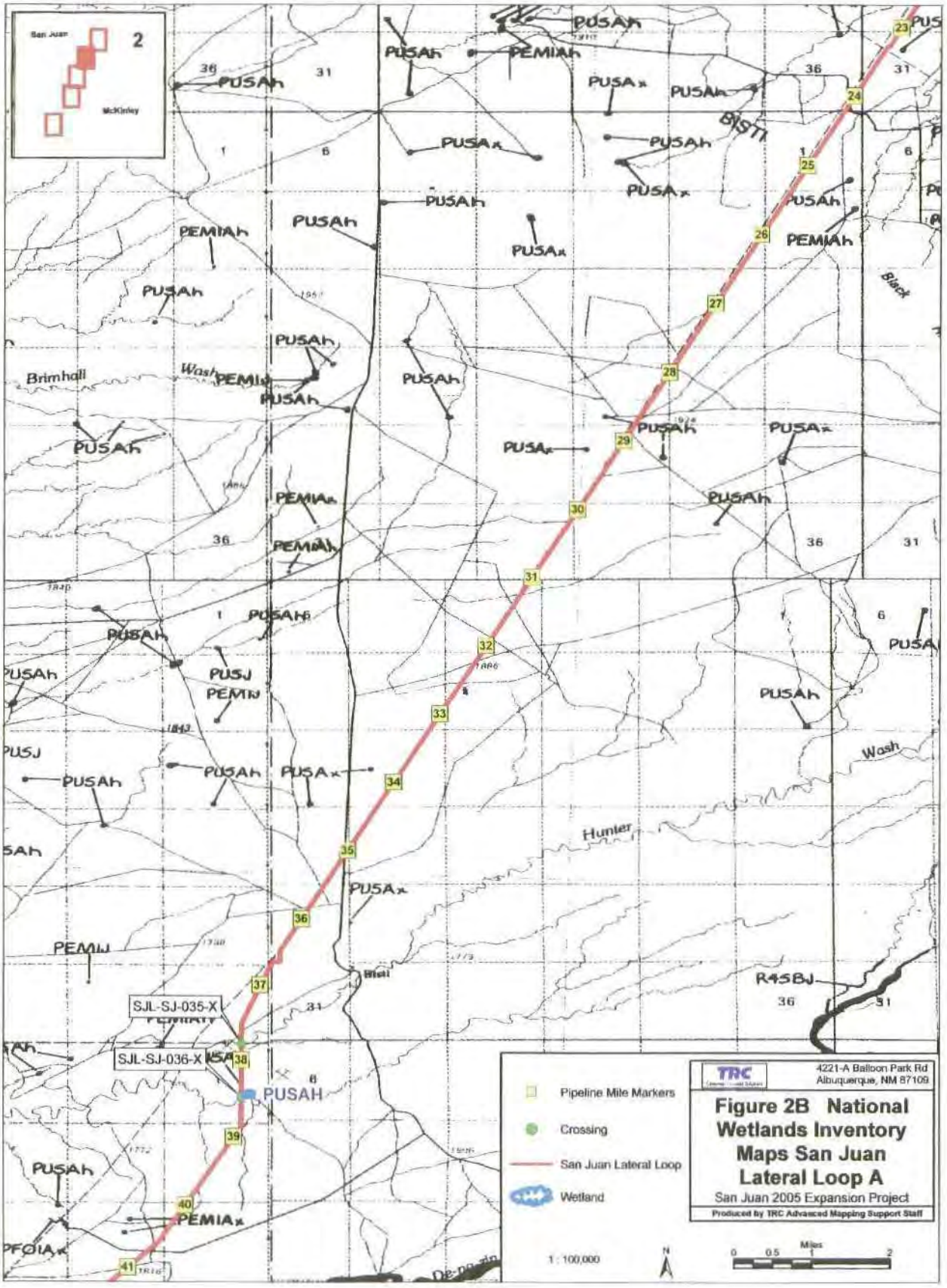
LABORATORY COMMENTS:
ND = Not detected at the report limit.
B = Analyte was detected in the method blank.
J = Estimated Value below Report Limit.
E = Estimated Value above the calibration limit of the instrument.
# = Recovery outside Laboratory historical or method prescribed limits.
Received outside of holding time.

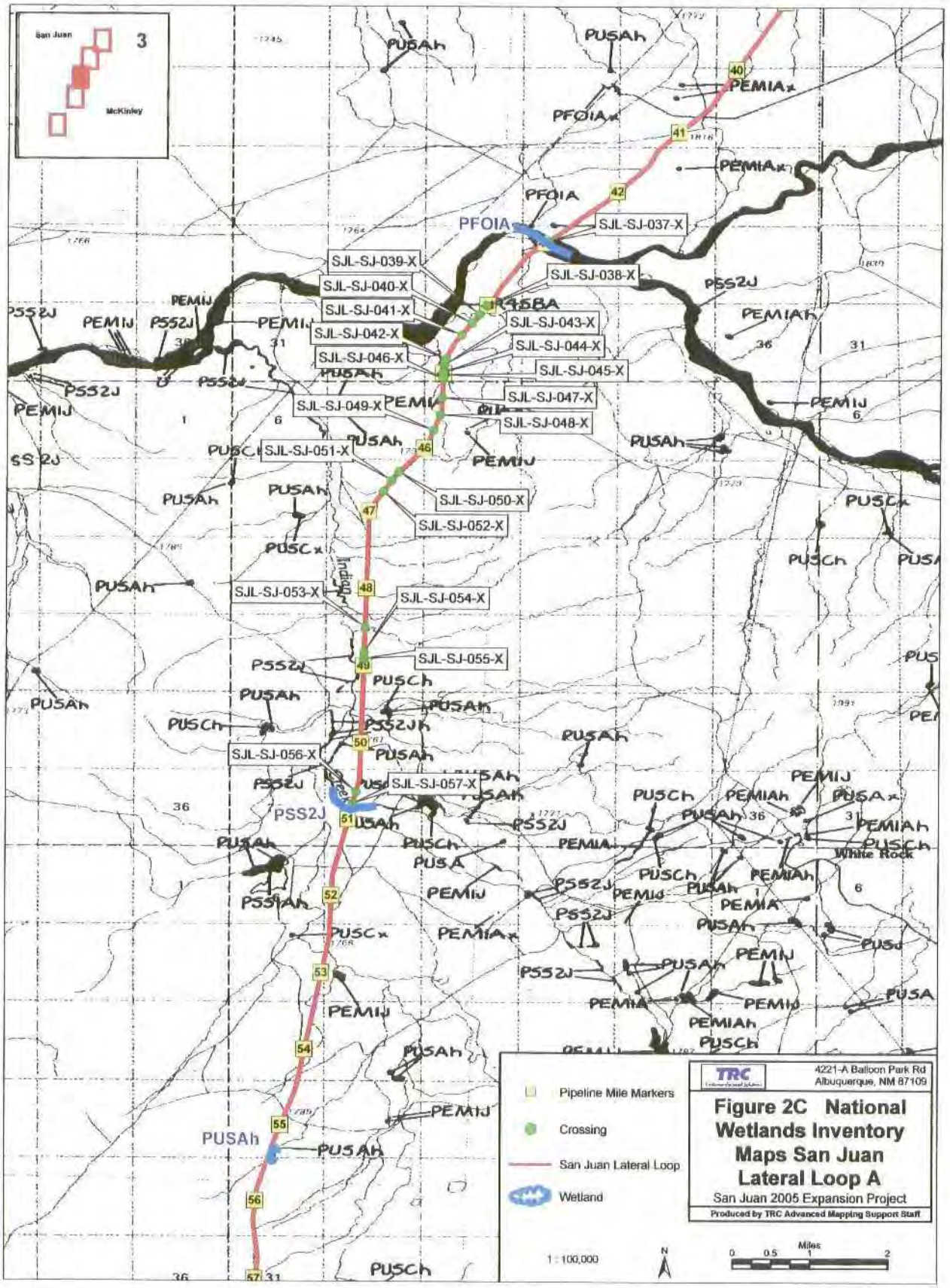
End of Sample Report.

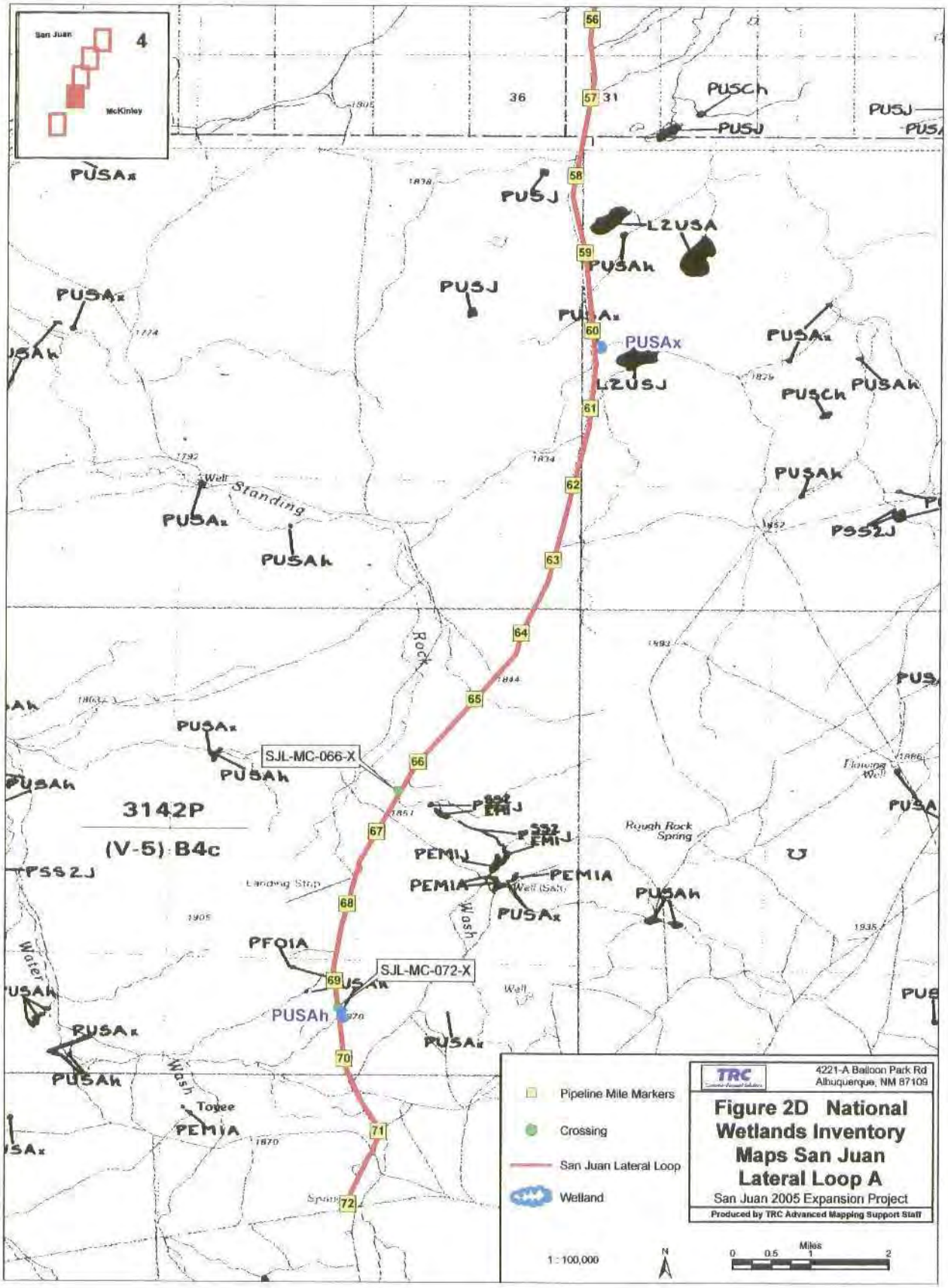
Appendix B

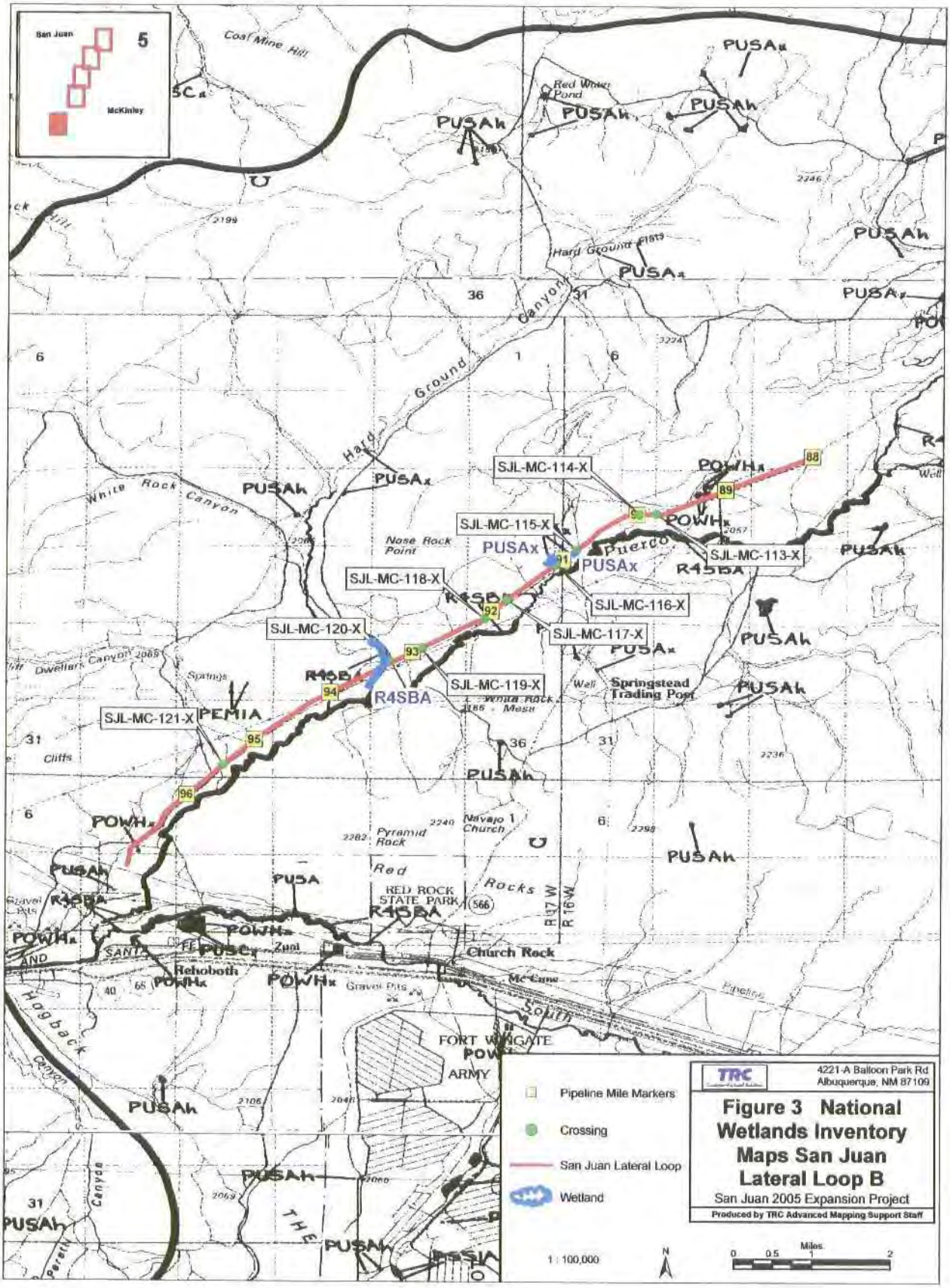
San Juan 2005 Expansion Project Route Alignment and Discharge Location Photos


San Juan
1
McKinley
SJL-MC-028-X
R4SB
PEMIA/PUSCx
R4SBA
SJL-SJ-031-X
SJL-SJ-032-X
SJL-SJ-033-X
R4SBA'H
SJL-SJ-034-X
SJL-SJ-034-X
Gallegos Spring
Pete Spring
Cedar Canyon
Gallegos Canyon
Pipeline Mile Markers
Crossing
San Juan Lateral Loop
Wetland
1:100,000
N
Miles
0 0.5 1 2
TRC
4221-A Balloon Park Rd
Albuquerque, NM 87109
Figure 2A National Wetlands Inventory Maps San Juan Lateral Loop A
San Juan 2005 Expansion Project
Produced by TRC Advanced Mapping Support Staff


San Juan
2
McKinley
PUSAh
PEMIAh
PUSAx
PEMIJ
PUSJ
R45BJ
Brimhall
Wash
Hunter
Black
SJL-SJ-035-X
SJL-SJ-036-X
PUSAH
Pipeline Mile Markers
Crossing
San Juan Lateral Loop
Wetland
1 : 100,000
N
Miles
0 0.5 1 2
TRC
4221-A Balloon Park Rd
Albuquerque, NM 87109
Figure 2B National Wetlands Inventory Maps San Juan Lateral Loop A
San Juan 2005 Expansion Project
Produced by TRC Advanced Mapping Support Staff


San Juan
3
McKinley
SJL-SJ-037-X
SJL-SJ-038-X
SJL-SJ-039-X
SJL-SJ-040-X
SJL-SJ-041-X
SJL-SJ-042-X
SJL-SJ-043-X
SJL-SJ-044-X
SJL-SJ-045-X
SJL-SJ-046-X
SJL-SJ-047-X
SJL-SJ-048-X
SJL-SJ-049-X
SJL-SJ-050-X
SJL-SJ-051-X
SJL-SJ-052-X
SJL-SJ-053-X
SJL-SJ-054-X
SJL-SJ-055-X
SJL-SJ-056-X
SJL-SJ-057-X
PFOIA
PEMIAx
PUSAh
PUSCh
PEMIJ
PSS2J
PUSAx
PEMIAh
White Rock
Pipeline Mile Markers
Crossing
San Juan Lateral Loop
Wetland
1:100,000
N
Miles
0 0.5 1 2
TRC
4221-A Balloon Park Rd
Albuquerque, NM 87109
Figure 2C National Wetlands Inventory Maps San Juan Lateral Loop A
San Juan 2005 Expansion Project
Produced by TRC Advanced Mapping Support Staff


San Juan
4
McKinley
SJL-MC-066-X
SJL-MC-072-X
3142P
(V-5) B4c
PUSAx
PUSAh
PUSJ
PUSCh
LZUSA
LZUSJ
PEMIA
PEMIJ
PFOIA
PSS2J
Standing Well
Rough Rock Spring
Landing Strip
Wash
Water
Toyee
Spring
Pipeline Mile Markers
Crossing
San Juan Lateral Loop
Wetland
1 : 100,000
N
0 0.5 1 2
Miles
TRC
4221-A Balloon Park Rd
Albuquerque, NM 87109
Figure 2D National Wetlands Inventory Maps San Juan Lateral Loop A
San Juan 2005 Expansion Project
Produced by TRC Advanced Mapping Support Staff


San Juan
5
McKinley
SJL-MC-114-X
SJL-MC-115-X
SJL-MC-113-X
SJL-MC-118-X
SJL-MC-116-X
SJL-MC-120-X
SJL-MC-117-X
SJL-MC-119-X
SJL-MC-121-X
R4SBA
PEMIA
POWHx
PUSAx
PUSAh
PUSCx
Springstead Trading Post
RED ROCK STATE PARK
Church Rock
FORT WINGATE ARMY
Pipeline Mile Markers
Crossing
San Juan Lateral Loop
Wetland
1 : 100,000
Miles
0 0.5 1 2
TRC
4221-A Balloon Park Rd
Albuquerque, NM 87109
Figure 3 National Wetlands Inventory Maps San Juan Lateral Loop B
San Juan 2005 Expansion Project
Produced by TRC Advanced Mapping Support Staff

Upstream

Upstream Left Bank

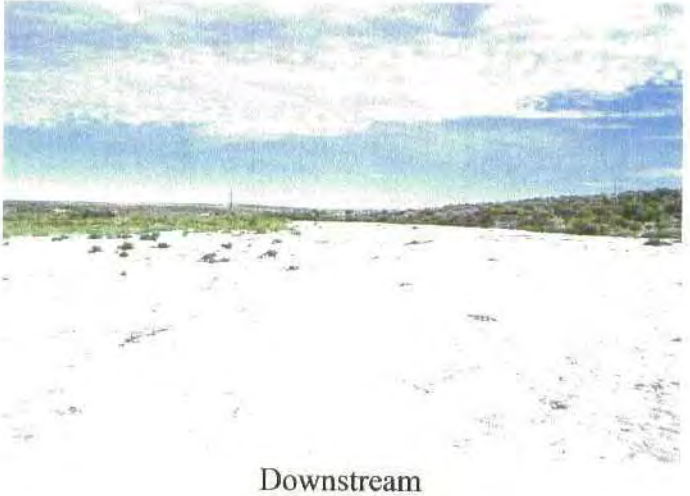
Upstream Right Bank

Downstream

Upstream

Upstream Left Bank

Upstream Right Bank



Downstream

Upstream

Upstream Left Bank

Upstream Right Bank

Downstream

Upstream

Upstream Left Bank

Upstream Right Bank

Downstream

FACSIMILE TRANSMITTAL SHEET

TO: Ed Martin
FROM: Jim Thompson
COMPANY: NM OCD
DATE: 01/13/05
FAX NUMBER: 505-476-3462
TOTAL NO. OF PAGES INCLUDING COVER: 11
PHONE NUMBER:
SENDER'S REFERENCE NUMBER:
RE: TW-SJE NPDES
YOUR REFERENCE NUMBER:

☒ URGENT ☒ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Ed,

Attached is a copy of the EPA-9 NPDES permit. I didn't include with this fax, the standard EPA-NPDES conditions.

This permit will apply to the large diameter pipeline construction.

I understand you are working with Larry Campbell on renewing TW's < 100K general permit. We'll use this one for the compressor station discharges.

Please call me if you have questions.

Thanks

JT

660A EAST BROADWAY, SUITE 2
BLOOMFIELD, NM 87413
505-634-0554
505-364-0557 (FAX)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

In Reply
Refer to: WTR-5
Certified Mail # 7000-0520-0021-6109-0522
Return Receipt Requested

DEC 2 2 2004

Jim Thompson
Transwestern Pipeline Company
Capital Projects
660A E. Broadway, Suite 2
Bloomfield, NM 87413

Subject: **Transmittal of NPDES Permit No NM003078**
Transwestern Pipeline Company - San Juan 2005 Expansion
Hydrostatic Test Water Discharge

Dear Mr. Thompson:

Enclosed please find the final National Pollutant Discharge Elimination System (NPDES) permit issued for the above captioned facility. The NPDES permit is hereby issued upon the date of signature and shall become effective thirty-three (33) days from the date of this cover letter, unless a petition is filed with the Environmental Appeals Board (EAB) to review any conditions of the final permit under 40 CFR §124.19(a), as revised at 65 Fed. Reg. 30886, 30911 (May 15, 2000.) A copy of such petition should be sent to the EPA address listed above.

The staff at the U.S. Environmental Protection Agency ("EPA") has reviewed the permit application and relevant information and prepared a draft permit for the above captioned facility in accordance with the Clean Water Act ("CWA.") The EPA has also published public notices of its tentative decision to issue the permit. The draft permit was public noticed on November 17, 2004, in the Gallup Independent and in Farmington Daily Times. We have received your comments dated December 6 and December 20, 2004. After considering the expressed views of all interested persons and agencies, and pertinent Federal statutes and regulations, the EPA, pursuant to 40 CFR §124, prepared the final permit.

As stated in newly-revised 40 CFR §124.19(a), within 33 days after EPA issues the final permit(s), any person who filed comments on the draft permit(s) or participated in the

public hearing may petition the EAB to review any condition of the permit decision. Any person who failed to file comments or failed to participate in a public hearing on the draft permit(s) may petition for administrative review only with regard to changes made from the draft permit(s) to the final permit(s). The petition shall include a statement of the reasons supporting the review, including a demonstration that any issue being raised was raised during the public comment period (including any public hearing) to the extent required by these regulations and, when appropriate, a showing that the condition in question is based on: (1) a finding of fact or conclusion of law which is clearly erroneous; or (2) an exercise of discretion or an important policy consideration which the EAB should, in its discretion, review. Under 40 CFR 124.16 and 124.60, a petition for review under 40 CFR 124.19 stays the force and effect of the contested conditions of the final permit until final agency action under 40 CFR 124.19(f).

The EPA will routinely deny any request for an evidentiary hearing which is postmarked later than the 33rd day from the date of this cover letter. If you have any questions regarding the procedures outlined above, please contact Linh Tran at (415) 972-3511.

Sincerely,

Douglas E. Eberhardt, Chief
CWA Standards and Permits Office
Water Division
U.S. EPA, Region 9

Enclosures

cc: Patrick Antonio, Navajo Nation EPA (w/ enclosures)

NPDES Permit No. NM0030708

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Clean Water Act, as amended (33 U.S.C. 1251 et. seq; the "Act"),

Transwestern Pipeline Company
Capital Projects
660 A E. Broadway, Suite 2
Bloomfield, NM 87413

is authorized to discharge hydrostatic test water from its San Juan 2005 Pipeline Expansion Project at various locations in San Juan and McKinley, New Mexico, from four (4) outfalls and their respective receiving waters, as follows:

Outfall	Latitude/Longitude	Receiving Water(s)
001	36° 38'01"N; 108° 02'12"W	Wash to Horn Canyon (San Juan River tributary)
002	36° 28'51"N; 108° 08'09"W	West Fork of Gallegos Canyon
003	36° 15'48"N; 108° 16'36"W	Hunter Wash
004	35° 35'14"N; 108° 36'52"W	Wash to Hard Ground Canyon (Puerco River tributary)

in accordance with effluent limitations, monitoring requirements and in the attached 10 pages of EPA Region 9 "Standard Federal NPDES Permit Conditions," dated June 3, 2002.

This permit shall become effective on JANUARY 24TH, 2005.

This permit and the authorization to discharge shall expire at midnight, JAN. 23RD, 2010.

Signed this 22ND day of DECEMBER, 2004.

For the Regional Administrator

/s/ Alexis Strauss, Director
Water Division
EPA, Region 9

SECTION A. EFFLUENT LIMITATION AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting through the date of the permit expiration, the permittee shall not discharge hydrostatic test water to receiving waters, except from those discharge points identified below, and in accordance with both the effluent limitations contained in Section A.3, and the narrative water quality standards cited in Section B below.

Outfall	Loop	Location ID	Coordinates (Longitude/Latitude)	Receiving Water(s)
001	A	SJL-SJ-028-x	36° 38' 01" North 108° 02' 12"West	Wash to Horn Canyon (San Juan River tributary)
002	A	SJL-SJ-032-x	36° 28' 51" North 108° 08' 09"West	West Fork of Gallegos Canyon
003	A	SJL-SJ-035-x	36° 15' 48" North 108° 16' 36"West	Hunter Wash
004	B	SJL-MC-120-x	35° 35' 14" North 108° 36' 52"West	Wash to Hard Ground Canyon (Puerco River tributary)

2. To ensure that the discharge will not cause severe erosion at any discharge locations, and in accordance with the requirements set forth at 40 CFR Parts §122.45(e), the total combined volume of hydrostatic test water discharges at Outfall Nos. 001, 002 and 003 shall not exceed 17 million gallons. The total volume of discharge shall not exceed 2.5 million gallons at Outfall No. 004. In addition, the duration of each discharge shall not exceed 7 days.

3. Discharges resulting from hydrostatic testing shall be monitored and limited by the permittee as specified below:

Effluent Parameter	Units	Limit		Monitoring Frequency	Sample Type[1]
		Daily Max	Daily Avg		
Flow[2]	MGD	4.3	2.5	Continuous	Estimate
Oil and Grease	mg/L	10	5	Per discharge	Grab
Total Dissolved Solids	mg/l	--	40	Per discharge	Grab
pH	S.U	between 6.5 to 9.0		Per discharge	Grab
Turbidity	NTU	--	50	Per discharge	Grab

SECTION B. GENERAL DISCHARGE SPECIFICATIONS

1. All Waters of the Navajo Nation shall be free from pollutants in amounts or combinations that, for any duration:

   a. Cause injury to, are toxic to, or otherwise adversely affect human health, public safety, or public welfare.

   b. Cause injury to, are toxic to, or otherwise adversely affect the habitation, growth, or propagation of indigenous aquatic plant and animal communities or any member of these communities; of any desirable non-indigenous member of these communities; of waterfowl accessing the water body; or otherwise adversely affect the physical, chemical, or biological conditions on which these communities and their members depend.

   c. Settle to form bottom deposits, including sediments, precipitates and organic materials, that cause injury to, are toxic to, or otherwise adversely affect the habitation, growth, or propagation of indigenous aquatic plant and animal communities or any member of these communities; of any desirable non-indigenous member of these communities; of waterfowl accessing the water body; or otherwise adversely affect the physical, chemical, or biological conditions on which these communities and their members depend.

---

[1]Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge but prior to entry into the receiving water.

[2]Flow shall be monitored and reported from each outfall.

d. Cause physical, chemical, or biological conditions that promote the habitation, growth or propagation of undesirable, non-indigenous species of plant or animal life in the water body.

e. Cause solids, oil, grease, foam, scum, or any other form of objectionable floating debris on the surface of the water body; may cause a film or irridescent appearance on the surface of the water body; or that may cause a deposit on a shoreline, on a bank, or on aquatic vegetation.

f. Cause objectionable odor in the area of the water body.

g. Cause objectionable taste, odor, color, or turbidity in the water body.

h. Cause objectionable taste in edible plant and animal life, including waterfowl, that reside in, on, or adjacent to the water body.

2. All waters of the Navajo Nation shall be free of toxic pollutants from other natural sources in amounts, concentrations, or combinations which affect the propagation of fish or which are toxic to humans, livestock or other animals, fish or other aquatic organisms, wildlife using aquatic environments for habitation or aquatic organisms for food, or which will or can reasonably be expected to bioaccumulate in tissue of fish, shellfish, or other aquatic organisms to levels which will impair the health of aquatic organism or wildlife or result in unacceptable tastes, odor or health risks to human consumers.

SECTION C. NOTIFICATION

The permittee shall notify the EPA and the Navajo EPA Water Quality/NNPDES Program (928 /871-7185) twenty-four (24) hours prior to commencing any discharge of hydrostatic test water.

SECTION D. PERMIT REOPENER

Should any of the monitoring indicate that the discharge causes, has the reasonable potential to cause, or contributes to excursions above water quality criteria, the permit may be reopened for the imposition of water quality based limits and/or additional monitoring, analytical, and reporting requirements as may be necessary. Also, this permit may be modified, in accordance with the requirements set forth at 40 CFR Parts §122.44 and §124.14, to include appropriate conditions or limits to address demonstrated effluent toxicity based on newly available information, or to implement any EPA-approved new Tribal water quality standards.

SECTION E. MONITORING AND REPORTING

1. Reporting of Monitoring Results

Monitoring results shall be reported on Discharge Monitoring Report ("DMR") forms (EPA No. 3320-1) to be supplied by the EPA Regional Administrator, to the extent that the information reported may be entered on the forms. The results of all monitoring required by this permit shall be submitted in such a format as to allow direct comparison with the limitations and requirements of the permit.

Discharge data obtained during each hydrostatic test event shall be summarized and reported. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the Navajo Nation EPA at the following addresses:

U.S. EPA - Region 9
Water Division
CWA Compliance Office (WTR-7)
75 Hawthorne Street
San Francisco, CA 94105

Navajo Nation EPA
NNPDES Program
P.O. Box 339
Window Rock, AZ 86515

2. Monitoring and Records

Records of monitoring information shall include:

a. Date, exact location, and time or sampling or measurements performed, preservatives used
b. Individual(s) who performed the sampling or measurements;
c. Date(s) analyses were performed;
d. Laboratory(ies) which performed the analyses;
e. Analytical techniques or methods used;
f. Any comments, case narrative or summary of results produced by the laboratory.

3. 24-Hour Reporting of Noncompliance

The permittee shall report any compliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances to the following persons or their offices:

CWA Compliance Office Manager
U.S. EPA Region 9
(415) 972-3505

Navajo Nation EPA
Attn: NNPDES Program
(928) 871-7185

If the permittee is unsuccessful in contacting the person above, the permittee shall report by 9 a.m. on the first business day following the noncompliance. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including dates and times, and, if the noncompliance has not been corrected, the time it is expected to continue; and steps or planned to reduce, eliminate, and prevent reoccurence of the noncompliance.

SECTION E. INSPECTION AND ENTRY

The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and such other documents as may be required by law, to perform inspections under authority of Section 10: Inspection and Entry of the EPA Region 9 "Standard Federal NPDES Permit Conditions," dated June 3, 2002, as attached.

SECTION F. DEFINITIONS

The following definitions shall apply unless otherwise specified in this permit:

1. "Grab" sample, for monitoring requirements, is defined as a single "dip and take" sample collected at a representative point in the discharge stream.

2. "Daily discharge" means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar for purposes of sampling. For pollutants with limitations expressed in units of concentration, the "daily discharge" is calculated as the average measurement of the pollutant over the sampling day. "Daily discharge" determination of concentration made using a composite sample shall be the concentration of the composite sample. When grab samples are used, the "daily discharge" determination of concentration shall be the arithmetic average (weighted by flow value) of all samples collected during that sampling day.

3. "Daily maximum" discharge limitation means the highest allowable "daily discharge" during the calendar month.

4. "Daily average" discharge limitation means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.

5. "EPA" means the United States Environmental Protection Agency.

6. "Regional Administrator" means EPA Region 9's Regional Administrator.

EPA RESPONSE TO COMMENTS

From Mr. Jim Thompson of Transwestern Pipeline Company ("Transwestern"), dated December 6, 2004:

Because the pipe to be installed is new, internally and externally coated with an inert fusion bonded epoxy coating and all of the proposed discharge locations are ephemeral water bodies and/or dry arroyos supporting no aquatic life, Transwestern requests a waiver from monitoring requirements for BOD, oil & grease, TSS, TDS and turbidity. The Navajo Nation EPA's draft originally set monitoring requirements for pH and flow only.

Response: Based on information provided in the September 8, 2004 permit application and an October 6, 2004 correspondence to Mr. Patrick Antonio of the Navajo Nation EPA, Transwestern indicates that hydrostatic test water for Loop A will be made up of water from Transwestern's El Paso/Gulf Terra Chaco Plant evaporation ponds, which receive non-contact cooling tower water from the plant itself, and any water withdrawn from the San Juan River and carriaged along a ditch to the existing El Paso/Gulf Terra withdrawal point. Sample results of the Chaco evaporation ponds collected by Iina Ba laboratory on April 15, 2004 and analyzed on April 16-19, 2004 indicated a presence of several pollutants of concern. The results showed that, among other pollutant parameters, the concentration levels were 1.6 mg/L for oil & grease, 40 mg/L for total dissolved solids and 15 mg/L for total suspended solids at 15 mg/L. And since discharge from cooling tower water is considered to be a regulated discharge, EPA chooses to retain the permit limitations and monitoring requirement for oil & grease, conductivity as TDS monitoring, and turbidity in the permit. The monitoring requirements for BOD and TSS have been removed at the request of the permittee.

Electronic Communication from Mr. Jim Thompson of Transwestern Pipeline Company ("TW"), dated December 20, 2004

(Excerpted from the email, subject: TW-SJE Hydrostatic test site modification)

"I wanted to update you on a modification to the hydrostatic testing plan Transwestern Pipeline Co. (TW) submitted for agency review/approval this past fall.

In the plan, there were 4 outfalls identified as waters of the US where spent hydrostatic test waters would be discharged. These sites are those currently being permitted. The plan also

identified a discharge location that is not a water of the US. TW estimated approximately 2.9 million gallons would be discharged at this 5th location.

Due to changes in the construction sequence of the project, the hydrostatic test plan requires some modification. First, it is anticipated that rather than using up to 17million gallons for the testing on Loop A, TW will probably only need about 9 -10 million gallons. The water will be used and reused between pipe segments more often in the new plan before being discharged. Also, the fifth site, the non-water of the US location, will now be used for the discharge of the majority of this spent hydrostatic test water. It is possible that some water may still be discharged from the northern segment of the pipeline to outfall #1 at MP 8.9.

I met with Patrick Antonio, Tom West and Fred ? all with the NNEPA onsite yesterday to review the proposed modification. In short, the area consists of sandy loam soils with minor drainages leading to an isolated playa. The discharge would occur at a sand dune area and water would eventually flow towards these drainages and possibly to the playa. The system is not a water of the US.

Patrick and I agreed that the best way to permit the modification would be for me to send him a formal request letter to modify the hydrostatic test plan to allow for a discharge of up to 10 million gallons of spent hydrostatic test water at the non-water of the US location. He will approve the request under the condition that this discharge be monitored as per the conditions of the other 4 waters of the US discharge locations in the forthcoming NPDES permit. I have agreed with this condition and we'll comply with it...."

Response: EPA believes that the current permit being prepared for the four (4) previously identified outfalls can be issued, and the permit conditions are achievable with the reduced discharge volumes. With regards to the proposed addition of the fifth outfall, Navajo Nation EPA and U.S. EPA will jointly evaluate to determine whether an NPDES permit as well as another 30-day public review are warranted. A new permit application including maps for the fifth outfall is requested prior to discharge at this location.