GW - 211

PERMITS, RENEWALS, & MODS Application

Griswold, Jim, EMNRD

From: Griswold, Jim, EMNRD
Sent: Wednesday, October 08, 2008 4:27 PM
To: 'dfernald@epco.com'
Subject: Upgrade at Largo Canyon Compressor Station (GW-211)

Don,

Having reviewed the information provided to date, and comparing the total capacity of the existing tank battery (2,720 bbl) versus the new one (3,510 bbl), it is my judgment this upgrade can be deemed a minor modification. As such no permit or filing fees will be necessary and the modification is approved at this time with a single condition: Enterprise needs to promptly file an appropriate closure plan for the old tank battery.

Jim Griswold
Hydrologist
Environmental Bureau
ENMRD/Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
direct: 505.476.3465
email: jim.griswold@state.nm.us

Griswold, Jim, EMNRD

From: Fernald, Donald [dfernald@epco.com]
Sent: Wednesday, September 03, 2008 5:26 PM
To: Griswold, Jim, EMNRD
Subject: RE: Modifications to Largo CS (GW-211)
Attachments: P3230034.JPG; P3230031.JPG; P3230032.JPG

Hi Jim,

Thanks for your review.

Lat/Lon: 36.48470 North / 107.55694 West
The locations for the tank battery will be East-Southeast of the existing compressor engines on the south side of CR 379 within the fenced area of the Largo Compressor Station site. The current facility is closer to the Largo Wash and has no lined secondary containment.

You are correct in that there is likely shallow groundwater in the area. I would estimate groundwater to be approximately 20' below ground surface in this area.

I have no knowledge of EPNG Well #1 and #2 other then they are located on the site.

You are correct in what we are proposing – steel sidewalls with 30 mil minimum liner (we'll likely use 60 mil as we have some in stock). The liner will be sealed with Polyurea to bond any seams and sprayed in work areas to add traction. I have included photographs of a site with a "spray-on liner" in which many locations in the SJ Basin have been using for several years. This material is similar to Line-X or the materials used in truck bed linings and other applications.

The low drain is meant to capture storm water to prevent ponding of the stormwater in work areas. Also, in the event of a spill, liquids would collect in this area for easy removal. It will not have leak detection, but will be an open, lined area as will the entire containment. Capacity is likely over 500 gallons. We do not consider this a sump. Any liquids that collect in this area will be removed with a vac truck and treated as exempt water or condensate. There will be no drain pipe installed in this area with the exception of a load out line for the vac truck to remove any accumulated liquids.

The surface area will be prepared by grading to allow drainage to the low drain. Rocks, vegetation or other objects that could damage the liner will be removed prior to installation of the liner.

The three drain tanks are double-walled steel tanks with a surface observation port between the two walls to allow for visual inspection or use of a dip stick to check for liquids. The liner will be installed around these tanks, and this area will also be sealed with the Polyurea.

All perforations in the liner required for installation of production piping, equipment, etc. will be sprayed with polyurea to seal the liner.

The seven storage tanks will be newly constructed and transported to the site for installation. The three sub-grade tanks will undergo an ultrasonic thickness test prior to installation to ensure the integrity of each tank in addition to monthly inspections once placed into service.

If you have additional questions, please let us know.

Sincerely,

Don Fernald
Please note new email: **dfernald@epco.com**
EHS&T - EPCO, Inc.
614 Reilly Avenue
Farmington, NM 87401
Office: 505-599-2141
Cell: 505-486-6668
dfernald@epco.com

From: Griswold, Jim, EMNRD [mailto:Jim.Griswold@state.nm.us]
Sent: Wednesday, September 03, 2008 4:09 PM
To: Fernald, Donald
Subject: Modifications to Largo CS (GW-211)

Don,

I have begun review of Enterprise's request. I will, however, be out of the office both Thursday (tomorrow) and Monday.

Please provide profile information and the exact location of the upgrade with respect to existing facilities? I am concerned about storm flow thru Largo Canyon, so I need elevation information.

I am more than a bit curious regarding protected groundwater in the area. Past applications have placed the shallowest aquifer as being confined and artesian. If EPNG Well #1 is screened between 170 and 365 feet while the water-bearing stratum is at 255 feet with a static level rising to only 26 feet below surface, then this well is not compliant with requirements of the Office of the State Engineer with respect to artesian aquifers. Same with Well #2. Regardless, there is almost certainly shallower protected groundwater in the area within the alluvium.

The earlier applications also consistently place the compressor station within the SW/4 of the NW/4 (Unit E) of Section 15. My preliminary review of available GIS data places the facility in Units H, I, and J. Unit E would be at the top of the cliffs located west of the site.

The drawing you provided raises more questions than it answers. What I THINK you are proposing are steel sidewalls surrounding a 30 mil liner. If so, how is the transition sealed? The "low drain" is a sump and as such cannot retain liquids for any more than 72 hours. Or is there a drain pipe? If so, where does it go? If this sump holds a volume of 500 gallons or more, then it must have secondary containment with leak detection. There is no mention of surface prep before installation of the liner. The 3 subgrade drain tanks, while double-walled, still need leak detection, or is that what the inspection ports are for and what is the configuration of the ports? What is the liner configuration in that area...over the tanks, under the tanks, what? What "perforations" are you talking about?

I need more information.

Jim Griswold

Hydrologist

Environmental Bureau

ENMRD/Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

direct: 505.476.3465

email: jim.griswold@state.nm.us


0-8

Griswold, Jim, EMNRD

From: Fernald, Donald [dfernald@epco.com]
Sent: Tuesday, September 02, 2008 8:59 AM
To: Griswold, Jim, EMNRD
Subject: FW: Largo SPCC Upgrades
Attachments: Largo SPPC Upgrade 2008.pdf

Hi Jim,

Thanks for your response. Please see the email forwarded to Mr. Price and Mr. Jones below dated August 22nd along with the attached plot plan. We are requesting approval for this plan as stated previously. We will update our Discharge Plan upon completion to reflect changes made during the upgrade. It is our preference not to take risks, therefore we request NMOCD approval prior to making the changes. If there is additional information the NMOCD requires, please let us know. We will initiate facility upgrades within the next three weeks.

Sincerely,

Don Fernald
Please note new email: **dfernald@epco.com**
EHS&T - EPCO, Inc.
614 Reilly Avenue
Farmington, NM 87401
Office: 505-599-2141
Cell: 505-486-6668
dfernald@epco.com

From: Fernald, Donald
Sent: Friday, August 22, 2008 1:37 PM
To: 'Price, Wayne, EMNRD'; Jones, Brad A., EMNRD
Cc: Powell, Brandon, EMNRD; Seale, Runell
Subject: Largo SPCC Upgrades

Enterprise will be upgrading our condensate/produced water storage at the Largo Compressor Station within the next month. We will update our NMOCD Discharge Plan, GW-211 upon completion of this upgrade. We are providing a copy of the plot plan of the proposed facility upgrade for your review and approval. The plan includes specifications for the facility upgrade regarding condensate/produced water storage.

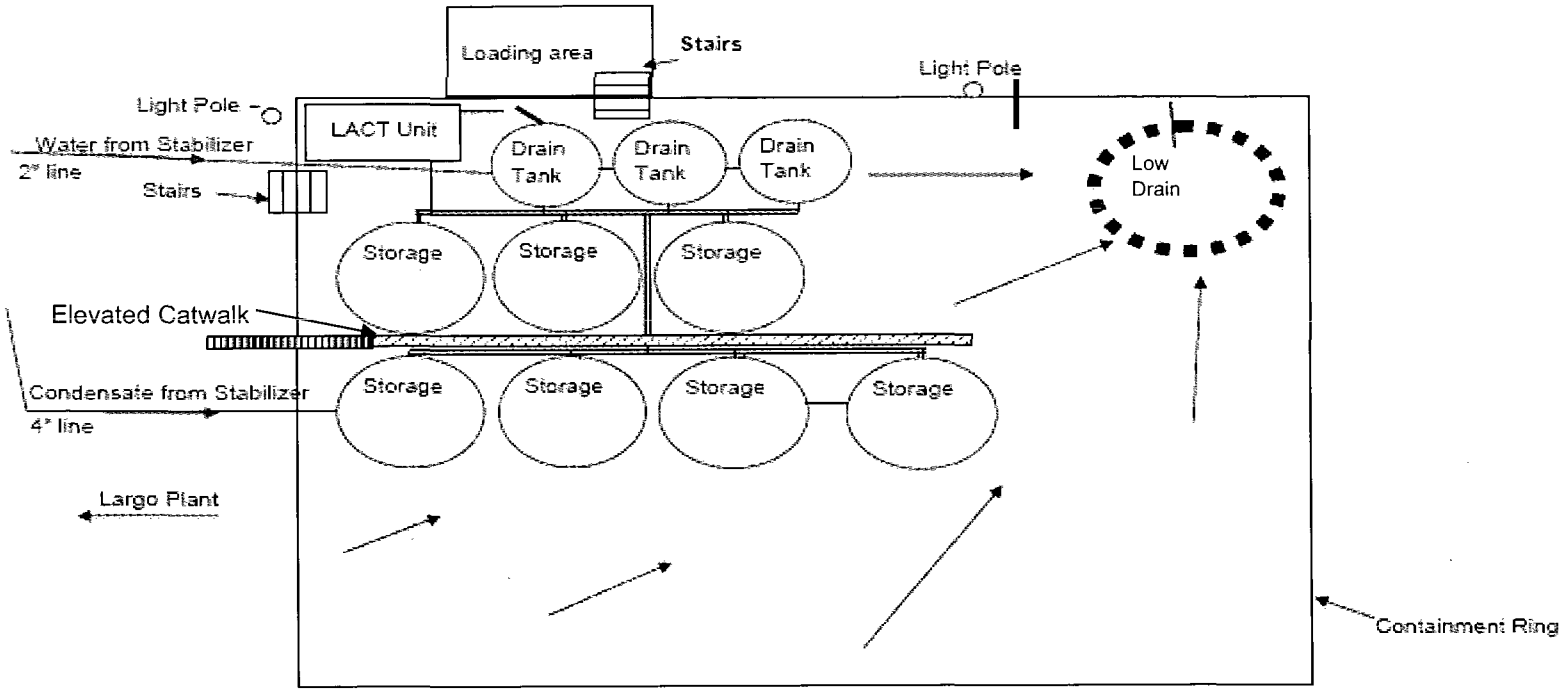
If you have questions or need additional information, please contact me.

Sincerely,

Don Fernald
Please note new email: **dfernald@epco.com**
EHS&T - EPCO, Inc.
614 Reilly Avenue

Farmington, NM 87401
Office: 505-599-2141
Cell: 505-486-6668
dfernald@epco.com

Largo Compressor Station
SPCC Upgrades 2008



1 - One each 82.3' x 86.9' x 44" high rectangular containment ring.

1. Steel Containment: 82.3' x 86.9' x 44" high rectangular = 26,223 cf = 196,151 gallons = 4,670 bbls
Include low drain area to capture rainwater/incidental spills
2. 7 new 450 bbl storage tanks = 3,150 bbls = 132,300 gallons
3. Three, double walled 120 bbl subgrade drain tanks for collection/separation of produced water from Condensate storage tanks as needed.

Subgrade tanks are double walled and have inspection ports to allow for monthly inspections.

4. Liner to consist of a minimum 30 mil UV HDPE. Line-X at seams, perforations & walk-ways for traction.

5. LACT Unit / meter

Containment Capacity = 4,678 bbls
Storage Capacity = 3,150 bbls
Storage Capacity x 1.33% = 4,189.5 bbls
Negligable displacement from LACT and tanks.
Actual Storage Capacity approximately 148%

Griswold, Jim, EMNRD

From: Griswold, Jim, EMNRD
Sent: Tuesday, September 02, 2008 8:44 AM
To: 'dfernald@epco.com'
Subject: Largo Compressor Station

Good Morning Mr. Fernald,

I am writing today to inform you that I have taken over oversight within OCD of all Enterprise compressor station discharge plans from Brad Jones. Wayne Price forwarded to me your email of Friday regarding the upgrade of condensate/produced water storage at the Largo CS (GW-211). That permit will not expire until August 2010. Your email states Enterprise will not seek modification of the discharge plan until the upgrade has been completed. In speaking with Wayne, he stated this would be fine but Enterprise does so at its own risk with respect to subsequent approval by the OCD of said modification.

Jim Griswold
Hydrologist
Environmental Bureau
ENMRD/Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
direct: 505.476.3465
email: jim.griswold@state.nm.us

Griswold, Jim, EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, August 29, 2008 11:06 AM
To: Griswold, Jim, EMNRD
Subject: FW: Largo SPCC Upgrades
Attachments: Largo SPPC Upgrade 2008.pdf

From: Fernald, Donald [mailto:dfernald@epco.com]
Sent: Friday, August 22, 2008 1:37 PM
To: Price, Wayne, EMNRD; Jones, Brad A., EMNRD
Cc: Powell, Brandon, EMNRD; Seale, Runell
Subject: Largo SPCC Upgrades

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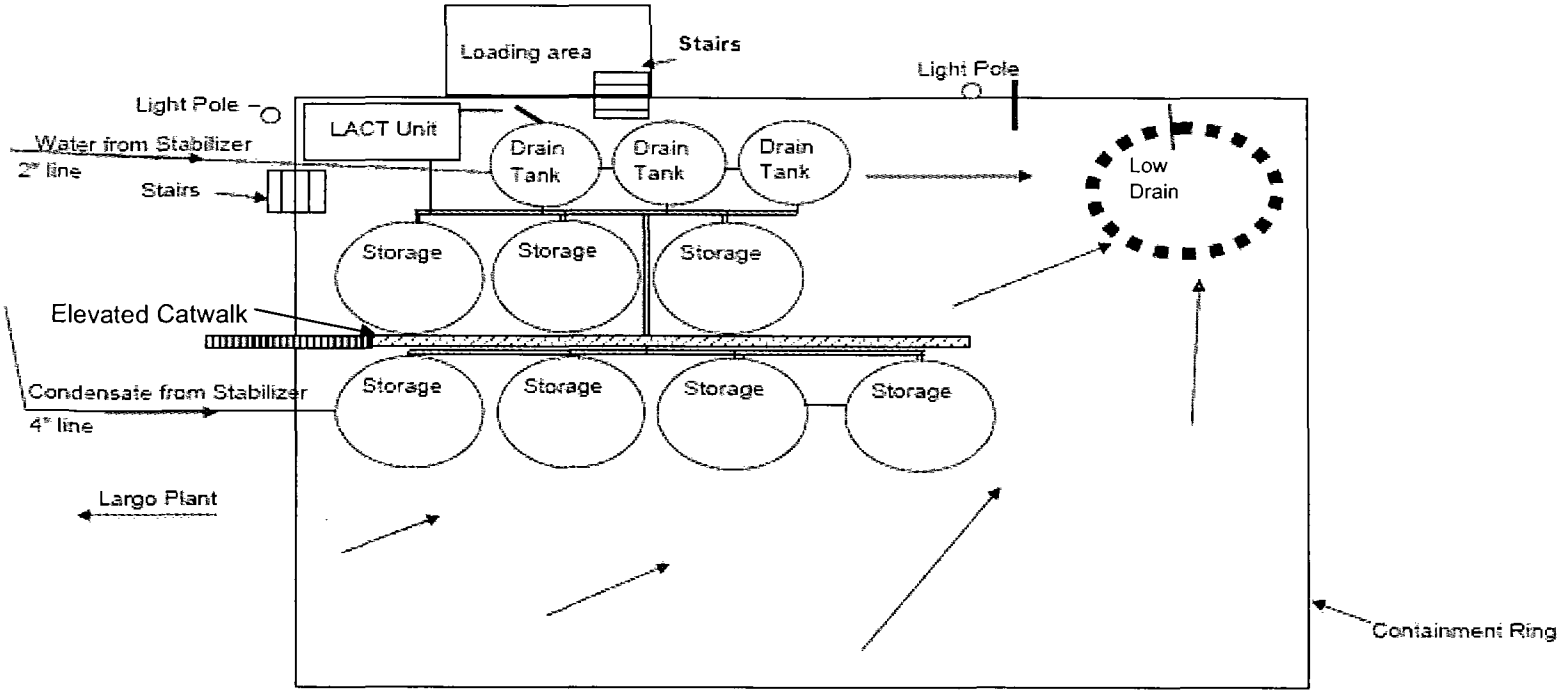
If you have questions or need additional information, please contact me.

Sincerely,

Don Fernald
Please note new email: **dfernald@epco.com**
EHS&T - EPCO, Inc.
614 Reilly Avenue
Farmington, NM 87401
Office: 505-599-2141
Cell: 505-486-6668
dfernald@epco.com

Largo Compressor Station
SPCC Upgrades 2008



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Storage Capacity = 3,150 bbls
Storage Capacity x 1.33% = 4,189.5 bbls
Negligable displacement from LACT and tanks.
Actual Storage Capacity approximately 148%

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 1/26/06

or cash received on _____ in the amount of $ 100.00

from Enterprise Products Operating

for Largo Compressor Station (Facility Name) GW-211

Submitted by: Lawrence Romero (DP No.) Date: 3/1/06

Submitted to ASD by: Lawrence Romero Date: 3/1/06

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

THE FACE OF THIS DOCUMENT CONTAINS SECURITY PRINTING.

BANK ONE, NA 56-1544/441

ENTERPRISE PRODUCTS OPERATING L.P.
P.O.BOX 4324
HOUSTON, TEXAS 77210

[redacted]

PRISE*

DATE
25-JAN-06

XACTLY

AMOUNT
$*********600.00

lundred And No/100 Dollars

REGULAR ACCOUNT
VOID AFTER 180 DAYS

'AY TO THE
)RDER OF

STATE OF NEW MEXICO
1220 SOUTH SAINT FRANCIS DR
SANTA FE, NM 87505
United States

W. Randolph Fawley

GW-188 GW-212 GW-211 GW209
GW-189 GW-186

[redacted]

ATTACHMENT TO THE DISCHARGE PERMIT
ENTERPRISE PRODUCTS OPERATING, L.P.,
LARGO COMPRESSOR STATION (GW-211)
DISCHARGE PERMIT APPROVAL CONDITIONS
April 12, 2006

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
c/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100. There is also a renewal flat fee of $1,700 for gas compressor stations greater than 1,001 horsepower (*see* WQCC Regulation 20.6.2.3114 NMAC).
2. **Permit Expiration and Renewal:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **This permit will expire on August 24, 2010** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if an owner/operator submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.
3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 14, 2006 discharge permit renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
5. **Modifications:** WQCC Regulation 20.6.2.3109.G NMAC addresses possible future modifications of a permit. Pursuant to WQCC Regulation 20.6.2.3107.C NMAC, the owner/operator shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. Pursuant to WQCC Regulation 20.6.2.3109.E NMAC, the Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well.

RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED-permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area. Waste generated during emergency response operations may be stored for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. Drum Storage: The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all above ground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and

Intrastate Streams) including any oil sheen in any storm water run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, or abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit: The owner/operator shall notify the OCD prior to any transfer of ownership, control or possession of a facility with an approved discharge permit. The purchaser shall submit a written commitment to comply with the terms and conditions of the previously approved discharge permit and shall seek OCD approval prior to transfer.

22. Closure: The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: Certification: Enterprise Products Operating, L.P., by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **Enterprise Products Operating, L.P.** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively. Conditions accepted by:

Enterprise Products Operating, L.P.

Terry L. Hurlburt
Company Representative- print name

Company Representative- signature

Vice President & General Manager - Operations
Title

April 26, 2006
Date

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

April 12, 2006

Mr. Terry L. Hurlburt
Enterprise Products Operating, L.P.
P.O. Box 4324
Houston, Texas 77210-4324

Re: Discharge Permit GW-211
Largo Compressor Station

Dear Mr. Hurlburt:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Enterprise Products Operating, L.P. (owner/operator) Largo Compressor Station GW-211 located in the SW/4 NW/4 of Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Ed Martin of my staff at (505-476-3492) or ed.martin@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

Copy: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
ENTERPRISE PRODUCTS OPERATING, L.P.,
LARGO COMPRESSOR STATION (GW-211)
DISCHARGE PERMIT APPROVAL CONDITIONS
April 12, 2006

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
c/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100. There is also a renewal flat fee of $1,700 for gas compressor stations greater than 1,001 horsepower (*see* WQCC Regulation 20.6.2.3114 NMAC).
2. **Permit Expiration and Renewal:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **This permit will expire on August 24, 2010** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if an owner/operator submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.
3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.
4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its February 14, 2006 discharge permit renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.
5. **Modifications:** WQCC Regulation 20.6.2.3109.G NMAC addresses possible future modifications of a permit. Pursuant to WQCC Regulation 20.6.2.3107.C NMAC, the owner/operator shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. Pursuant to WQCC Regulation 20.6.2.3109.E NMAC, the Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.
6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well.

RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED-permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area. Waste generated during emergency response operations may be stored for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all above ground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. **Labeling:** The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. **Below-Grade Tanks/Sumps and Pits/Ponds.**

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and

Intrastate Streams) including any oil sheen in any storm water run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, or abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit: The owner/operator shall notify the OCD prior to any transfer of ownership, control or possession of a facility with an approved discharge permit. The purchaser shall submit a written commitment to comply with the terms and conditions of the previously approved discharge permit and shall seek OCD approval prior to transfer.

22. Closure: The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: Certification: Enterprise Products Operating, L.P., by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **Enterprise Products Operating, L.P.** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively. Conditions accepted by:

Enterprise Products Operating, L.P.

_____
Company Representative- print name

_____
Company Representative- signature

_____
Title

_____
Date

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-211
EL PASO FIELD SERVICES CO.
LARGO COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
October 27, 2000

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating of 1,001 to 3,000 horsepower. The renewal flat fee required for this facility is $345.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   2040 South Pacheco
   Santa Fe, New Mexico 87505

2. Commitments: El Paso Field Services Co. will abide by all commitments submitted in the discharge plan renewal application letter dated August 17, 2000 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every five (5) years. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: The facility will have an approved storm water run-off plan by December 31, 2000.

16. Closure: The OCD will be notified when operations of the Largo Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Largo Compressor Station, the Director will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: El Paso Field Services Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services Co. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

El Paso Field Services Co.

Print Name: Bennie Armenta

Signature: [signature]

Title: Complex Manager

Date: 11/8/00

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 27, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5051-6069

Mr. David Bays
El Paso Field Services Co.
614 Reilly Avenue
Farmington, New Mexico 87401

RE: Discharge Plan Renewal GW-211
El Paso Field Services Co.
Largo Compressor Station
Rio Arriba County, New Mexico

Dear Mr. Bays:

The ground water discharge plan renewal **GW-211** for the **El Paso Field Services Co. Largo Compressor Station** located in the /4 /4 of Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on July 10, 1995 and approved August 24, 1995. The discharge plan renewal application letter, dated August 17, 2000, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve El Paso Field Services Co. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve El Paso Field Services Co. of responsibility to comply with any other government authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open tanks (exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, El Paso Field Services Co. is required to notify the Director of any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on **August 24, 2005**, and El Paso Field Services Co. should submit an application in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan renewal application for the El Paso Field Services Co. Largo Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of $50.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating of 1,001 to 3,000 horsepower equal to one-half of the original flat fee or $345.00. The OCD has received the filing fee.

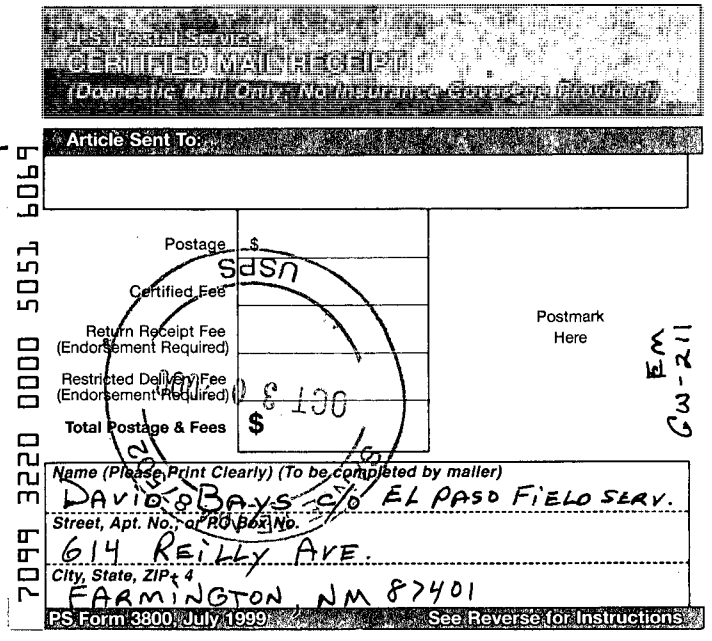
On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

cc: OCD Aztec Office



ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-211
EL PASO FIELD SERVICES CO.
LARGO COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
October 27, 2000

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating of 1,001 to 3,000 horsepower. The renewal flat fee required for this facility is $345.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval. Please make all checks payable to:

   Water Quality Management Fund
   c/o Oil Conservation Division
   2040 South Pacheco
   Santa Fe, New Mexico 87505

2. Commitments: El Paso Field Services Co. will abide by all commitments submitted in the discharge plan renewal application letter dated August 17, 2000 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

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7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every five (5) years. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

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12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: The facility will have an approved storm water run-off plan by December 31, 2000.

16. Closure: The OCD will be notified when operations of the Largo Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Largo Compressor Station, the Director will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: El Paso Field Services Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services Co. further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

El Paso Field Services Co.

Print Name: _____

Signature: _____

Title: _____

Date: _____

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/29/00,
or cash received on 8/31/00 in the amount of $ 100.00
from EL PASO FIELD SERVICES CO.
for LINORITH C.S. AND LARGO C.S. 209 AND 211
(Facility Name) (OP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: ED MARTIN Date: 9/1/00
Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

THE FACE OF THIS DOCUMENT HAS A BLUE BACKGROUND AND MICROPRINTING. THERE IS AN ARTIFICIAL WATERMARK ON THE REVERSE SIDE.

EL PASO FIELD SERVICES COMPANY
1001 Louisiana
Houston, TX 77002

CITIBANK
One Penn's Way
New Castle, DE 19720

[redacted]

62-20/311

Pay Amount $100.00***

Date 08/29/2000

Void After One Year

Pay ****ONE HUNDRED AND XX / 100 US DOLLAR****

To The Order Of NEW MEXICO OIL CONSERVATION
DIVISON
2040 S PACHECO
SANTA FE, NM 87505

H. Brent Austin

Authorized Signature

[redacted]

Check Date: 08/29/2000

EL PASO FIELD SERVICES COMPANY
Refer Payment Inquires to (713) 420-5719

Check No. 01047267

Invoice Number	Invoice Date	Voucher ID	Gross Amount	Discount Available	Paid Amount
DISCHGPLT 211	08/17/2000	00087859	100.00	0.00	100.00

+DP209

Vendor Number	Vendor Name		Total Discounts	
0000000858	NEW MEXICO OIL CONSERVATION		$0.00	
Check Number	**Date**	**Total Amount**	**Discounts Taken**	**Total Paid Amount**
[redacted]	08/29/2000	$ 100.00	0.00	$100.00

NEW MEXICO ENVIRONMENT DEPARTMENT
REVENUE TRANSMITTAL FORM

	Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1	CY Reimbursement Project _____ Tax ___	064	01						1
5	Gross Receipt Tax	064	01		2329	900000	2329134		2
3	Air Quality Title V	092	13	1300	1696	900000	4169134		3
4	PRP Prepayments	248	14	1400	9696	900000	4969014		4
2	Climax Chemical Co.	248	14	1400	9696	900000	4969015		5
6	Circle K Reimbursements	248	14	1400	9696	900000	4969248		6
7	Hazardous Waste Permits	339	27	2700	1696	900000	4169027		7
8	Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		8
10	Water Quality - Oil Conservation Division	341	29		2329	900000	2329029		10
11	Water Quality - GW Discharge Permit 209/211	341	29	2900	1696	900000	4169029	150.00	11
12	Air Quality Permits AND 212	631	31	2500	1696	900000	4169031		12
13	Payments under Protest	851	33		2919	900000	2919033		13
*14	Xerox Copies	652	34		2349	900000	2349001		*14
15	Ground Water Penalties	652	34		2349	900000	2349002		15
16	Witness Fees	652	34		2349	900000	2439003		16
17	Air Quality Penalties	652	34		2349	900000	2349004		17
18	OSHA Penalties	652	34		2349	900000	2349005		18
19	Prior Year Reimbursement	652	34		2349	900000	2349006		19
20	Surface Water Quality Certification	652	34		2349	900000	2349009		20
21	Jury Duty	652	34		2349	900000	2349012		21
22	CY Reimbursements (I.e. telephone)	652	34		2349	900000	2349014		22
*23	UST Owner's List	783	24	2500	9696	900000	4969201		*23
*24	Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
*25	UST Maps	783	24	2500	9696	900000	4969203		*25
*26	UST Owner's Update	783	24	2500	9696	900000	4969205		*26
*28	Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
*29	Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
*30	Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
31	Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
32	Smoking School	783	24	2500	9696	900000	4969214		32
*33	SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
*34	Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
*35	Sale of Equipment	783	24	2500	9696	900000	4969301		*35
*36	Sale of Automobile	783	24	2500	9696	900000	4969302		*36
*37	Lust Recoveries	783	24	2500	9696	900000	4969614		**37
*38	Lust Repayments	783	24	2500	9696	900000	4969615		**38
39	Surface Water Publication	783	24	2500	9696	900000	4969801		39
40	Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
41	Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
42	Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
44	Ust Permit Fees	988	20	3100	1696	900000	4169020		44
45	UST Tank Installers Fees	989	20	3100	1696	900000	4169021		45
46	Food Permit Fees	991	26	2600	1696	900000	4169026		46
43	Other								43

* Gross Receipt Tax Required ** Site Name & Project Code Required TOTAL 150.00

Contact Person: Ed Martinez Phone: 827-7151 Date: 9/1/00

Received in ASD By: _____ Date: _____ RT #: _____ ST # : _____

FSB025
Revised 07/07/00

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

November 22, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-705

Mr. David Bays
El Paso Field Services (EPFS)
P.O. Box 4990
Farmington, NM 87499

RE: Closure Inspections - Old Ballard,
Old Largo, and Old Lindrith Compressors
San Juan and Rio Arriba County, New Mexico

Dear Mr. Bays:

The OCD in letters dated September 26, 1996 approved of the closure plans for each of the above captioned facilities with the following condition:

- *The NMOCD Santa Fe Division Office upon site inspection of this closure may require additional clean-up.* (From September 26, 1996 approval letters from OCD.)

The OCD on Thursday, October 24, 1996 inspected the sites captioned above, and based on the walk through inspection at each the closure(s) site(s) appear to meet OCD standards.

Please be advised that OCD approval of the closure(s) for these facilities does not relieve EPFS from liability should it latter be found that contamination exists at the one of the sites. Further, OCD approval does not relieve EPFS from compliance with other federal, state, or local rules and regulations that may apply.

Sincerely,

Patricio W. Sanchez,
Petroleum Engineering Specialist
Environmental Bureau-OCD

xc: Denny Foust , OCD Aztec Office

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 26, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-637

Mr. David Bays
EPFS
P.O. Box 4990
Farmington, NM 87499

RE: Closure Approval
Old Largo Compressor Station
Rio Arriba County, New Mexico

Dear Mr. Bays:

The OCD has received the closure plan report dated August 21, 1996 for the old "Largo" compressor station located in Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Upon review of this report **the closure of the old "Largo" Compressor station is hereby approved with the following condition:**

- The NMOCD Santa Fe Division Office upon site inspection of this closure may require additional clean-up.

Please be advised that OCD approval of the closure for this facility does not relieve EPFS from liability should it latter be found that contamination exists at the "Old Largo" site. Further, OCD approval does not relieve EPFS from compliance with other Federal, State, or Local rules and regulations that may apply.

Sincerely,

Patricio W. Sanchez,
Petroleum Engineering Specialist
Environmental Bureau

xc: Denny Foust , OCD Aztec Office

P 288 258 637

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail *(See reverse)*

Sent to Bays - EPFS	
Street & Number c/o Largo	
Post Office, State, & ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

EPFS

EL PASO FIELD SERVICES

August 21, 1996

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: Facility Closure Plan - Largo Compressor Station - Discharge Plan GW-211

Dear Mr. Anderson:

In accordance with Mr. Chris Eustice's letter of June 30, 1995, this is to notify you that El Paso Field Services Company (EPFS) has completed the construction and demolition project at the Largo Station.

1. Soil contamination around the old compressor station was remediated in accordance with OCD's "Spill, Leak Remediation Guidelines." Excavated soil was transported to the Envirotech landfarm for remediation.

2. The old compressors, motors, piping, valves, the compressor building, and ancillary buildings were removed for resale by the demolition division of Philip Environmental, Inc. All concrete foundations were broken down to a depth of one foot below the natural grade, then covered with clean fill. The removed upper portions of the foundations were broken into easily manageable size, then buried on-site.

3. All asbestos containing material was removed by Philip Environmental and disposed of at an approved landfill.

If you need any additional information regarding the Largo Station closure, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Sr. Environmental Scientist

cc: Denny Foust - NMOCD - Aztec
R. D. Cosby/S. D. Miller/J. Sterrett/Largo regulatory file

NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. Pacheco
Santa Fe, New Mexico 87505

August 24, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-179

Mr. David Bays
El Paso Natural Gas Company
P.O. Box 4990
Farmington, New Mexico 87499

Re: Discharge Plan (GW-211)
Largo Compressor Station
San Juan County, New Mexico

Dear Mr. Bays:

The groundwater discharge plan GW-211 for the El Paso Natural Gas Company's Largo Compressor Station located in the NW/4 NE/4 Section 15, Township 26 North, Range 7 West, NMPM, San Juan County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated July 10, 1995.

The discharge plan was submitted pursuant to section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A.. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve you of your liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase,or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire August 24, 2000 and El Paso Natural Gas Company should submit an application for renewal in ample time before that date.

The discharge plan application for the El Paso Natural Gas Company's Largo Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars and a flat rate fee. The flat fee for a compressor facility in excess of 3000 horsepower (site rated) is thirteen hundred eighty (1380) dollars.

The OCD has received the fifty dollar filing fee. The flat fee is due upon receipt of this approval. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal installments over the duration of the plan.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/cee
Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-211 APPROVAL
EL PASO NATURAL GAS COMPANY
LARGO COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(August 24, 1995)

1. Drum Storage: All drums will be stored on pad and curb type containment.

2. Sump Inspection: All pre-existing sumps will be cleaned and visually inspected on an annual basis. All inspections will be documented and recorded for a period of five (5) years and the records made available to OCD inspectors upon request. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.

3. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.

4. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.

5. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

6. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

7. Payment of Discharge Plan Fees: The $1380.00 flat fee will be paid upon receipt of this approval.

Detach and retain this statement for your records

EL PASO NATURAL GAS COMPANY

REMITTANCE ADVICE

Vendor Number
018711 001

Check Date
09/14/95

Check Number
[redacted]

VOUCHER NUMBER	INVOICE NUMBER	AMOUNT		
		Invoice	Discount	Net
REFER PAYMENT INQUIRIES TO ACCOUNTS PAYABLE (915) 541-5354				
VOUCHER NO	INVOICE NO	GROSS	DISCOUNT	NET
000521657	CKREQ950907	1,380.00	.00	1,380.00
LARGO PLANT DISCHARGE PLAN				
FLAT FEE				
	TOTALS	1,380.00	.00	1,380.00

FM SS0044 (REV. 10/94)

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 9/14/95

or cash received on 9/19/95 in the amount of $ 1380.00

from EPNG

for Largo Plant (Facility Name) GW-211 (DP No.)

Submitted by: ______ Date: ______

Submitted to ASD by: Roger Anderson Date: 9/24/95

Received in ASD by: Angie Alvie Date: 9/26/95

Filing Fee ____ New Facility X Renewal ____

Modification ____ Other ______ (specify)

Organization Code 52107 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ____

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER [redacted]

El Paso Natural Gas Company

P.O. BOX 1492
EL PASO, TX 79978

232 CBD

PAYABLE AT
CITIBANK DELAWARE
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

62-20
311

09/14/95
Date

PAY TO THE ORDER OF

NMED WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE NM 87505

PAY AMOUNT
$1,380.00

Void After 1 Year

John M. Breen, Jr.

COPYBAN ANTI-FRAUD PROTECTION - PATENTS 4,210,346; 4,227,720; 4,310,180; 5,197,765

[redacted]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/13/95,

or cash received on 8/3/95 in the amount of $ 50.00

from El Paso Natural Gas

for Largo C.S. (Facility Name) GW-211 (DP No.)

Submitted by: ______ Date: ______

Submitted to ASD by: R. Anderson Date: 8/8/95

Received in ASD by: Angie Alire Date: 8/9/95

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other ______ (specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER [redacted]

El Paso Natural Gas Company

P.O. BOX 1492
EL PASO, TX 79978

232 CBD

62-20
311

07/13/95
Date

PAYABLE AT
CITIBANK DELAWARE
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

PAY AMOUNT
$50.00
Void After 1 Year

PAY TO THE ORDER OF

NMED WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE NM 87505

John M. Green Jr

COPYBAN® ANTI-FRAUD PROTECTION - PATENTS 4,310,346; 4,227,720; 4,218,180; 5,197,765

[redacted]

Paris

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

New Mexico
Energy Minerals and Natural Resources Department
Oil Conservation Division
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505
(505) 827-7131

Revised 12/1/95

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS
(Refer to OCD Guidelines for assistance in completing the application)

GW-211

☐ New ☒ Renewed ☐ Modification

1. Type: Largo Compressor Station
2. Operator: Enterprise Products Operating, L.P.
   Address: P.O. Box 4324, Houston, Texas 77210-4324
   Contact Person: Doug Jordan
3. Location: SW/4 NW/4 Section 15 Township 26 North Range 7 West
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average daily quality and daily volume of waste water must be included.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other rules, regulations, and/or orders.
14. CERTIFICATION

I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: ~~Terry L. Hurlburt~~ Title: Vice President & General Manager, Operations

Signature: Terry Hurlburt Date: 2/14/06

02/08/06

ENTERPRISE FIELD SERVICES, LLC

LARGO COMPRESSION STATION: DISCHARGE PLAN RENEWAL, GW-211

Revised January 2006

Prepared for:

NEW MEXICO OIL CONSERVATION DIVISION

1220 South Saint Francis Drive

Santa Fe, New Mexico 87505

Enterprise Field Services, LLC
614 Reilly Ave.
Farmington, NM 87401

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Item 1: Type of Operation

Indicate the major operational purpose of the facility. If the facility is a compressor station, include the total combined site rated horsepower.

The Largo facility compresses approximately 60 MMSCFD of natural gas from low pressure San Juan Field lines (250 psig design pressure) to an existing line (20" 500 psig design pressure). Enterprise Field Services, LLC (Enterprise) is the owner and Enterprise Products Operating, L.P. is operator of the compressor facility. The site includes the following major equipment:

- Two-phase inlet separator
- Gas compressor suction scrubbers
- Two engine-driven compressors (engines site rated at 3100 HP each)
- Gas compressor discharge scrubbers
- Fuel/gas filter scrubbers
- Glycol dehydration train, four contact towers, glycol reboiler
- One aboveground 100 bbl condensate tank
- Two overhead 100 gallon lube oil tanks
- One aboveground 500 gallon lube oil tank
- One aboveground 500 gallon diesel tank
- One aboveground 160 bbl wastewater tank (nonexempt)
- One aboveground 500 gallon Ambitrol tank.
- One overhead 100 bbl tri-ethylene glycol tanks
- One aboveground 500 gallon dehydrator surge tank
- One overhead 100 bbl. methanol tank

The auxiliary equipment and tanks at the compressor site are installed, maintained, and operated by Enterprise Products Operating L.P. (Enterprise). Enterprise is responsible for scheduling the hauling and disposing of the waste oil, waste filters, wash down water, condensate, and field liquids generated at the facility.

Condensate and produced water generated or captured at the facility are transferred to an adjacent "offsite" field tank battery owned/operated by Enterprise. The tank battery comprises of three 500 barrel and three 300 barrel above ground, steel tanks, and two below grade 160 bbl. double-wall tanks (exempt). These tanks are located in a bermed area. As these tanks are not located within the fence of the Largo Compressor Station, they are not included as part of the plan.

Item 2: Operator/Legally Responsible Party and Local Representative

Name of operator or legally responsible party and local representative.

Legally Responsible Party: **(operator)**	Terry L. Hurlburt Enterprise Products Operating, L.P. P.O. Box 4324 Houston, TX 77210-4324 (713) 803-8298
Local Representative:	Joe Velasquez Director, San Juan Operations Enterprise Field Services, LLC 614 Reilly Ave. Farmington, NM 87401 (505) 599-2200 **24 hour – (800) 203-1347**
Station Operator:	Enterprise Products Operating, L.P. 614 Reilly Ave. Farmington, New Mexico 87401 (505) 325-2841

Item 3: Location of Facility and Landowner

Give a legal description of the location and county. Attach a large-scale topographic map.

The facility is located in Sec. 15, T26N, R7W, in Rio Arriba County. A topographic map is under Tab A. The Largo Plant is located approximately 30 miles south of Hwy. 64 on CR 4450, approximately 30 miles south of Blanco, New Mexico.

Item 4: Landowner

Provide the name, telephone number and the landowner of the facility.

Enterprise Field Services LLC
P.O. Box 4324
Houston, TX 77210-4324
(713) 880-6500

Item 5: Facility Description

Provide a description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.

A plot plan of the facility indicating location of fences, gates, foundations and equipment on the facility is attached as Tab B. Natural gas enters the site from Enterprise's lateral line via both

underground and aboveground piping. Gas entering the compressor station passes through the inlet separator for initial gas and entrained liquids separation. The gas is then routed through the compressor suction scrubber, the compressor for gas compression, the compressor discharge scrubber, the glycol dehydration train for water removal and into the Enterprise discharge pipeline. A slip stream of gas is routed through the fuel scrubber and used as fuel by the engine.

The site may be subject to weekly pigging operations. Condensate and produced water from the pigging operations, the scrubbers, and the separators is piped underground to the exempt condensate/process water tank battery located offsite from the Largo Compressor Station. Condensate recovered from the glycol reboiler system is routed to the onsite dehydration condensate 100 barrel tank.

Item 6: Materials Stored and Used

Provide a description of all materials stored and used at the facility

Product Storage

Tank Contents	Tank Construction Material	Tank Capacity
Lube Oil	Single wall, welded steel (AST)	100 gal.
Lube Oil	Single wall, welded steel (AST)	100 gal.
Lube Oil	Single wall, welded steel (AST)	500 gal.
Ambitrol	Single wall, welded steel (AST)	500 gal.
Diesel	Single wall, welded steel (AST)	500 gal.
Tri-ethylene Glycol	Single wall, welded steel (AST)	100 bbl
Dehydrator Surge Tank	Single wall, welded steel (AST)	500 gal.

The 100 gallon lube oil tanks are located on the engine skids. Spills or releases from these lube oil tanks would be contained by the engine skid secondary containment. The 500 gallon lube oil tank, ambitrol tank, and diesel tank are located within secondary containment.

The following table shows the condensate and wastewater storage tanks at this site:

Tank Contents	Tank Construction Material	Tank Capacity
Dehydrator Condensate/ produced water (exempt)	Single wall, welded steel (AST)	100 bbls
Wash water/precipitation (non-exempt)	Double wall, welded steel (partially below grade)	160 bbls

The wash water/precipitation tank is equipped with an inspection port that allows for visual observation between the interstitial space of the double walled tank.

Item 7: Sources and Quantities of Effluent and Waste Solids

Provide a description of present sources of effluent and waste solids. Average quality and volume of wastewater must be included.

A simplified diagram of effluent streams is included in Tab C.

The exempt waste stream consists of condensate and produced water from the scrubbers and separators which flow under pressure to one of the six storage tanks located at an offsite tank battery. The scrubbers and separators generate approximately 350 barrel of condensate, oil, and produced water per month.

The dehydrator glycol reboiler generates a stream of condensate and produced water. This stream is collected and stored in the onsite 100 bbl dehydrator condensate storage tank. Approximately 60 barrels of condensate is recovered per month.

The nonexempt waste stream consists of water, oil, coolant, and soaps generated primarily by precipitation and compressor wash down. Wastewater from the compressor skid drains to a partially below grade, double wall, steel tank. Approximately 15 barrels of nonexempt wastewater is generated per month.

The facility also generates spent compressor oil filters and engine oil filters. Approximately 2 compressor oil filter and 6 engine oil filters are replaced each month. The oil filters are drained and the filter disposed of at the Crouch Mesa Landfill. Fuel gas filters are also disposed of at the Crouch Mesa Landfill. The frequency of fuel gas filter replacement/disposal is a function of the inlet gas quality.

A mixture of ethylene glycol and water will be used as cooling water. If it is necessary to drain the cooling water system for maintenance or repairs, the cooling water will be drained into steel drums or a small tank mounted on a pickup truck. After maintenance and/or repairs, the cooling water will be placed back into the cooling system. As this is a closed system, operational discharges are not expected.

Item 8: Liquid and Solid Waste Collection, Storage, and Disposal

Provide a description of current liquid and solid waste collection/treatment/disposal procedures.

Enterprise performs no on-site disposal. Enterprise coordinates the transportation of wastewater and waste solids to off-site disposal facilities.

As reflected in Item 7 (above), condensate and produced water from the separator and scrubbers drain via pressurized underground lines to the offsite storage tank battery. Precipitation and wash water from the compressor skids drain via gravity flow to a 160 barrel tank for nonexempt wastewater.

The hydrocarbon fraction from the onsite 100 bbl dehydration condensate tank is sent to offsite storage and ultimately transported to the Giant Refinery in Bloomfield, NM for recycling. Triple S Trucking Company of Aztec and/or Industrial Mechanical Inc. of Farmington take the water fraction of the exempt waste to the Kutz Separator-Blanco Storage facility for additional

hydrocarbon recovery and separation. Non-exempt wastewater from wash downs and rainwater events will also be transported to the Enterprise Kutz Separator-Blanco Storage.

Oil and fuel filters are disposed of in the Crouch Mesa Landfill. Intermittent maintenance activities such as pipeline cleaning (sandblasting) and painting may generate waste streams requiring offsite disposal. The compressor station is unmanned and does not generate domestic or hazardous solid wastes.

Item 9: Proposed Modifications

Provide a description of proposed modifications to existing collection, treatment, and disposal systems.

Currently, EPO has no planned modifications for this site.

Item 10: Inspection, Maintenance, and Reporting

Provide a routine inspection and maintenance plan to ensure permit compliance

Material storage tanks are within berms that contain a volume one-third more than the tank contents. Aboveground storage tanks are on concrete pads, gravel pads or placed on an elevated stand so leaks can be visually detected.

Enterprise employees visit the site on a regular basis. The compressor, related equipment, the storage tanks, and berms are inspected for leaks and spills.

Underground piping carrying waste liquids will be hydrostatically tested at a minimum of three pounds over operating pressure at least once every five years.

Item 11: Spill Prevention and Reporting Procedures

The compressor site is graded and bermed so that precipitation and runoff does not cause water to enter or leave the process areas. Precipitation that falls on the compressor skid is contained and routed to the 160 barrel wastewater tank.

Since the site will be visited on a regular basis by Enterprise, leaks, spills and/or drips will be identified. Regular scheduled maintenance procedures will also help to assure that the equipment remains functional and thus the possibility of spills or leaks is further minimized. Enterprise's Environmental Department will be notified upon discovery of leaks which result in soil contamination.

Leaks, spills and drips will be handled in accordance with OCD Rule 116 as follows:

a. small spills will be absorbed with soil and shoveled into drums for off-site disposal. If the soil is an "exempt" waste, the soil will be disposed at Envirotech or other OCD approved land farm facility. If the soil is an "nonexempt" waste the soil will be characterized and disposed according to the analytical profile.

b. large spills will be contained with temporary berms. Free liquids will be pumped out by vacuum truck. Hydrocarbon liquids will be recycled. Contaminated soil will be disposed of as discussed in the paragraph above.

c. verbal and written notification of leaks or spills will be made to OCD in accordance with Rule 116.

d. areas identified during operations as susceptible to leaks or spills will be bermed or otherwise contained to prevent the discharge of effluent.

e. Enterprise personnel will carry oil absorbent booms in their trucks. The booms will be used as needed to contain any spills or leaks. The booms will be disposed of according to OCD and NMED guidelines.

Item 12: Site Characteristics[1]

The Largo Compressor Station is located in the San Juan River drainage Basin, and within the northwest portion of the San Juan structural basin. Topographic relief within 1 mile of the site is about 816 feet with elevations from 6923 to 6107 feet above sea level. The elevation of the plant is 6500 feet above sea level. The average annual precipitation is 10 to 12 inches. The area around the station is characterized by valley-fill and terrace deposits. The area supports native grasses and small shrubs.

Geomorphology and Soils

The compressor station is located at the base of a cliff on the debris skirt of the adjacent mesa. The plant is located at the intersection of the Palluche Canyon and the Little Palluche Canyon with Largo Canyon. The surface slopes from about 0 to 90 percent from the highest point, 6500 feet at the compressor site to 6923 feet to the south of the plant site. Major soil associations in the area of the compressor site include the Argiboroll association, the Travessilla-Rotk Land association, and the Del Rio-Silver association (USSCS, 1977). According to the USSCS, 1977 the plant sits on the Argiboroll soil association. The Argiboroll association consists of materials weathered from sedimentary rocks, principally sandstone and shale.

---

[1] References Cited

Fasset, J.E. and J.S. Hinds, 1971, Geology and Fuel Resources of the Fruitland Formation and Kirkland Shale of the San Juan Basin, New Mexico and Colorado. USGS Professional Paper 676.

Geological Map of New Mexico, United States Geological Survey, 1985.

Geological Map of the Aztec 1° x 2° quadrangle Northwestern New Mexico and Southern Colorado. USGS Miscellaneous Investigation Service, 1987.

Soil Association and Land Classification for Irrigation, Rio Arriba County, New Mexico State University, 1973. Agricultural Experiment Station, Research Report 254.

Stone, W.J., F.P. Lyford, P.F. Frenzel, N.H. Mizell, and E.T. Padgett, Hydrology and Water Resources of San Juan Basin, New Mexico. New Mexico Bureau of Mines and Mineral Resources, Hydraulic Report 6, 1983.

White, W. E., Kues, G.E. Inventory of Springs in the State of New Mexico, United States Geological Survey, 1992

Regional Geology

The compressor station is located within the east-central part of the San Juan Basin. The deepest portion of the basin contains up to 15,000 feet of Paieozoic and Mesozoic sediments (Fassett and Hinds, 1971). Tertiary and Holocene age rocks crop out in the immediate vicinity of the compressor site.

Local Geology

The Largo Compressor Station is located in an arroyo where Quaternary alluvium overlies the Tertiary San Jose Formation. There are two El Paso Natural Gas (currently Enterprise) water wells located within one mile of the Station (See Table 1). The attached drillers logs for these wells report that 365 feet of sand clay, shale and minor sandstone were encountered. Stone et. a], (1983) reports that the EPNG wells (currently Enterprise) were completed in the San Jose Formation.

Hydrology and Groundwater Quality

Local Groundwater Hydrology and Quality

According to topographic maps published by New Mexico Oil Conservation Division to support "Vulnerable Area Order", R-7940-C, the Largo Compressor Station is located in the expanded vulnerable zone, possibly overlying an alluvial aquifer.

Records available at the State Engineers Office and Stone et. a] (1983) indicate 4 water wells within one mile of the compressor station (Topographic map). These wells are used for both stock and domestic uses. There are no springs located within one mile of the plant site.

Two of these wells were drilled by EPNG between May and June of 1957. These wells were drilled into the San Jose Formation to depths between 335 and *365* feet.

EPNG Well #1, is located in Largo Canyon. This well is completed in the San Jose Formation and is screened between 170 and 365 feet, in the San Jose Formation and supplies the potable water for the Largo Compressor Station. This well was originally screened between 255 and 325 feet, but due to unknown damage it was redrilled and refined with the new screen. The aquifer appears to be confined, because the principle water bearing strata is at a depth of 255 feet, and the static water level is reported to be 26 feet below the ground surface. The drill log also shows 55 feet of shale and chert above the water bearing sand layer which could serve as a confining layer. The total dissolved solids reported from this aquifer was 542 ppm on 07-12-1982.

EPNG Well #2 is located in Palluche Canyon. This well is screened between 169 and 335 feet, in the San Jose Formation and is not currently in service, but could be placed in operation after some repair work, should the need arise. The aquifer appears to be confined, because the principle water bearing strata is at a depth of 230 feet, and the static water level is reported to be 22 feet below the ground surface. The drill log also shows 123 feet of shale above the water

bearing sand layer which could serve to confine the aquifer. The total dissolved solids reported for this aquifer was 500 ppm on 07-12-1982.

The other two wells are privately owned wells used for both stock and domestic use by Richard Boyd. These wells are located approximately *2,750* and 3,500 feet southwest and up-gradient (SE/4, SEI4, NW/4 and NE/4, N7E/4, SW/4 of Sec *15,* T-26-N, R-7-W) of the Largo Plant in Palluche Canyon.

The local alluvial groundwater flow appears to move in a easterly direction down Largo Canyon. The potable aquifer most likely to be affected is the San Jose. The plant gets its drinking water from this aquifer at a depth of 170 feet below the surface. Regional flow direction in the San Jose in the general vicinity of the plant is toward the northeast.

Surface Water Hydrology and Flooding Potential

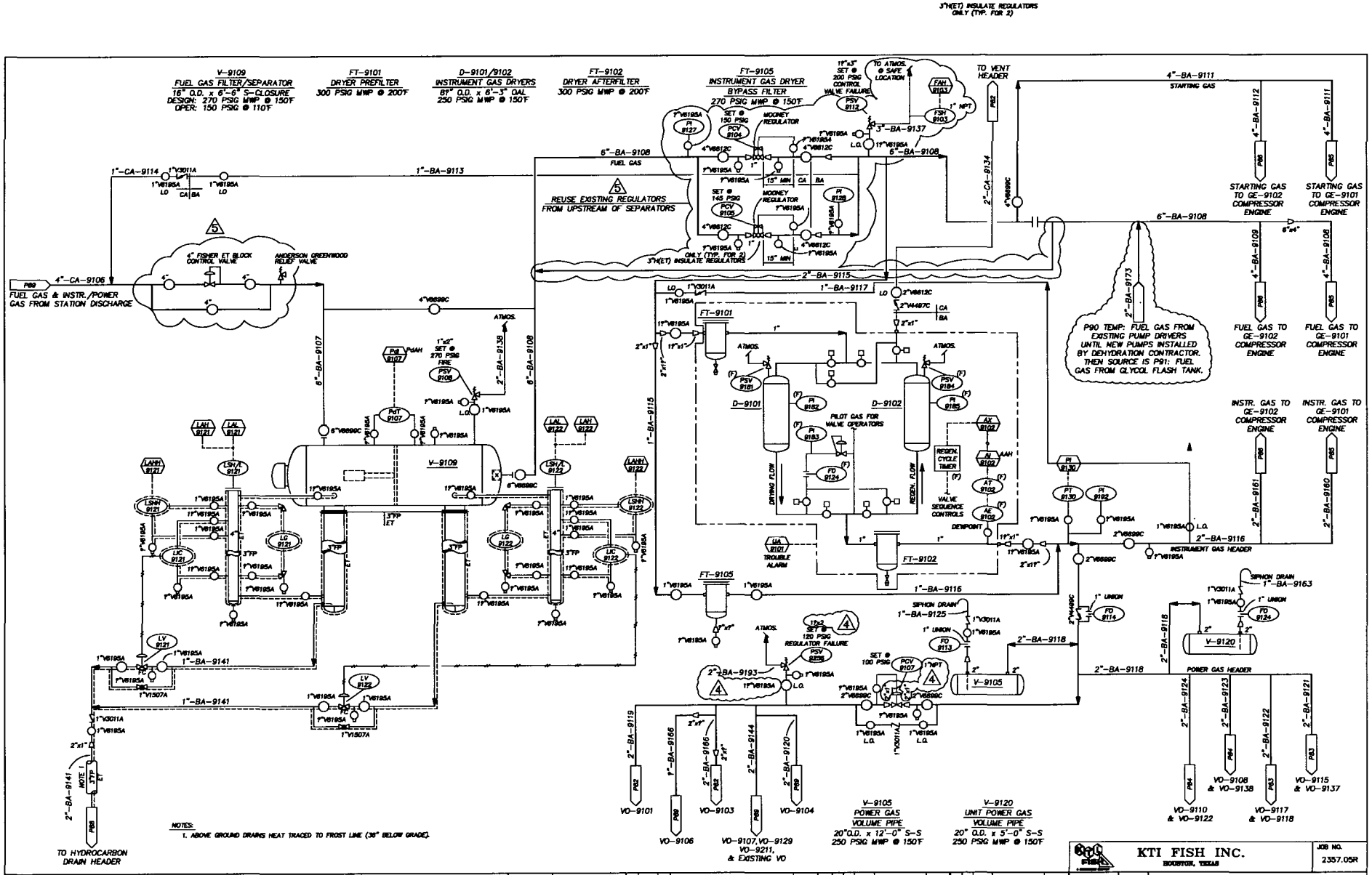
The Largo Compressor Station is located at the confluence of Palluche Canyon and Little Palluche Canyon with Largo Canon. There are no permanent surface waters in the immediate vicinity of the plant. Surface water drainage at the plant is to the north, in the direction of Largo Canyon. Largo Canyon drains approximately 300 square miles and discharges into the San Juan River east of Bloomfield, NM.

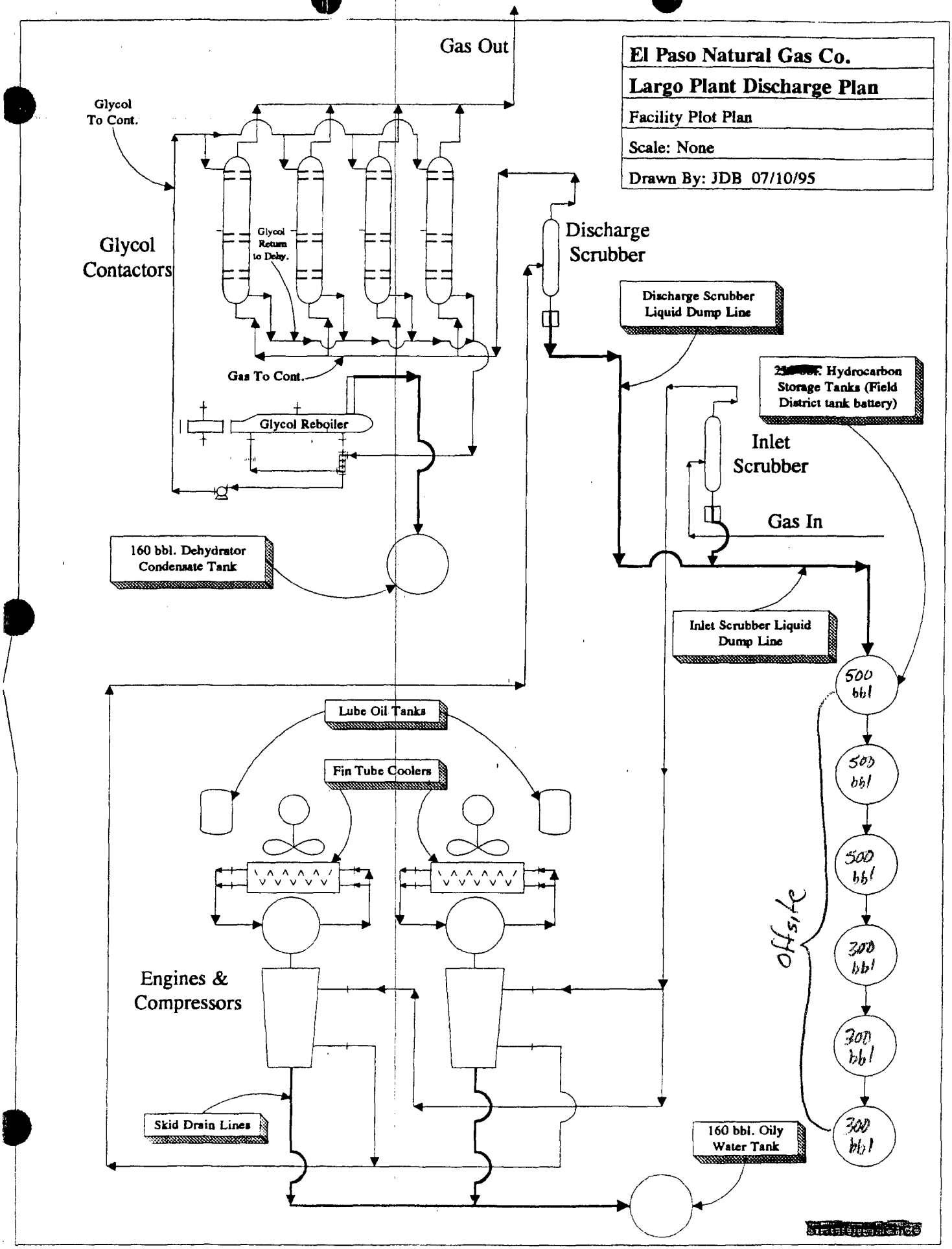
Palluche Canyon is an ephemeral stream located immediately west of the plant that flows from south to north into Largo Canyon. Little Palluche Canyon is an ephemeral stream located immediately east of the plant that flows from north to south into Largo Canyon. Largo Canyon is the main ephemeral stream that flows southeast to northwest and eventually into the San Juan River that is located approximately 22 miles away. The plant is located near an ephemeral stream there is a potential of flooding from severe thunderstorms in the area. Berms are placed around all tanks to prevent contamination of surface water by run-off from the plant site.

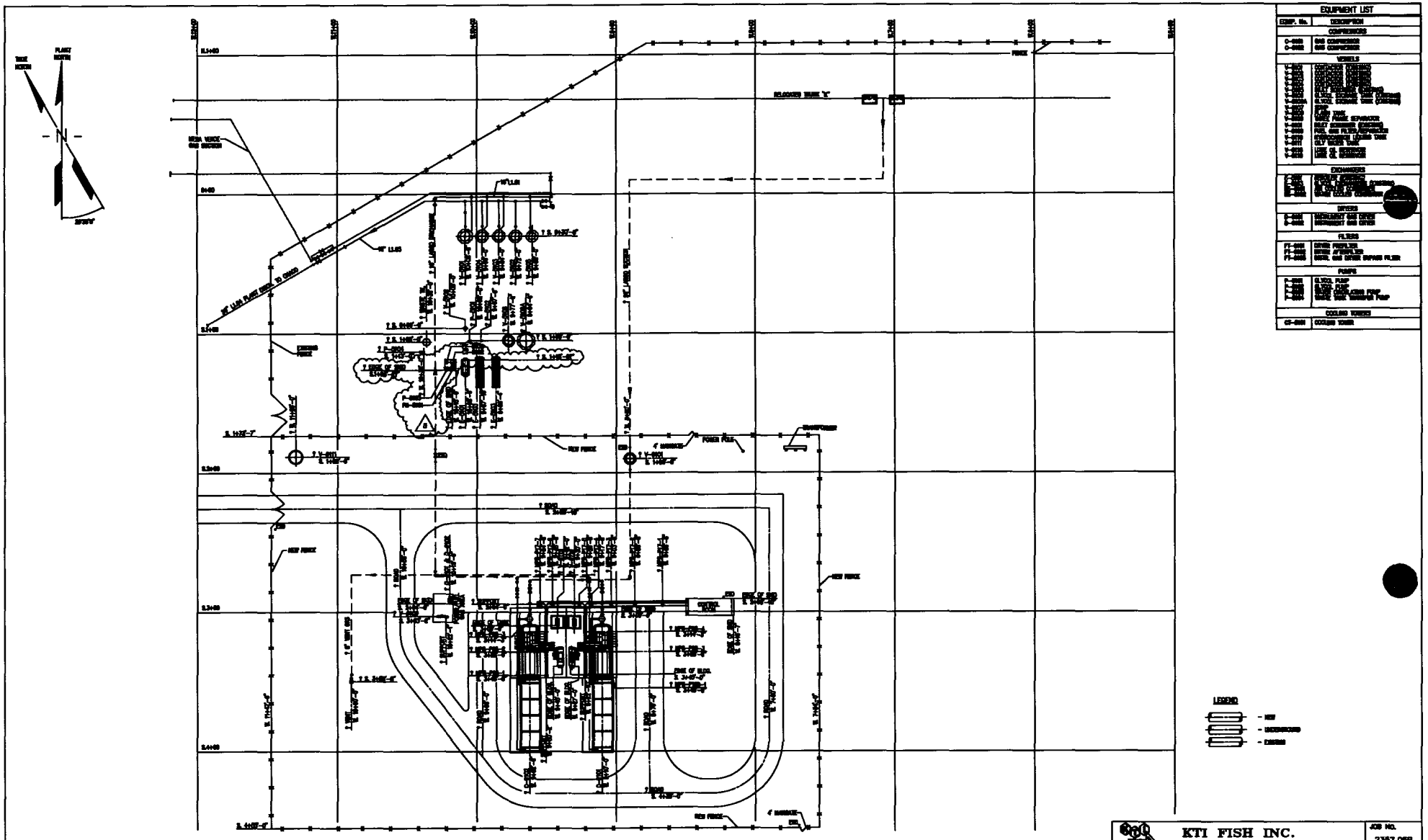
Item 13: Other Compliance Information

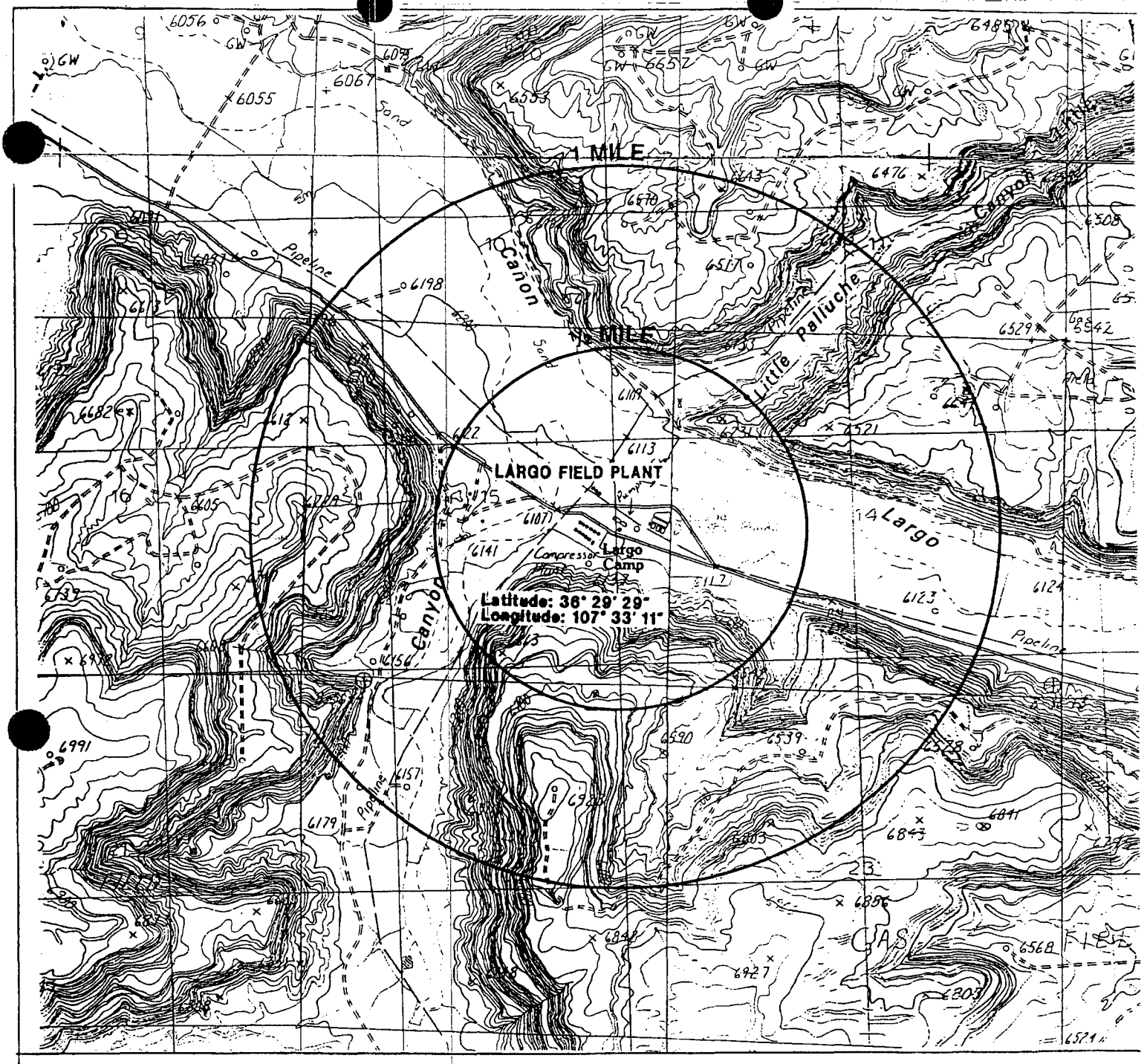
Provide a facility closure plan and other information as is necessary to demonstrate compliance with any other OCD rules, regulations, and orders.

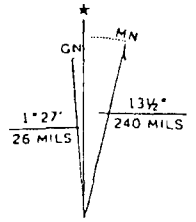
Enterprise will take reasonable and necessary measures to prevent exceeding New Mexico Water Quality Standards (20 NMAC 6.2.3103) should they choose to permanently close the facility. Closure measures will include removal or closure in place of underground piping and equipment. Tanks will be emptied and if practical removed from the site. Potentially toxic materials or effluents will be removed from the site. Potential sources of toxic pollutants will be inspected. If contaminated soil is discovered, reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.


V-9109
FUEL GAS FILTER/SEPARATOR
16" O.D. x 6'-6" S-CLOSURE
DESIGN: 270 PSIG MWP @ 150°F
OPER: 150 PSIG @ 110°F
FT-9101
DRYER PREFILTER
300 PSIG MWP @ 200°F
D-9101/9102
INSTRUMENT GAS DRYERS
81" O.D. x 6'-3" OAL
250 PSIG MWP @ 150°F
FT-9102
DRYER AFTERFILTER
300 PSIG MWP @ 200°F
FT-9105
INSTRUMENT GAS DRYER
BYPASS FILTER
270 PSIG MWP @ 150°F
3"H(ET) INSULATE REGULATORS ONLY (TYP. FOR 2)
TO VENT HEADER
TO ATMOS. @ SAFE LOCATION
4"-BA-9111
STARTING GAS
STARTING GAS TO GE-9102 COMPRESSOR ENGINE
STARTING GAS TO GE-9101 COMPRESSOR ENGINE
FUEL GAS TO GE-9102 COMPRESSOR ENGINE
FUEL GAS TO GE-9101 COMPRESSOR ENGINE
INSTR. GAS TO GE-9102 COMPRESSOR ENGINE
INSTR. GAS TO GE-9101 COMPRESSOR ENGINE
P90 TEMP: FUEL GAS FROM EXISTING PUMP DRIVERS UNTIL NEW PUMPS INSTALLED BY DEHYDRATION CONTRACTOR. THEN SOURCE IS P91: FUEL GAS FROM GLYCOL FLASH TANK.
4"-CA-9106
FUEL GAS & INSTR./POWER GAS FROM STATION DISCHARGE
4" FISHER ET BLOCK CONTROL VALVE
ANDERSON GREENWOOD RELIEF VALVE
REUSE EXISTING REGULATORS FROM UPSTREAM OF SEPARATORS
6"-BA-9108
FUEL GAS
1"-CA-9114
1"-BA-9113
2"-CA-9134
2"-BA-9115
1"-BA-9117
1"-BA-9116
2"-BA-9116
INSTRUMENT GAS HEADER
1"-BA-9125
SIPHON DRAIN
1"-BA-9163
2"-BA-9118
POWER GAS HEADER
2"-BA-9193
1"-BA-9141
2"-BA-9141
TO HYDROCARBON DRAIN HEADER
V-9109
V-9105
V-9120
D-9101
D-9102
FT-9101
FT-9102
FT-9105
V-9120
PILOT GAS FOR VALVE OPERATORS
REGEN. CYCLE TIMER
VALVE SEQUENCE CONTROLS
DRYING FLOW
REGEN. FLOW
DEWPOINT
TROUBLE ALARM
REGULATOR FAILURE
V-9105
POWER GAS
VOLUME PIPE
20"O.D. x 12'-0" S-S
250 PSIG MWP @ 150°F
V-9120
UNIT POWER GAS
VOLUME PIPE
20" O.D. x 5'-0" S-S
250 PSIG MWP @ 150°F
VO-9101
VO-9106
VO-9103
VO-9107, VO-9129
VO-9211,
& EXISTING VO
VO-9104
VO-9110
& VO-9122
VO-9117
& VO-9118
VO-9108
& VO-9138
VO-9115
& VO-9137
NOTES:
1. ABOVE GROUND DRAINS HEAT TRACED TO FROST LINE (39" BELOW GRADE).
KTI FISH INC.
HOUSTON, TEXAS
JOB NO. 2357.05R
El Paso
Natural Gas Company
LARGO COMPRESSOR STATION
MECHANICAL FLOW DIAGRAM
FUEL GAS, STARTING GAS, POWER GAS
AND INSTRUMENT GAS SYSTEMS
DWG. NO. 2LG-2-P87
REV. 5
SCALE: NONE
W.O. L-8740
ENG. RECORD
DRAWING DESIGN
COMPUTER GRAPHICS
CHECKED
PROJECT APPROVAL
DESIGN APPROVAL
COMPUTER FILE NAME
DSK\LGP87
LEGEND
REFERENCE DRAWINGS
REVISIONS
PRINT RECORD
12-21-95 • 09:21 • CN • FLOW


El Paso Natural Gas Co.
Largo Plant Discharge Plan
Facility Plot Plan
Scale: None
Drawn By: JDB 07/10/95
Gas Out
Glycol To Cont.
Glycol Contactors
Glycol Return to Dehy.
Gas To Cont.
Glycol Reboiler
Discharge Scrubber
Discharge Scrubber Liquid Dump Line
Hydrocarbon Storage Tanks (Field District tank battery)
Inlet Scrubber
Gas In
160 bbl. Dehydrator Condensate Tank
Inlet Scrubber Liquid Dump Line
500 bbl
500 bbl
500 bbl
300 bbl
300 bbl
300 bbl
Offsite
Lube Oil Tanks
Fin Tube Coolers
Engines & Compressors
Skid Drain Lines
160 bbl. Oily Water Tank


EQUIPMENT LIST
LEGEND
KTI FISH INC.
JOB NO. 2357.05R
El Paso
LARGO COMPRESSOR STATION
PLOT PLAN
SCALE 1"=50'-0"
DWG. NO. 2LG-1-P17
REV. 5
LEGEND
REFERENCE DRAWINGS
REVISIONS
PRINT RECORD





UTM GRID AND 1963 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

QUADRANGLE LOCATION

SMOUSE MESA
7.5 MINUTE SERIES QUADRANGLE
PREPARED FOR: LARGO DISCHARGE PLAN
PREPARED BY: EL PASO NATURAL GAS COMPANY
DATE: MAY 1, 1995

SCALE 1:24 000

1 0 S 0

MILES

1000 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10 000

FEET

1 0 S 0 1 2

KILOMETERS

1000 0 1000 2000

METERS

CONTOUR INTERVAL 20 FEET