

GW - 232

**PERMITS,
RENEWALS,
& MODS
Application**

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-232
EL PASO NATURAL GAS CO.
EPNG TRUNK A COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
June 11, 2001

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has not been received by the OCD. The filing fee is payable at the time of application and is due upon receipt of this approval. There is a flat fee for renewal of discharge plans on compressor stations with less than 1,000 horsepower of \$400. Both of these fees are due and payable. **All checks are to be made payable to Water Quality Management Fund** and forwarded to the OCD Santa Fe Office. Please note new mailing address on letterhead.
2. Commitments: El Paso Natural Gas Co. will abide by all commitments submitted in the discharge plan renewal application letter dated March 12, 2001 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. All pre-existing sumps and below-grade tanks must demonstrate integrity annually. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity annually. 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 Artesia 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.
16. Closure: The OCD will be notified when operations of the **EPNG Trunk A Compressor Station** are discontinued for a period in excess of six months. Prior to closure of the **EPNG Trunk A 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 Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas 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 Natural Gas Co.

Print Name: K. Courtney Raggsdale

Signature: K. Courtney Raggsdale

Title: Lead Operations Specialist

Date: 6-18-2001



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

June 11, 2001

CERTIFIED MAIL

RETURN RECEIPT NO. 5357-6822

Mr. David Bays
El Paso Natural Gas Co.
614 Reilly Avenue
Farmington, NM 87401

RE: Discharge Plan Renewal GW-232
El Paso Natural Gas Co.
EPNG Trunk A Compressor Station
Eddy County, New Mexico

Dear Mr. Bays

The ground water discharge plan renewal application GW-232 for the El Paso Natural Gas Co. EPNG Trunk A Compressor Station located in the NW/4 SE/4 of Section 10, Township 23 South, Range 26 East, NMPM, Eddy 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 thirty (30) days of receipt of this letter. Please note new mailing address below.**

The original discharge plan application was submitted on December 6, 1995 and approved February 5, 1996. The discharge plan renewal application letter, dated March 12, 2001, 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 Natural Gas Co. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve El Paso Natural Gas Co. of its responsibility to comply with any other governmental 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.

Mr. David Bays

GW-232

June 11, 2001

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Please note that Section 3104 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 3107.C, El Paso Natural Gas 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 February 5, 2006**, and El Paso Natural Gas 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

The discharge plan renewal application for the El Paso Natural Gas Co. **EPNG Trunk A Compressor Station** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a filing fee of \$50.00. The OCD has no record of receiving the filing fee for this renewal. There is also a flat fee for renewal of discharge plans for compressor stations with less than 1,000 horsepower of \$400. Please remit both the filing fee and the flat fee upon receipt of this renewal approval.

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

Xc: OCD Artesia Office

2289 4555 2100 0217 0002

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted/Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Postmark Here	
Sent To DAVID BAYS - EL PASO NAT. GAS CO. Street, Apt. No., or PO Box No. 614 REILLY AVE. City, State, ZIP+4 FARMINGTON, NM 87401	
PS Form 3800, May 2000 See Reverse for Instructions	

GW-232
eem

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-232
EL PASO NATURAL GAS CO.
EPNG TRUNK A COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
June 11, 2001

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has **not** been received by the OCD. The filing fee is payable at the time of application and is due upon receipt of this approval. There is a flat fee for renewal of discharge plans on compressor stations with less than 1,000 horsepower of \$400. Both of these fees are due and payable. **All checks are to be made payable to Water Quality Management Fund** and forwarded to the OCD Santa Fe Office. Please note new mailing address on letterhead.
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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.

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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 Artesia 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.
16. Closure: The OCD will be notified when operations of the **EPNG Trunk A Compressor Station** are discontinued for a period in excess of six months. Prior to closure of the **EPNG Trunk A 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 Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas 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 Natural Gas Co.

Print Name: _____

Signature: _____

Title: _____

Date: _____

ATTACHMENT TO THE DISCHARGE PLAN GW-232 APPROVAL
EL PASO NATURAL GAS COMPANY
TRUNK "A" COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(February 5, 1996)

1. EPNG Commitments: EPNG will abide by all the commitments submitted in the discharge plan application dated December 6, 1995.
2. Drum Storage: All drums containing materials other than fresh water must be stored on pad and curb type containment. All empty drums will be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemical(s) stored in any other containers such as buckets and sacks must be stored on pad and curb type containment.
3. 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 (i.e. drip pan) incorporated into the design.
4. 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 years and the records will be available to OCD inspectors upon request. Any new sumps or below-grade tanks will be approved by the OCD prior to installation and will incorporate leak detection in their designs.
5. Above Ground Tanks: All above ground tanks which contain fluids other than freshwater must be bermed to contain a volume of one and one-third (1-1/3) more than the total volume of the largest tank within the berm or of all interconnected tanks. All new or replacement tanks will be placed on an impermeable liner.
6. Saddle Tanks: All saddle tanks will be placed on pad and curb type containment unless they contain fresh water or liquids that are gases at atmospheric temperature and pressure.
7. Tank Labeling: All tanks must be clearly labeled to identify their contents and other emergency information necessary if the tank(s) were to rupture, spill and/or ignite.
8. 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. All pre-existing sumps and below grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every five years there after. Permittee 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.
10. Spill Reporting: All spills and/or leaks will be reported to the OCD District Office pursuant to WQCC Rule 1203 and OCD Rule 116.
11. Housekeeping: All systems designed for spill collection/prevention will be inspected daily to ensure proper operation, prevent overtopping and/or system failure.
12. Transfer of Discharge Plan: The OCD will be notified prior to the 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.
13. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.
15. Conditions Accepted by:

David Bay
Company Representative

Feb. 23, 1996
Date

Sr. Environmental Scientist
Title



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

February 5, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-610

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

Re: Discharge Plan (GW-232)
Trunk "A" Compressor Station
Eddy County, New Mexico

Dear Mr. Bays:

The groundwater discharge plan (GW-232) for the El Paso Natural Gas Company's (EPNG) Trunk "A" Compressor Station located in the W/2 SE/4 of Section 10, Township 23 South, Range 26 East, NMPM, Eddy County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated December 6, 1995. 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 five working days of receipt of this letter.

The discharge plan was submitted pursuant to Section 3106 of the Water Quality Control Commission Regulations. It is approved pursuant to Section 3109.A.. Please note Section 3109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve EPNG of liability should their operation result in pollution of surface water, ground water or the environment.

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 3104 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 3107.C. EPNG 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.

Mr. David Bays
February 5, 1996
Page 2

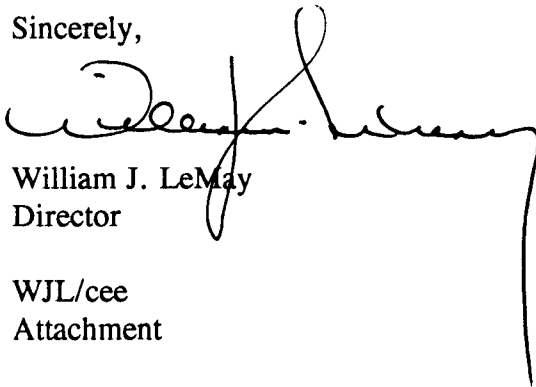
Pursuant to Section 3109.G.4., this approval is for a period of five years. This approval will expire February 5, 2001 and EPNG should submit an application for renewal in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan application for the EPNG's Trunk "A" Compressor Station is subject to the WQCC Regulation 3114 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. There is no flat fee for a compressor facility with less than 1000 horsepower (site rated).

The OCD has received the fifty dollar filing fee.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'William J. LeMay', with a long, sweeping horizontal line extending to the right.

William J. LeMay
Director

WJL/cee
Attachment

xc: OCD Artesia Office

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EL PASO NATURAL GAS COMPANY
TRUNK "A" COMPRESSOR STATION
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Company Representative

Date

Title