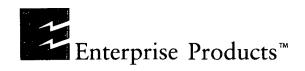
## GW-317

# PERMITS, RENEWALS, & MODS Application

## ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge rece	cipt of check No		_dated///əc/	05
or cash received on	in the amoun	tof\$_/00	00	
from <u>Gw-317</u>	1			
for Enterprisa	· Produc	ts		
Submitted by: Lawre				
Submitted to ASD by:	horac K	Date:	11/24/09	_
Received in ASD by:		Date:		,
Filing Fee	New Facility	Renewal _		
Modification	Other			
Organization Code5	21.07 A <sub>I</sub>	oplicable FY <u>200</u>	)4	
To be deposited in the Wate	r Quality Managem	ent Fund.		
Full Payment	or Annual Increm	ent		



ENTERPRISE PRODUCTS PARTNERS LP ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

November 20, 2009

7008 1300 0000 4586 4174 Return Receipt Requested

New Mexico Oil Conservation Division Environmental Bureau Attn: Leonard Lowe 1220 South St. Francis Drive Santa Fe, NM 87505

**RE:** Groundwater Discharge Plan Renewal Application

Rattlesnake Canyon Compressor Station - GW-317

**Enterprise Fields Services LLC** 

Dear Mr. Lowe:

Enclosed for your review and handling is the referenced Discharge Plan Application with plan details. Also enclosed is a check, payable to NMED Water Quality Management Fund, in the amount of \$100 which covers the application fee for the permit.

Should you have questions or need additional information, please contact Ms. Runell Seale at (505) 599-2124 or me at (713) 381-5470.

Sincerely,

Clayton A. Roesler

Manager, Environmental Permitting

/sin

attachments

ce: OCD-District 3, 1000 Rio Brazos Blvd., Aztec, NM 87410 w/attch.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

## State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit Original Plus I Copy to Santa Fe I Copy to Appropriate District Office

Revised June 10, 2003

## DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

	☐ New ☐ Renewal ☐ Modification
1.	Type: Natural Gas Purification Plant and Compressor Station - Rattlesnake Compressor Station GW-317
2.	Operator: Enterprise Field Services, LLC, Owner: Enterprise Products Operating, LLC, Operator
	Address: P. O. Box 4324, Houston, TX 77210-4324
	Contact Person: Clay Roesler, Manager-Environmental Permitting Phone: 713-381-5470
3.	Location: SE/4 NE/4 Section 17 Township 29N Range 9W  Submit large scale topographic map showing exact location.
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 quality and daily volume of waste water must be included.
8.	Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
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 OCD 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: Senior Vice President - Operations
;	Signature:
,	E-mail Address: snolan@eprod.com

## Rattlesnake Canyon Compressor Station

SE/4 of NE/4 of Section 16, Township 32N, Range 9W San Juan County, New Mexico

## **GROUNDWATER DISCHARGE PLAN – GW317**

This document constitutes a renewal for the Groundwater Discharge Plan (GW-317) for the Rattlesnake Canyon Compressor Station in San Juan County, New Mexico. This Groundwater Discharge Plan has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor, and Crude Oil Pump Stations" (rev. 12-95) and the New Mexico Water Quality Control Commission (WQCC) regulations, 20.6.2.3104 and 20.6.2.3106 NMAC.

## 1. Type of Operation

This is a natural gas purification plant and gas compression station consisting of four (4) skid mounted Arial compressors with Caterpillar G3516 internal combustion engines with a total site rated capacity of 4976 HP. This facility does not discharge any liquids to the surface and does not intend to discharge directly or indirectly into groundwater.

## 2. Operator/Legally Responsible Party

## Operator/Owner:

Enterprise Field Services LLC, Owner (EFS)
Enterprise Products Operating LLC, Operator (EPO)
P. O. Box 4324
Houston, TX 77210-4324
713.767.3922

## Local Representative:

Don Fernald, Field Environmental Scientist 614 Reilly Ave. Farmington, NM 87401 505.599.2141

## 3. Facility Location

SE/4 of NE/4 (UL H), S16, T32N, R9W, San Juan County, NM Latitude N 36 59.2911 Longitude W –107 46.671 See Figure 1-Site Location Map (Topo Map) and Figure 2-Site Survey (Plat)

## 4. Landowner

State of New Mexico-NM State Land Office Attn: Commercial Leasing, P. O. Box 1148 Santa Fe, New Mexico 87501 505.827.5760

## 5. Facility Description

The facility provides natural gas compression and dehydration for the gathering system. Natural gas will enter the site from a lateral gathering line via underground and above ground pipelines. The gas will pass through the unit scrubbers, four Arial compressors with internal combustion engines and then to a coalescer to remove particulates then to an amine contactor for removal of CO2 and a glycol dehydrator for removal of water. The gas will then be discharged into an El Paso Natural Gas main transmission line. See Figure 3-Site Layout Plat.

The facility will also have weekly pigging operations. Condensate and field liquids from the pigging operations, unit scrubber, and separator are piped underground into one of two produced water/condensate storage tanks. These facilities are located immediately outside the plant fending. Materials Stored or Used at the Facility

## 6. Materials Stored or Used at the Facility

Tank Contents	Solid or Liquid	Tank Capacity-Max Volume Stored	Location-Refer to Plot Plan
Condensate & field Liquids (TK-3030A & TK-3030B)	Liquid	210 barrels each, interconnected	Inside berm in NE corner of facility, near facility entrance
Non-exempt water & used oil (TK- 3030C)	Liquid	210 barrels	Inside berm in NE corner of facility, near facility entrance
Amine (TK-3410)	Liquid	100 barrels	Inside berm in NE corner of facility, near facility entrance
De-ionized Water (TK-3400)	Liquid	210 barrels	Inside berm in NE corner of facility, near plant entrance
Used Oil-BGT (BG- 3000)	Liquid	1000 gallons	Inside berm in NE corner of facility, near plant entrance
Glycol (TK-007, TK-014)	Liquid	500 gallons each	TK-7 is adjacent to glycol still in NW portion of facility TK-14 is adjacent to glycol still in SE portion of facility
Engine Coolant (TK-008, TK-013)	Liquid	500 gallons each	Behind compressors on West side of facility
Lube Oil (TK-009, TK-010, TK-011, TK-012)	Liquid	500 gallons each	Adjacent to each compressor on west side of facility
Diesel (TK-015)	Liquid	500 gallons	South central portion of facility near instrument air building
Produced Water & Field Liquids-3 AG catch basins	Liquid	30 gallons each	Outside fence by pig receiver and tank load lines

## 7. Sources and Quantities of Effluent and Waste Solids Generated at the Facility

7A. Source & Quantity

Process Fluid/Waste	Source	Quantity (Ranges)	Additives
Used Glycol Filters	Dehydration Units	20 filters/year	None
Used Coalescer Filters	Coalescer Separator	30 filters /year	None
Used Amine Filters	Amine re-boiler	300 filters/year	None
Used Oil Filters	Compressor Engines	80 filters/year	None
Used Oil	Compressor Engines	1600 gallons/year	None
Produced Water and field liquids	Condensate Tank	650 barrels/month	None
Domestic Sewage	Office restroom	n/a	None, not commingled with other wastes
Solid Waste (Trash)	General trash	< 1 yd/month	None
Sorbent Material and rags	Compressor skids	1-2 lb/month	None
Washdown water with residual used oil with solids and sludge	Compressor skids	480 barrels/year	Water with detergents and used lube oil

7B. Quality Characteristics

Process	NM WASTE STATUS	Analytical Process	Toxic Pollutants
Fluid/Waste			
Used Glycol Filters	Exempt	BTEX required	None
		analysis/profiled annually	
Used Coalescer	Used Coalescer Exempt BTEX required		None
Filters		analysis/profiled annually	
Used Amine Filters			None
		analysis/profiled annually	
Used Oil Filters			None
		analysis/profiled annually	
Used Oil	Non-Exempt	Profiled, recycled	
Produced Water	Exempt	Profiled,	None
and field liquids		evaporated/injected after	1
		condensate separation	
Domestic Sewage	Exempt	Not required	None
Solid Waste	Exempt from NMED Solid	Not required	None
	Waste regulations due to		
	small quantity generated		
Sorbent materials	Non-exempt	Profiled, recycled	None
and rags			
Washdown Water	Non-exempt	Annual TCLP minus	None
with residual used		pesticides and herbicides.	1
oil with solids and			
sludge			

## 7 (C). Commingled Waste Streams

The oil and oil filters are removed to Chaco Plant (GW-071) for temporary storage until disposed of or recycled as stated in Section 8.

The used amine, coalscer and glycol filters are removed to Chaco Plant (GW-071) for temporary storage until disposed of or recycled as stated in Section 8.

## 8. Description of Current Liquid and Solid Waste Collection/Storage/Disposal Procedures Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids RATTLESNAKE CANYON COMPRESSOR STATION

DESCRIPTION OF FINAL DISPOSITION	Buried-Transported by Waste Management to San Juan County Regional landfill facility.	Buried-Transported by Waste Management to San Juan County Regional landfill facility.	Buried: Transported by Waste Management to San Juan County Regional landfill facility.	Buried: Transported by Waste Management to San Juan County Regional landfill facility and/or Thermal Fluids, Inc to recycling facility located at 9010 Bates Road SW Albuquerque, NM EPA #NMD986674141.	Recycled: Transported by Safety Kleen Systems, Inc to facility Sec 10, T10N, R3E, NM-EPA ID #NMD000804294 and/or Thermal Fluids, Inc. to recycling facility located at 9010 Bates Road, SW Albuquerque, NM-EPA #NMD986674141	Evap/Injection: Transported by Industrial Mechanical Inc. to Basin Disposal Evap. Pond location: F 3-29-11.
NM Waste STATUS	Exempt	Exempt	Exempt	Non-Exempt	Non-Exempt	Exempt
CONTAINER CAPACITY/ DESCRIPTION	Special waste dumpster, 8 yard steel bin	Special waste dumpster, 8 yard steel bin	Special waste dumpster, 8 yard steel bin	Special waste dumpster, 8 yard steel bin	Put into closed drain line system into the oil classifier sump and pumped into a AGT for used oil.	(2) 210 barrel steel AGT
COLLECTION & STORAGE SYSTEM	Placed on the glycol skid grate which drains into the BGT #6. Then moved to Chaco Plant for interim storage before final disposition.	Filters placed on a tarp within concrete containment to air dry. Then moved to Chaco Plant for interim storage before final disposition.	Placed on the amine skid grate which drains into the BGT #6. Then moved to Chaco Plant for interim storage before final disposition.	Placed on skid grate which drains into the BGT #6. Removed at time of replacement, not stored onsite. Moved to Chaco Plant by company maintenance personnel.	Removed at time of replacement, not stored onsite. Moved to Chaco Plant by company maintenance personnel.	Below grade steel pipes pump water to a 210 bbl AGT, tank #3 or #4.
PROCESS FLUID/WASTE	Used Glycol Filters	Used Coalescer Filters	Used Amine Filters	Used Oil Filters	Used Oil	Produced Water & field liquids

Page 5

Rattlesnake Canyon Compressor Station Discharge Plan Renewal GW-317 November 2009

PROCESS	COLLECTION &	CONTAINER	NM Waste	DESCRIPTION OF FINAL DISPOSITION
FLUID/WASTE	STORAGE SYSTEM	CAPACITY/	STATUS	
		DESCRIPTION		
Domestic Waste	Approved Septic System	Concrete Tank	Regulated by NMED	Solids removed by Serranos Portable Toilets as needed.
Solid Waste(Trash)	Placed into trashcan inside	Trash cans with plastic	Exempt	Buried: Transported by Waste Management, Inc. to San
	control building.	liners		Juan County Regional Landfill, #78 CR 3140, Aztec, NM 87410.
Absorbent materials	Placed into sealed bin and	Special Waste	Non-exempt	Buried: Transported by Waste Management to San Juan
and rags	moved to Chaco Plant for	Dumpster, 8 yard steel		County Regional landfill facility
	temporary storage until final disposition.	bin		
Wash down water	Collected via below ground	300 barrel steel AGT @	Non-exempt	Evap/Injection: Trucked by Key Energy Services to the
with traces of lube	drain lines into BG tank then	Kutz Hydrocarbon		Key Four Corners Inc Disposal facility @ UL E, S2,
lio	pumped to tank #5. Trucked	Recovery Facility		T29N,R12W.
	to Kutz Hydrocarbon			
	Recovery Facility (GW-49-1)			
	for recycling or disposal.			

Bermed areas are designed and constructed to ensure that they are sufficient to contain one and one-third capacity of the largest tank. Concrete curbed containments are provided beneath most of the process areas in the facility. A closed drain system from the compressor engine skids drain to the 1000 gallon double walled BG tank. Produced water drains to the 120 barrel produced water AGT tank within the large bermed area which has an impermeable liner.

Hydrostatic testing of the facility piping to the drain system is conducted every five (5) years to ensure the integrity of the passive drain line piping at this facility using appropriate methods to test integrity. This facility was last tested on January 4, 2008.

There is an approved permit for the onsite septic system, #NMED FA990718.

## 9. Proposed Modifications

There are no planned modifications to this facility.

## 10. Inspection, Maintenance and Reporting

Routine inspections and maintenance are performed to ensure proper collection, storage, and off-site disposal at approved disposal and recycling facilities.

The BGT at this facility is a double lined steel vessel with leak detection. The AGT and BGT tanks will be inspected monthly. Leaks will be reported to the NMOCD in accordance with NMOCD Rule 116, NMAC 19.15.29 and WQCC regulations, NMAC 20.6.2.1203.

Precipitation and run-off do not come in contact with process waste streams. As a result, the facility has not installed any special storm water containment or collection systems. The facility pad is maintained to prevent surface accumulations.

## 11. Spill/Leak Prevention and Reporting Procedures

Potential sources of spills or leaks at this facility include the following, tank overflow or failure; overflow or cracking of fiberglass tanks; overflow or cracking on concrete sumps, failure of process pipeline.

Prevention of accidental release from these sources is a high priority of operating personnel. Spill prevention will be achieved primarily through proper execution of operating procedures and secondly, by an active equipment inspection and maintenance program. Spill detection will be accomplished by daily visual inspection of facility equipment and continuous monitoring of process instrumentation. Tanks will be inspected monthly.

Spills occurring at this facility would be contained by the installed berms, or by berms erected on-site at the time of the incident. Heavy equipment to construct containment berms is readily available from private contractors in the area. Due to the lack of water bodies in the immediate area of the facility, containment equipment such as booms will not be stockpiled.

Operator will respond to and report spills as outlined in the SPCC plan of the Rattlesnake Canyon Compressor Station and in accordance with the requirements of NMOCD Rule 116, NMAC 19.15.29.

## 12. Site Characteristics

The Rattlesnake Plant site is approximately six miles east and three miles north of Cedar Hill, New Mexico, near the northern end of Box Canyon. Box Canyon connects with drainages leading to the San Juan River, approximately 14 miles south of the Plant site. The approximate site elevation is 6900 feet above sea level (ASL). The USGS Mount Nebo, Anastacio Spring, and Archuleta, New Mexico 7.5 minute quadrangles show all of these drainages as perennial.

Soils in the plant area are derived from sandstone and shale from the San Jose formation. The major soil unit is the Travessilla Rock outcrop Weska. These units run from shallow to very deep and range from level to extremely steep, well-drained soils that formed in the alluvium, residuum, and eolian material, and rock outcrop on uplands.

Other mapped unit include unconsolidated Quarternay Terrace and apron deposits, Quarternary alluvium and the overlying San Jose Formation.

Groundwater beneath the Rattlesnake Canyon Compressor station site is believed to be more than 500 feet deep. There are no wells that supply water for human consumption within a 1-mile radius of the site.

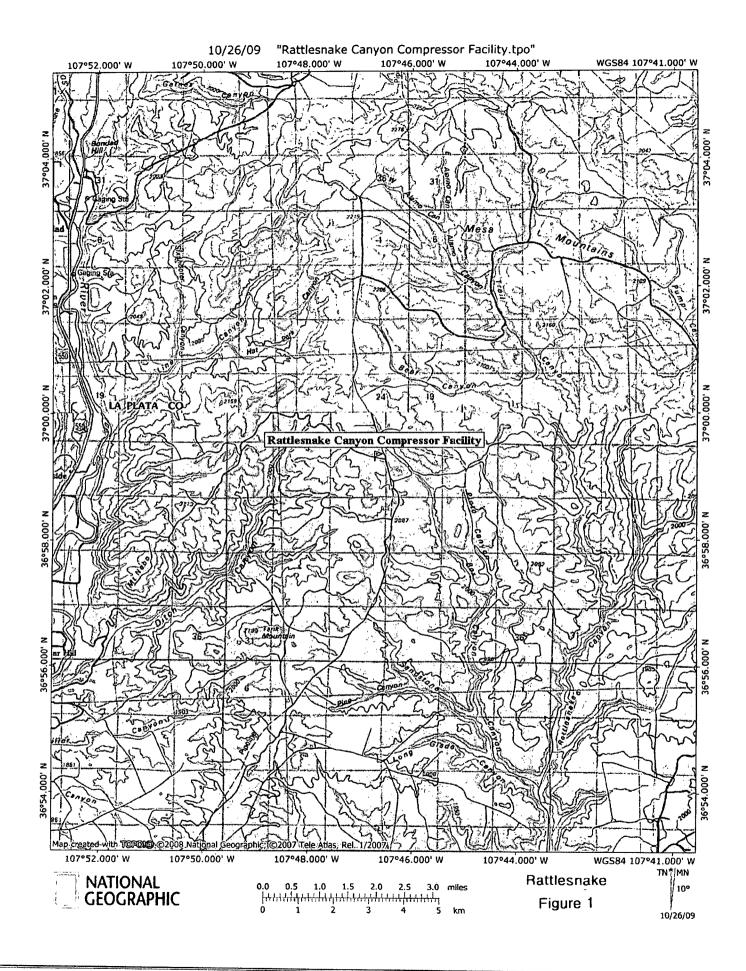
According to 'A Summary of the Regional Geology of the Permian and San Juan Basins of New Mexico by Maureen Wilks, Ph.D.,' the total dissolved solids (TDS) content of water in this area ranges from about 8,000 ppm to 76,142 ppm. EPFS estimates TDS of water will range between 10,000 ppm to 15,000 ppm for the site.

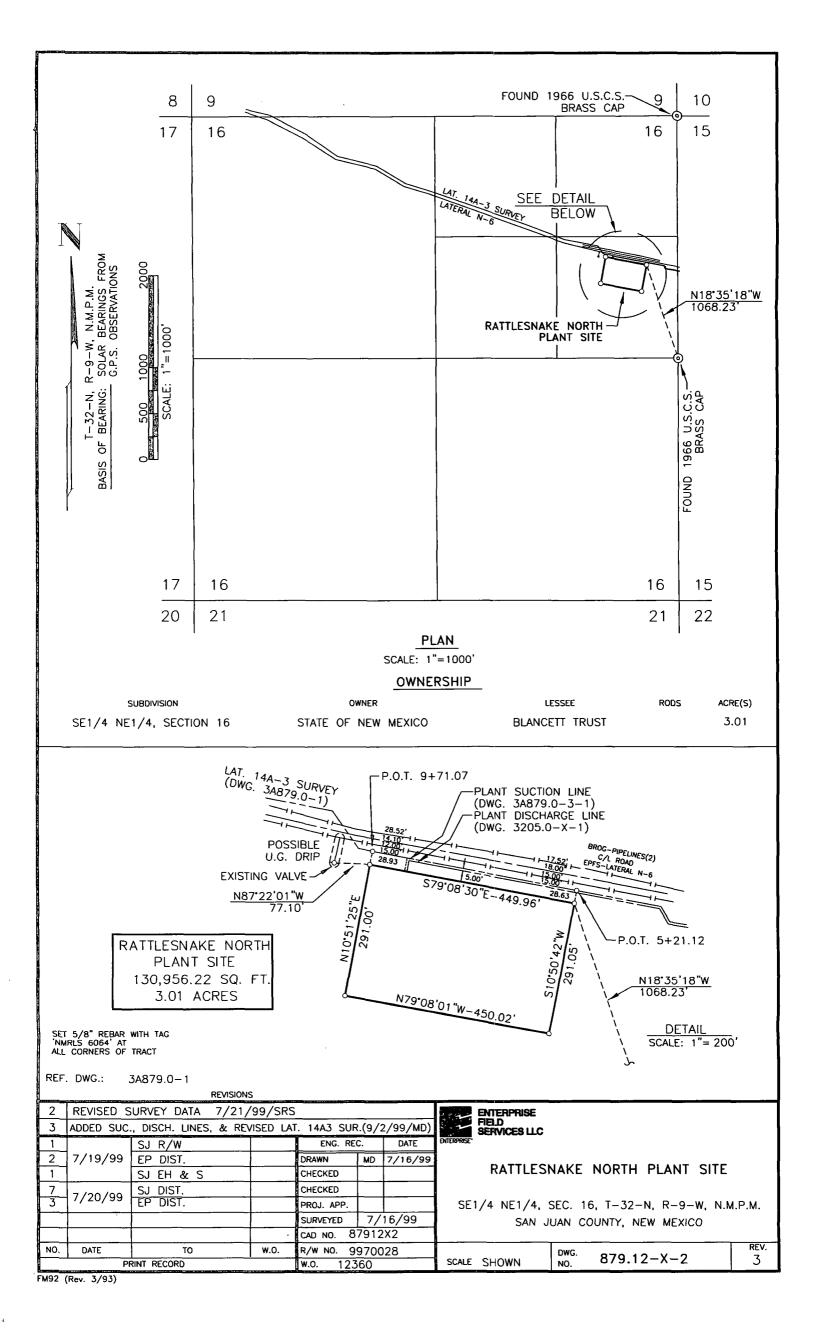
The flooding potential at this site is considered negligible. As a result, flood protection measures will not be installed at the facility. Stormwater run-off is being controlled with dirt berm with liner and covered with cobbles located on the northeast side of the facility

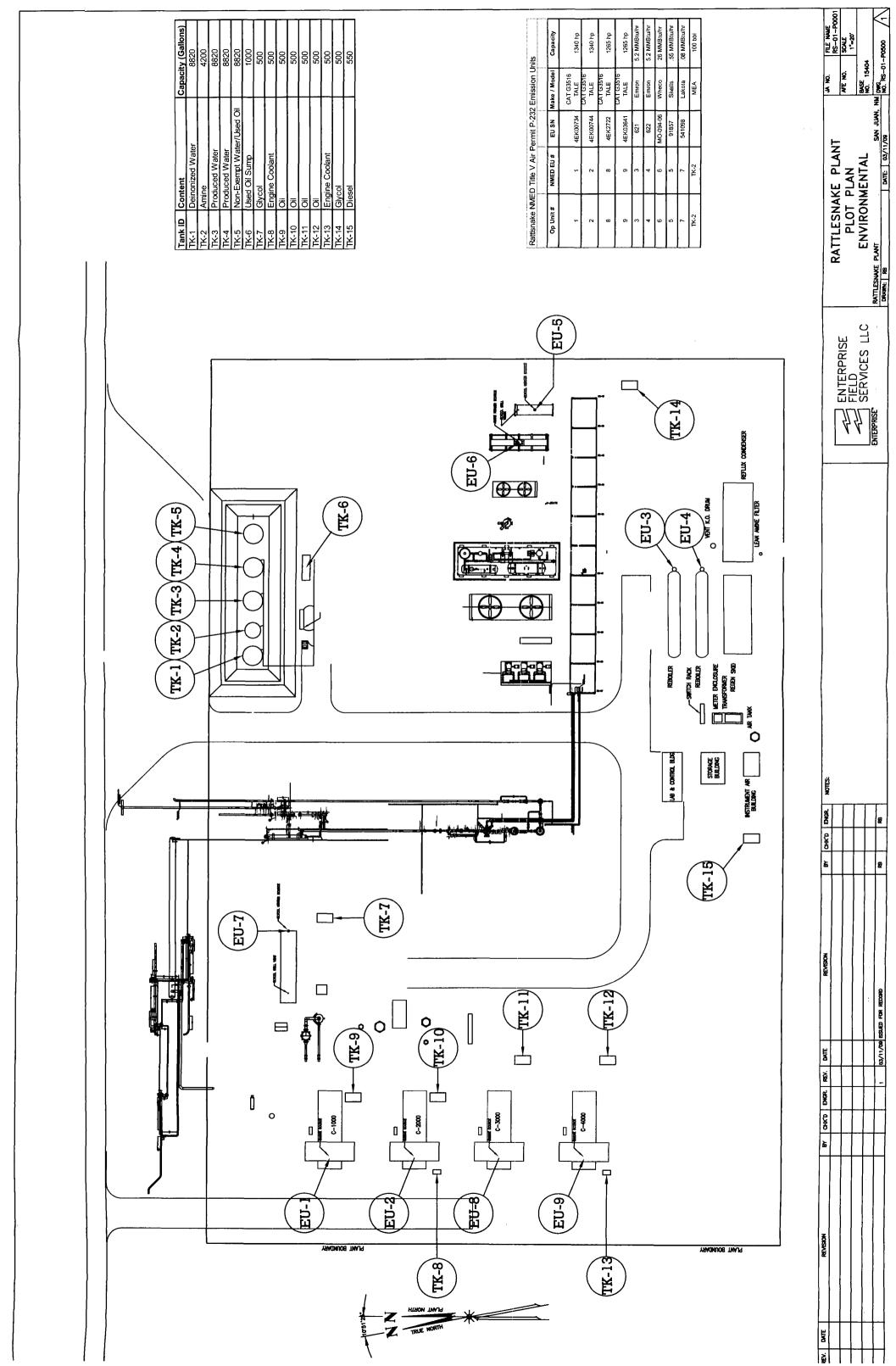
## 13. Additional Information

Unauthorized releases or discharges will be reported to the NMOCD in accordance with NMOCD Rule 116, NMAC 19.15.29.

Closure of facility when abandoned will meet current NMOCD guidelines and will conform to WQCC regulations NMAC 20.6.2.3107. Reasonable and necessary measures will be taken to prevent exceedances of NMAC 20.6.2.3103 water quality standards should Enterprise choose to permanently close the facility. Closure measure will include removal or closure in place of the underground piping and equipment. The tanks will be emptied before removal. Potentially toxic materials or effluents will be removed from the site and properly disposed. Potential sources of toxic pollutants will be inspected. Contaminated soil, if discovered, will be reported under NMOCD Rule 116 and WQCC regulations NMAC 20.6.2.1203 procedures and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.







Enterprise Products Operating, L.P.
Rattlesnake Canyon Compressor Station
GW-317
Page 3 of 5

## ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-317 ENTERPRISE PRODUCTS OPERATING, L.P. RATTLESNAKE CANYON COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS December 20, 2005

- 1. <u>Payment of Discharge Permit Fees:</u> Neither of the required fees has been received by the NMOCD. The filing fee of \$100 and the permit fee of \$1,700 are both due and payable upon receipt of this approval.
- 2. <u>Commitments:</u> Enterprise will abide by all commitments submitted in the discharge permit renewal application letter dated August 23, 2004 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an NMOCD-approved facility. Only exempt oilfield wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an NMOCD-approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by the NMOCD on a case-by-case basis. <u>Rule 712 Waste</u>: Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
  - 1. the waste stream is identified, and authorized, as such in the discharge permit, and;
  - 2. existing process knowledge of such waste stream does not change without notification to the Oil Conservation Division.
- 4. <u>Drum Storage</u>: All drums containing material 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> 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. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers must be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the NMOCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All below grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch

Enterprise Products Operating, L.P.
Rattlesnake Canyon Compressor Station
GW-317
Page 4 of 5

above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other NMOCD approved methods. The NMOCD will be notified at least 72 hours prior to all testing.

- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be approved by the NMOCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders 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 NMOCD. The NMOCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at NMOCD-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, which inject domestic waste only, must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> 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. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to NMOCD Rule 116 and WQCC 1203 to the NMOCD Aztec District Office.
- 14. <u>Transfer of Discharge Permit:</u> The NMOCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the NMOCD prior to transfer.
- 15. <u>Storm Water Plan:</u> Enterprise shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then Enterprise shall: take immediate actions to mitigate the effects of the run-off, notify the NMOCD within 24 hours, and modify the discharge permit to include a formal storm water run-off containment plan and submit for NMOCD approval within 15 days.
- 16. <u>Closure:</u> The NMOCD will be notified when operations at the Rattlesnake Canyon Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company 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.

Enterprise Products Operating, L.P. Rattlesnake Canyon Compressor Station GW-317

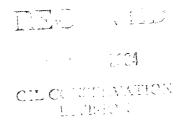
Page 5 of 5

17. <u>Conditions accepted by:</u> Enterprise, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Enterprise further acknowledges that the division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

Enterprise Products Operating, L.P.

	Print Name:	Terry	L. Hurlb	urt		
200	Signature:	les	the	elle	1	_
Rojio	Title:	V.P.	& General	Manager	$\int_{\text{of Op}}$	<u>era</u> tions
	Date:	1/12/	06			





August 23, 2004

Mr. Roger Anderson New Mexico Oil Conservation Division 1220 S. St. Francis Santa Fe, NM 87505

RE: Discharge Plan Renewal – Rattlesnake Canyon Plant – Discharge Plant No. GW-317

Dear Sir:

Please find enclosed the renewal application for the El Paso Field Services Co. Rattlesnake Canyon Plant and Compressor Station, Discharge Plan GW-317. Please send the invoice for all applicable fees to my attention at the following address:

El Paso Field Services Co. 614 Reilly Avenue Farmington, NM 87401

EPFS has operated the Station in accordance with Discharge Plan GW-317. The plant has been modified to increase throughput since the original discharge plan was submitted. The additional treating capacity and horsepower is reflected in the attached discharge plan..." If you need any additional information regarding this application, please call me at (505) 599-2256.

Sincerely yours,

David Bays, REM

Principal Environmental Scientist

cc: Rattlesnake file

District I - (505) 393-6161

P. O. Box 1980

Hobbs, NM 88241-1980

District II - (505) 748-1283

811 S. First

Artesia, NM 88210

<u>District III</u> - (505) 334-6178

1000 Rio Brazos Road

Aztec, NM 87410

<u>District IV</u> - (505) 827-7131

## New Mexico Energy Minerals and Natural Resources Departments Oil Conservation Division 2040 South Pacheco Street 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

DISC	CHARG	E PLAN	APPLIC	CATION F	OR SE	RVICE (	COM	PANIE	<u>S.</u>	
<b>GAS PLANTS</b>	REFI	NERIES,	COMP	RESSOR,	AND	<b>CRUDE</b>	OIL I	PUMP	STAT	<u>IONS</u>

		(Refer to OCD Guidelines for assistance in completing the application)									
		☐ New	<b>⊠</b> Re	newed		Modification	ı				
1.	Туре:	Natural Gas Purification	n Plant and	Compresso	r Station						
2.	Operator:	El Paso Field Services	El Paso Field Services Co.								
	Address:	614 Reilly Avenue, Far	rmington, NI	M 87401							
	Contact Person:	David Bays									
3.	Location:	NE/4	Section	16	Township	32 North	Range	9 West			
4.	Attach the name,	telephone number and a	address of th	ne landowne	r of the facilit	y site.					
5.	Attach the descrip	otion of the facility with a	diagram inc	licating locat	ion of fences	, pits, dikes	and tanks o	n the facility.			
6.	Attach a description	on 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 descripti	a description of current liquid waste and solid waste collection/treatment/disposal systems.									
9.	Attach a descripti	on of proposed modifica	tions to exis	ting collectio	n/treatment/d	disposal sys	tems.				
10.	Attach a routine in	nspection and maintenar	nce plan to e	ensure permi	t compliance						
11.	Attach a continge	ncy plan for reporting an	d clean-up	of spills or re	leases.						
12.	Attach geological	hydrological information	for the facil	ity. Depth to	and quality	of ground wa	ater must be	included.			
13.	Attach a facility cl rules, regulations	osure plan, and other inf , and/or orders.	formation as	is necessar	y to demonst	rate complia	ance with an	y other			
14.	CERTIFICATION										
	I hereby certify the and belief.	at the information submi	tted with this	s application	is true and c	orrect to the	best of my	knowledge			
	NAME: Day	rid Bays		Title:	Principal E	nvironmenta	al Scientist				
	Signature:	Jania Ba	un	Date:	August 23	2004					

## EL PASO FIELD SERVICES COMPANY RATTLESNAKE CANYON PLANT DISCHARGE PLAN GW-317 RENEWAL

Prepared for:

New Mexico Oil Conservation Division August 2004

El Paso Field Services Company 614 Reilly Avenue Farmington, NM 87401

### Item I

Indicate the major operational purpose of the facility. If the facility is a natural gas purification plant  $(CO_2 \text{ removal})$  and compressor station include the total combined site rated horsepower.

The Rattlesnake Canyon Treating Plant is a natural purification plant and gas compressor station owned and operated by El Paso Field Services Company (EPFS). The site will include the following equipment:

Pigging operations.

Two inlet scrubbers.

Four skid-mounted Arial compressors with Caterpillar G3516 internal combustion engines.

One gas cooler.

Two absorber tower.

Two skid mounted amine reboiler and still column unit.

Two skid mounted glycol dehydration and regeneration units.

One coalescing filter separator.

One 100 bbl water storage tank.

One 100 bbl amine storage tank.

Two 500 bbl produced water and hydrocarbon tanks.

One 75 bbl skid drain tank.

One 500 gallon engine lube oil tank.

The auxiliary equipment and tanks at the plant site will be installed, maintained, and operated by EPFS. EPFS will be responsible for the hauling and disposal of the waste oil, used glycol filters, wash down water, and produced water and hydrocarbon liquids.

The site rated compressor horsepower is 4,976 HP (2 each 1,223 HP units and 2 each 1,265 HP units).

## Item 2

Name of operator or legally responsible party and local representative.

**Legally Responsible Party** 

E. Randall West

El Paso Field Services Company

4 Greenway Plaza Houston, TX 77251 (832) 676-5410

**Local Representative** 

Douglas Jordan

El Paso Field Services Company

4 Greenway Plaza Houston ,TX 77251 (832) 676-5454

## Operator

El Paso Field Services Company 614 Reilly Avenue Farmington, NM 87401-2634 (505) 325-2841 1-800-203-1347 (24 hour emergency notification)

## Item 3

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

San Juan County, New Mexico Township 32 North, Range 9 West, NE/4 of Section 16 The topographic map is attached at Tab 1.

## Item 4

Attach the name, telephone number and address of the landowner of the facility site.

State of New Mexico 310 Old Santa Fe Trail Santa Fe, NM 87504-1148 (505) 827-5728

## Item 5

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

See On-File.

Item 6
Attach a description of all materials stored or used at the facility.

Container	ID	Material	Form	Volume	Location	Containment
Closed steel AGT	Condensate tanks	Condensate & field liquids	liquid	2 each 500 bbl	200 feet away from facility components	Impermeable barrier surrounded by gravel, dirt berm
Closed steel BGT	Produced water and skid drain tank	Produced water, lube oil & wash down water	liquid	65 bbl	Near condensate tanks	Impermeable barrier surrounded by gravel, dirt berm
Closed steel AGT- elevated	Engine lube oil		liquid	500 gal	On compressor skid	Steel containment basin (compressor skid)

Closed steel AGT- elevated	Amine storage tank	Amine	liquid	100 bbl	Near condensate tanks	Impermeable barrier by gravel, dirt berm
Closed steel AGT	Glycol storage tank	Triethylene glycol	liquid	100 bbl	Near condensate tanks	Impermeable barrier by gravel, dirt berm
Closed steel AGT	Water storage tank	Fresh water	liquid	100 bbl	Near condensate tanks	Near condensate tanks

AGT – above ground tank (non-pressurized)

BGT-below ground tank

Condensate will be produced during weekly pigging operations, and scrubber and separator operation at the facility. The condensate will be transferred via pipelines from the slug catcher, scrubber and separator to onsite condensate storage tank.

Skid drains will empty into a piping system that leads to a double-walled steel sump tank. The sump tank will collect used drips, leaks and spills of lube oil, rainwater falling on the compressor skid, and wash down water. The sump tank will be equipped with a manual leak detection system.

Lube oil will be supplied to the engine by an on-fine reservoir on the compressor skid. Drips, leaks and spills of lube oil which occur on the compressor skid will be contained in the 65 bbl. below grade tank.

MSD sheets for materials at the site are maintained in EPFS's corporate office and are available upon request.

Rattlesnake Plant Discharge Plan - Page 4

Item 7
Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included.

Source	Type of Waste	Volume	Quality
Compressor via the skid drains	Spills, leaks and drips of engine oil, wash down water, and rain water collected on the skid	10 bbl/year	Used lube oil and water with detergents
Glycol dehydrator	Used filters	10 filters/month	No additives
Pigging operations, unit scrubber	Hydrocarbon condensate	1000 bbl/month	No additives
Hydrocarbon	Hydrocarbon and Produced water	500 bbl/month	No additives

According to A Summary of the Regional Geology of the Permian and San Juan Basins of New Mexico by Maureen Wilks, Ph.D., the total dissolved solids (TDS) of produced water in the San Juan Basin range from 8,000 ppm to 76,142 ppm. EPFS estimates TDS of produced water will range between 10,000 ppm to 15,000 ppm for Rattlesnake Plant Site.

Item 8
Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

Type of Waste	Collection	Storage	Hauler	Disposal
Used oil, wash down water, rain water	Drained to an underground storage sump	Double-walled steel tank	Removed as generated by Dawn Trucking	EPFS, Kutz Hydrocarbon Recovery Facility
Used filters	Collected when replaced	Steel drum	Removed as generated by Waste Management	Crouch Mesa Landfill
Condensate, field liquids and produced water	Underground steel pipes	Steel tanks	Water and Hydrocarbons Dawn Trucking	Water-Basin Disposal; Hydrocarbons- Giant Industries

## **OCD Transporters/Disposal Facilities**

Waste Management of Four Comers, 101 Spruce St., Farmington, NM (505) 327-6284
Three Rivers Trucking Company, 5929 Highway 54, Bloomfield, NM 87413 (505) 632-5300
Basin Disposal, Inc., 6 County Road 5046, Bloomfield, NM (505) 632-8936
Giant Industries, 111 County Road 4990, Bloomfield, NM (505) 632-8024
EPFS, Kutz Hydrocarbon Recovery Facility, East County Road 4900, Bloomfield, NM (505)632-2803

## **Exempt Waste**

Only exempt wastes, such as water from condensate and field liquids, and produced water will be disposed in Class II injection wells (Basin Disposal).

Used glycol dehydrator filters will be put into 55 gallon drums, drained of all free liquids and will be collected as needed by Waste Management of Four Corners for disposal at the San Juan County Regional Landfill.

## Non-Exempt, Non-Hazardous Waste

Waste oil will be collected as generated from the compressor unit and removed from the site by Dawn Trucking. New lube oil will be brought to the site by vendors as needed and stored in the on-line reservoir. Waste oil from the compressor will be taken to EPFS Kutz Hydrocarbon Recovery Facility for storage pending recycling. Engine coolant will be replaced once per year and removed from the site by the current contractor, Dow, for recycling.

Wash down water from the compressor engine will be collected as generated in an underground storage tank. Wash down water will be brought to the facility as needed. A portable washer is kept in the maintenance truck to wash the compressor engine. Wash down water will be taken to EPFS Kutz Hydrocarbon Recovery Facility for disposal.

## **Hazardous Waste**

No RCRA-listed hazardous wastes is generated at the facility.

## Other Solid Waste

There is no solid waste or miscellaneous trash disposal at the facility. All solid waste will be brought to the Waste Management dumpsters at the district offices.

### Item 9

Attach a description of proposed modifications to existing collection/treatment/disposal systems.

No modifications to the facility are necessary to meet NMOCD requirements.

## Item 10

Attach a routine inspection and maintenance plan to ensure permit compliance.

The facility is unmanned but will be inspected daily by an operator. Maintenance will be performed and records will be kept according to EPFS procedures. The integrity of any buried piping installed at the facility will be tested prior to commencement of operation and then retested once every five years.

## Item 11

Attach a contingency plan for reporting and clean up of spills or releases.

EPFS will handle all spills and leaks immediately as required by company procedures and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and WQCC Section 1203.

## Item 12

Attach ecological/hydrological information for the facility. Depth to and quality of groundwater must be included.

The Rattlesnake Plant site is about 6 miles east and 3 miles north of Cedar Hill, New Mexico near the northern end of Box Canyon. Box Canyon connects with drainages leading to the San Juan River, approximately 14 miles south of the Plant site. Tab 1 shows the exact location of the site. The approximate site elevation is 6,900 feet above sea level (ASL). The USGS Mount Nebo, Anastacio Spring, and Archuleta, New Mexico 7.5 minute quadrangles shows all of these drainages as perennial.

Soils in the plant area are derived from sandstone and shale from the San Jose formation. The major soil unit is the Travessilla Rock outcrop Weska. These units run from shallow to very deep and range from level to extremely steep, well drained soils that formed in the alluvium, residuum, and eolian material, and Rock outcrop on uplands.

Other mapped units include unconsolidated Quarternay Terrace and apron deposits, Quarternary alluvium and the overlying San Jose Formation.

## Item 13

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

All reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC 6.2-3103 water quality standards should EPFS choose to permanently close the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will be made, and clean-up activities will commence. Postclosure maintenance and monitoring plans would not be necessary unless contamination is encountered.



## NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON** 

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

December 20, 2005

Mr. Terry Hurlburt Enterprise Products Operating, L.P. 2727 North Loop West Houston, TX 77008

RE:

Discharge Permit Renewal GW-317 Enterprise Products Operating, L.P. Rattlesnake Canyon Compressor Station San Juan County, New Mexico

Dear Mr. Hurlburt:

The ground water discharge permit renewal GW-317 for the Enterprise Products Operating, L.P. (Enterprise) Rattlesnake Canyon Compressor Station located in the NE/4 of Section 16, Township 32 North, Range 9 West, NMPM, San Juan 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 (NMOCD) Santa Fe office within thirty (30) days of receipt of this letter.

The discharge permit renewal application letter, dated August 23, 2004, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge permit is renewed pursuant to Section 3109.C. Note Section 3109.G, which provides for possible future amendment of the permit. Be advised that approval of this permit does not relieve Enterprise of responsibility should operations result in pollution of surface water, groundwater or the environment. Nor does it relieve Enterprise of its responsibility to comply with any other governmental authority's rules and regulations.

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

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, Enterprise 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 permit is for a period of five years. This permit will expire on October 25, 2009, and Enterprise should submit an application in ample time before that date. Section 3106.F of the regulations states that if a discharger 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.

Enterprise Products Operating.

Rattlesnake Canyon Compressor Station
GW-317
Page 2 of 5

The discharge permit renewal application for the Enterprise Rattlesnake Canyon Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge permit application is assessed a filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor stations with greater than 1,000 horsepower of \$1,700.00.

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

Sincerely,

Róger C. Anderson

Chief, Environmental Bureau Oil Conservation Division

RCA/eem Attachment

Xc: NMOCD Aztec Office

Enterprise Products Operating.

Rattlesnake Canyon Compressor Station
GW-317
Page 3 of 5

## ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-317 ENTERPRISE PRODUCTS OPERATING, L.P. RATTLESNAKE CANYON COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS December 20, 2005

- 1. <u>Payment of Discharge Permit Fees:</u> Neither of the required fees has been received by the NMOCD. The filing fee of \$100 and the permit fee of \$1,700 are both due and payable upon receipt of this approval.
- 2. <u>Commitments:</u> Enterprise will abide by all commitments submitted in the discharge permit renewal application letter dated August 23, 2004 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an NMOCD-approved facility. Only exempt oilfield wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an NMOCD-approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by the NMOCD on a case-by-case basis. <u>Rule 712 Waste</u>: Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
  - 1. the waste stream is identified, and authorized, as such in the discharge permit, and;
  - 2. existing process knowledge of such waste stream does not change without notification to the Oil Conservation Division.
- 4. <u>Drum Storage:</u> All drums containing material 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks</u>: 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. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers must be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> All below grade tanks, sumps, and pits must be approved by the NMOCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All below grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch

Enterprise Products Operating.

Rattlesnake Canyon Compressor Station GW-317

Page 4 of 5

above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other NMOCD approved methods. The NMOCD will be notified at least 72 hours prior to all testing.

- 10. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be approved by the NMOCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders 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 NMOCD. The NMOCD will be notified at least 72 hours prior to all testing.
- 11. <u>Class V Wells</u>: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at NMOCD-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, which inject domestic waste only, must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> 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. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to NMOCD Rule 116 and WQCC 1203 to the NMOCD Aztec District Office.
- 14. <u>Transfer of Discharge Permit:</u> The NMOCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the NMOCD prior to transfer.
- 15. <u>Storm Water Plan:</u> Enterprise shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then Enterprise shall: take immediate actions to mitigate the effects of the run-off, notify the NMOCD within 24 hours, and modify the discharge permit to include a formal storm water run-off containment plan and submit for NMOCD approval within 15 days.
- 16. <u>Closure:</u> The NMOCD will be notified when operations at the Rattlesnake Canyon Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company 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.

Enterprise Products Operating, L.P. Rattlesnake Canyon Compressor Station GW-317 Page 5 of 5

17. <u>Conditions accepted by:</u> Enterprise, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Enterprise further acknowledges that the division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

Enterprise Products Operating, L.P.

Print Name: \_\_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## ATTACHMENT TO THE DISCHARGE PLAN GW-317 EL PASO FIELD SERVICES RATTLESNAKE CANYON TREATING PLANT AND COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (October 25, 1999)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$50.00 filing fee has been received by the OCD. The \$690.00 required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.
- 2. <u>El Paso Field Services Commitments:</u> El Paso Field Services will abide by all commitments submitted in the discharge plan application dated August 21, 1999 and the se conditions for approval.
- 3. <u>Waste Disposal</u>: 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 characterization per 40 CFR Part 261.
- 4. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> 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. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

- 9. <u>Below Grade Tanks/Sumps:</u> 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 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. <u>Underground Process/Wastewater Lines:</u> All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity a minimum of every 5 years. The 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. The OCD will be notified at least 72 hours prior to all testing.
- 11. Class V Wells: 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. All 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. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 12. <u>Housekeeping:</u> 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. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> 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. <u>Closure:</u> The OCD will be notified when operations of the Rattlesnake Canyon Treating Plant and Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Rattlesnake Canyon Treating Plant and Compressor Station 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.
- 16. <u>Certification:</u> El Paso Field Services, 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 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.

Accepted:

EL PASO FIELD SERVICES

by for I. Wally maneger