



El Paso
Natural Gas Company
a Kinder Morgan company

November 4, 2025

Mr. Joel B. Stone
Environmental Scientist & Specialist
New Mexico Oil Conservation Division
Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: Request for Renewal of 120 Day Temporary Permission to Discharge for El Paso
Natural Gas Company L.L.C-OGRID 7046**

Dear Mr. Stone,

El Paso Natural Gas Company, L.L.C (EPNG) is submitting the following application to renew our existing 120-day Temporary Permission (**Permit No.: HBP-44**) to discharge small quantities of hydrostatic test wastewater generated from the testing of new transmission natural gas pipelines, or segments thereof, and/or new Aboveground Storage Tanks throughout the State of New Mexico. EPNG's existing Permit No. HBP-44 will expire on **November 15, 2025**. Although the renewal request was submitted through the online system, attached with this hard copy of the renewal request is a check in the amount of \$150.00 to cover the \$100 filing, and \$50.00 temporary permission fee pursuant to 20.6.2.3114 NMAC.

To maintain coverage under the 120-Day Temporary Permit, EPNG will comply with the following conditions:

- 1) The volume of the discharge will be less than 25,000 gallons per hydrostatic test;
- 2) Water from a public/municipal water supply or other OCD-approved sources, by written request and analytical results, is used for each hydrostatic test;
- 3) Email or written notification shall be provided to the OCD 72-hours prior to each hydrostatic discharge event; The notice shall contain the following information:
 - a) The proposed location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
 - b) The date of the proposed discharge;
 - c) The volume of the proposed discharge; and
 - d) The source of hydrostatic test water.
- 4) The discharge will not enter any lake, perennial stream, river, or their respective tributaries that may be seasonal;
- 5) No discharge shall occur:
 - a) Where ground water is less than 10 feet below ground surface;
 - b) Within 200 feet of a watercourse (defined in 19.15.2.7.W(4) NMAC), lakebed, sinkhole, or playa lake (defined in 19.15.2.7.P(4) NMAC);
 - c) Within an existing wellhead protection area (defined in 19.15.2.7.W(8) NMAC);
 - d) Within 500 feet of a wetland (defined in 19.15.2.7.W(9) NMAC); or
 - e) Within 500 feet from the nearest permanent residence, school, hospital, institution, or church.

6. No discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED, and OCD prior to the discharge;
7. Best management practices shall be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
8. The discharge will not cause any freshwater supplies to be degraded or to exceed standards as set forth in Subsections A, B and C of the 20.6.2.3103 NMAC (the Water Quality Regulations);
9. EPNG shall report all unauthorized discharges, spills, leaks, and releases of hydrostatic test wastewater and conduct corrective action pursuant to the Water Quality Regulations of 20.6.2.1203 NMAC and release notification pursuant to OCD Rule 29 (19.15.29 NMAC);
10. The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location shall be properly notified of the activities prior to each proposed hydrostatic test discharge event; and
11. A report summarizing each test of new pipe with less than 25,000 gallons per hydrostatic test per discharge event performed within the approved 120-day period, shall be submitted to OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a) The location of each hydrostatic test discharge (Section/Township/Range or GPS coordinates);
 - b) The date of each discharge
 - c) The volume of each discharge; and
 - d) The source and quality of test water (laboratory analysis, if necessary)

If you have any questions, please contact me at 719-520-4813.

Respectfully,



Amy M. Blythe
Environmental Specialist II

Copy (with enclosure):

CC: Nicole Pedigo – Environmental Project Permitting Manager

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/oed/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 522931

CONDITIONS

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|---|--|
| Operator: El Paso Natural Gas Company, L.L.C 1001 Louisiana Street Houston, TX 77002 | OGRID: 7046 |
| | Action Number: 522931 |
| | Action Type: [UF-HP] HBP Permission (HBP) |

CONDITIONS

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| joel.stone | None | 11/7/2025 |