HIP - __137__

GENERAL CORRESPONDENCE

YEAR(S): 2018 to Present

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

Heather Riley, Division Director
Oil Conservation Division

February 26, 2018

Mr. Deodat Bhagwandin
Enterprise Products Operating LLC
P.O. Box 4324
Houston, Texas 77210

Re: Hydrostatic Test Discharge HIP-137
Enterprise Products Operating, LLC
Line ID 3300 – Transwestern Interconnect
Locations: Section 16, Township 26 North, Range 12 West, NMPM,
San Juan County, New Mexico

Dear Mr. Bhagwandin:

The Oil Conservation Division (OCD) has received Enterprise Products Operating LLC's (Enterprise) notice of intent, dated February 15, 2018 and received by OCD on February 20, 2018, for authorization to discharge approximately 88,000 gallons of wastewater generated from a hydrostatic test of approximately 0.7 miles (3696) feet of a new 24-inch inner diameter natural gas transmission pipeline into frac tanks for reuse as cooling tower make-up water at the Chaco Gas Plant, approximately 17.6 miles southwest of Bloomfield, New Mexico.

The OCD has reviewed the notice of intent and has determined that the Division does not have the authority or jurisdiction to permit activities pursuant to 20.6.2 NMAC, New Mexico Water Quality Control Commission Regulations, on tribal land.

If there are any questions regarding this matter, please do not hesitate to contact Brad Jones on my staff at (505) 476-3487 or brad.a.jones@state.nm.us.

Respectfully,

Jim Griswold
Environmental Bureau Chief

JG/baj

cc: OCD District III Office, Aztec

Enterprise Products

ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

February 15, 2018

7015 3010 0000 3042 3755
Return Receipt Requested

New Mexico Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, NM 87505

FEB 20 2018 PM03:40

RE: Application to Discharge Hydrostatic Test Water from an Existing Pipeline
Individual Discharge Permit
Enterprise Products Operating LLC – Line ID 3300 - Transwestern Interconnect

To Whom It May Concern:

Enterprise Products Operating LLC (Enterprise) is submitting this Notice Of intent (NOI) for an Individual Discharge Permit for the discharge of Hydrotest water associated with the testing of an existing 0.7 mile section of pipeline in San Juan County.

Enterprise needs to Hydrotest this pipeline to meet the requirements of the Pipeline and Hazardous Materials Safety Administration (PHMSA) Integrity Management Regulations to ensure that the pipeline can be operated safely. The Hydrotest is scheduled for April 10, 2018 and is expected to take three days to complete. This date has been chosen because it coincides with a planned shutdown of the pipeline for other required maintenance. This will avoid unnecessary scheduling and operational problems and loss of revenue associated with an unscheduled shutdown.

The information required for an NOI for an Individual discharge permit pursuant to Section 1201 of 20.6.2 NMAC is included in Attachment 1. Check # 3647562 for the filing fee of $100.00, and made out to the Water Quality management Fund, is also attached.

If you have any questions or need additional information about this NOI, you may contact Deodat Bhagwandin at (713) 381-8353/dpbhagwandin@eprod.com or call Michael Souliere at (713) 381–6757.

Sincerely,

Deodat Bhagwandin
Senior Engineer, Environmental

Michael Souliere
Manager, Environmental Permitting

/bjm
Attachments:

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.381.6500

1100 LOUISIANA STREET
HOUSTON, TX 77002-5227
www.enterpriseproducts.com

ENTERPRISE PRODUCTS OPERATING LLC

LID 3300 - TRANSWESTERN INTERCONNECT
HYDROSTATIC TESTING

ATTACHMENT 1 - NOTICE OF INTENT

ATTACHMENT 1 - NOI

Individual Discharge Permit
Notice of Intent (NOI) To Discharge Hydrotest Water From An Existing Pipeline

1. Name & Address of Discharger – Enterprise Products Operating LLC (Enterprise)

   c/o ENV

   P. O. Box 4324, Houston, TX 77210 – 4324

2. Discharge Location:

   Start: 36°28'59.78 N 108°07'28.12" W

   End: 36°29'26.49 N 108°07'48.53" W

3. Legal Description: Section 16, Township 26N, Range 12W
   County: San Juan

4. Maps of the Location of the pipelines and the proposed discharge point:
   a. See Attachment A

5. Demonstration of compliance with siting criteria:
   a. Location is not within 200 feet of a watercourse, lakebed, sinkhole or playa lake
   b. Location is not within an existing wellhead protection area or 100 – year floodplain
   c. Location is not within a wetland nor is it within 500' of a wetland
   d. Location is not within the area overlying a subsurface mine
   e. Location is not within 500' of the nearest permanent residence, school, hospital, institution or church

6. Activities that produce the discharge:

   Approximately 0.7 miles of 24-in diameter natural gas transmission pipe line will be hydrotested to demonstrate its integrity as required by Department of Transportation (DOT) PHMSA Regulations. This Hydrotest will result in the production of 88,000 gallons of Hydrotest water. Water from the City of Bloomfield will be used for the hydrotesting. The water will be discharged to, and, held in Frac tanks at the discharge location (See Fig. 1), until it can be treated to remove fluids (oil) and solids in the water. The water will then be sent to the cooling towers for use as makeup water for the cooling towers.

7. The method and location for collection and retention of fluids and solids:

   The water will be discharged to Frac Tanks located at the discharge point at the facility (see Fig. 1). The water will be kept in the Frac tank for a few days to allow the solids to settle and allow any oily liquids to rise to the top. The oily liquids will be skimmed off the top and placed in a container for transportation to a New Mexico Oil Conservation Division (NMOCD) accredited disposal site. The solids will be removed from the bottom of the Frac tank and taken to a NMOCD accredited disposal site.

8. Best Management Practices that will be implemented to contain the discharges onsite and to control erosion:

The water will be discharged to, and held in a Frac tank until the solids and any oils have separated out. The oils will be skimmed off and the cleaned water will be pumped to the cooling tower holding tank. The oils and solids will be transported to an authorized disposal well site.

9. Alternative treatment, use and / or discharge location:
   The Hydrotest discharge water will be reused in the facility's cooling towers as make-up water. Alternatively, if it does not meet the requirements for use in the cooling towers the use of an OCD approved disposal well will be used for disposal of the water.

10. Hydrostatic test wastewater Sampling Plan:
    A contractor will be utilized to collect all water samples and to arrange for testing with an accredited laboratory.

11. The proposed method of disposal of fluids and solids after test completion, in case the water generated form the tests exceeds the standards set forth in Subsections A, B, C of the 20.6.23103 NMAC ((the New Mexico Water Quality Control Commission Regulations):
    a. No pits will be used at this site, so closure will not be required.
    b. Fluids and solids that do not meet the NMAC requirements will be taken to an OCD approved disposal well

12. Description of the quality and volume of water to be discharged:
    a. The test water is expected to meet the NMAC 20.6.2.3103 – Standards for Groundwater of 10,000 mg/l TDS Concentration or less.
    b. The source of the water will be the City of Bloomfield.
    c. The total volume of water expected is 88,000 gallons (2100 bbls).

13. The geological characteristics of the subsurface at the proposed discharge site: The soil at the discharge location is Sheppard-Mayqueen-Shiprock complex, 0-8 percent slopes.

    a. The Sheppard (45%) series consists of very deep, somewhat excessively drained soils that formed in eolian material derived from sandstone. Sheppard soils are on structural benches, alluvial fans, dunes on structural benches, and terraces. Slopes range from 0 to 60 percent. Mean annual precipitation is about 9 inches and the mean annual air temperature is about 54 degrees F.

       TAXONOMIC CLASS: Mixed, mesic Typic Torripsamments

       TYPICAL PEDON: Sheppard fine sand - rangeland. (Colors are for dry soil unless otherwise noted.)

       C1--0 to 2 inches; reddish yellow (5YR 6/6) fine sand, yellowish red (5YR 5/6) moist; weak thick platy structure parting to single grain; soft, loose; few fine roots; many fine interstitial pores; slightly effervescent; moderately alkaline (pH 8.4); gradual wavy boundary. (0 to 2 inches thick)

       C2--2 to 12 inches; reddish yellow (5YR 6/6) fine sand, yellowish red (5YR 5/6) moist; single grain; soft, loose; few fine roots; many fine interstitial pores; slightly effervescent; moderately alkaline (pH 8.4); gradual wavy boundary. (9 to 16 inches thick)

       C3--12 to 60 inches; reddish yellow (5YR 6/6) loamy fine sand, yellowish red (5YR 5/6) moist;

single grain; soft, loose; few medium and fine roots; few coarse pores, many fine interstitial pores; slightly effervescent; moderately alkaline (pH 8.4).

b. The Mayqueen (30%) series consists of deep, somewhat excessively drained soils formed in eolian material and alluvium on stabilized dune deposits and alluvial fans on mesas and plateaus. Slopes are 0 to 8 percent. Average annual precipitation is about 8 inches. Average annual air temperature is about 53 degrees F.

   i. **TAXONOMIC CLASS:** Coarse-loamy, mixed, superactive, mesic Typic Haplargids
   ii. **TYPICAL PEDON:** Mayqueen loamy fine sand-cropland. (Colors are for dry soil unless otherwise noted.)
   iii. **A**--0 to 3 inches; brown (7.5YR 5/4) loamy fine sand, brown (7.5YR 4/4) moist; single grained; loose dry and moist, nonsticky and nonplastic; few fine roots; common very fine interstitial pores; moderately alkaline; abrupt smooth boundary. (2 to 4 inches thick)
   iv. **Bt**--3 to 12 inches; reddish brown (5YR 5/4) fine sandy loam, reddish brown (5YR 4/4) moist; weak medium prismatic parting to weak fine subangular blocky structure; slightly hard, very friable, slightly sticky and slightly plastic; common fine and medium roots, few fine and medium continuous pores; thin continuous clay films; moderately alkaline; abrupt smooth boundary. (6 to 18 inches thick)
   v. **C1**--12 to 24 inches; light brown (7.5YR 6/4) loamy fine sand, brown (7.5YR 5/4) moist; single grained; loose dry and moist; nonsticky and nonplastic; few fine and medium roots; common fine interstitial pores; moderately alkaline; clear smooth boundary. (10 to 20 inches thick)
   vi. **C2**--24 to 38 inches; light yellowish brown (10YR 6/4) loamy fine sand, yellowish brown (10YR 5/4) moist; single grained; loose dry and moist; nonsticky and nonplastic; few fine roots; common very fine interstitial pores; moderately alkaline; clear smooth boundary. (10 to 20 inches thick)
   vii. **C3**--38 to 60 inches; light yellowish brown (10YR 6/4) loamy sand, yellowish brown (10YR 5/4) moist; single grained; loose dry and moist; nonsticky and nonplastic; few fine roots; common fine interstitial pores; moderately alkaline.

c. The Shiprock (20%) series consists of very deep, well drained and somewhat excessively drained, moderately rapidly permeable soils that formed in eolian material and alluvium, fan alluvium, and slope alluvium derived from sandstone and shale on summits of mesas, and plateaus, cuestas, fan remnants and fan terraces on valley sides and sideslopes of hills. Slopes are 0 to 15 percent, mean annual precipitation is about 7 inches, and the mean annual temperature is about 53 degrees F.
   i. **TAXONOMIC CLASS:** Coarse-loamy, mixed, superactive, mesic Typic Haplargids
   ii. **TYPICAL PEDON:** Shiprock fine sandy loam--rangeland. (Colors are for dry soils unless otherwise noted.)
   iii. **A**--0 to 3 inches; light yellowish brown (10YR 6/4) fine sandy loam, yellowish brown (10YR 5/4) moist; moderate fine granular structure; soft, very friable, nonsticky and nonplastic; few very fine roots; many very fine irregular pores; neutral; abrupt smooth boundary. (1 to 4 inches thick)
   iv. **Bt**--3 to 15 inches; strong brown (7.5YR 5/6) fine sandy loam, strong brown (7.5YR 4/6) moist; moderate medium subangular blocky structure; slightly hard, very friable, nonsticky and nonplastic; common fine and very fine roots; common very fine tubular pores; common distinct clay films bridging sand grains and lining pores; slightly alkaline; abrupt smooth boundary. (8 to 22 inches thick)
   v. **Bk1**--15 to 37 inches; light brown (7.5YR 6/4) fine sandy loam, brown (7.5YR 5/4) moist; massive; slightly hard, very friable, nonsticky and nonplastic; few fine and common very fine roots; few very fine tubular pores; strongly effervescent; few fine irregular calcium carbonate masses; slightly alkaline; clear smooth boundary. (15 to 25 inches thick)
   vi. **Bk2**--37 to 60 inches; very pale brown (10YR 7/4) fine sandy loam, light yellowish brown (10YR 6/4) moist; massive; soft, very friable nonsticky and nonplastic; few very

fine roots; common very fine irregular pores; violently effervescent; few fine and medium irregular calcium carbonate masses; moderately alkaline. (10 to 25 inches thick)

14. The depth to, and the total dissolved solids concentration, of the nearest groundwater most likely to be affected by the discharge are as follows:
    a. Depth to the nearest groundwater is: NA. There will not be an intentional discharge to the ground
    b. Total Dissolved Solids concentration is: NA.

15. Names and addresses of landowners at and adjacent to the discharge and collection / retention site: See Attachment B.

ENTERPRISE PRODUCTS OPERATING LLC

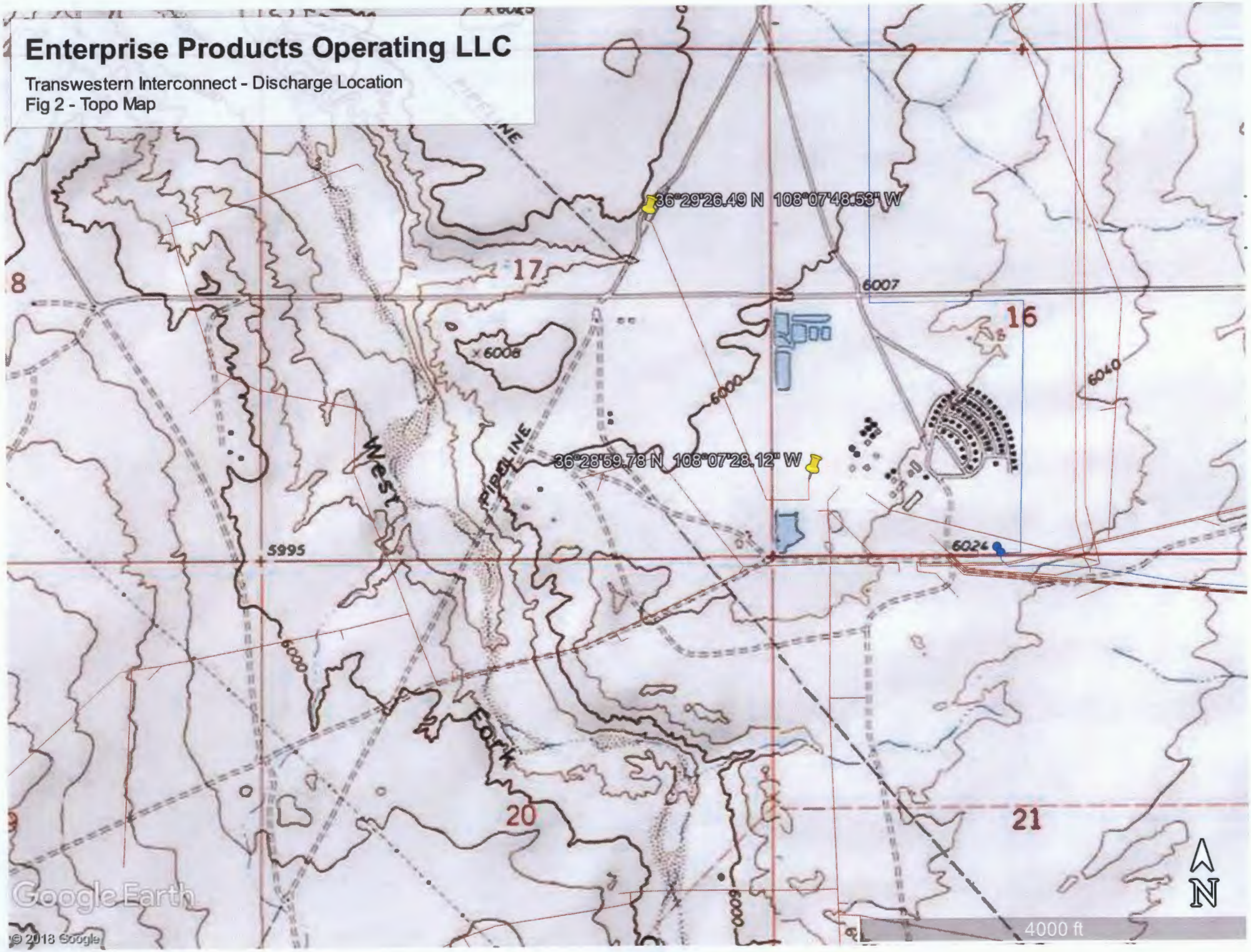
LID 3300 - TRANSWESTERN INTERCONNECT
HYDROSTATIC TESTING

ATTACHMENT A - MAPS


Enterprise Products Operating LLC
Transwestern Interconnect - Discharge Location
End
36°29'26.49" N 108°07'48.53" W
Fill / Discharge Location
FRAC Tanks
36°28'59.78" N 108°07'28.12" W
Google Earth
© 2018 Google
N
2000 ft

Enterprise Products Operating LLC

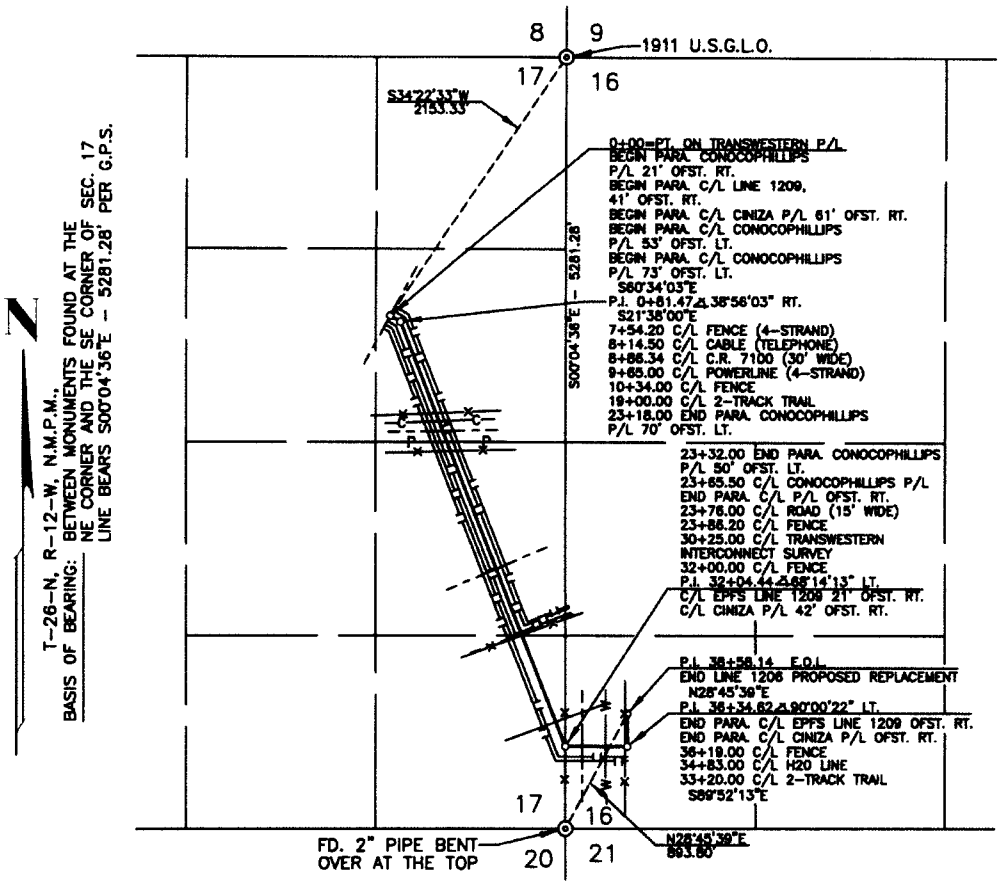
Transwestern Interconnect - Discharge Location
Fig 2 - Topo Map



ENTERPRISE PRODUCTS OPERATING LLC

LID 3300 - TRANSWESTERN INTERCONNECT
HYDROSTATIC TESTING

ATTACHMENT B - OWNERSHIP PLATS



PLAN

SCALE: 1"=1000'

OWNERSHIP

SUBDIVISION	OWNER	LESSEE	ROD(S)	ACRE(S)
E/2 SEC. 17	U.S.A. IN TRUST FOR THE NAVAJO TRIBE		193.939	0.074
SW/4 SEC. 16	GULF TERRA FIELD SERVICES, LLC	AKA Enterprise Prod.	39.887	0.907

The Navajo Nation
Attn: Howard Draper
P.O. Box 2249
Window Rock, AZ 86515

ITEM 555
REF. DWG.: 1206.0-X-1, FORMERLY EPNG PIPELINE

NOTE:
THIS 24" DISCHARGE LINE TO BE REPLACED IN THE SAME DITCH.

REVISIONS EXTENDED SURVEY AT E.O.L (3/18/04/TD)

NO.	DATE	TO	W.O.
1	EXTENDED SURVEY FROM E.S. 36+34.62 TO E.S. 38+58.14		
7	3/11/04	SJ DISTRIB.	
7	3/22/04	SJ DISTRIB.	
	PRINT RECORD		

ENG. REC.		DATE
DRAWN	TD	3/11/04
CHECKED		
CHECKED		
PROJ. APP.		
SURVEYED		3/5/04
CAD NO. 01206.00-X-002		
R/W NO. 0370158		
W.O. 077071		

GulfTerra Field Services LLC

CHACO PLANT DISCHARGE LINE FROM
CHACO PLANT TO TRANSWESTERN PIPELINE
SEC. 17, 16, T-26-N, R-12-W, N.M.P.M.,
SAN JUAN COUNTY, NEW MEXICO

SCALE AS SHOWN | DWG. NO. 01206.00-X-002 | REV. 1

FSFM92G (Rev. 9/03)