

HBP - _____ 26 _____

**GENERAL
CORRESPONDENCE**

**YEAR(S):
_____ 2012 - 2015 _____**

Jones, Brad A., EMNRD

From: Kinard, Todd A. [Todd.A.Kinard@conocophillips.com]
Sent: Tuesday, March 20, 2012 3:21 PM
To: Jones, Brad A., EMNRD
Subject: COP Hydro ATP request_Rev-2_3-20-2012.pdf - Adobe Acrobat Professional
Attachments: COP Hydro ATP request_Rev-2_3-20-2012.pdf

Brad,
Please review the changes we discussed in this revised ATP request. If there are any other questions, please contact me.

Thank You,
Todd Kinard
P:505-632-4954
C:505-330-8309



P.O. Box 217
Bloomfield, NM 87413

March 20, 2012

Mr. Brad Jones
New Mexico Oil Conservation Division
1120 South St. Francis Dr.
Santa Fe, New Mexico 87505

**RE: Revised request for Annual Temporary Permission to Discharge
Hydrostatic Test Water.
ConocoPhillips San Juan Basin Gas Plant
Bloomfield, NM**

Dear Mr. Jones

Pursuant to 20.6.2 NMAC, ConocoPhillips San Juan Gas Plant (SJGP) requests the New Mexico Oil Conservation Division (OCD) to grant SJGP Annual Temporary Permission (ATP) to discharge hydrostatic test water to ConocoPhillips SJGP waste water disposal system, which will transport the E&P exempt hydrostatic test water by pipeline to a Class II injection well (20.6.2.5002 B.(2) NMAC) owned by Basin Disposal in Bloomfield, New Mexico. This will eliminate any surface discharge of the hydrostatic test water. This ATP will only cover testing of the Inlet/Gathering Natural Gas flow lines to the SJGP. This ATP will NOT cover any hydrostatic testing of Natural Gas outlet (Post Processing) pipelines.

Response to OCD Guidelines ATP Conditions

In support of this request for Annual Temporary Permission to discharge hydrostatic test water, ConocoPhillips SJGP provides the following information as specified by OCD's Guidelines for Hydrostatic Test Dewatering (Rev. January 11, 2007):

- a. Each hydrostatic test dewatering event performed under a granted ATP will NOT exceed a volume of 25,000 gallons.
- b. Only municipal-sourced water obtained from the City of Bloomfield, New Mexico, or other OCD-approved sources, will be utilized to test the new natural gas inlet/gathering flowline(s) anticipated to be tested under a granted ATP.
- c. At least 72 hours prior to any dewatering event, the OCD will be provided oral or written notification.

- d. No test water from any dewatering event will be allowed to enter any lake, perennial stream, river or their respective tributaries that may be seasonal.
- e. No dewater event will occur:
 - 1. Where groundwater is less than ten feet (10') below ground surface.
 - 2. Within 200 feet of a watercourse, lakebed, sinkhole or playa lake.
 - 3. Within an existing wellhead protection area.
 - 4. Within, or within 500 feet of, a wetland
 - 5. Within 500 feet of the nearest permanent residence, school, hospital, institution or church.
- f. Best management practices will be implemented to contain all test water from any dewatering event onsite, not impact to adjacent property will occur, and erosion will be controlled. All test water will be contained and transferred to our waste water control system where it will then be delivered via pipeline to the Class II injection well (20.6.2.5002 B.(2) NMAC) owned by Basin Disposal in Bloomfield, New Mexico.
- g. No dewatering event will be allowed to cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsection A, B, or C of 20.6.2.3103 NMAC. This water is classified as E&P exempt waste by the Resource Conservation and Recovery Act.
- h. The hydrostatic test events will happen on the ConocoPhillips SJGP facility, therefore no other landowners will need to be informed.
- i. ConocoPhillips SJGP will submit an annual report to the OCD summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event within 45 days after the permit expiration date. The report will contain the following information:
 - 1. The location of the tests.
 - 2. The date of each test.
 - 3. The volume of each test dewatering.
 - 4. The source of the water used during the test.

The filing fee in the amount of \$100.00, payable to the Water Quality Management Fund, is attached to this ATP request. The remaining \$150.00 will be submitted upon acceptance of this request by the OCD.

If there are any questions concerning this request or additional information is required, please contact me at (505) 632-4954.

Sincerely,



Todd Kinard
Compliance Coordinator SJGP

cc: Beverly J. Cox



P.O. Box 217
Bloomfield, NM 87413

March 16, 2012

Mr. Brad Jones
New Mexico Oil Conservation Division
1120 South St. Francis Dr.
Santa Fe, New Mexico 87505

RECEIVED OCD
2012 MAR 20 A 8:58

**RE: Request for Annual Temporary Permission to Discharge
Hydrostatic Test Water.
ConocoPhillips San Juan Basin Gas Plant
Bloomfield, NM**

Dear Mr. Jones

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Sincerely,



Todd Kinard
Compliance Coordinator SJGP

cc: Beverly J. Cox

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 1006 dated 3/16/12

or cash received on _____ in the amount of \$ 100⁰⁰

from Conoco Phillips Co.

for HISP-26

Submitted by: LAURENCE ROMERO Date: 3/22/12

Submitted to ASD by: Karen Kim Date: 3/22/12

Received in ASD by: _____ Date: _____

Filing Fee: New Facility _____ Renewal

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____