HITP - _25_

GENERAL CORRESPONDENCE

YEAR(S): _2012-2013_

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DOCUMENT TRANSMITTAL FORM

TO:	Mr. Brad Jones New Mexico Energy, Minerals, and Natural Resources Department Oil Conservation Division Santa Fe, NM 87505	**PAGE** 1 **OF** 1	
		TRANSMITTAL DATE:	03/23/12
		TRANSMITTAL DCN:	126026.1-ALB12TS003
		DATA MEDIA DCN:	N/A

RECEIVED OCD
2012 MAR 24 A 11:55

RETURN RESPONSES/COMMENTS TO:	Eileen Shannon
RETURN RESPONSES/COMMENTS BY:	04/10/12

PROJECT NO.:	126026	**PROJECT NAME:**	Enterprise Hydrostatic 2012
ACTIVITY/DESCRIPTION:	Letter		

DOCUMENTS BEING TRANSMITTED

ITEM	REV.	PAGES	DATE	DESIGNATOR
Resending Letter - Submittal of the Application and Permit Fee for Notice of Intent	0	1	03/16/12	126026.1-ALB12LT001

INSTRUCTIONS/REMARKS

1 Copy of Transmittal only to :
James Heap
1031 Andrews Highway, Suite 320
Midland, TX 79701

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- ☒ Not Applicable

RECEIPT AND READ ACKNOWLEDGEMENT
Please Sign and Return To:

ADMINISTRATIVE SUPERVISOR
9019 WASHINGTON ST. NE BLDG A
ALBUQUERQUE, NM 87113

CLIENT RECEIPT	PRINT NAME	SIGNATURE	DATE
Complete & Return this page via Fax/Mail/Email			

KLEINFELDER RECEIPT	PRINT NAME	SIGNATURE	DATE
Complete this section upon receipt from client			

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CLIENT RECEIPT	PRINT NAME	SIGNATURE	DATE
Complete & Return this page via Fax/Mail/Email			

KLEINFELDER RECEIPT	PRINT NAME	SIGNATURE	DATE
Complete this section upon receipt from client			

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March 15, 2012
File No.: 126026.1-ALB12RP001

Mr. Brad Jones
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 St. Francis Drive
Santa Fe, NM 87505

Subject: Submittal of a Notice of Intent to Perform a Hydrostatic Test
500 feet of Pipeline North of Maljamar Gas Plant
Lea County, New Mexico

Dear Mr. Jones:

On behalf of the Enterprise Products Operating Company, Inc. (Enterprise), Kleinfelder West, Inc. (Kleinfelder) is pleased to submit this Notice of Intent (NOI) for a hydrostatic test of the Enterprise pipeline. Enterprise intends to dispose of the used hydrostatic test water into an evaporation pond and no surface discharge of hydrostatic test water is planned.

Enterprise planning to conduct hydrostatic testing on its 3-inch ID line 696 located at the north end of the Maljamar Gas Plant in Lea County. Actually placement of water into the pipeline is scheduled to start on Tuesday March 20, 2012. Approximately 500 feet of piping will be tested.

Kleinfelder has included the required information for the NOI as stated in the "Guidelines for Hydrostatic Test Dewatering" dated January 11, 2007. Attached to this NOI are the following:

- Background Information;
- Notice of Intent;
- Figure 1, Pipeline Undergoing Hydrostatic Test;
- Figure 2, Temporary Frac tank Staging Location for Hydrostatic Test Water;
- Appendix A, Water Well Information within 1,000 feet of the Temporary Frac Tank Storage Area and Figure A-1; and
- Appendix B, Mine Information within 1,000 feet of the Temporary Frac Tank Storage Area and Figure B-1.

It is Enterprise's understanding that public notice will not be required for this permit. A check totaling $250.00 made out to the New Mexico Water Quality Management Fund is enclosed, submitted on behalf of Enterprise for the $100 filing fee and the $150 for the temporary permit fee.

Kleinfelder prepared this NOI in a manner consistent with the level of care and skill ordinarily exercised by other members of Kleinfelder's profession practicing in the same locality, under similar conditions and at the date the services are provided. The information provided in this document is based on our understanding of the information provided by Enterprise.

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Should you have any questions, please feel free to contact Eileen Shannon (Kleinfelder) at (505) 344-7373 or Jim Heap (Enterprise) at (432) 686-5404

Respectfully submitted,

KLEINFELDER WEST, INC.

Eileen L. Shannon, P.G
Project Manager

Reviewed by:

Barbara Everett, P.G.
Program Manager

cc: James Heap, Enterprise Products, LLC, 1031 Andrews Highway, Suite 320, Midland, TX 79701

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Background Information

- The Enterprise line is an existing 3-inch natural gas pipeline and the section to be tested is a launcher line physically located downstream of the Maljamar pump station.
- This pipeline is part of a network that transports natural gas liquids.
- The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) requires periodic pressurized tests on all DOT-regulated pipelines and all newly installed pipelines to verify the integrity and safety of pipeline systems. Because the pipeline is used for the transportation of natural gas liquids, waste water generated during hydrostatic testing is classified as non-exempt RCRA waste and is subject to the Water Quality Control Commission (WQCC) Regulations.

Notice of Intent Plan

On behalf of Enterprise, Kleinfelder is submitting this NOI plan as outlined in NMOCD Guidance document, "Guidelines for Hydrostatic Test Dewatering," (revised January 11, 2007). The NOI plan includes the following items:

Item a. Name and address of the proposed discharger;

Legally Responsible Party	Mr. Rex Morsey Enterprise Products Operating Company 2162 Commerce Drive Midland, TX 79703 (432) 681-2609
Local Representative	Mr. Jim Heap 1031 Andrews Highway, Suite 320, Midland, TX 79701 (432) 686-5404
Operator	
Physical Address	Maljamar Gas Plant Approximately 3 miles south of Maljamar, NM
Mailing Address	Mr. Jim Heap 1031 Andrews Highway, Suite 320, Midland, TX 79701 (432) 686-5404

Item b. Location of the discharge, including a street address, if available, and sufficient information to locate the facility with respect to surrounding landmarks;

The section of the pipeline to be tested is located in Lea County. Water from the hydrostatic testing will not be discharged. Water will be transferred from the pipeline into a 1,000-gallon frac tank for temporary storage. The water will be tested and then hauled to an OCD-approved evaporation pond. The location pipeline to be hydrostatically tested is shown on Figure 1.

The source of water used for the hydrostatic test will be from a fire hydrant connected to the Conoco/Phillips plant-wide fire suppression system.

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As discussed with Mr. Brad Jones, NMOCD on March 14, 2012, if the following conditions are met, water from the fire hydrant may be used for the hydrostatic discharge:

- no discharge of water;
- water will be tested prior to disposal; and
- water will be disposed in an OCD-approved evaporation pond.

One frac tank, placed within secondary containment, will be located on property leased to Enterprise by Conoco-Phillips located just outside the Maljamar Gas Plant. Directions to the site from Lovington, New Mexico are:

- Follow US-82/NM 31 east for approximately 35 miles;
- Turn left (south) onto Maljamar Rd/County Road 126 and go approximately 3 miles where County Road 126 turns to the right (east);
- Go east on County Road 126 for approximately 0.6 miles; and
- Turn left (south) at Conoco Rd and site will be approximately 600 down the road on the right.

The frac will be oriented in a manner that provides at least a 10-foot buffer between the tank and the boundary of the property. The approximate coordinates for the proposed frac tank location are: Latitude 32°48'54.20"N; Longitude: - 103°46'25.01"W. Approximately 250 gallons of water will be used for the hydrostatic test.

Item c. Legal description of the discharge location;

Storage of hydrostatic test water will occur in the frac tank staging at the following location:

- SE ¼ of the SW ¼ of Section 21, Township 17 South, Range 32 East, Lea County, New Mexico (See Figure 1).

Item d. Maps (site-specific and regional) indicating the location of the pipelines to be tested;

Figure 1 is a regional map showing topography, the pipeline section undergoing testing, and the hydrostatic test water staging area. Figure 2 is a site-specific map showing details of the hydrostatic test water staging area.

Item e. A demonstration of compliance to the following siting criteria or justification for any exceptions:

i. Within 200 feet of a watercourse, lakebed, sinkhole, or playa lake;

ii. Within 1,000 feet of an existing wellhead protection area or 100-year floodplain;

iii. Within, or within 500 feet of, a wetland;

iv. Within the area overlying a subsurface mine; or

v. Within 500 feet from the nearest permanent residence, school, hospital, institution or church.

Hydrostatic test water will not be discharged to the surface. It will be temporarily stored in a frac tank, and transported to an OCD-approved evaporation pond.

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A search for surrounding water wells was completed to satisfy a portion of this requirement. The NMOCD Pit Rule Mapping Portal database was used for this search, which was conducted on March 14, 2012. According to the database search, no water wells are located within 1,000 feet of the temporary frac tank staging area. Figure A-1, generated from the portal database, shows water wells in the vicinity of the site and is included in Appendix A.

Mr. Mike Tompson with the New Mexico Abandoned Mine Lands Program was contacted to assess the presence of abandoned subsurface mines in the vicinity of the temporary frac tank staging area. According to Mr. Tompson, there is no record of abandoned subsurface mines in that area. A copy of the email from Mr. Tompson is attached in Appendix B. According to the NMOCD Pit Rule Mapping Portal database, no active or inactive mines were located in the vicinity of the temporary frac tank staging area. Figure B-1 (Appendix B), generated from this portal shows no mines within 1,000 feet of the site.

Federal Emergency Management Administration (FEMA) flood insurance rate maps were searched on the FEMA website for 100-year floodplains in the proposed hydrostatic test water staging area. According to the FEMA website, the temporary frac tank staging area is not located within a 100-year floodplain (the entire floodplain panel (35025C1050D) is Zone D (areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted) (FEMA, fema.gov).

Item f. A brief description of the activities that produce the discharge;

Pressure testing with water, known as hydrostatic testing, is one of the tools pipeline operators use to verify pipeline integrity. The test involves clearing the pipeline of debris, purging the natural gas from the pipeline with nitrogen, filling the pipeline with water, then pressurizing the pipeline to a pressure higher than the standard operating pressure for approximately eight hours. The purpose of hydrostatic testing in a pipeline is to determine the extent to which potential defects might threaten the pipeline's ability to sustain maximum allowable operation pressure. If leaks or breaks occur, the pipeline is repaired or the affected areas is replaced, and then re-tested. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) requires periodic pressurized tests on all DOT-regulated pipelines and all newly installed pipelines to verify the integrity and safety of pipeline systems. Approximately 200 gallons of water will be used for the hydrostatic test.

Item g. The method and location for collection and retention of fluids and solids;

A hose will be connected to the fire hydrant and will run directly to the pipeline. Once the hydrostatic test has been conducted, the water will be transferred with a pump and hose into one frac tank with secondary containment. The secondary containment under the frac tank will consist of a 1,500 gallon galvanized portable stock tank. The containment will hold a minimum of 1 and 1/3 the volume of the frac tanks. The frac tanks will be located within 50 feet of the point of connection on the pipeline. All individual tank valves will be closed and locked when not in use. Solids are not anticipated to be produced from the hydrostatic testing.

Item h. A brief description of best management practices to be implemented to contain the discharge onsite and to control erosion;

Enterprise intends to discharge the hydrostatic test water into one frac tank for temporary storage. The frac tank will be located within a stock tank as described above in Item g. Once analytical results are obtained for the hydrostatic test water, the water will be transported from the project site in DOT-approved tanker trucks to Controlled Recovery, Inc. in Halfway, New Mexico. The water will be transported by Mesquite Services, Inc. (C133-211). The water will be disposed of in an evaporation pond well operated by Controlled Recovery, Inc. No upland discharges are planned.

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Item i. A request for approval of an alternative treatment, use, and/or discharge location (other than the original discharge site), if necessary;

In the event that the hydrostatic test water is found to be unsuitable for disposal in an evaporation pond, Enterprise will acquire a temporary identification number from the US Environmental Protection Agency for the waste, and it will be properly transported and disposed of at a RCRA-permitted Treatment, Storage, and Disposal facility. Enterprise will provide the name and address of the facility and the appropriate disposal documentation to the NMOCD.

Item j. A proposed hydrostatic test wastewater sampling plan;

Enterprise will not collect nor analyze a pre-test sample of the water obtained from the fire hydrant, but will conduct post-hydrostatic testing as described below.

The post-hydrostatic test water samples will be analyzed for corrosivity, ignitability, reactivity, toxicity, and/or other characterization as required by the disposal facility. Analytical results of the post-hydrostatic test water analysis will be submitted to the NMOCD with a recommendation for disposal of the hydrostatic test water into an evaporative pond.

Item k. A proposed method of disposal of fluids and solids after test completion, including closure of any pits, in case the water generated from test exceeds the standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);

All fluids will be containerized, tested, and transported for disposal as described under item i and f. No solid waste is anticipated. In the event that the hydrostatic test water is found to be unsuitable for disposal into an evaporation pond, a temporary identification number will be acquired from the US Environmental Protection Agency for the waste, and it will be properly transported and disposed of at a RCRA-permitted Treatment, Storage, and Disposal facility. Enterprise will provide the name and address of the facility and the appropriate disposal documentation to the NMOCD.

Item l. A brief description of the expected quality and volume of the discharge;

The hydrostatic test water will be analyzed to assess if the constituent concentrations meet the disposal facilities requirements. Based on historical data collected from previous hydrostatic test events using similar methods and solutions, the water quality is expected to be in compliance with regulatory limits. The volume of the hydrostatic test water is expected to be approximately 200 gallons.

Item m. Geological characteristics of the subsurface at the proposed discharge site;

The site is located in the Baish Oil field of the Pecos Slope, west of the Mescalero Arch and includes the southern flank of the Artesia-Vacuum Arch. Groundwater investigations, conducted at the Maljamar Gas Plant by Maxim Technologies between 2000 and 2004 (Maxim, 2004), reported the following subsurface conditions:

- Sand and silt were detected in soil borings to depths of approximately 65 feet below ground surface (bgs);
- Bedrock consisting of interbedded shale and sandstone were encountered at an approximate depth of 65 feet;
- Confined groundwater was observed in sandstone at portions of the site between 70 and 95 feet bgs; and

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- Groundwater was measured at depths ranging from 72.9 to 117.2 feet bgs in 21 monitor wells installed at the site.

Item n. The depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge;

Based on monitor wells installed at the Maljamar Gas Plant between 2000 and 2002, depth to water ranges from 72.9 to 117.2 feet bgs. Total dissolved solids measured in the wells ranged from 645 to 20,300 milligrams per liter. (Maxim, 2004)

Item o. Identification of landowners at, and adjacent to, the discharge collection/retention site. Landowners within 1/3-mile of the boundary of the temporary frac tank storage area within the Enterprise pipeline easement:

Because the hydrostatic test water will not be discharged to the surface, this information is not required.

References

Federal Emergency Management Agency website, accessed March 2012, http://www.fema.gov/.

Maxim Technologies, Inc. (Maxim), March 2004, Comprehensive Groundwater Report, Maljamar Gas Plant, Maljamar, New Mexico.

NMOCD Pit Rule Mapping Portal database search accessed March 2012 from http://ford.nmt.edu/prrc_MF/index5.html.

San Juan County Office of the County Assessor, Parcel Map Search, accessed March 2012, https://maps.sjcounty.net/imf/imf.jsp?site=SanJuanGIS.

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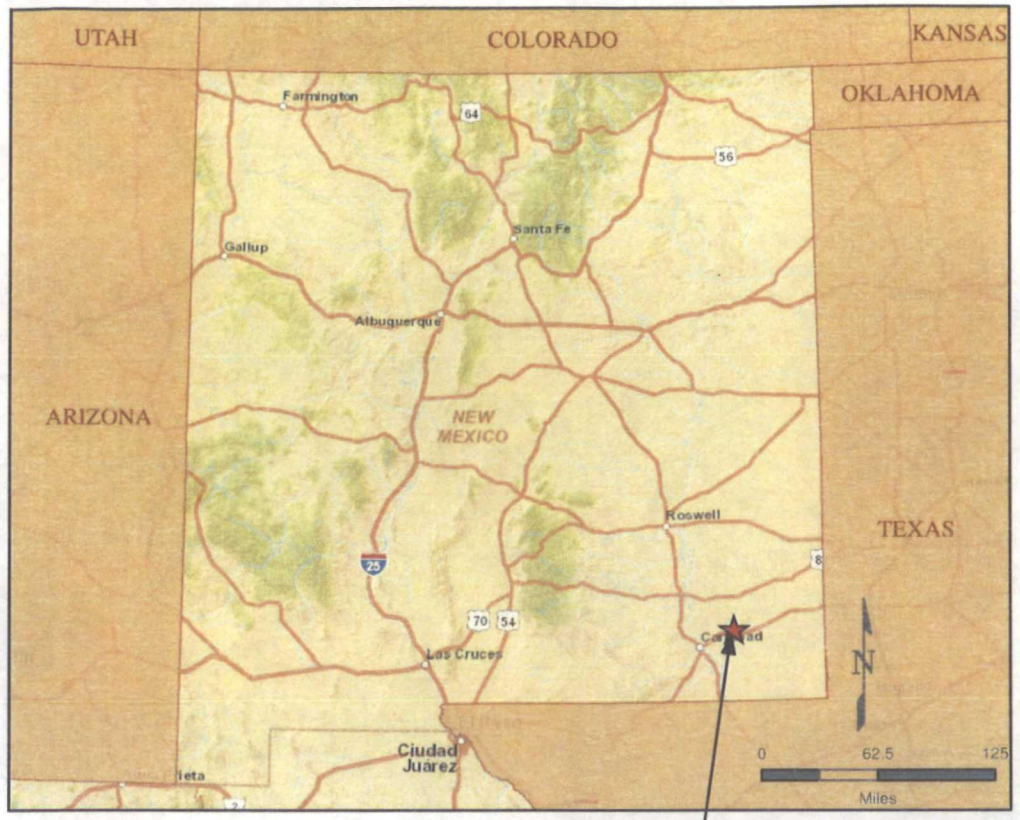
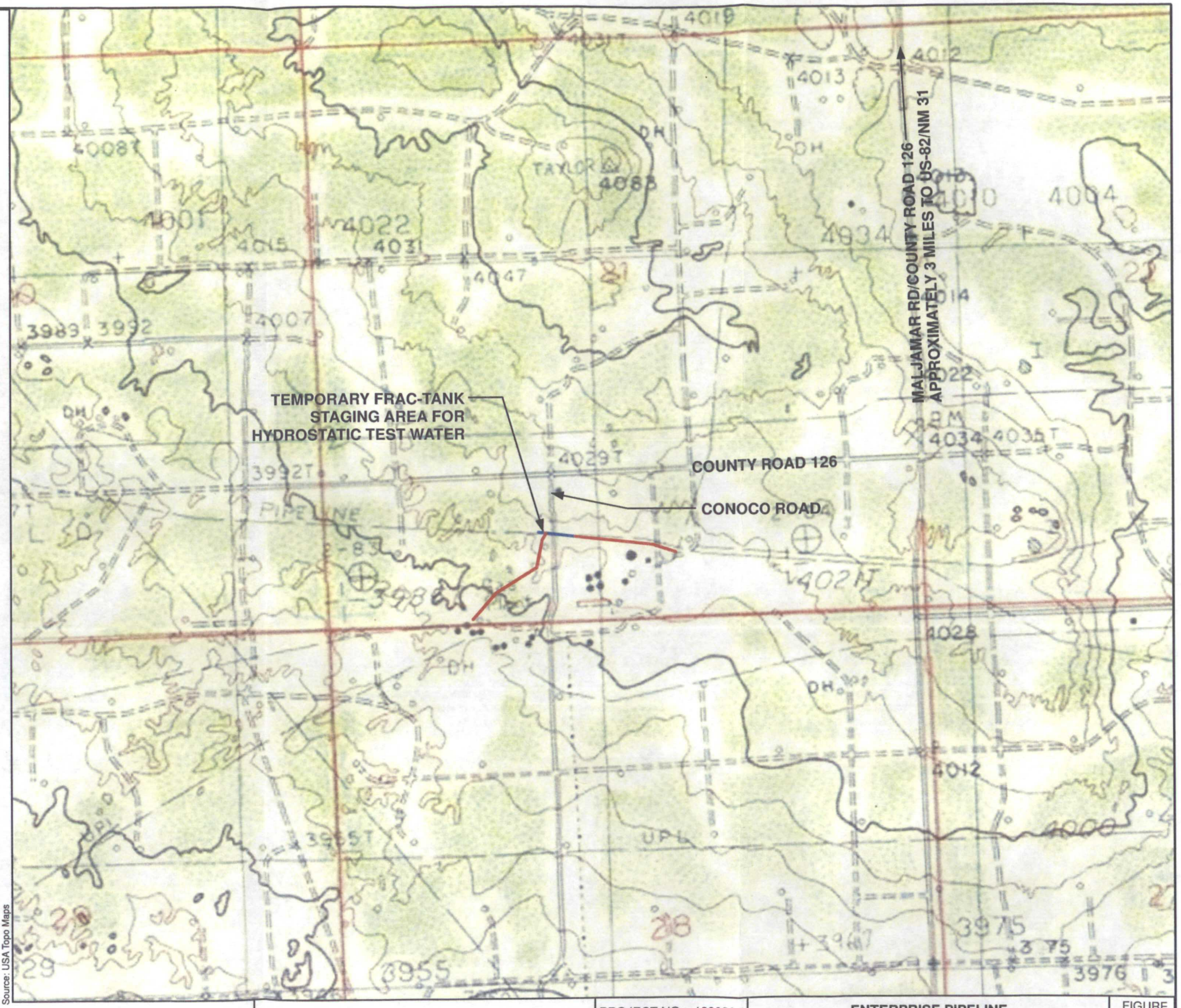
FIGURES



Source: ESRI World Street Map



Source: USA Topo Maps

LEGEND

- APPROXIMATE SITE LOCATION
- APPROXIMATE ENTERPRISE PIPELINE
- APPROXIMATE HYDROSTATIC TEST LOCATION

1,000 0 1,000
Feet
NAD 1983 StatePlane
New Mexico East, US Feet

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PROJECT NO.: 126026.1	
DRAWN: 03/14/12	
DRAWN BY: PD	
CHECKED BY: ES	
FILE NAME: 126026\Figure1.mxd	
ORIGINATOR: E. SHANNON	DRAWING CATEGORY: 1
APPROVED BY: ES 3-15-12	

ENTERPRISE PIPELINE UNDERGOING HYDROSTATIC TEST

NORTH OF MALJAMAR GAS PLANT
LEA COUNTY, NEW MEXICO

FIGURE **1**

300 0 300 Feet

NAD 1983 StatePlane
New Mexico East, US Feet

LEGEND

- APPROXIMATE PIPELINE
- APPROXIMATE HYDROSTATIC DISCHARGE TEST LOCATION

Source: ESRI World Imagery

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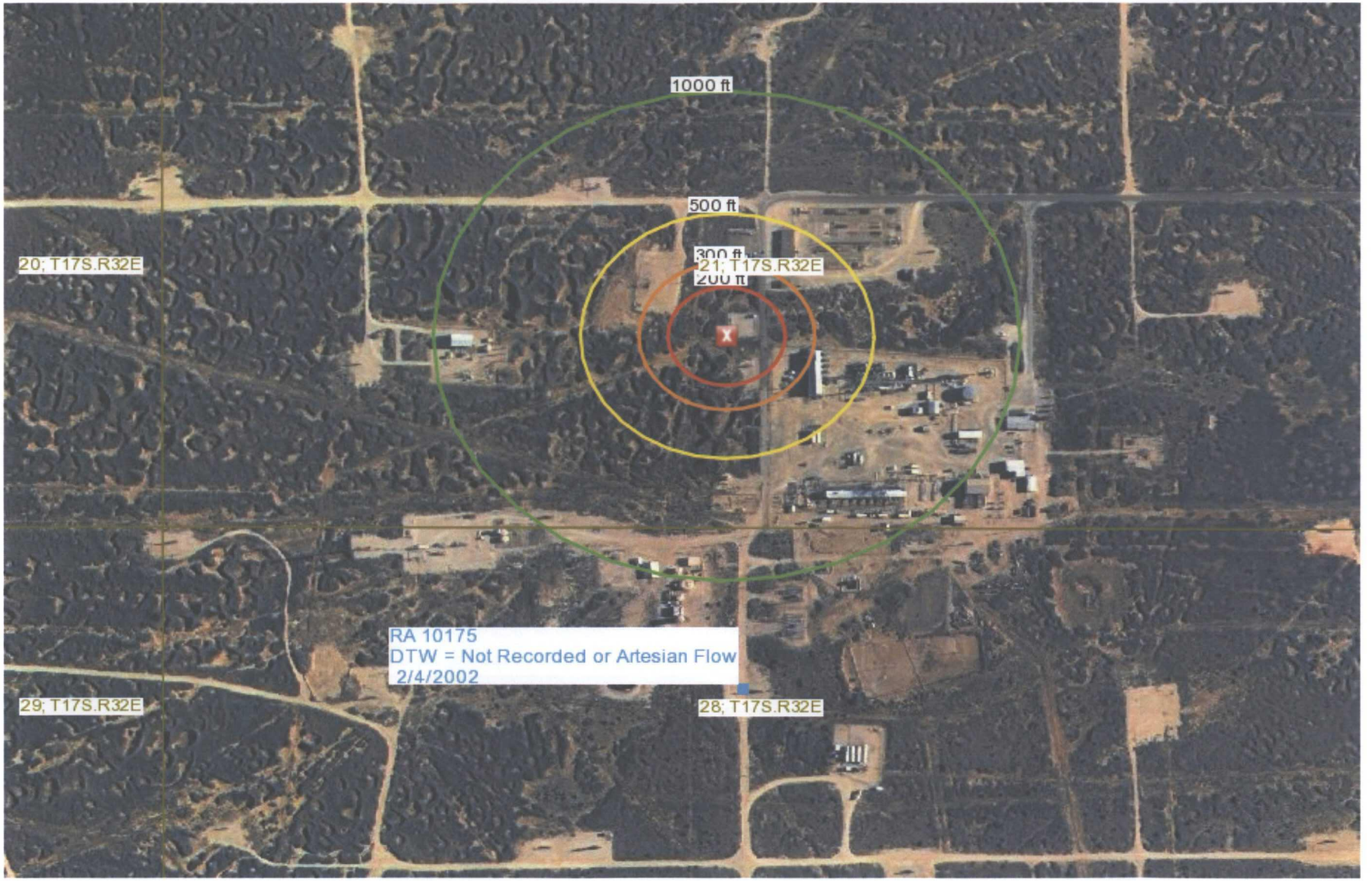
PROJECT NO. 126026.1	**TEMPORARY FRAC TANK STAGING AREA FOR HYDROSTATIC TEST WATER**	FIGURE
DRAWN: 03/14/12		
DRAWN BY: PD	NORTH OF MALJAMAR GAS PLANT LEA COUNTY, NEW MEXICO	2
CHECKED BY: BB		
FILE NAME: 126026\Figure2.mxd	ORIGINATOR: E. SHANNON	
	APPROVED BY: BS 3-15-12	

APPENDIX A
Wells in Vicinity of Frac Tank



0 200 400ft

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Petroleum Recovery Research Center	Water Wells in the Vicinity of the Frac Tanks	Figure A-1
	Enterprise Products, LLC.	Mar 14, 2012

APPENDIX B
Mines in Vicinity of Frac Tank

Petroleum Recovery Research Center	Abandoned Mines in the Vicinity of the Frac Tanks	Figure B-1
	Enterprise Products, LLC.	Mar 14, 2012

Eileen Shannon

From: Tompson, Mike, EMNRD <Mike.Tompson@state.nm.us>
Sent: Wednesday, March 14, 2012 3:18 PM
To: Eileen Shannon
Subject: RE: Abandoned mines near Maljamar, Lea County, NM

Eileen,

The Abandoned Mine Land Program knows of no abandoned mines in that section.

Mike

From: Eileen Shannon [mailto:EShannon@kleinfelder.com]
Sent: Wednesday, March 14, 2012 12:25 PM
To: Tompson, Mike, EMNRD
Subject: Abandoned mines near Maljamar, Lea County, NM

Hi Mike,

I am working on a hydrostatic discharge plan for Enterprise and we are required to research whether there are abandoned mines in the vicinity of the frac tanks. Water used to test the hydrostatic pipeline will be temporarily stored in a frac tank prior to disposal in a permitted evaporation pond.

The frac tanks will be located at:

- Section 21, T17S, R32E or
- Lat: 32°48'54.20"N; Long: - 103°46'25.01"W
-

A map showing the proposed frac tank location is attached.

Please let me know if there are any abandoned mines in this area.

Thank you,

Eileen

Eileen Shannon P.G.
Project Manager
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Albuquerque, NM 87113
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c| 505.307.0722
f| 505.344.1711

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