HIP - 113

PERMITS, RENEWALS, & MODS

Griswold, Jim, EMNRD

From: Griswold, Jim, EMNRD
Sent: Friday, January 02, 2009 3:10 PM
To: 'St John Jr, Robert H (Bob)'
Subject: RE: Approval of Sundance Services Inc for hydrostatic test water

Bob,

EPNG's request to properly dispose of the hydrostatic test water generated under the conditions of HIP-113 at the Sundance facility is approved.

Jim Griswold
Hydrologist
Oil Conservation Division
Energy, Minerals & Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
main 505.476.3440
direct 505.476.3465
email jim.griswold@state.nm.us

From: St John Jr, Robert H (Bob) [mailto:Robert.StJohn@ElPaso.com]
Sent: Friday, January 02, 2009 2:56 PM
To: Griswold, Jim, EMNRD
Cc: Thompson, Glen D; Haag, Mark A
Subject: Approval of Sundance Services Inc for hydrostatic test water

Mr. Griswold – Thank you for visiting with me in allowing El Paso Natural Gas (EPNG) to transport the hydrostatic test water to an alternative facility than that presented in the Notice of Intent (NOI). The hydrostatic water was generated during the renovation of EPNG Lines 30148 and L30131, in Lea County, New Mexico

The hydrostatic test water was initially scheduled for injection well disposal in Texas. Due to the holiday schedules and timeliness desires of EPNG, the facility initially contracted to receive the hydrostatic water was unable to meet the scheduled deadlines. EPNG has secured the services of Sundance Services, Inc. for disposal of the hydrostatic test water. The method of disposal will be in Sundance's evaporation pond. Sundance is an OCD-permitted Surface Waste Management Facility with permit number NM 01-0003.

Your written approval would be greatly appreciated.

Regard,
Bob

Robert St. John
Principal Environmental Scientist
Pipelines West
432.686.3289 (office)

Griswold, Jim, EMNRD

From: Griswold, Jim, EMNRD
Sent: Wednesday, December 24, 2008 10:12 AM
To: 'Thompson, Glen D'
Subject: RE: LSR-Monument Station/Hydrostatic Sampling 2008121731

Glen,

I have reviewed the lab report and everything appears to meet WQCC requirements with the exception of manganese at a reported concentration of 0.46 mg/liter compared to the standard of 0.2 mg/liter. Based on your review of the available lab data of the water put into the tested pipe, the manganese does not appear to have originated from the supply well. As such, the water CANNOT be discharged on the ground surface.

Jim Griswold
OCD

From: Thompson, Glen D [mailto:Glen.Thompson@ElPaso.com]
Sent: Wednesday, December 24, 2008 9:17 AM
To: Griswold, Jim, EMNRD
Subject: FW: LSR-Monument Station/Hydrostatic Sampling 2008121731

For your review and approval. . .

From: Haag, Mark A
Sent: Wednesday, December 24, 2008 9:07 AM
To: 'Tommy E Alford (tlalford@plateautel.net)'
Cc: Thompson, Glen D; Moore, Lloyd A; 'Jerry Harpole'; Wedel, Jason D (Derek)
Subject: FW: LSR-Monument Station/Hydrostatic Sampling 2008121731

We just got the frac tank sample results Tommy. I will call Glen Thompson now to request review by NMOCD. Copying Jerry Harpole for information only. No approvals till NMOCD advises Glen.

Mark Haag
719.948.5208 cell 719.337.6783 fax 719.948.5289

From: Romero, Teresa (Contractor)
Sent: Wednesday, December 24, 2008 6:19 AM
To: Morrow, Kenneth L (Kenny)
Cc: Alford, Tommy E. (Contractor); Haag, Mark A; Haveman, Billy W; Haveman, Billy W; Howell, Timothy G (Tim); Moore, Amy M (Amy); Silva, Daniel M (Daniel) (Contractor); Thompson, Glen D; Whitney, Mark P
Subject: LSR-Monument Station/Hydrostatic Sampling 2008121731

elpaso

LABORATORY SERVICE REPORT

REQUESTOR:	Morrow, Kenny	**REPORT DATE:**	12/23/2008
	Hobbs, NM	**REQUEST NO:**	2008121731
	(505) 492-2380	**APPROVED BY:**	Campbell, Darrell
		PENDING REQ. ID:	2008121731
DEPARTMENT:	Midland Division		
DISTRIBUTION:	Alford, Tommy E.; Haag, Mark A; Haveman, Billy; Howell, Timothy G.; Moore, Amy M [Amy]; Silva, Daniel M [Daniel]; Thompson, Glen; Whitney, Mark P.		
PERFORMED BY:	Columbia Analytical Services		

Request Description: Hyrostatic Sampling - Monument Station
Date Received: 12/15/2008
Date Completed: 12/23/2008

Sample No: 1 Sampled By: Mark Whitney/Lorenzo Hernandez Sample Date: 12/13/2008 12:00:00 PM
Received Vol.: Received Date: 12/15/2008
Description: 17 Frac Tanks
Analysis: WP New Mexico Hydrotest
Purpose: Disposal/Environmental Concerns
Matrix: Water
Location: EPNG - Midland - Plains - 6550 - 0000+0 - South of Monument Station - Frac Tanks

Data: See attached sheet(s).

Comments:

Sample:	1
Total Metals	
Aluminum (mg/l)	< 0.10
Arsenic (mg/l)	< 0.010
Barium (mg/l)	0.025
Boron (mg/l)	< 0.10
Cadmium (mg/l)	< 0.0030
Chromium (mg/l)	< 0.010
Cobalt (mg/l)	< 0.010
Copper (mg/l)	< 0.010
Iron (mg/l)	< 0.10
Lead (mg/l)	< 0.010
Manganese (mg/l)	0.46
Molybdenum (mg/l)	< 0.010
Nickel (Ni) (mg/l)	< 0.010
Mercury (mg/l)	< 0.0002
Selenium (mg/l)	< 0.025
Silver (mg/l)	< 0.0050
Uranium (mg/l)	0.0006
Zinc (mg/l)	< 0.050

Request: 2008121731

Sample:	**1**
Anions	
Chloride (mg/l)	46
Fluoride (mg/l)	0.76
Nitrite, as N (mg/l)	0.13
Nitrate, as N (mg/l)	2.2
Nitrate/Nitrite (as N) (mg/l)	2.3
Sulfate (mg/l)	62
General Analyses	
pH	7.7
Temperature °C.	19.1
Total Dissolved Solids (mg/l)	320
Phenolics, Total Recoverable (mg/l)	< 0.0050
Cyanide, Total (mg/l)	< 0.020
Flashpoint (°F)	> 200
Volatile Organic Compounds	
Acetone (µg/l)	< 20
Benzene (µg/l)	0.98
Bromobenzene (µg/l)	< 1.5
Bromochloromethane (µg/l)	< 0.50
Bromodichloromethane (µg/l)	< 0.50
Bromoform (µg/l)	< 1.0
Bromomethane (µg/l)	< 5.0
2-Butanone (µg/l)	< 5.0
n-Butylbenzene (µg/l)	< 2.5
sec-Butylbenzene (µg/l)	< 1.5
tert-Butylbenzene (µg/l)	< 2.5
Carbon disulfide (µg/l)	< 0.50
Carbon tetrachloride (µg/l)	< 0.50
Chlorobenzene (µg/l)	< 0.50
Chloroethane (µg/l)	< 4.0
Chloroform (µg/l)	< 0.50
Chloromethane (µg/l)	< 5.0
2-Chlorotoluene (µg/l)	< 1.5
4-Chlorotoluene (µg/l)	< 2.0
Dibromochloromethane (µg/l)	< 0.50
1,2-Dibromo-3-chloropropane (µg/l)	< 0.01
1,2-Dibromoethane (µg/l)	< 0.01
Dibromomethane (µg/l)	< 0.50
1,2-Dichlorobenzene (µg/l)	< 2
1,3-Dichlorobenzene (µg/l)	< 2
1,4-Dichlorobenzene (µg/l)	< 2
Dichlorodifluoromethane (µg/l)	< 2.0
1,1-Dichloroethane (µg/l)	< 1.0
1,2-Dichloroethane (µg/l)	< 1.0
1,1-Dichloroethene (µg/l)	< 0.50
cis-1,2-Dichloroethene (µg/l)	< 0.50
trans-1,2-Dichloroethene (µg/l)	< 0.50
1,2-Dichloropropane (µg/l)	< 0.50
1,3-Dichloropropane (µg/l)	< 1.0

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Sample:	1
2,2-Dichloropropane (µg/l)	< 0.50
1,1-Dichloropropene (µg/l)	< 1.0
cis-1,3-Dichloropropene (µg/l)	< 1.0
trans-1,3-Dichloropropene (µg/l)	< 0.50
Ethylbenzene (µg/l)	< 2.0
Hexachlorobutadiene (µg/l)	< 10
2-Hexanone (µg/l)	< 5.0
Iodomethane (µg/l)	< 2.0
Isopropylbenzene (µg/l)	< 2.5
4-Isopropyltoluene (µg/l)	< 1.5
Methylene chloride (µg/l)	15
4-Methyl-2-pentanone (µg/l)	< 5.0
Methyl tert-butyl ether (µg/l)	< 2.0
Naphthalene (µg/l)	< 10
n-Propylbenzene (µg/l)	< 2.0
Styrene (µg/l)	< 1.0
1,1,1,2-Tetrachloroethane (µg/l)	< 0.50
1,1,2,2-Tetrachloroethane (µg/l)	< 0.50
Tetrachloroethene (µg/l)	< 0.50
Toluene (µg/l)	< 2.0
1,2,3-Trichlorobenzene (µg/l)	< 5.0
1,2,4-Trichlorobenzene (µg/l)	< 5.0
1,1,1-Trichloroethane (µg/l)	< 0.50
1,1,2-Trichloroethane (µg/l)	< 0.50
Trichloroethene (µg/l)	< 0.50
Trichlorofluoromethane (µg/l)	< 2.0
1,2,3-Trichloropropane (µg/l)	< 1.0
1,2,4-Trimethylbenzene (µg/l)	< 2.0
1,3,5-Trimethylbenzene (µg/l)	< 1.5
Vinyl Acetate (µg/l)	< 5.0
Vinyl chloride (µg/l)	< 0.50
Xylenes, Total (µg/l)	< 3.0
Semi Volatiles Organic Compounds	
Acenaphthene (µg/l)	< 10
Acenaphthylene (µg/l)	< 10
Anthracene (µg/l)	< 10
Azobenzene (µg/l)	< 10
Benz(a)anthracene (µg/l)	< 10
Benzo(b)fluoranthene (µg/l)	< 10
Benzo(k)fluoranthene (µg/l)	< 10
Benzo(g,h,i)perylene (µg/l)	< 10
Benzo(a)pyrene (µg/l)	< 10
Bis(2-chloroethoxy)methane (µg/l)	< 10
Bis(2-chloroethyl)ether (µg/l)	< 10
Bis(2-chloroisopropyl)ether (µg/l)	< 10
Bis(2-ethylhexyl)phthalate (µg/l)	< 10
4-Bromophenyl phenyl ether (µg/l)	< 10
Butyl benzyl phthalate (µg/l)	< 10
4-Chloro-3-methylphenol (µg/l)	< 10
2-Chloronaphthalene (µg/l)	< 10
2-Chlorophenol (µg/l)	< 10

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Sample:	**1**
4-Chlorophenyl phenyl ether (µg/l)	< 10
Chrysene (µg/l)	< 10
Dibenz(a,h)anthracene (µg/l)	< 10
Di-n-butyl phthalate (µg/l)	< 10
2,4-Dichlorophenol (µg/l)	< 10
3,3'-Dichlorobenzidine (µg/l)	< 10
Diethyl phthalate (µg/l)	< 10
2,4-Dimethylphenol (µg/l)	< 10
Dimethyl phthalate (µg/l)	< 10
4,6-Dinitro-2-methylphenol (µg/l)	< 10
2,4-Dinitrotoluene (µg/l)	< 10
2,6-Dinitrotoluene (µg/l)	< 10
2,4-Dinitrophenol (µg/l)	< 20
Di-n-octyl phthalate (µg/l)	< 10
Fluoranthene (µg/l)	< 10
Fluorene (µg/l)	< 10
Hexachlorobenzene (µg/l)	< 10
Hexachlorobutadiene (µg/l)	< 10
Hexachlorocyclopentadiene (µg/l)	< 10
Hexachloroethane (µg/l)	< 10
Indeno(1,2,3-cd)pyrene (µg/l)	< 10
Isophorone (µg/l)	< 10
Naphthalene (mg/l)	< 0.0050
1-Methylnaphthalene (mg/l)	< 0.0050
2-Methylnaphthalene (mg/l)	< 0.0050
Nitrobenzene (µg/l)	< 10
2-Nitrophenol (µg/l)	< 10
4-Nitrophenol (µg/l)	< 10
N-Nitrosodi-n-propylamine (µg/l)	< 10
N-Nitrosodiphenylamine (µg/l)	< 10
Pentachlorophenol (µg/l)	< 10
Phenol (µg/l)	< 10
Phenanthrene (µg/l)	< 10
Pyrene (µg/l)	< 10
Pyridine (µg/l)	< 20
2,4,5-Trichlorophenol (µg/l)	< 10
2,4,6-Trichlorophenol (µg/l)	< 10
2-Methlyphenol (µg/l)	< 10
4-Chloroaniline (µg/l)	< 10
4-Methylphenol (µg/l)	< 10
Benzoic acid (µg/l)	< 50
Benzyl alcohol (µg/l)	< 10
Dibenzofuran (µg/l)	< 10
PCB Analysis	
Aroclor 1016 (µg/l)	< 0.24
Aroclor 1221 (µg/l)	< 0.57
Aroclor 1232 (µg/l)	< 0.69
Aroclor 1242 (µg/l)	< 0.78
Aroclor 1248 (µg/l)	< 0.3
Aroclor 1254 (µg/l)	< 0.3
Aroclor 1260 (µg/l)	< 0.6

Request: 2008121731

Sample:	**1**
Aroclor 1268 (µg/l)	*< 0.40*
Radiochemical Activity	
Radium 226 (pCi/L)	<0.4
Radium 228 (pCi/L)	<0.4
Total Radium (pCi/L)	<0.4

Griswold, Jim, EMNRD

From: Thompson, Glen D [Glen.Thompson@ElPaso.com]
Sent: Wednesday, December 10, 2008 1:56 PM
To: Jones, Brad A., EMNRD; Griswold, Jim, EMNRD
Subject: FW: LSR-Monument Station/Hydrotest Water 2008111669
Attachments: 2008111669.pdf

The lab analysis is attached for the hydrotest water that came out of the pipe and is currently stored in 17 frac tanks in Section. Please review and if meets with your approval, please forward me an e-mail approving surface discharge as per Hydrotest Permit HP-113.

Glen Thompson
Principal Environmental Representative
El Paso Natural Gas
(432) 686-3268

From: Haag, Mark A
Sent: Wednesday, December 10, 2008 2:31 PM
To: Thompson, Glen D
Cc: Alford, Tommy E. (Contractor); 'Jerry Harpole'; 'Jerry Harpole'; Lowder, Phillip L (Contractor); Moore, Lloyd A
Subject: FW: LSR-Monument Station/Hydrotest Water 2008111669

This frac tank water test result for the 17 frac tanks looks really good to me, Glen.

Mark Haag
719.948.5208 cell 719.337.6783 fax 719.948.5289

From: Romero, Teresa (Contractor)
Sent: Wednesday, December 10, 2008 1:22 PM
To: Haag, Mark A
Subject: FW: LSR-Monument Station/Hydrotest Water 2008111669

From: Romero, Teresa (Contractor)
Sent: Tuesday, December 09, 2008 12:51 PM
To: Morrow, Kenneth L (Kenny)
Cc: Haveman, Billy W; Howell, Timothy G (Tim); Thompson, Glen D; Weaver, Isaac L (Ike); Whitney, Mark P
Subject: LSR-Monument Station/Hydrotest Water 2008111669

elpaso

LABORATORY SERVICE REPORT

REQUESTOR:	Morrow, Kenny Hobbs, NM (505) 492-2380	**REPORT DATE:** **REQUEST NO:** **APPROVED BY:** **PENDING REQ. ID:**	12/9/2008 2008111669 Campbell, Darrell 2008111669
DEPARTMENT:	Midland Division		
DISTRIBUTION:	Haveman, Billy; Howell, Timothy G.; Thompson, Glen; Weaver, Isaac; Whitney, Mark P.		
PERFORMED BY:	Columbia Analytical Services		

Request Description: Hydrotest water South of Monument station.
Date Received: 11/26/2008
Date Completed: 12/9/2008

Sample No: 1 Sampled By: Mark Whitney Sample Date: 11/24/2008 3:00:00 PM
Received Vol.: Received Date: 11/25/2008
Description: 17 Frac Tanks
Analysis: WP TCLP Anal (Aqueous)
Purpose: Disposal/Environmental Concerns
Matrix: Water
Location: EPNG - Midland - Plains - 6550 - 0000+0 - South of Monument Station - Frac Tanks

Data: See attached sheet(s).

Comments:

Sample:	**1**
TCLP Characteristics	
Ignitability	
Flash Point (°F)	> 200
Corrosivity	
pH	7.8
Reactivity	
Total Sulfide (mg/l)	< 0.04
TCLP Metals	
Arsenic (mg/l)	< 1.0
Barium (mg/l)	< 5.0
Cadmium (mg/l)	< 0.50
Chromium (mg/l)	< 1.0
Lead (mg/l)	< 1.0
Mercury (mg/l)	< 0.0020
Selenium (mg/l)	< 0.50
Silver (mg/l)	< 1.0

Request: 2008111669

Sample:	**1**
TCLP 8260	
1,1 Dichlorochtene (mg/l)	< 1.0
1,2 Dichloroethane (mg/l)	< 0.50
1,4-Dichlorobenzene (mg/l)	< 0.05
Benzene (mg/l)	< 0.50
Carbon Tetrachloride (mg/l)	< 0.50
Chlorobenzene (mg/l)	< 0.50
Chloroform (mg/l)	< 0.50
2-Butanone (mg/l)	< 5.0
Tetrachloroethene (mg/l)	< 0.50
Trichloroethene (mg/l)	< 0.50
Vinyl Chloride (mg/l)	< 5.0
TCLP 8270	
2,4,5-Trichlorophenol (mg/l)	< 0.05
2,4,6-Trichlorophenol (mg/l)	< 0.05
2,4-Dinitrotoluene (mg/l)	< 0.05
o-Cresol (mg/l)	< 0.05
m,p-Cresol (mg/l)	< 0.10
Hexachlorobenzene (mg/l)	< 0.05
Hexachlorobutadiene (mg/l)	< 0.05
Hexachloroethane (mg/l)	< 0.05
Nitrobenzene (mg/l)	< 0.05
Pentachlorophenol (mg/l)	< 0.05
Pyridine (mg/l)	< 0.10
PCB Analysis	
Aroclor 1016 (µg/l)	< 1.0
Aroclor 1221 (µg/l)	< 3.0
Aroclor 1232 (µg/l)	< 2.0
Aroclor 1242 (µg/l)	< 1.0
Aroclor 1248 (µg/l)	< 1.0
Aroclor 1254 (µg/l)	< 1.0
Aroclor 1260 (µg/l)	< 1.0
Aroclor 1268 (µg/l)	< 0.40

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 31, 2008

Mr. Kenneth Marrow
El Paso Natural Gas Company
2316 West Bender Blvd.
Hobbs, New Mexico 88240

Re: Hydrostatic Test Discharge Permit HIP-113
El Paso Natural Gas Company
Pipeline Numbers L30148 and L30101
Location: Sections 24, 25, and 36, Township 19 South, Range 36 East, and Section 1, Township 20 South, Range 36 East, NMPM
Lea County, New Mexico

Dear Mr. Marrow:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) revised notice of intent, dated September 24, 2008, for authorization to discharge approximately 326,000 gallons of wastewater generated from a hydrostatic test of approximately 5.8 miles of a new 16-inch natural gas transmission pipeline L30131 and 7.3 miles of an existing 20-inch natural gas transmission pipeline L30148, approximately 11 miles southwest of Hobbs, New Mexico. The proposed collection and discharge areas are located within Sections 24, 25, and 36 of Township 19 South, Range 36 East and Section 1 of Township 20 South, Range 36 East, NMPM, Lea County, New Mexico.

Based on the information provided in the request, the hydrostatic test water discharge **is hereby approved** with the following understandings and conditions:

1. EPNG will be testing approximately 5.8 miles of a new 16-inch natural gas transmission pipeline L30131 and 7.3 miles of an existing 20-inch natural gas transmission pipeline L30148, approximately 11 miles southwest of Hobbs, New Mexico.
2. Source of the hydrostatic test water will be obtained from EPNG's Monument Well. Based the laboratory analytical results and on the information provided in the request; OCD identifies the Monument Well as an approved water source for this hydrostatic test.
3. Hydrostatic test water generated from the test will be temporarily stored in 23 temporary frac tanks within Section 1 of Township 20 South, Range 36 East, NMPM, Lea County, New Mexico awaiting the continued testing of pipeline L30148 and analytical testing.
4. EPNG shall implement best management practices in order to prevent the release of any hydrostatic test wastewater.
5. EPNG will secure a sample from the temporary frac tanks and immediately analyzes it at a certified laboratory.
6. All analyzes of samples from wastewater generated from the test must not exceed the standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC.
7. Test results will be sent to the OCD for review and subsequent approval or disapproval for the test water to be discharged.

8. If final discharge of the test water is not approved by the OCD, ENPG will transport the hydrostatic test water to an OCD approved facility for disposal or treat the wastewater to OCD's approved specifications for discharge.
9. If final discharge of the wastewater is approved, the discharge shall occur on the easement right-of-way located within Sections 24, 25, and 36 of Township 19 South, Range 36 East and Section 1 of Township 20 South, Range 36 East, NMPM, Lea County, New Mexico.
10. If final discharge of the wastewater is approved, no hydrostatic test water generated from the test will be discharged to groundwater.
11. If final discharge of the wastewater is approved, no discharge shall occur:
    a. where ground water is less than 10 feet below ground surface;
    b. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
    c. within an existing wellhead protection area;
    d. within, or within 500 feet of a wetland; or
    e. within 500 feet from the nearest permanent residence, school, hospital, institution or church;
12. EPNG shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC).

It is understood that the hydrostatic test will begin approximately November 1, 2008. **This permit will expire in 120 calendar days.** This permit may be revoked or suspended for violation of any applicable provisions and/or conditions of the permit.

This approval does not relieve EPNG of responsibility should its operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve EPNG of responsibility for compliance with other federal, state or local regulations.

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

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/baj

cc: OCD District I Office, Hobbs