

HITP - 017

**TEMPORARY
PERMISSION
2011**

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 3/31/11

or cash received on _____ in the amount of \$ 150⁰⁰

from EL PASO NATURAL GAS CO

for HITP-17

Submitted by: Lawrence Rando Date: 4/7/11

Submitted to ASD by: Lawrence Rando Date: 4/7/11

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Temp Fee

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 3/31/11

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

from El Paso Natural Gas Co.

for H1TP-17

Submitted by: Lawrence Romero Date: 4/7/11

Submitted to ASD by: Lawrence Romero Date: 4/7/11

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 _____

EL PASO NATURAL GAS COMPANY
1001 LOUISIANA STREET
HOUSTON, TX 77002

RECEIVED OCD

2011 APR -4 A 1: 35

REMITTANCE ADVICE

CHECK DATE 03/31/2011
CHECK NUMBER 1160116223
VENDOR NUM 0000002667

WATER QUALITY MANAGEMENT FUND
C/O OIL CONSERVATION DIVISION
1220 S SAINT FRANCIS DR
SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00434975	CKEPGTR-101296 EPNG-LINE 1103	03/28/2011	0.00	250.00
TOTAL			\$0.00	\$250.00



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Daniel Sanchez
Acting Division Director
Oil Conservation Division



March 30, 2011

Mr. Robert St. John
El Paso Natural Gas Company
1550 Wind Way
Odessa, Texas 79761

**Re: Hydrostatic Test Individual Temporary Permission HITP-17
El Paso Natural Gas Company
Pipeline Number 1103 – northwest of Anthony, New Mexico
Locations: NE/4 of the NE/4 of Section 7, Township 26 South, Range 3 East, NMPM,
Dona Ana County, New Mexico**

Dear Mr. St. John:

The Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) notice of intent, dated March 30, 2011, for authorization to temporary store approximately 105,000 gallons of wastewater generated from a hydrostatic test of approximately 3,200 feet of existing 30-inch natural gas transmission pipeline (EPNG 1103), located northwest of the Town of Anthony, New Mexico. The proposed collection location is within EPNG's pipeline easement right-of-way near MP 225+2822 in the NE/4 of the NE/4 of Section 7, Township 26 South, Range 3 East, NMPM, Dona Ana County, New Mexico, approximately 3,000 feet northeast of the intersection of NM Highway 28 and West Berino Road. No surface discharge is proposed by EPNG. The hydrostatic test wastewater will be discharged into frac tanks for temporary storage, transferred from the frac tanks to an OCD approved water hauler, and delivered to Key Energy Services for injection and disposal into a Class I well. The OCD acknowledges the urgency of this situation and will allow the approved activities to commence while awaiting the receipt of the filing fee (\$100.00) and the temporary permission fee (\$150.00) pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

Based on the information provided in the request, temporary permission is hereby granted for the collection, retention, and disposal of the hydrostatic test water generated from the pipeline test with the following understandings and conditions:



1. EPNG will be testing approximately 3,200 feet of existing 30-inch natural gas transmission pipeline (EPNG 1103), northwest of the Town of Anthony, New Mexico;
2. no discharge will occur at the hydrostatic test wastewater collection/discharge location: within EPNG's pipeline easement right-of-way near MP 225+2822 in the NE/4 of the NE/4 of Section 7, Township 26 South, Range 3 East, NMPM, Dona Ana County, New Mexico, approximately 3,000 feet northeast of the intersection of NM Highway 28 and West Berino Road;
3. the source of the hydrostatic test water will be a municipal water source obtained from the Town of Anthony or other local municipal water supplies;
4. approximately 105,000 gallons of hydrostatic test wastewater generated from the test will be slowly discharged into six (6) 21,000 gallon frac tanks for temporary storage, while awaiting testing, transfer and disposal into a Class I well at Key Energy Services;
5. the temporary storage tanks shall have impermeable secondary containment (e.g., liners - geomembrane and berms - hay bales), which will contain a volume of at least one-third greater than the total volume of the largest tank or one-third greater than the total volume of all tanks that are inter-connected, whichever is greater;
6. no hydrostatic test wastewater generated from the test will be discharged to the ground or within the existing easement right-of-way;
7. the hydrostatic test wastewater will be analyzed to determine if it is a RCRA non-hazardous/non-exempt waste that Key Energy Services may accept for disposal. EPNG will expedite the laboratory analytical testing. If the hydrostatic test wastewater does not meet the criteria for Key Energy Services waste acceptance, the test water shall be sent to a RCRA permitted TSD for disposal;
8. EPNG will ensure the transfer the hydrostatic test wastewater via an OCD approved water hauler to Key Energy Services Class I well for injection and disposal;
9. all hydrostatic test wastewater will be removed from the discharge and/or collection/retention locations within ten (10) calendar days of the completion of the hydrostatic test;
10. any surface area impacted or disturb from the approved activities shall be restored.
11. no collection or retention of hydrostatic test wastewater shall occur:
 - a. within any lake, perennial stream, river or their respective tributaries that may be seasonal;
 - b. where ground water is less than 7 feet below ground surface.
 - c. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - d. within an existing wellhead protection area;
 - e. within, or within 500 feet of a wetland; or
 - f. within 500 feet from the nearest permanent residence, school, hospital, institution or church;
12. best management practices must be implemented to contain the discharge and/or collection /retention onsite, not impact adjacent property, and to control erosion;
13. the discharge and/or collection/retention does not cause any fresh water 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 New Mexico Water Quality Control Commission Regulations);

14. the landowner(s) of the proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to the proposed hydrostatic test event; and
15. 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 29 (19.15.29 NMAC).

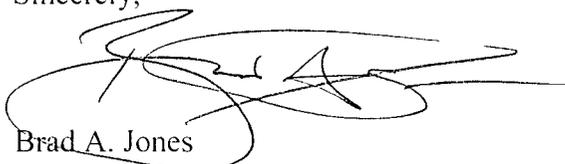
It is understood that the hydrostatic test will begin approximately April 2, 2011. This temporary permission will expire within 120 calendar days of its issue date. Temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions.

The OCD acknowledges the urgency of this situation and will allow the approved activities to commence while awaiting the receipt of the filing fee (\$100.00) and the temporary permission fee (\$150.00) pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

Please be advised that approval of this request does not relieve EPNG of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve EPNG of its responsibility to comply with any other applicable governmental authority's rules and regulations.

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

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

Cc: OCD District II Office, Artesia