

HBP - _____17_____

**RENEWAL REQUEST
AND APPROVAL**

YEAR:

_____2020_____

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Tuesday, June 9, 2020 1:22 PM
To: 'Blythe, Amy M (Amy)'
Subject: RE: Resubmittal of EPNG Renewal of the Annual Hydrostatic Discharge Permit HBP-017
Attachments: 2020 0609 HBP-017 renewal approval signed.pdf

Amy,

Please see the attached renewal approval for EPNG's annual temporary permission HBP-017. If you have any questions regarding the approval, please do not hesitate to contact me.

Brad

Brad A. Jones
Environmental Engineer
EMNRD Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office: (505) 476-3487
Fax: (505) 476-3462

From: Blythe, Amy M (Amy) <Amy_Blythe@kindermorgan.com>
Sent: Tuesday, June 2, 2020 12:15 PM
To: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>
Subject: [EXT] Resubmittal of EPNG Renewal of the Annual Hydrostatic Discharge Permit HBP-017
Importance: High

Hello Brad,

Attached is a copy of the *revised* renewal submittal letter and check for EPNG's Annual Temporary Discharge Permit HBP-017.

Thanks so much for your patience and assistance.

Hope all is well with you! ☺

Thanks,
Amy

KINDER MORGAN

Amy Blythe
Environmental Specialist
Two North Nevada Ave
Colorado Springs, CO 80903

719.520.4813 or 575.644.3336
(Child Ambassador - www.worldvision.org)

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Secretary

Adrienne Sandoval, Division Director
Oil Conservation Division



June 9, 2020

Ms. Amy M. Blythe
El Paso Natural Gas Company
2 North Nevada Avenue
Colorado Springs, Colorado 80903

**Re: Request for Renewal of Annual Temporary Permission to Discharge Hydrostatic Test Water
Company: El Paso Natural Gas Company
Permit: HBP - 017**

Dear Ms. Blythe:

The Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) renewal request, dated June 2, 2020, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new crude and/or natural gas pipelines throughout the State of New Mexico. EPNG's current approval expires June 26, 2020. Also, OCD acknowledges the submittal of the filing fee (\$100.00) and temporary permission fee (\$50.00) with the June 2, 2020 request.

Based on the information provided in the request, annual temporary permission is hereby granted to EPNG for the discharge of the hydrostatic test wastewater generated from all new pipeline hydrostatic tests the operator may perform during an approved one-year period with the following understandings and conditions:

1. the volume of the discharge does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources (upon a written request to OCD) is used for each test;
3. email or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event. The notice shall contain the following information:
 - a. the proposed location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
 - b. the date of the proposed discharge;
 - c. the volume of the proposed discharge; and
 - d. the source of hydrostatic test water;
4. the discharge does not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
5. no discharge shall occur:
 - a. where ground water is less than 10 feet below ground surface.
 - b. within 200 feet of a watercourse (19.15.7.W(4) NMAC), lakebed, sinkhole, or playa lake (19.15.7.P(4) NMAC);

- c. within an existing wellhead protection area (19.15.7.W(8) NMAC);
 - d. within 500 feet of a wetland (19.15.7.W(9) NMAC); or
 - e. within 500 feet from the nearest permanent residence, school, hospital, institution, or church;
6. no discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED, and OCD prior to the discharge;
 7. best management practices must be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
 8. the discharge 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 Water Quality Regulations);
 9. EPNG shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test wastewater and conduct corrective action pursuant to the Water Quality Regulations of 20.6.2.1203 NMAC and release notification pursuant to OCD Rule 29 (19.15.29 NMAC);
 10. the landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event; and
 11. an annual report, summarizing each test of new pipeline with less than 25,000 gallons per hydrostatic test per discharge event, will be submitted to OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a. the location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
 - b. the date of each discharge;
 - c. the volume of each discharge; and
 - d. the source and quality of test water (laboratory analysis, if necessary).

Annual temporary permissions shall expire one (1) year after issuance. **This temporary permission will expire June 26, 2021.** Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date. An annual temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of this approval.

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

Jones, Brad A., EMNRD

From: Blythe, Amy M (Amy) <Amy_Blythe@kindermorgan.com>
Sent: Tuesday, June 2, 2020 12:15 PM
To: Jones, Brad A., EMNRD
Subject: [EXT] Resubmittal of EPNG Renewal of the Annual Hydrostatic Discharge Permit HBP-017
Attachments: Revised EPNG Renewal Submittal to NMOCD (6-2-2020).pdf; KM Check-150 dollars.pdf

Importance: High

Hello Brad,

Attached is a copy of the *revised* renewal submittal letter and check for EPNG's Annual Temporary Discharge Permit HBP-017.

Thanks so much for your patience and assistance.

Hope all is well with you! ☺

Thanks,
Amy

KINDER MORGAN

Amy Blythe
Environmental Specialist
Two North Nevada Ave
Colorado Springs, CO 80903
719.520.4813 or 575.644.3336
(Child Ambassador - www.worldvision.org)



June 2, 2020

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Request for EPNG's Annual Temporary Discharge Permit HBP-017

Dear Mr. Jones

El Paso Natural Gas Company (EPNG) is submitting the following request to renew our Annual Temporary Permit to discharge waters from hydrostatic tests from new pipe. This application was completed using the OCD's Guidelines for Hydrostatic Test Dewatering, revised October 1, 2019. The current permit expires on June 26, 2020. A check for \$150.00, that covers the filing and permission fees, is enclosed within this submittal application.

In order to maintain coverage under the Annual Temporary Permit, EPNG will comply with the following conditions:

- 1) The volume will not exceed 25,000 gallons per hydrostatic test;
- 2) Water from a public/municipal water supply or other OCD-approved sources will be used for each test;
- 3) Written notification shall be provided to the OCD 72-hours prior to each hydrostatic discharge event;
- 4) The discharge will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
- 5) No discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED and OCD prior to discharge;
- 6) Best management practices shall be implemented to contain the discharge onsite, prevent impact to adjacent properties, and to control erosion;
- 7) The discharge will 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)
- 8) The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location shall be properly notified of the activities prior to each proposed hydrostatic event; and
- 9) An annual report, summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - (a) The location of hydrostatic test (Section/Township/Range or GPS coordinates)
 - (b) The date of each test;

(c) The volume of each discharge; and

(d) The source and quality of test water (laboratory analysis, if necessary).

If you have any questions, please contact me at 719-520-4813.

Sincerely,

A handwritten signature in blue ink that reads "Amy Blythe". The signature is written in a cursive, flowing style.

Amy M. Blythe
Environmental Specialist II

Copy (with enclosure):

CC: Chris Janak – Environmental Project Permitting Manager

Kinder Morgan Inc. as Paying Agent

No. 103314

Check Date: 05/29/2020

WATER QUALITY MANAGEMENT FUND, C/O OIL CONSERVATION DIVISION, 1220 S SAINT FRANCIS DR, SANTA FE NM, 87305 (1330344470)

Description	Voucher #	Date	PO Number	Gross Amount	Discount Amount	Net Amount Paid
PMTREQ1HBBNM1017 Please send the check to Amy Blythe so she can submit payment with the renewal letter to NMOCD	15768198	05/28/20		\$150.00	\$0.00	\$150.00
Totals				\$150.00	\$0.00	\$150.00

Detach at Perforation Before Depositing Check
100034470



Kinder Morgan Inc. as Paying Agent
1001 Louisiana Ste 1000
Houston, TX 77002

J.P. Morgan Chase Bank, N.A.
Dallas, TX
88-88/1113

Check No. 103314

Check Date
05/29/2020

Check Amount
