HBP - 3

GENERAL CORRESPONDENCE

YEAR(S):
1984 - 1983

NORTHWEST PIPELINE CORPORATION

P.O. BOX 1526
SALT LAKE CITY, UTAH 84110-1526
801 583 8800

March 14, 1984

Mr. Joe D. Ramey, Director
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, NM 87501

Dear Mr. Ramey:

Attached is the correspondence that has transpired pursuant to your January 13, 1983 letter requesting hydrostatic test discharge plans for Northwest Pipeline Corporation facilities in New Mexico. I had requested information from Mr. Oscar Simpson regarding your procedures in December of 1982. I assume that discussion is what prompted your January 13 letter. I also have included a January 13 letter I received from Oscar Simpson.

On April 21, 1983, I sent the attached letter requesting a blanket discharge permit for all discharges from new pipe under 100,000 gallons and included Northwest's procedures for insuring protection of the environment. In late May I received a call from Mr. Simpson in which he indicated he had not received the April 21 letter. I forwarded him another copy on that day.

I assumed this second copy was received and approved since I received a permit on July 26, 1983, with your signature on it referencing my April 21 letter.

There have been no discharges since the permit was issued since it has become company practice to gas-test the smaller gathering system lines. We will continue to comply with the provisions of the permit and notify you should a water test be performed.

I hope this clears up any discrepancies you may have within your system.

Sincerely,

NORTHWEST PIPELINE CORPORATION

Lori Komatar

Lori Komatar
Environmental Affairs

ps

enc

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

January 13, 1983

RECEIVED
MAR 19 1984
OIL CONSERVATION DIVISION
SANTA FE

Northwest Pipeline Corporation
Environmental Department - 10356
P. O. Box 1526
Salt Lake City, Utah 84110

ATTN: Lorie Kolimator

RE: Request for Discharge Plan
for Facilities in New
Mexico

Dear Ms. Kolimator:

Under the provisions of the regulations of the Water Quality Control Commission, you are hereby notified that the filing of discharge plans for your facilities in New Mexico are required. Discharge plans are defined in Section 1-101.P of the regulations and a copy of the regulations is enclosed for your convenience.

This plan should cover all discharges of effluent at or adjacent to your facilities in New Mexico. Section 3-106A of the regulations requires submittal of the discharge plans within 120 days of receipt of this notice unless an extension of this period is sought and approved. The discharge plans should be prepared in accordance with Part 3 of the regulations.

If there are any questions on this matter, please do not hesitate to call Oscar Simpson, as he has been assigned the responsibility for review of all discharge plans.

Sincerely,

Joe D. Ramey
Director

JDR/OS/dp

Enc.

NORTHWEST PIPELINE CORPORATION

P.O. BOX 1526
SALT LAKE CITY, UTAH 84110-1526
801 583-8800

April 21, 1983

Mr. Oscar Simpson
Energy & Minerals Dept.
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, NM 87501

Dear Mr. Simpson:

This letter constitutes Northwest Pipeline Corporation's request for a blanket hydrostatic test discharge permit for all discharges under 100,000 gallons from new pipe as described in your January 13, 1983 letter.

A monthly report will be submitted by the 20th day of the succeeding month describing the date, location, purpose, volume, and source of the discharged water.

Attached is a general description of Northwest's hydrostatic test procedures which incorporate, to the degree necessary for each discharge event, measures to provide for protection of the environment.

Northwest understands that all discharges over 100,000 gallons or discharges from old pipe will be handled by an individual permit.

Please refer all comments concerning hydrostatic test discharges in New Mexico to:

Lori Komatar
Northwest Pipeline Corporation
Environmental Affairs - 10356
P. O. Box 1526
Salt Lake City, UT 84110

Your cooperation is appreciated.

Sincerely,

NORTHWEST PIPELINE CORPORATION

Lori Komatar

Lori Komatar
Environmental Affairs

bcc: W. A. Thomasson 10356
W. J. Huhtala 10356
S. W. Dougherty 10450
Environmental Files
Lori

NORTHWEST ENERGY COMPANY
P.O. BOX SALT LAKE CITY, UTAH 84108

GENERAL PROCEDURES FOR HYDROSTATIC TESTING - ENVIRONMENTAL

Attached is a general description of the hydrostatic test process used by Northwest in testing its facilities. The numbered items refer to the numbers on the attached drawing.

1. Source water - Hydrostatic test water is obtained from river/creeks, wells, private ponds, or through agreements with local water haulers. Appropriate state or federal permit or landowner approval is obtained prior to the appropriation of the test water.

2. Fill Line - Water is transferred from the source to the pipeline via a temporary water line that is connected to the test manifold. The water line can be several miles long or only a few feet long depending on the distance of the source water to the test section. The fill line will have a basket strainer or intake screen attached to the end of the pipe to prevent accidental suction of fish or plant life into the pipeline.

3. Fill Pump - The fill pump is used to pump the water into the gas pipeline and raise the system to an intermediate pressure. The fill pump contains an internal filter (usually a 100 mesh screen) to filter the source water as it enters the pipeline. The larger particulates are thus captured in the filter preventing them from being washed through the new pipeline.

4. Test manifold - The test manifold is the cap and riser that is welded to the pipeline that is being tested. The riser serves as a water intake (or discharge) point and the cap on the end isolates the section of the pipeline being tested. There is a test manifold located at each end of the test section. The manifold also serves as a transfer vehicle for the water from one test section to the next.

5. The pipeline - The pipeline to be tested ranges from 4 1/2" diameter pipe to 36" or larger diameter pipe. The pipeline is tested in segments whose lengths are determined by topography (greater elevation changes require shorter test sections) class location (proximity of the pipe to inhabited areas) and availability of water. In most cases water is pumped from one section to the next to be reused as many times as is practical.

   The majority of pipelines being tested in New Mexico consist of 4 1/2" well lines which connect to 6" and 8" gathering trunk or lateral lines. On occasion, a larger 24-36" or larger line may be tested as a result of new construction or replacement of portions of the existing mainline system through Colorado.

6. Brush Pig - Prior to filling the pipeline with the test water, a brush pig is pushed through the line to remove dirt and debris that have accumulated in the pipeline during construction.

   After the pigging operation is complete a small quantity of washwater is pushed through the pipeline to remove additional dirt, rust, and mill scale. This wash water is collected as it exits the pipe and disposed of by hauling it out or allowing it to evaporate in a settling pond which is later restored to original ground contour.

The quantity of wash water varies depending on size and length of pipe but generally ranges from approximately 2 barrels on the smaller gathering lines up to approximately 2000 gallons on large diameter pipe. In some cases, a detergent is added to help clean the pipeline. After the pipeline has been washed it is filled with water, pressured, and tested.

7. Dewatering Pig - After the pipeline has been tested the water is either transferred to another section to be used again or is discharged from the pipe through a manifold connected to a discharge line.

8. Discharge Line - The discharge line is usually the same type of water line as the fill line. In most cases the water is discharged to an area other than the original source, but in some cases the water is pushed back through the fill line and discharged to the original source. Factors determined where the water will be discharged include topography, land owner or agency stipulations, contractor's preference, availability of equipment, and test program dynamics.

9. Energy Dissipating Device (EDD) - An EDD is placed at the end of the discharge line on all large diameter pipelines and a majority of the small gathering lines depending on quantity of water being discharged, pressures at discharge, and local environmental constraints. There are numerous types of EDD's available, most are fabricated on-site and are chosen based on contractor preference, topography, discharge quantities and pressures, and nature of the receiving waters. Examples of more common EDD's include:

   a) Splash plate - a metal plate welded at an angle to the discharge pipe which allows the discharge stream to be directed upward as it exits the pipe. This not only reduces the velocity of the discharge stream, it also tends to re-oxygenate the water as it is discharged. This device is practical for most applications including land application where a natural drainage is not available.

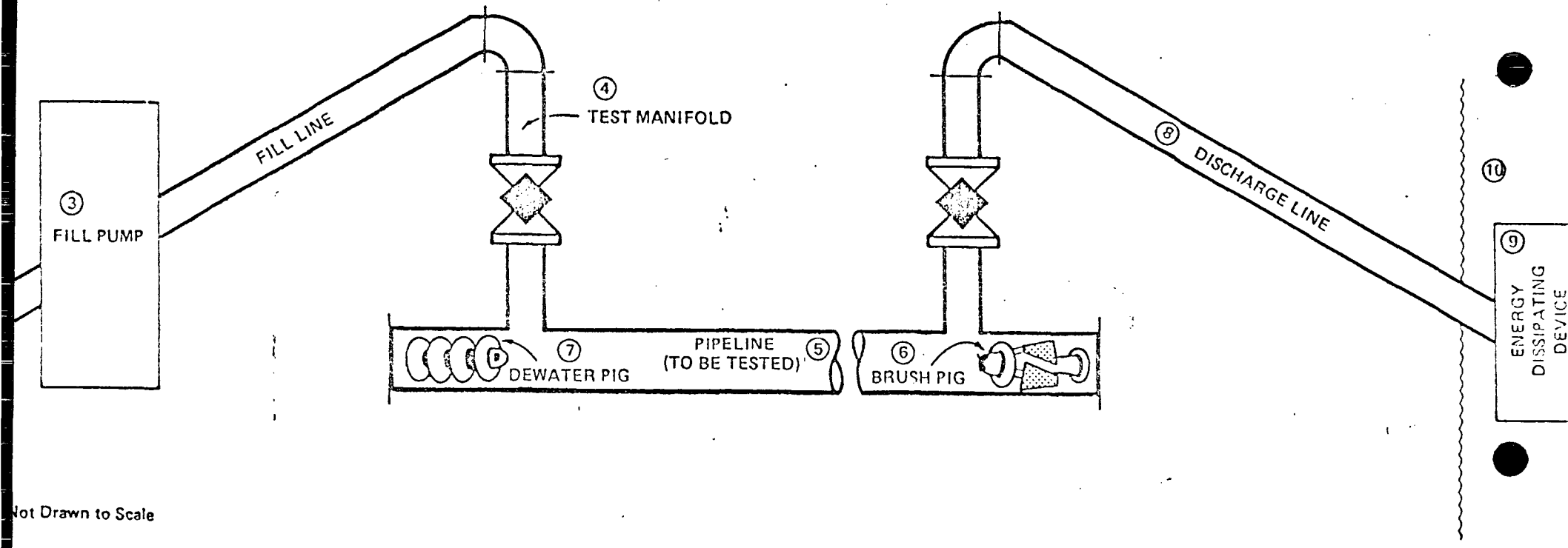
   b) Splash Pup - This device is fabricated from excess pipe that is a larger diameter than the discharge line. It is used more frequently on large diameter pipeline construction where large volumes of water are involved. The T-square is generally made from a 24"-30", 10-20' segment of pipe that is welded perpendicular to the discharge line. As the water exits the discharge line it hits the rear of the T-square reducing the velocity allowing the water to flow out of the pipe at a non-erosive rate. Variations of the T-square exists which include capped ends of the T with numerous holes punched in the pipe to allow the water to exit. The T-square is most effective when used in a natural drainage with the T lying in the middle of and parallel to the direction of the receiving water flow.

c) Dozer blade - In some cases, usually on the smaller gathering lines a dozer blade is placed opposite the discharge pipe and the water is directed against the blade to reduce velocity.

d) Other EDD's are available which certain contractors prefer to use or are designed to fit a particular discharge situation.

10. Receiving waters - the receiving waters are in most cases a dry wash, a pit, or a natural depression in the land surface. In some cases prior arrangements are made with private landowners or irrigation companies to accept the water into their canals or ponds.

Hydrostatic test discharges are always of an intermittent nature. As a project is completed the line is tested and the water discharged. Discharges take anywhere from two hours on the small lines to two days to evacuate the large lines. Quantities for any single discharge vary from 500 gallons on small lines to over 1,000,000 gallons on large diameter lines. The majority (over 90%) of Northwest's discharges would be under 5,000 gallons for any single discharge.



Not Drawn to Scale

NORTHWEST PIPELINE CORPORATION

HYDROSTATIC TEST PLAN

The following information shall be tabulated for each report:

1. Date

2. County in which testing was done and location by Section, Township and Range

3. Purpose of test- Example: Pipeline replacement, well connection, road crossing, tap and meter, etc.

4. Total amount of discharge in gallons for each test

5. Source of water Example:

   a. Well water (supply owner's name and well location by Section, Township and Range.

   b. Municipal water supply (supply name of county)

   c. River or stream (supply name and location by Section, Township and Range.

   d. Surface water impoundment (supply owner and location by Section, Township and Range.

7. All hydrostatic testing discharges for a specific area or job will have blanket approval under the one year permit if discharges are under 100,000 gallons.

DISCHARGES OVER 100,000 GALLONS

1. For hydrostatic discharges over 100,000 gallons from new pipelines, the Oil Conservation Division must be notified sixty days in advance of any proposed hydrostatic test discharges. A written program description of the intended sequence of events for testing and dewatering the pipeline as per the enclosed OCD "Guidelines for Hydrostatic Test Dewatering" must accompany the notice. After review and acceptance of the program, the OCD will issue a permit for the discharge.

OLD PIPELINE DISCHARGES

1. Old pipeline discharges are defined as discharges emanating from oil and gas transmission lines that have been previously or presently used to transport hydrocarbons.

2. Discharges from old pipelines will not be allowed unless prior notification (60 days) and subsequent OCD approval is obtained. A written detailed program description of the intended discharge must accompany the notice. The OCD "Guildelines for Hydrostatic Test Dewatering" will be used for a program description except for the following items:

   a. Item 1-B (1) TOC - Total Organic Carbon

      The OCD at its discretion may request the applicant to define the composition of the TOC in the soure water or

b. Item C-3 (6) Total Organic Carbon

The OCD at its discretion may request the applicant to define the composition of the TOC in the discharge.

c. Item D - Discharges from old pipelines must be discharged and held in OCD approved lined pits or containers. Discharges to the ground surface or rivers and streams is prohibited.

d. The applicant will describe in detail what methods will be implemented to treat the discharge if it is intended to be discharged to the ground surface. The fluid to be discharged must meet the standards of the Water Quality Control Commission Regulations 82-1 (WQCC) Part 3, 3-103 Standards for Ground Water (A, B and C) plus Definition "UU" Toxic Pollutant.

e. The applicant must verify by lab analysis that after treatment, the fluid to be discharged meets the WQCC regulation standards. The OCD will review the analysis and upon acceptance will grant the discharge.

f. Treated or untreated fluids that fail to meet the WQCC standards - A detailed description must be submitted describing where and how the fluid is to be disposed of. Fluids discharged from old pipelines is considered to contain toxic pollutants and the disposal of such fluids must be disposed of at an appropriate waste disposal facility or an authorized hazardous waste injection well.

If you have any questions concerning this matter, call me at (505) 827-5822.

Sincerely,

Oscar D. Simpson III

Oscar Simpson, III
Water Resource Specialist

OS/dp

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

January 13, 1983

Northwest Pipeline Corporation
Environmental Department - 10356
P.O. Box 1526
Salt Lake City, Utah 84110

ATTENTION: Lorie Komator

RE: Permit to Discharge
Hydrostatic Test Water
from Newly Constructed
Pipelines

Dear Ms. Komator:

Pursuant to our past telephone conversations pertaining to the permitting procedures for discharging hydrostatic test waters from newly constructed pipelines and any discharges from old or in use pipelines, the Oil Conservation Division (OCD) requests that Northwest Pipeline Corporation obtain permission by administrative approval from the OCD, Director, Joe D. Ramey.

The following is an outline of the various permits and procedures for discharges from oil and gas transmission pipelines:

1. A permit will be granted for a period of one year from the date of issuance.

2. Discharges of hydrostatic test water shall be from only newly constructed pipelines.

3. Newly constructed pipelines are defined as pipelines which have been recently constructed and have not been used to transport hydrocarbons prior to hydrostatic testing.

4. Discharge of hydrostatic test water will not be made into any lake, perennial stream or river, or their respective immediate tributaries that may have seasonal flow.

5. Only fresh water (10,000 ppm Total Dissolved Solids or less) will be used for hydrostatic testing.

6. Summaries of hydrostatic test water discharges for each month shall be submitted to the Oil Conservation Division. Each monthly report is due by the 20th day of the succeeding month.

The following information shall be tabulated for each report:

1. Date

2. County in which testing was done and location by Section, Township and Range

3. Purpose of test- Example: Pipeline replacement, well connection, road crossing, tap and meter, etc.

4. Total amount of discharge in gallons for each test

5. Source of water Example:

   a. Well water (supply owner's name and well location by Section, Township and Range.

   b. Municipal water supply (supply name of county)

   c. River or stream (supply name and location by Section, Township and Range.

   d. Surface water impoundment (supply owner and location by Section, Township and Range.

7. All hydrostatic testing discharges for a specific area or job will have blanket approval under the one year permit if discharges are under 100,000 gallons.

DISCHARGES OVER 100,000 GALLONS

1. For hydrostatic discharges over 100,000 gallons from new pipelines, the Oil Conservation Division must be notified sixty days in advance of any proposed hydrostatic test discharges. A written program description of the intended sequence of events for testing and dewatering the pipeline as per the enclosed OCD "Guidelines for Hydrostatic Test Dewatering" must accompany the notice. After review and acceptance of the program, the OCD will issue a permit for the discharge.

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If you have any questions concerning this matter, call me at (505) 827-5822.

Sincerely,

Oscar Simpson, III
Water Resource Specialist

OS/dp