

HIP - 42

**PERMITS,
RENEWALS, &
MODS**



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 2, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-459

Mr. Thomas Bach
Natural Gas Pipeline Company of America
701 East 22nd Street
Lombard, Illinois 60148-5072

Re: **Hydrostatic Test Water Discharge**
Lea County, New Mexico
Used Pipeline
Section 14 and 23, Township 16 South, Range 33 East, NMPM,
Lea County, New Mexico

Dear Mr. Bach:

The New Mexico Oil Conservation Division (OCD) has received the Natural Gas Pipeline Company of America (NGPL) analytical results for the hydrostatic test discharge performed at the above location. The pigging waste analytical results show that the non-exempt waste was non-hazardous. This waste is approved for disposal at an OCD surface waste management facility or may be placed into the NGPL's temporary evaporation pond constructed at the above referenced hydrostatic discharge location.

The OCD appreciates NGPL's notification that a disposal mistake was made and that the non-exempt pigging waste was disposed of at the Shell State Salt Water Disposal #1 (Section 32, T14S, R34E, Lea County Permit #104). The OCD chooses at this time to remind NGPL that non-exempt waste shall not be disposed of at a class II disposal well. Please note that additional security measures such as padlocks may be needed on tanks holding non-exempt waste if NGPL believes that this type of disposal accident may reoccur. The information regarding the class II disposal well accepting non-exempt waste has been forwarded to the OCD Engineering Bureau for review.

Please be advised that this approval does not relieve NGPL of liability should their operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve NGPL of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at (505) 827-7153.

Sincerely,

Martyn J. Kieling
Environmental Geologist

xc: OCD Hobbs Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

April 30, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-429

Mr. Thomas Bach
Natural Gas Pipeline Company of America
701 East 22nd Street
Lombard, Illinois 60148-5072

Re: **Hydrostatic Test Water Discharge**
Lea County, New Mexico
Used Pipeline
Section 14 and 23, Township 16 South, Range 33 East, NMPM,
Lea County, New Mexico

Dear Mr. Bach:

The New Mexico Oil Conservation Division (OCD) has received the Natural Gas Pipeline Company of America (NGPL) request dated March 31, 1998 and supplemental information dated April 15, 1998 for authorization to discharge approximately 1,200,000 gallons of waste water from the hydrostatic test of 10 miles of used pipeline in Section 14 and 23, Township 16 South, Range 33 East, NMPM, Lea County, New Mexico. NGPL is the land owner at the discharge location, NGPL Station 167.

Based on the information provided in the request, the hydrostatic test water discharge is hereby approved subject to the following conditions:

1. Pigging wastes will be held in frac tanks and will be subject to full hazardous waste characterization testing to determine the proper means of disposal. Pigging wastes must receive separate authorization from the OCD prior to disposal and the request must be accompanied with laboratory analysis and chain of custody.
2. The test water (1,200,000 gallons) will be discharged into a lined pit located in Section 23, Township 16 South, Range 33 East, NMPM, Lea County, New Mexico and allowed to evaporate.
3. The liner in the pit shall be not less than 12 mm thick.

Mr. Thomas Bach

April 30, 1998

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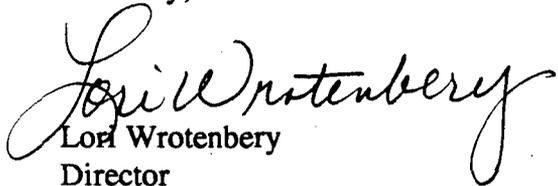
4. Hydrostatic test water sample analysis will include major anions and cations (Ca, Mg, Na, K, HCO₃, CO₃, Cl, SO₄), heavy metals (As, Ba, Cd, Pb, Hg, Se, Fe, Zn), aromatic and halogenated hydrocarbons screens, PAH (Polynuclear Aromatic Hydrocarbons), TDS, Fe, Mn, pH and conductivity.
5. The analytical results from the hydrostatic test discharge will be made available to the OCD.
6. Any solids that accumulate in the lined pit as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.
7. The analytical results will be made available to the OCD along with a request for disposal of the accumulated solids.

Pursuant to WQCC Regulation 3-106.B, this approval will allow NGPL to discharge without an approved discharge plan for a period not to exceed 120 days. If the site is to be used for more than one test discharge, formal reapplication must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

Please be advised that this approval does not relieve NGPL of liability should their operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve NGPL of responsibility for compliance with other federal, state or local laws and/or regulations.

If there are any questions, please call Martyne Kieling at (505) 827-7153.

Sincerely,


Lori Wrotenbery
Director

LW/mjk

xc: OCD Hobbs Office