

HIP -

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**PERMITS,
RENEWALS, &
MODS**

Kieling, Martyne

From: Kieling, Martyne
Sent: Monday, December 03, 2001 8:16 AM
To: 'Padilla, Daniel'
Subject: RE: Hydrostatic Test Water Permit: Authorization to Discharge

Re: Hydrostatic Test Water Discharge HI-073
Pipeline No. 2008 Between Valve No.'s 3 and 4
Sections 1, 6, 7, 11, 12, 13, 24, 25, 26
Townships 20, 21, 22 South, Ranges 12, 13 West, NMPM,
Grant and Luna Counties, New Mexico

Daniel Padilla:

Based on the criteria provided in your E-mail Request, your request is hereby approved.

- * El Paso is testing new pipe;
- * El Paso has obtained test water from a good source;
- * El Paso will not discharge test water into any washes - only in upland areas (most of the water will be sprinkled on the right-of-way for dust control and trench settling);
- * Water collected in the frac-tanks from the hydrostatic test, came out clean with no sludge build-up at the bottom of the frac-tanks.

Please be advised that this approval does not relieve EPNG of liability should their 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, please call me at (505) 476-3488.

Sincerely,

Martyne J. Kieling
Environmental Geologis

-----Original Message-----

From: Padilla, Daniel [mailto:Daniel.Padilla@ElPaso.com]
Sent: Friday, November 30, 2001 8:38 AM
To: 'MKieling@state.nm.us'
Subject: Hydrostatic Test Water Permit: Authorization to Discharge

Martyne:

I'm a bit under the gun regarding the approval for discharging the hydrostatic test water for the Silver City Project in Grant and Luna Counties, New Mexico and I was wondering if you could help me out. Currently, I have not allowed the discharge for the hydrostatic test water until the results from the lab have been obtained. By doing so, El Paso is now incurring a huge cost. In the permit application that El Paso submitted to the NM-OCD, dated November 9, 2001, we used discharge requirements for used pipe, which obligates El Paso to wait for the test water results from the lab before discharging the water. We should have submitted a permit application for new pipe, not used pipe. The application for new pipe would normally allow us to discharge without waiting for the test water results. I would like to request that El Paso be allowed to release the hydrostatic test water as soon as possible, based on the following:

- * El Paso is testing new pipe;

- * El Paso has obtained test water from a good source;
- * El Paso will not discharge test water into any washes - only in upland areas (most of the water will be sprinkled on the right-of-way for dust control and trench settling);
- * Water collected in the frac-tanks from the hydrostatic test, came out clean with no sludge build-up at the bottom of the frac-tanks.

Would the NM-OCD consider allowing El Paso to discharge without waiting for the lab results. If so, please let me know as soon as possible. El Paso understands that by not waiting for the test water results, they have not been relieved of any legal obligation to clean up should the test results reveal that the water was contaminated.

Regards,

Daniel I. Padilla
Special Projects,
Pipelines West Env. Dept.,
EPNG, El Paso Corporation
Office (719) 520-4652
Fax (719) 520-4716
Email Daniel.Padilla@ElPaso.com

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 26, 2001

RETURN RECEIPT NO. 7099-3220-0000-5051-2665

Mr. Daniel I. Padilla
El Paso Natural Gas Company
2 North Nevada Ave
Colorado Springs, CO 80903

**Re: Hydrostatic Test Water Discharge HI-075
Pipeline No. 2008 Between Valve No.'s 3 and 4
Sections 1, 6, 7, 11, 12, 13, 24, 25, 26
Townships 20, 21, 22 South,
Ranges 12, 13 West, NMPM, Grant and Luna Counties, New Mexico**

Dear Mr. Padilla:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request, dated November 9, 2001, for authorization to discharge approximately 274,000 gal of waste water from the hydrostatic test of approximately 12 miles of new pipeline (10 $\frac{3}{4}$ inch steel line) located in Sections 1, 6, 7, 11, 12, 13, 24, 25, 26 Townships 20, 21, 22 South, Ranges 12, 13 West, NMPM, Grant and Luna Counties, New Mexico.

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

1. The test water (274,000 gallons) will be held frac-tanks along the EPNG right-of-way and then, provided that the test water passes the water-quality criteria outlined in the EPNG plan, the water will be discharged along the right of way for dust suppression, hydro-mulching and reseeded purposes.
2. Only fresh water of less than 2,000 mg/l total dissolved solids from a water supply system or other potable source shall be used in the hydrostatic test.
3. The fluids will not be allowed to migrate to a water of the State or a water of the U.S.
4. Any solids that accumulate in the frac-tanks as a result of the discharge will be subject to full hazardous waste characterization testing to determine the proper means of disposal.

5. The analytical results will be made available to the OCD along with a request for disposal of the accumulated solids.

Pursuant to WQCC Regulation 20 NMAC 6.2.3106.B, this approval will allow EPNG to discharge without an approved discharge plan for a period not to exceed 120 days. Pursuant to WQCC Regulation 20 NMAC 6.2.3114 an application fee of one hundred dollars (\$100) is due at the time of the permit application submittal and a temporary permission permit fee of one hundred fifty dollars (\$150) is due upon receipt of this approval. The \$100 application and \$150 temporary permission permit fees have been received. 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 EPNG of liability should their 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, please call Martyne Kieling at (505) 476-3488.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/mjk

xc: OCD Artesia Office