GW - 6

PERMITS, RENEWALS, & MODS

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary

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

Jami Bailey
Division Director
Oil Conservation Division

FEBRUARY 27, 2012

Mr. Glen Thompson
El Paso Natural Gas Company
1550 Wind Way
Odessa TX 79761

Dear Mr. Thompson:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that one of your facilities with an expired or soon to be expired permit does not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for **GW - 006** (Washington Ranch Gas Storage Facility) is hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste treatment, storage and disposal operations; and landfarms and landfills. OCD will make an inspection of your facility to determine if any of these existing processes may require a separate permit under OCD's Oil, Gas, and Geothermal regulations. If OCD determines that a separate permit(s) is required, then a letter will be sent to you indicating what type of permit is required.

Please keep in mind, if your facility has any discharges that would require a WQCC Discharge Permit now or in the future, then you will be required to renew or obtain a WQCC Discharge Permit. If you have any questions regarding this matter, please contact Glenn von Gonten at 505-476-3488.

Thank you for your cooperation.

Jami Bailey
Director

JB/gvg

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, June 21, 2011 9:47 AM
To: 'Thompson, Glen D'
Subject: RE: Wash Ranch Sump Mod

Mr. Glenn Thompson,

Good morning,

As a follow up to the voicemail I left you this morning.

NMOCD approves your modification to the Washington Ranch Sump modification.

Please update all changes accordingly to your facility map and schematics.

Thank you Mr. Thompson,

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

From: Thompson, Glen D [mailto:Glen.Thompson@ElPaso.com]
Sent: Friday, June 10, 2011 9:11 AM
To: Lowe, Leonard, EMNRD
Subject: FW: Wash Ranch Sump Mod

Mr. Lowe:

I am forwarding the responses from Wayne Ritchie, the project coordinator, to the questions you raised in an earlier e-mail. His answers are highlighted in green. Please review and approve if you have no additional questions. I look forward to your response.

Glen Thompson
Principal Environmental Representative
El Paso Natural Gas

From: Ritchie, Wayne E (Wayne) (Contractor)
Sent: Thursday, June 09, 2011 1:22 PM
To: Thompson, Glen D; Howell, Timothy G (Tim)
Cc: Barta, George B
Subject: RE: Wash Ranch Sump Mod

Glen,

The answers are included below highlighted in green.

Thanks,

Wayne

From: Thompson, Glen D
Sent: Monday, June 06, 2011 6:05 PM
To: Ritchie, Wayne E (Wayne) (Contractor); Howell, Timothy G (Tim)
Subject: FW: Wash Ranch Sump Mod

I need your assistance in answering the yellow-highlighted questions. Please call me at (432) 413-7844 to discuss.

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, June 06, 2011 2:25 PM
To: Thompson, Glen D
Subject: FW: Wash Ranch Sump Mod

Mr. Thompson

I have a few questions.
See below:

The existing underground cylindrical tank measures 42-inches in outside diameter and is of single-wall steel construction, nine feet in total length with a total capacity of approximately 617gal. The tank is equipped with external coating and tied into the facility's cathodic protection system. The tank is identified as a "sump" in the attached WRS-02-P0045.tif drawing. This existing tank was subjected to pressure testing during plant commissioning in June of 1982 and annually since.

OCD (06.06.11)

1. It is noted that this tank (BGT) has been pressure tested since 1982. Have all those years of "pressure" testing concluded a non leaking tank? Yes, the pressure testing has confirmed no leakage.
2. Generally, throughout the use of this tank (BGT), did it receive the same effluent? Yes, the effluent has remained the same since installation.
3. What is the "coating" on the external portion of the tank? We believe it is coal tar based pipe coating but will verify during modification

The tank is tied into the Washington Ranch Storage Facility Compressor and Auxiliary Building floor drain systems. The primary source of fluid is rain water from thunder storms that infiltrates through roof leaks into the buildings and flows through the drainage system into this tank. The tank is equipped with a 15gpm rated, float-controlled pump which discharges to the 1000Bbl Formation Water Tank (V-4103) which is shown in the attached drawing WRS-01-P0014.dwf. The Formation Water Tank is equipped with secondary containment.

The proposed modification to create the required double-wall containment is to insert a new cylindrical steel containment tank inside the existing tank, extend the floor drain piping into the new primary containment, seal the annulus created between the inner and outer tank walls, install a high level warning system and interstitial leak detection utilizing OCD 17.11I(4)(b) as a guide.

The cylindrical tank will be fabricated from 36-inch diameter 0.375 wall pipe with a total depth of approximately 107 inches (450gal). The pipe will meet the requirements of the latest editions of API-5L (Specification for Line Pipe), with attachments meeting the requirements of listed ASTM specifications and welds satisfying the requirements of API-1104 (Welding of Pipelines and Related Facilities).

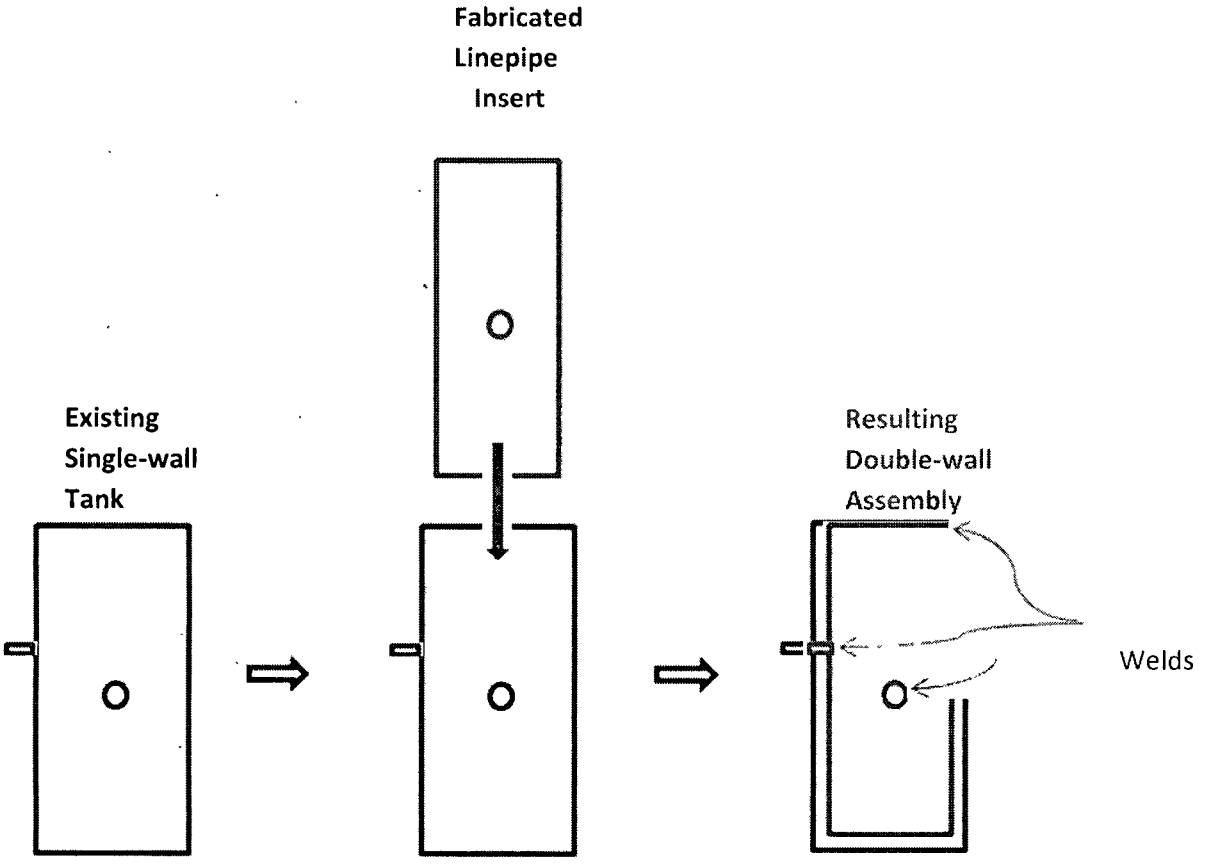
All welds will be applied by a Code current/qualified Welder utilizing API-1104 complaint Welding Procedures and non-destructively inspected per the requirements of API-1104.

The primary and secondary portions of the sump will be pressure tested to ensure integrity prior to the assembly being placed into service.

We believe that our proposed modifications will satisfy the requirements of the regulations and provide a level of protection equivalent to a completely new system installation.

What is the depth to groundwater and TDS of that groundwater in this area? Ground water depth is 140 feet and TDS is 280mg/L.

Do you have a drawing of what the modification looks like? If so, please submit. It does not have to be a "certified" drawing, just a visual of what the final intent of the modification will look like.

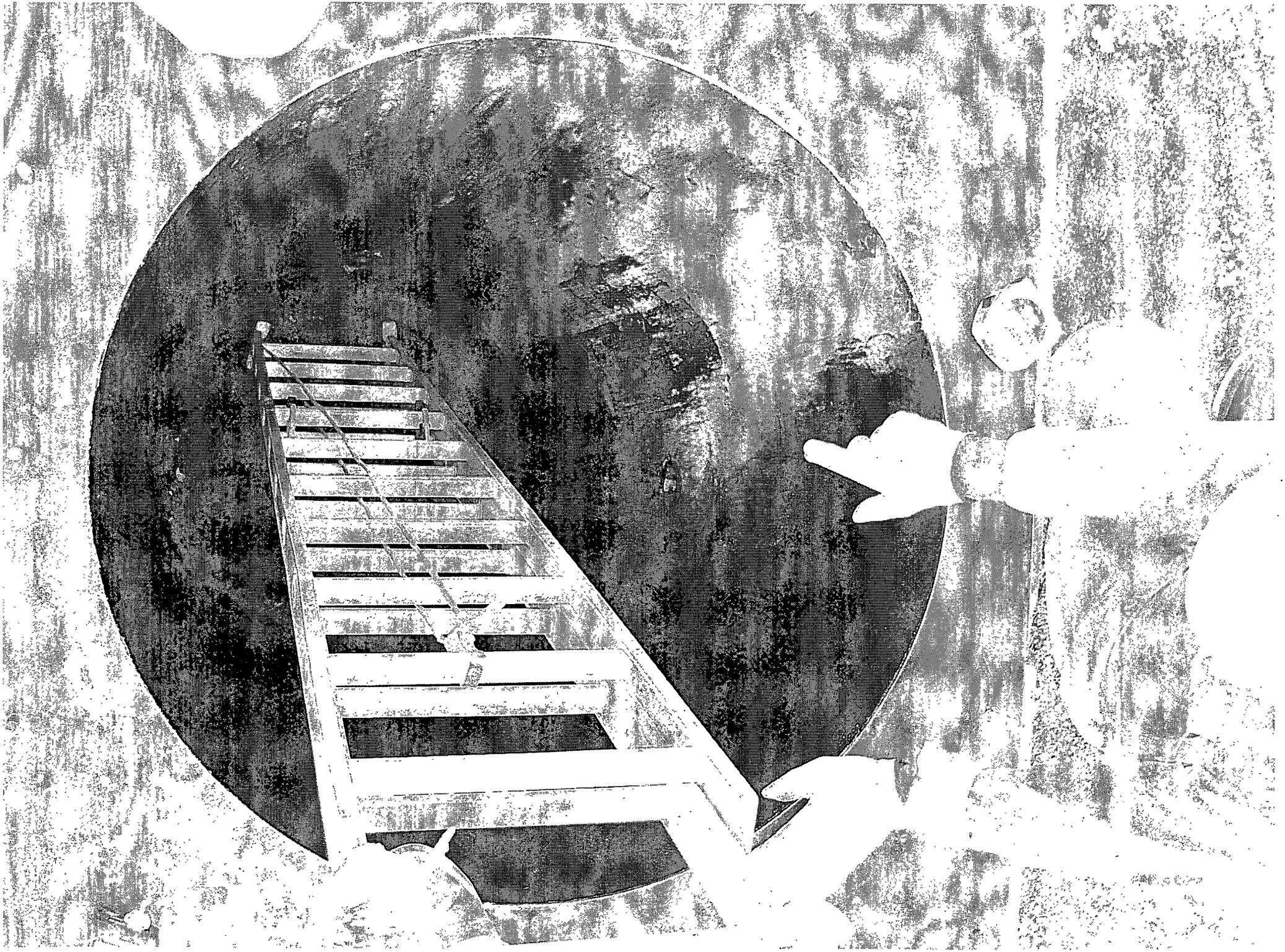


Thank you,

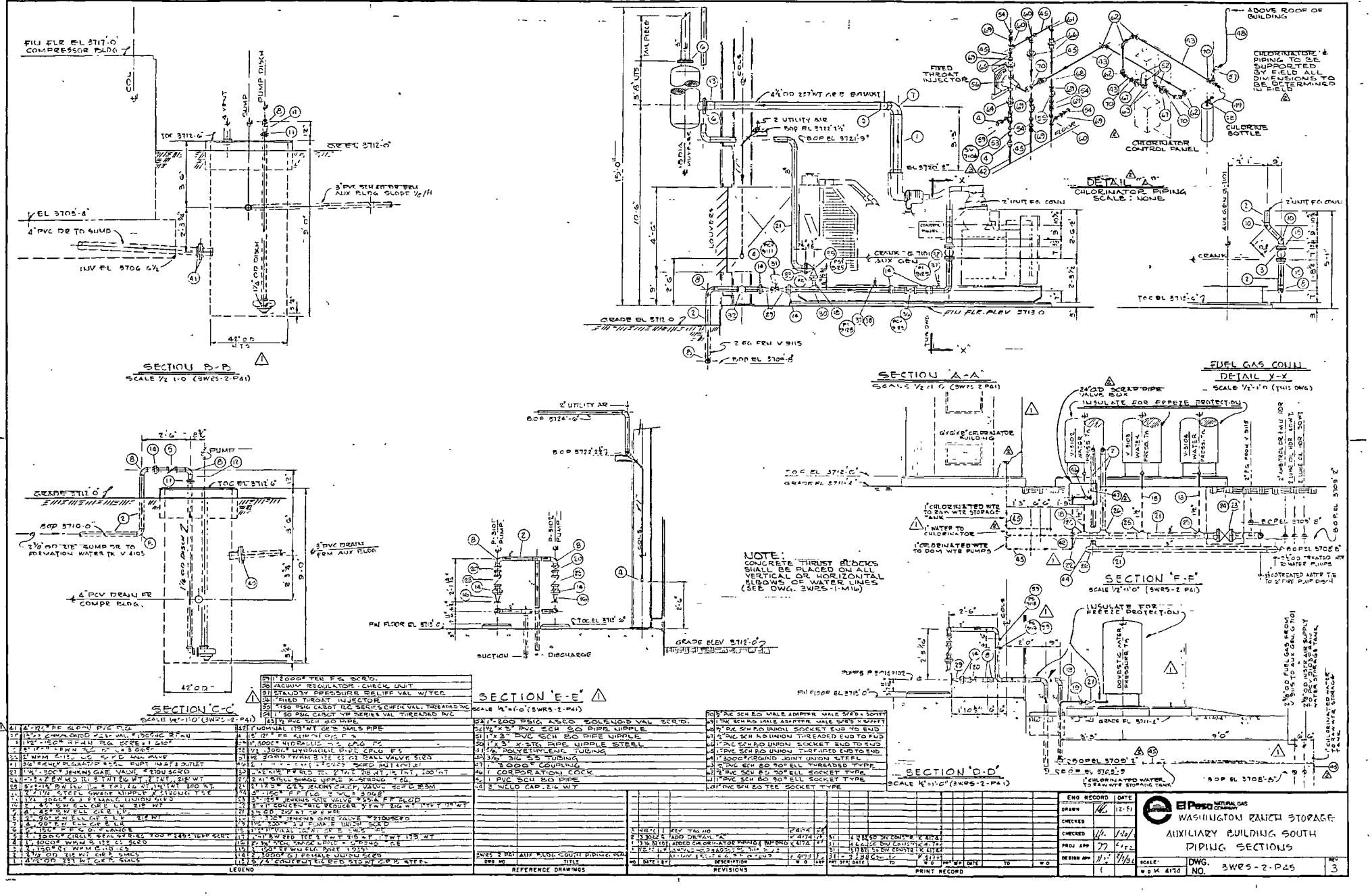
Ilowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: http://www.emnrd.state.nm.us/ocd/

06.02.11 E-MAIL ATTACHMENT 2/2 P9090054.JPG



06.02.11 E-MAIL ATTACHMENT 1/2 [WRS-02-P0045.TIF]



ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 11/22/10

or cash received on _____ in the amount of $ 100.00

from El Paso Natural Gas Co.

for GW-6

Submitted by: Lawrence Romero Date: 12/16/10

Submitted to ASD by: [signature] Date: 12/16/10

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 _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 11/22/10

or cash received on _____ in the amount of $ 1700 00

from El Paso Natural Gas Co.

for GW-6

Submitted by: Lawrence Romero Date: 12/16/10

Submitted to ASD by: Lauren Romero Date: 12/16/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Permit Fee

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

elpaso Natural Gas

November 24, 2010

RECEIVED OCD
2010 NOV 29 A 11: 28

Mr. Mark Fesmire **via UPS 1Z 700 YY5 02 9685 4035**
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: El Paso Natural Gas Company
Washington Ranch Gas Storage Facility
Discharge Plan Renewal Application GW-006

Dear Mr. Fesmire:

Enclosed please find two (2) executed copies (one original and one copy) of a renewal application form and El Paso Natural Gas Company's (EPNG) Washington Ranch Gas Storage Facility Discharge Plan. We have also enclosed both an application filing fee of $100.00 as well as the permit fee of $1,700 in accordance with NMWQCC guidelines. An additional copy of the application and Discharge Plan is being provided to the District Office under separate cover.

If you have any questions concerning this submission or require additional information or clarification, please contact me at your convenience at (432) 333-5532.

Sincerely,
El Paso Natural Gas Company

Robert H. St. John
Principal Environmental Representative

Atc

cc: **via UPS 1Z 700 YY5 02 9685 4640**
NMOCD, District Office #2
Mike Bratcher, Environmental Program Manager
1301 West Grand Ave.
Artesia, NM 88210

Keith Uhde – EPNG
Sandra Miller – EPNG

El Paso Natural Gas
1550 Windway Odessa, Texas 79761
PO Box 4718 Odessa, Texas 79760

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES, GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: Storage Facility GW-006
2. Operator: El Paso Natural Gas Company
   Address: 1550 Wind Way, Odessa, TX 79761
   Contact Person: Robert St. John Phone: 432-333-5532
3. Location: SW 1/4 SE 1/4 Section 34 Township 25S Range 24E
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
   See Attached
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
   See Attached
6. Attach a description of all materials stored or used at the facility.
   See Attached
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
   See Attached
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
   See Attached
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
   See Attached
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
    See Attached
11. Attach a contingency plan for reporting and clean-up of spills or releases.
    See Attached
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
    See Attached
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
    See Attached
14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Philip L. Baca Title: Tucson Division Director

Signature: Philip L Baca Date: 11-24-10

E-mail Address: philip.baca@ElPaso.com

Public Notice

Application for a Discharge Permit Renewal for the Washington Ranch Storage Facility (GW-6), Eddy County, NM

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit application has been submitted in accordance with Subsections B, C, and E of 20.6.2.3108 NM Administrative Code.

El Paso Natural Gas Company (EPNG), 4305 National Parks Highway, Carlsbad, New Mexico, has submitted a renewal application for the Washington Ranch Storage Facility which is located in the SW-1/4 of the SE-1/4 of Section 34, Township 25 South, Range 24 East, in Eddy County, NM. The facility is located approximately 20 miles southwest of Carlsbad, NM adjacent to Washington Ranch Road. The mailing address for the Washington Ranch Storage Facility is El Paso Natural Gas, Carlsbad Operating Area, 4305 National Parks Highway, Carlsbad, NM 88220.

The Washington Ranch Storage Facility is used to inject and withdraw natural gas into formational storage. No intentional or inadvertent discharges that could affect surface or groundwater are known or anticipated at the facility. Potential discharges at the station are limited to approximately 15,175 gallons of new and used oil, 8,820 gallons of ethylene glycol, and 8,820 gallons of tri-ethylene glycol from aboveground storage tanks. These tanks are equipped with secondary containment and liquid level indicators to prevent spills. Process fluids such as water and used oil associated with daily operations are contained by a facility drain system, transferred to storage tanks, then recycled or disposed by New Mexico Oil Conservation District (NMOCD)-approved facilities.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of 70 feet below the ground surface. This aquifer system has a total dissolved solids concentration of approximately 280 milligrams per liter or greater.

The discharge plan submitted to the NMOCD outlines how produced water, used oil, and waste will be properly managed, including handling, storage, and final disposition. The plan also includes procedures for the proper management of leaks, accidental discharges, and spills to protect the waters of the State of New Mexico.

For additional information, to be placed on a facility-specific mailing list for future notices, or to submit comments, please contact:

Mr. Leonard Lowe
Environmental Engineer
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Phone: (505) 476-3492

The New Mexico Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future notices for the Washington Ranch Storage Facility upon request.

Aviso Público

Aplicación para la Renovación de Permiso de Descarga para las Instalaciones de Almacenamiento de Washington Ranch (GW6) en el Condado de Eddy, NM

El Paso Natural Gas (EPNG) da por notificado que la siguiente solicitud de permiso de descarga ha sido presentada con conformidad a las Sub-secciones B, C y E del código administrativo 20.6.2.3108 de NM.

El Paso Natural Gas Company (EPNG), 4305 National Parks Highway, Carlsbad, Nuevo México, ha presentado una solicitud de renovación para las Instalaciones de Almacenamiento Washington Ranch la cual está localizada en el SW-1/4 de la SE-1/4 de la Sección 34, Township 25 Sur, Range 24 Este, en el condado Eddy de NM. Las Instalaciones están situadas aproximadamente a 20 millas al Suroeste de Carlsbad, NM adyacente a la carretera Washington Ranch (Road). La dirección de correo postal para las Instalaciones de Almacenamiento Washington Ranch es El Paso Natural Gas, área de operaciones de Carlsbad, 4305 National Park Highway, Carlsbad, NM 88220.

Las Instalaciones de Almacenamiento Washington Ranch son utilizadas para inyectar y encerrar el gas natural en áreas de almacenamiento de las formaciones. No se conoce de descargas intencionales o involuntarias que pudiesen afectar aguas subterráneas o superficiales en las instalaciones. Potenciales descargas en la estación se limitan aproximadamente a 15,175 galones de petróleo virgen y usado, 8.820 galones de etilenglicol y 8,820 galones de tri-etilenglicol provenientes de los tanques superficiales de almacenamiento. Estos tanques están equipados con contenedores segundarios e indicadores de nivel de líquido para evitar derrames. Fluidos del proceso, como agua y petróleo usado, asociados con las operaciones diarias son contenidas/recolectadas por un sistema de drenaje de la instalación, transfiriéndolas a tanques de almacenamiento, que posteriormente, serán recicladas o desechadas por el Distrito de Conservación del Petróleo de Nuevo México (NMOCD) y/o instalaciones aprobadas.

El agua subterránea superficial probablemente será afectada por una fuga (goteo), una descarga accidental, o por un derrame que pudiese existir a una profundidad aproximada de 70 pies por debajo de la superficie de tierra. El sistema del acuífero superficial probablemente tiene una concentración total de sólidos en suspensión de 280 miligramos por litro o mayor.

El plan de descarga consignado al NMOCD especifica claramente de cómo se va a proceder, ejecutar y/o manejar el agua, petróleo utilizado y desechos producidos durante la descarga, incluyendo su manejo, almacenaje, y disposición final de los mismos. El plan también incluye los procedimientos para el manejo apropiado de fugas, descargas accidentales, y derrames para la protección de las aguas del Estado de Nuevo México.

Para información adicional, o para ser incluido en la lista de distribución a quienes se les enviaran futuras notificaciones relacionadas con instalaciones/facilidades, o para enviar comentarios, favor contactar a:

Mr. Leonard Lowe
Environmental Engineer
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505
Teléfono: (505) 476-3492

El Departamento de Energía, Recursos Naturales y Minerales de Nuevo México aceptará comentarios y declaraciones de interés correspondientes a la aplicación de las Instalaciones de Almacenamiento Washington Ranch y proporcionará futuras notificaciones bajo petición.

WASHINGTON RANCH STORAGE FACILITY DISCHARGE PLAN
EL PASO NATURAL GAS
Prepared by Kleinfelder West, Inc., Albuquerque, NM
November 2010

Attachments:

Appendix A:

- Figure 1, Washington Ranch Compressor Station Site Plan
- Figure 2, Washington Ranch Compressor Station Location and Topographic Map

Appendix B

- New Containment System

Appendix C:

- Laboratory Service Report, Domestic Water at Washington Ranch, 9/24/08

Appendix D:

- Spill and Release Control, Cleanup and Reporting Procedures – Excerpted from the 2008 EPNG Environmental Handbook

Item 1

Indicate the major operational purpose of the facility. If the facility is a compressor station include the total combined site rated horsepower.

The El Paso Natural Gas Company (EPNG) Washington Ranch Storage Facility GW-006 (facility) is used to inject and withdraw natural gas into formational storage, and for conditioning stored natural gas for customer use. A site plan of the facility is included as Figure 1 in Appendix A.

The facility consists of two natural gas fueled internal combustion compressor drives with a total of 9,000 International Standards Organization (ISO) horsepower (hp), backup emergency generation, a formation gas conditioning system, and associated equipment.

Total site combined compressor rated horsepower is 9,000 ISO hp.

Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party	Mike Catt, Vice President El Paso Natural Gas Company 2 North Nevada Ave. Colorado Springs, CO 80903
Local Representative	Keith Uhde, Area Manager El Paso Natural Gas Company Carlsbad Operating Area 4305 National Parks Highway Carlsbad, NM 88220 Office: (575) 234-5415 1-800-334-8047 (24-hour emergency notification)
Or **Alt. Local Representative/Operator**	John Shafer El Paso Natural Gas Company Washington Ranch Storage Facility 493 Washington Ranch Road Carlsbad, NM 88220 (915) 587-3257
Physical Address	El Paso Natural Gas Company Washington Ranch Storage Facility 493 Washington Ranch Road Carlsbad, NM 88220
Mailing Address	El Paso Natural Gas Company Carlsbad Operating Area 4305 National Parks Highway Carlsbad, NM 88220

Item 3

Give a legal description of the location and county. Attach a large-scale topographic map.

Eddy County, New Mexico
SW 1/4, SE 1/4, Section 34, Township 25 South, Range 24 East

Latitude: 32 Degrees, 4 Minutes, and 53 seconds North
Longitude: 104 Degrees, 29 Minutes, and 5 Seconds West

A site location map and a topographic map are attached in Appendix A (Figure 2).

Item 4

Attach the name, telephone number and address of the landowner of the facility site.

El Paso Natural Gas Company
2 North Nevada Ave.
Colorado Springs, CO 80903

(432) 333-5532 Robert St. John or alternate contact (719) 520-4350 Sandra D. Miller

Item 5

Attach a description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

The facility utilizes the following for natural gas compression and conditioning:

- One (1) compressor building equipped with a building basement and sump;
  - Two (2) compressor engine day tanks with volumes of 20 and 30 gallons;
  - Two (2) 4,500 ISO hp Cooper Bessemer 12Q155HC2 natural gas fueled reciprocating engines;
  - Two (2) reciprocating natural gas compressors;
  - One (1) fuel gas filter for natural gas used to fuel the compressor engines;
- Two (2) inlet scrubbers for the natural gas stream entering the compressors;
- Two (2) fin-fan structures, each containing one (1) compressor engine jacket water fin-fan and one (1) compressor engine oil cooling fin-fan;
- Two (2) fin-fan structures for cooling the natural gas stream entering the compressors;
- One (1) auxiliary/maintenance building;
  - One (1) Cummins GTA1710 500 ISO hp natural gas fueled generator engine;
  - Two (2) electrically-driven instrument air compressors;
- Two (2) small fin-fan structures for jacket cooling of instrument air compressors;
- One (1) 500-gallon aboveground fresh oil tank;
- One (1) 8,820-gallon aboveground fresh oil tank;
- One (1) 140 cubic foot aboveground "three-phase" separator;
- One (1) 8,820-gallon aboveground ethylene glycol tank;
- One (1) 8,820-gallon aboveground tri-ethylene glycol tank;
- One (1) formation gas conditioning system consisting of a gas heater, dehydration inlet scrubber, contactor, and a dehydration unit with re-boiler;
- One (1) 6,300-gallon aboveground used oil tank;
- One (1) 42,000-gallon aboveground formation water tank;
- One (1) 42,000-gallon aboveground raw water tank (supplied by an offsite well);
- One (1) 700-gallon UST south of the compressor building;
- One (1) Storage building with a concrete floored awning area;
- One (1) pump house containing a water pump and associated equipment;
- One (1) 137 ISO hp diesel fueled water pump engine;

- One (1) 70-gallon diesel fuel tank (for the water pump engine);
- One (1) Drum storage area with secondary containment;
- One (1) lined and covered 25 cubic yard roll-off container for storage and transport of used scrubber filters (does not remain onsite continuously or in the same location);
- One (1) domestic trash dumpster; and
- One (1) 750-gallon septic tank with an attached leach field.

See Figure 1 for locations of the above equipment.

Compressor Building
The compressor building housing the compressor engines, compressors, and day tanks is constructed in such as manner as to ensure containment of leaks, spills and wash down water. Any spill or wash down water from cleaning and maintenance operations is contained via the building basement and sump, and is pumped to the external building sump. Location of the compressor building is illustrated in Figure 1.

Compressors, Engines, and Ancillary Equipment Housed Inside the Compressor Building
Natural gas compressed by reciprocating compressors does not produce wastewater. The compressor engines and ancillary equipment are washed on an as-needed basis. Biodegradable detergents such as Tide or dish soap are used to clean the equipment. The wash down water and used oil are routed to the external building sump. The sump then pumps this effluent to the formation water tank. Oil, water and glycol collected in the building basement is pumped from a small sump directly to the 6,300-gallon used oil tank.

Natural Gas Scrubbers (inlet and fuel)
All inlet gas is passed through suction scrubbers on the upstream side of the compressors. Two scrubbers are used, one for each compressor. Also, a fuel gas filter removes minimal liquids and other foreign matter from the natural gas stream before entering the compressor engines. Scrubber blow-down or other liquids generated by the suction scrubbers and fuel gas filters are discharged into the separator.

Filters from this operation are replaced as needed. The filters are characterized as prescribed by 20 New Mexico Administrative Code (NMAC) 3.1, Subpart 14, regulated Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas industry. Regulated NORM is defined as NORM at a concentration of greater than 30 picocuries per gram of radium 226 above background, or NORM with a maximum radiation exposure reading at any accessible point that is greater than 50 microroentgens per hour, including background levels.

If any filters are characterized as NORM-regulated they are stored in properly labeled, UN/DOT-approved 55-gallon metal drums for disposal at an approved facility.

Gas inlet scrubber filters that are not characterized as NORM-regulated are drained for 24 to 48 hours. After the scrubber filters are drained they are stored in a lined and covered 25 cubic yard roll off container. As needed, the container is transported to an industrial solid waste landfill or recycling facility where the scrubber filters are disposed or recycled.

Fin-Fans
The facility contains six fin-fan structures for the cooling of natural gas and liquids. Two fin-fan structures are used to cool the natural gas stream before entering the compressors, two fin-fan structures are used for compressor engine jacket cooling and oil cooling, and two small fin-fan structures are used for jacket cooling of the electrically-driven instrument air compressors. Jacket cooling liquids consist of a mixture of ethylene glycol and water.

Auxiliary/Maintenance Building
One auxiliary/maintenance building is used to house the facility generator, instrument air compressors, a work shop, and the facility office. This building is designed to contain spills and is drained to the below-grade external building sump. Location of the auxiliary/maintenance building is illustrated on Figure 1.

Auxiliary Generator
One 500 ISO hp Cummins GTA1710 natural gas fueled generator is used to supply essential electrical needs at the facility when purchased (utility) power is not available. The generator is housed inside the auxiliary/maintenance building.

Air Compressors
Two electrically-driven air compressors are used to supply instrument air and for other station operations. The compressors are housed inside the auxiliary/maintenance building.

140 Cubic Foot Aboveground Three-Phase Separator
One 140 cubic foot above ground separator is used to separate used oil and formation water from the dehydration system at the facility. Used oil is routed to the 6,300 gallon used oil aboveground storage tank (AST) and the water solutions are sent to the 42,000 gallon formation water AST. The three phase separator also receives oil/water from the high pressure inlet scrubbers.

Fresh Oil ASTs (500-Gallon and 8,820-Gallon)
Two fresh oil ASTs are used to supply the compressors and auxiliary equipment with fresh oil as it is consumed with use. Both tanks reside in concrete-lined secondary containment which is capable of holding 1.3 times the contents of the largest tank or sum of interconnected tanks in the containment. While tank filling is in progress, drip pans are placed under all connection points between the tank truck and fresh oil tanks. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator.

8,820-Gallon Ethylene Glycol AST
One 8,820-gallon ethylene glycol tank is used to store ethylene glycol for compressor engine and air compressor jacket cooling. This tank resides in concrete-lined secondary containment which is capable of holding 1.3 times the contents of the largest tank or sum of interconnected tanks in the containment. While tank filling is in progress, drip pans are placed under all connection points between the tank truck and ethylene glycol tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator.

8,820-Gallon Tri-Ethylene Glycol AST
One 8,820-gallon tri-ethylene glycol tank is used to store tri-ethylene glycol for formation gas dehydration. This tank resides in concrete-lined secondary containment which is capable of holding 1.3 times the contents of the largest tank or sum of interconnected tanks in the containment. While tank filling is in progress, drip pans are placed under all connection points between the tank truck and tri-ethylene glycol tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator.

Formation Gas Conditioning System
One formation gas conditioning system is used to remove water and other contaminants from natural gas stored in formation. The system consists of a gas heater, dehydration inlet scrubber, contactor, and dehydration unit with re-boiler. Water and used oil from the system are discharged to the 140 cubic foot three-phase separator. From the separator, used oil is sent to the 6,300-gallon used oil AST, and water solutions are sent to the 42,000-gallon formation water AST. Tri-ethylene glycol is dried onsite and re-used until it loses the ability to remove water from the natural gas, at which point it is sent to the supplier to be re-cycled.

6,300-Gallon Used Oil AST
One 6,300-gallon AST is used to store used oil. The used oil AST receives used oil from the three-phase separator. This tank resides in clay-lined secondary containment which is capable of holding 1.3 times the contents of the largest tank or sum of interconnected tanks in the containment. This clay-lined secondary containment structure is currently being replaced by a concrete-lined secondary containment structure that will hold at least 1.3 times the volume of the largest tank or sum of interconnected tanks in the containment (See Appendix B for details). While tank emptying is in progress, drip pans are placed under all connection points between the tank truck and used oil tank. EPNG also requires that the tank truck

operator be in direct, radio, or telephone contact with the station operator. EPNG currently has an oil recycling contract with Safety Kleen of Midland, Texas which recycles the used oil (see contact information under item 8).

42,000-Gallon Formation Water AST
One 42,000-gallon formation water AST is used to store water from the formation gas conditioning system and other facility processes. This tank resides in clay-lined secondary containment which is capable of holding 1.3 times the contents of the largest tank or sum of interconnected tanks in the containment. This clay-lined secondary containment structure is currently being replaced by a concrete-lined secondary containment structure that will hold at least 1.3 times the volume of the largest tank or sum of interconnected tanks in the containment (see Appendix B for details). While tank emptying is in progress, drip pans are placed under all connection points between the tank truck and formation water tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. EPNG currently has a contract with Key Energy of Carlsbad, NM to dispose of the formation water down hole via a permitted injection well (see contact information under item 8).

42,000-Gallon Raw Water AST
One 42,000-gallon raw water AST is used to store water for station operations such as jacket cooling and station restrooms. Water for this tank is received from an EPNG-owned well located approximately two miles northwest of the facility. Laboratory analytical results are included in Appendix C.

700-Gallon Underground Storage Tank (UST)
One 700-gallon UST is used to collect used oil/water/detergent mixtures from the auxiliary/maintenance building drain system. This steel tank is scheduled to be replaced by a double-walled fiberglass tank. Oil/water/detergent mixtures from the tank are pumped to the formation water tank.

Storage Building
One storage building is used to house spare parts and supplies needed for facility operation. An awning covered concrete pad area attached to this building is used for used oil filter draining and storage. Oil filters are stored in a small double-wall steel container until they are recycled.

Pump House
One pump house contains a diesel-powered water pump used for firefighting. The pump house is equipped with a concrete-curbed floor to contain spills.

Diesel Powered Water Pump
One 137 ISO hp Cummings diesel engine is used to operate an emergency water pump for firefighting. This engine is housed inside the pump house.

70-Gallon Diesel AST
One 70-gallon diesel AST is used to fuel the diesel powered water pump. This AST is housed inside the pump house which is equipped with a concrete-curbed floor to contain spills.

Drum Storage Area
One drum storage area is used to store drums of lubricants and other products used for station operations. The drum storage area is equipped with concrete-lined secondary containment which is capable of holding more than 1.3 times the contents of any drum.

Roll Off Container for Scrubber Filters
As needed when changing scrubber filters, a lined and covered portable 25 cubic yard roll-off container is provided to temporarily store used scrubber filters. This roll-off container does not stay onsite continuously. EPNG currently has a contract with Controlled Recovery Inc. for scrubber filter disposal/recycling (see contact information under item 8).

Domestic Trash
Facility domestic trash is placed into a dumpster which is emptied once a month. EPNG currently has a contract with Eddy's Pumping Services to empty the trash dumpster. The trash is currently taken to the Sandpoint Landfill near Carlsbad, NM. (See item 8 for contact information.)

750-Gallon Septic Tank and Leach Field
One NMED approved 750-gallon below grade concrete septic tank and leach field is used to dispose of sewage from the station restroom.

Underground Drain Lines
Underground piping and drain lines from the below grade sump to the formation water tank are hydrostatically tested every five years during the annual station shutdown. Duration of hydrostatic testing is at least 30 minutes and piping is subjected to at least three pounds per square inch (PSI) above operating pressure during the test. Upon request, EPNG will provide the New Mexico Oil Conservation Division (NMOCD) the results of the test findings.

Storm Water and Other Precipitation
The facility has good natural drainage to the northeast. Station facilities are constructed and site grading is accomplished in such a way to, as much as practical, prevent ingress or pooling of storm water around buildings, process vessels, piping, secondary containment, and other equipment. Process fluids do not intermingle with storm water drained onto adjacent rangeland.

Uncontained Wash Down Water
As necessary for general housekeeping of outdoor areas, facility personnel utilize high-pressure water-jets or high-pressure steam to remove solid particulate matter (dust, dirt, weeds, etc.) from fin fans or piping that are not contained within the buildings or secondary containment structures. No detergents or cleaning solutions are used for this procedure, and no process fluids intermingle with this water. This wash water is not contained.

Contained Wash Down Water
As necessary for maintenance, repair, and general housekeeping, facility personnel utilize high-pressure water jets or high-pressure steam to clean process vessels inside secondary containment, engines, and equipment inside the compressor and auxiliary buildings. This wash down water may contain biodegradable detergents such as Tide® or dish soap. The wash down water drains via the building drain systems, is sent to the 700-gallon UST, and is transferred to the formation water tank.

Additional Information
The Washington Ranch Facility Map (Figure 1) shows the location of fences, property boundaries, buildings, equipment, and tanks.

Item 6
Attach a description of all materials stored or used at the facility.

Container	ID	Material	Form	Volume	Location	Containment
Steel AST	Used oil tank	Used oil	Liquid	6,300 gallons	Southwest corner of facility	Clay-lined berm shared with formation water tank. Scheduled for replacement by a concrete lined containment.

Container	ID	Material	Form	Volume	Location	Containment
Steel AST	Formation water tank	Formation water	Liquid	42,000 gallons	Southwest corner of facility	Clay-lined berm shared with used oil tank. Scheduled for replacement by a concrete lined containment.
Thick wall steel vessel	Three-phase separator (Separator)	Used oil and water solution mixtures	Liquid	140 cubic foot	Southwest corner of facility	None
Steel AST	Fresh oil tank	New Lube Oil	Liquid	500 gallons	East of compressor building	Concrete secondary containment shared with other fresh oil tank and ethylene glycol tank
Steel AST	Fresh oil tank	New Lube Oil	Liquid	8,820 gallons	East of compressor building	Concrete secondary containment shared with other fresh oil tank and ethylene glycol tank
Steel AST	Ethylene glycol tank	Ethylene glycol	Liquid	8,820 gallons	East of compressor building	Concrete secondary containment shared with fresh oil tanks
Steel AST	Tri-ethylene glycol tank	Tri-ethylene glycol	Liquid	8,820 gallons	North of compressor building	Concrete secondary containment
55-gallon drums	None	Lubricants and other products	Liquid	Varies	Northeast corner of facility	Concrete secondary containment
Steel AST	Raw water tank	Water	Liquid	42,000 gallons	East of compressor building	Small concrete containment
Steel AST	Diesel fuel tank	Diesel fuel	Liquid	70 gallons	Inside pump house	Concrete curbed building floor
Portable lined steel roll off container	Roll off	Used scrubber filters	Solid	25 cubic yards	Moved around facility as needed	Lined and covered

Container	ID	Material	Form	Volume	Location	Containment
Steel dumpster	Dumpster	Domestic trash	Solid	6 cubic yards	South of compressor building	None
Below grade concrete	Septic system	Sewage	Domestic sewage solid and liquid	750 gallon	Southeast of compressor building	None
Steel UST	Wash down water oil tank	Used oil, wash down water, and used ethylene glycol	Liquid	700 gallon	South of compressor building	None, single-walled tank

See Figure 1 for locations.

Item 7

Attach a description of present sources of effluent and waste solid. Average quality and daily volume of waste water must be included.

Source	Type of Effluent	Volume	Quality
Building sumps, scrubber blow-downs, engine drains, and formation gas conditioning system	Used engine oil, scrubber blow down, used oil from formation gas conditioning system	75 barrels per year or approximately 8.6 gallons per day	Used oil, scrubber blow down
Building sumps, engine drains, and formation gas conditioning system	Water	750 barrels per year or 86 gallons per day	Water, water with detergents, and formation water
Oil and scrubber filters, fuel gas filters	Regulated solid waste	25 cubic yards per year or 1.85 cubic feet per day	Metal, paper, cloth, and non-hazardous waste
Domestic trash, empty containers and drums*	Domestic trash	5.4 cubic feet per day	Paper, metal, plastic, food waste
Station Restrooms	Sewage	Less than 300 gallons per day	Sewage liquids and solids

*EPA Empty as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Item 8

Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

Type of Effluent	Collection	Storage	Hauler	Disposition
Used oil	Drained to the separator where it is routed to the 6,300 gallon used oil AST	6,300 gallon AST	Removed as needed by an approved hauler (currently Safety Kleen)	Hydrocarbon Recovery Facility (currently Safety Kleen, Midland, TX)
Scrubber blow-down and formation gas conditioning system	Drained to the separator where it is routed to the 6,300 gallon used oil AST	6,300 gallon AST	Removed as needed by an approved hauler (currently Safety Kleen)	Hydrocarbon Recovery Facility (currently Safety Kleen, Midland, TX)
Dehydration system (formation water)	Drained to the separator where it is routed to the 42,000 gallon formation water AST	42,000 gallon AST	Removed as needed by an approved hauler (currently Key Energy)	Permitted injection well (currently Key Energy, Carlsbad, NM)
Wash down water, water with detergents	Drained to the 700 gallon steel tank	700 gallon UST	Pumped to formation water tank	Permitted injection well (currently Key Energy, Carlsbad, NM)
Oil and scrubber filters, fuel gas filters	After draining for 24 to 48 hours the filters are removed and placed into a portable roll off container	25 cubic yard lined and covered roll off container	Removed as needed by an approved hauler (currently Controlled Recovery, Inc.)	Approved recycling facility (currently Controlled Recovery, Inc. recycling facility)
Empty containers and drums*, domestic trash	Trash collected in waste can, fuel gas filters drained and bagged	6 cubic yard onsite dumpster	Removed once a month by an approved hauler (currently Eddy's Pumping Service)	Approved landfill (currently the Sandpoint Landfill, Carlsbad, NM)
Domestic Sewage	Restroom drain system	Drained to an approved onsite septic tank and leach system	None	Onsite septic tank and leach system

*EPA Empty as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Non-Exempt, Non-Hazardous Waste

Used oil is collected as needed from the used oil AST and removed from the site by an NMOCD-approved contractor. While tank emptying is in progress, drip pans are placed under all connection points between the tank truck and tank. EPNG requires that the tank truck operator be in direct, radio or telephone contact with the station operator. Disposal records are maintained at the EPNG Carlsbad Operating Area Office (see address under Item 2).

Hazardous Waste
The facility is registered as a Conditionally Exempt Small Quantity Generator (CESQG) with the New Mexico Environment Department. From time to time, mercury products or lead acetate tape is generated. The waste is transported and disposed of by a licensed RCRA hazardous waste transportation and disposal company.

Domestic Sewage
A restroom facility containing wash basins and toilets is installed at the station. Sewage treatment consists of an approved 750-gallon septic tank and onsite leach system.

Other Solid Waste
Solid waste is placed into a portable disposal dumpster that is emptied by a solid waste contractor once per month. Used scrubber and oil filters are drained to the separator, then to the 6,300-gallon used oil tank, and placed into a portable lined and covered roll off container. These non-regulated solid wastes are disposed by a permitted solid waste contractor.

Names, addresses, and phone numbers of currently used NMED and NMOCD-approved transporters/disposal facilities. EPNG will also use other NMED and NMOCD-approved transporters and/or disposal facilities as needed after a minor modification is approved by NMOCD.

Safety Kleen (permitted recycling facility for used oil)
10607 WCR 127
Midland, TX 79711
Phone Number: (432) 563-2305

Key Energy (formation water permitted down hole injection)
1609 E Greene
Carlsbad, NM 88220
Phone Number: (575) 885-2053

Controlled Recovery, Inc. (recycling facility for scrubber and oil filters)
4507 W. Carlsbad Highway
Carlsbad, NM 88220
Phone Number: (575) 393-1079

Eddy's Pumping Services (domestic trash hauler)
2224 Collins Avenue
Carlsbad, NM 88220-9672
Phone Number: (575) 236-6262

Sandpoint Landfill (approved landfill for domestic waste)
164 Landfill Road
Carlsbad, NM 88220
Phone Number: (575) 885-4835

Item 9
Attach a description of proposed modifications to existing collection/treatment/disposal system.

EPNG will notify NMOCD of any significant changes from this plan, process modification, or production increase that could result in a significant modification in discharges from this facility.

Item 10
Attach a routine inspection and maintenance plan to ensure permit compliance.

The facility is designed to minimize on-site chemicals. Liquids stored on-site in excess of five gallons are placed within secondary containment that prevents or mitigates any releases to the environment. When

in operation, the facility is visually inspected by EPNG personnel a minimum of once per day and underground piping is hydrostatically tested every five years during the annual station shutdown. If the station is not in operation the visual inspection is accomplished as necessary.

Verbal and written notifications of leaks or spills will be made to the NMOCD according to NMOCD Rule 116. Any release of a chemical with a reportable quantity regulated by Title 40 Code of Federal Regulations (CFR) Part 300 and 372 will be reported to the National Response Center, and when applicable, to the New Mexico Environment Department (NMED).

Item 11

Attach a contingency plan for reporting and clean-up of spills or releases.

EPNG will handle all spills and leaks immediately in accordance with their Spill Prevention Control and Countermeasure (SPCC) plan and as required by the EPNG procedures outlined in the EPNG Environmental handbook (Appendix D). EPNG will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and Water Quality Control Commission (WQCC) regulations, WQCC section 1203.

The "Spill and Release Control, Cleanup and Reporting" section of the El Paso Corporation Environmental Handbook, which is available to site personnel, provides guidance in the management of leaks or spills, and outlines procedures to be used in case of a leak or spill (a copy of the 2008 version is presented in Appendix D). Visual monitoring is conducted on a regular basis (at least daily when operating) of aboveground components, including all containment structures and ASTs. As stated, hydrostatic testing of buried components is accomplished every five years.

Spills, if they occur, will be addressed by trained personnel using source removal techniques such as sorbents, excavation, collection, and proper disposal. Spill response contractors are available if additional resources are needed.

Commercial absorbent pads and/or rags will be used to absorb small spills. Any oil-bearing soil will be disposed of in New Mexico at an NMOCD-approved facility that approves the waste profile. Spill containment kits are located at the facility.

Large spills will be contained within the secondary containment system consisting of containment structures, sumps, separator, and the used oil tank. Where applicable, liquids and solid waste are segregated, characterized, and managed accordingly.

In the event of a spill, personnel are trained to notify EPNG's Environmental Department. The EPNG Environmental Department, in turn, will make the necessary notifications to regulatory agencies.

Site personnel will also have access to the El Paso Corporation Environmental Compliance Manual, located on the EPNG Environmental web page. It contains spill reporting thresholds for fluids typically found at EPNG compressor stations. The manual contains a decision tree to aid in proper reporting procedures, including notification guidelines for reporting to the NMOCD District Field Office, and if appropriate, procedures for reporting to the NMOCD Director. If there is a conflict between the El Paso Corporation Compliance Manual and state regulations, state regulations will always take precedence.

EPNG contingency plans provide verbal and written notification of reportable leaks or spills to be made in accordance with OCD Rule 116 and New Mexico Water Quality Control Commission (NMWQCC) Section 1203 guidelines within the time limits set by NMOCD. Reportable releases regulated by the Code of Federal Regulations, Title 40, Parts 300 and 372 will be reported to the National Response Center, and where appropriate, the NMED.

Item 12

Attach geological/hydrological information for the facility, Depth to and quality of groundwater must be included.

Geologic Description

Soils in the area are dominated by the Karro loam series of the Reeves-Gypsum and Cottonwood association. These units are comprised of light-colored, strongly calcareous, loamy soils developed in older alluvium. Soils of the vadose zone have been characterized as terrace/alluvial deposits. These Quaternary units are between 30 and 50 feet thick and overlie older Delaware Basin sediments composed of evaporate minerals, shale, and limestone. Logs of soil borings at the site reveal clay to gravel size soils to depths of up to 50 feet below the ground surface overlying limestone and shale (EPNG, 2007). Large cave systems in the area were formed in the limestone and evaporate deposits (mostly gypsum). A good example is Carlsbad Caverns National Park which lies to the north of the site.

Site Hydrology

The nearest ephemeral stream is the Slaughter Canyon Draw located 400 feet north of the facility. The nearest perennial stream is the Black River located approximately 2500 feet east of the facility. Surface water from precipitation that does not quickly absorb into the soil is thought to flow to the northeast due to topography (Figure 2).

Site Hydrogeology and Water Quality

The first groundwater (uppermost aquifer) is likely present at the base of the alluvial sediments and within the upper portions of the limestone and shale underlying the site (EPNG, 2007). According to the New Mexico Office of the State Engineer well record for a well drilled then abandoned at the facility (EPNG well permit number C-1977, drilled in September 1981), water was first encountered at a depth of 140 feet below ground surface. According to the iWATERS database (accessed on November 5, 2010) in wells drilled within ½-mile of the facility, groundwater was encountered between 70 and 260 feet below the ground surface. These wells were drilled between 1970 and 1985.

Laboratory results from an EPNG-owned well two miles from the site show that total dissolved solids concentration is 280 milligrams per liter. This well is the closest known to be operating near the facility, and is the well used for facility restrooms and jacket cooling (see Appendix A., Laboratory Service Report, Domestic Water at Washington Ranch).

Flooding Potential

The Washington Ranch Storage Facility is located in the Pecos River Basin in an area of low precipitation and high evaporation. The nearest perennial stream is the Black River, located approximately 2,500 feet to the east of the facility. Elevation difference between the facility and the Black river is approximately 45 feet, so flooding from the Black River is unlikely. Most precipitation quickly soaks into the soil or evaporates. Topography suggests that site runoff is generally to the east and northeast. Site topographic slope is approximately 0.01 ft/ft, dipping east (Figure 2). Federal Emergency Management Agency (FEMA) flood maps do not exist for this site. Site grading is designed to ensure that offsite drainage is diverted from the station and that pooling of water is minimized. No significant flooding has been recorded at the facility.

According to the National Oceanic and Atmospheric Administration (NOAA) Hydrometeorological Design Studies Center Precipitation Frequency Data Server, Point Precipitation Frequency Estimates From NOAA Atlas 14, the 5-year, 10-year, 25-year, 50-year, and 100-year, 24-hour storm precipitation levels for the area are estimated at 3.14 inches, 3.76 inches, 4.63 inches, 5.33 inches, and 6.07 inches, respectively (accessed on November 5, 2010).

Wells

According to the iWATERS database (accessed on November 5, 2010) four wells were noted within a ½-mile radius, and one well within ¼-mile radius of the facility. It is unknown if any of these wells are active (database accessed on November 5, 2010).

Additional Information
The facility does not contain any unlined surface impoundments, pits, leach fields (other than domestic sewage), injection wells, drying beds, solids disposal, or land farms.

Item 13

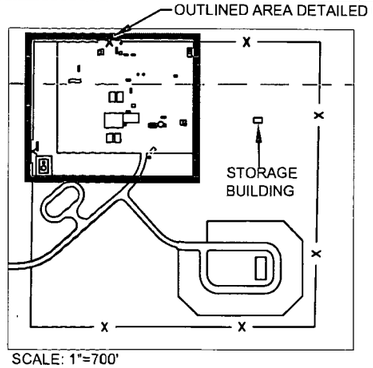
Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

All reasonable and necessary measures will be taken to comply with 20 NMAC 6.2.3103, Water Quality Standards. Should EPNG choose to permanently close the facility, closure measures will include removal of all aboveground and underground piping and equipment. All tanks will be emptied and removed from the site. All potential sources of toxic pollutants will be inspected and no potentially toxic materials or effluents will remain on site. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will occur, and clean-up activities will commence. Post closure maintenance and monitoring plans are not anticipated unless contamination is encountered.

References

El Paso Natural Gas (EPNG), Washington Ranch Storage Facility Discharge Plan Addendum No. 1, 2007.

APPENDIX A
Figures



LEGEND

FENCELINE

ACCESS GATE

UNDERGROUND PIPELINE

NOTE:

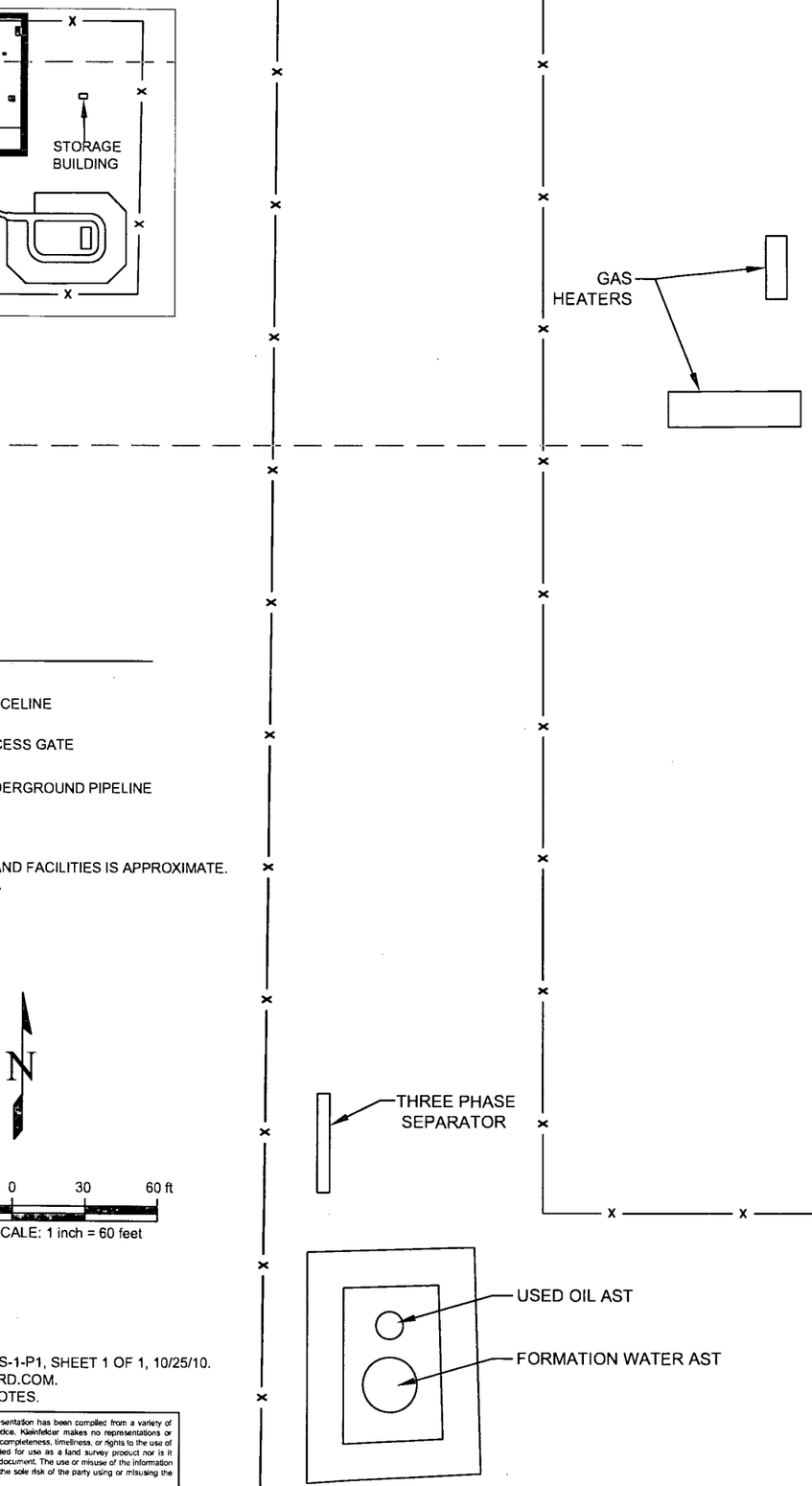
SIZES OF EQUIPMENT AND FACILITIES IS APPROXIMATE. FOR REFERENCE ONLY.

N

60 0 30 60 ft

APPROXIMATE SCALE: 1 inch = 60 feet

SOURCES:
1) EPNG, PLOT PLAN, WRS-1-P1, SHEET 1 OF 1, 10/25/10.
2) AERIAL IMAGE MAPCARD.COM.
3) KLEINFELDER FIELD NOTES.



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www.kleinfelder.com

PROJECT NO.	109637
DRAWN:	OCT 2010
DRAWN BY:	PD
CHECKED BY:	ES
FILE NAME:	109637_02_0.dwg

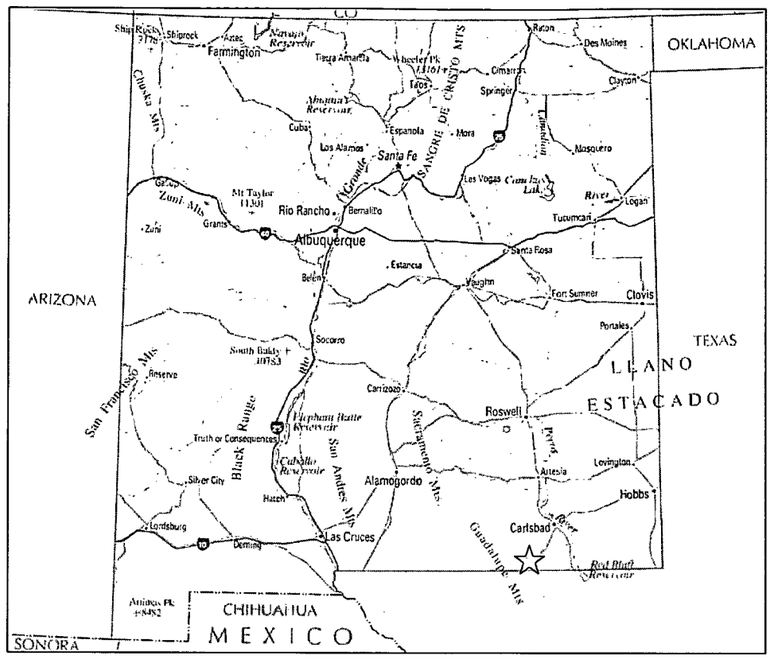
SITE MAP

EPNG
WASHINGTON RANCH STORAGE FACILITY
EDDY COUNTY, NEW MEXICO

ORIGINATOR: M. WIKSTROM
APPROVED BY: ES 11/19/10
DRAWING CATEGORY: 1

FIGURE **1**

ATTACHED IMAGES: Images: washranch.jpg Images: wr.jpg
ATTACHED XREFS:
ALBUQUERQUE, NM
CAD FILE: G:\Environ\CURRENT WORK FOLDER PROJECTS\109637 - EPNG Pipeline Hydro Test Discharge Permits\7 - wash ranch\Figures\ LAYOUT: Layout1 PLOTTED: 19 Nov 2010, 8:31am, PDan



SOURCE: Base map provided by *nationalatlas*.gov. NTS

LEGEND

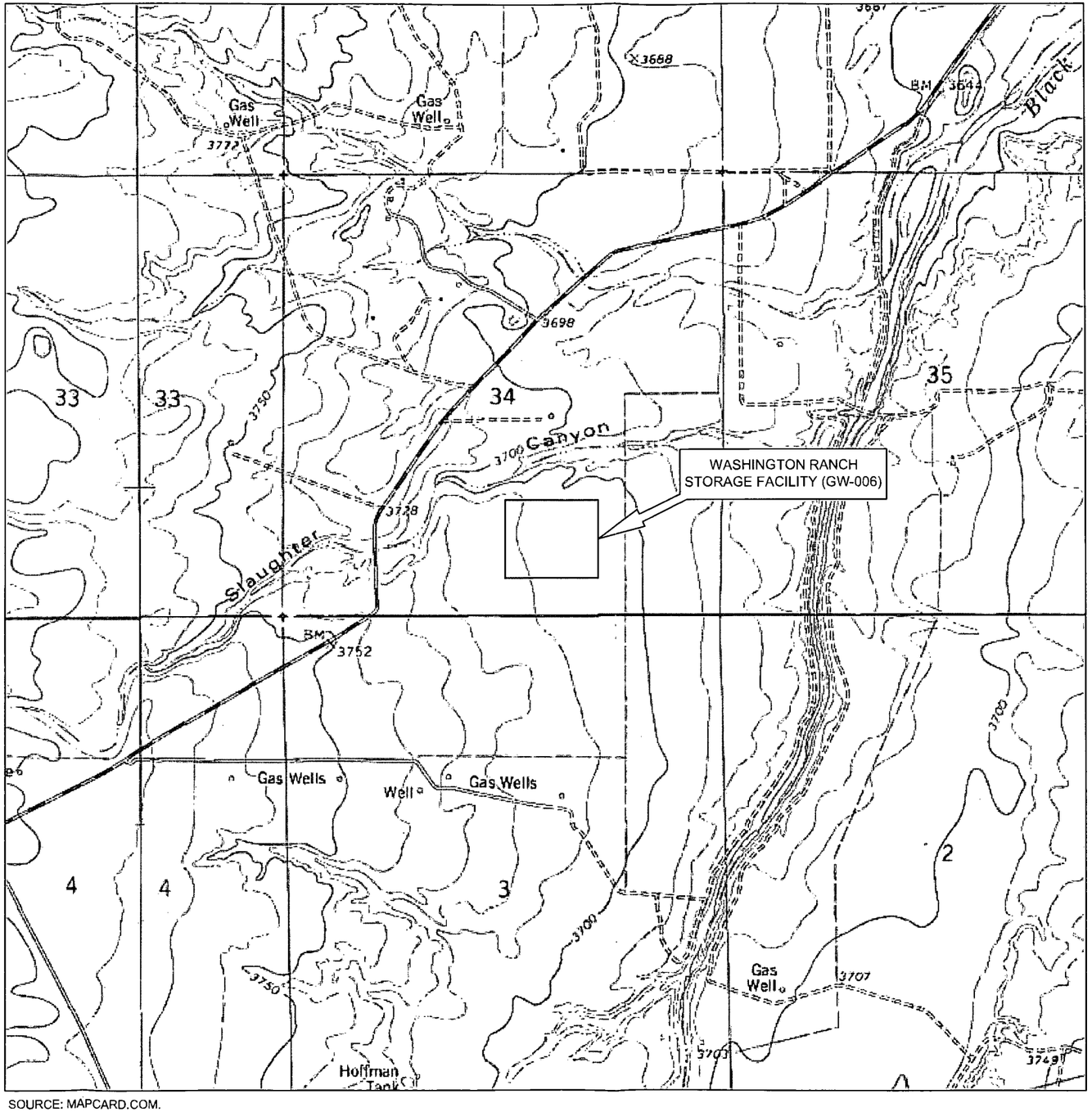
☆ APPROXIMATE SITE LOCATION

SECTION 34, SE ¼, SW ¼
RANGE 24 EAST, TOWNSHIP 25 SOUTH

N

1500 0 750 1500 ft

SCALE: 1 inch = 1500 feet



SOURCE: MAPCARD.COM.

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PROJECT NO.	109637
DRAWN:	NOV 2010
DRAWN BY:	PD
CHECKED BY:	ES
FILE NAME:	109637_01_0.dwg

SITE LOCATION MAP

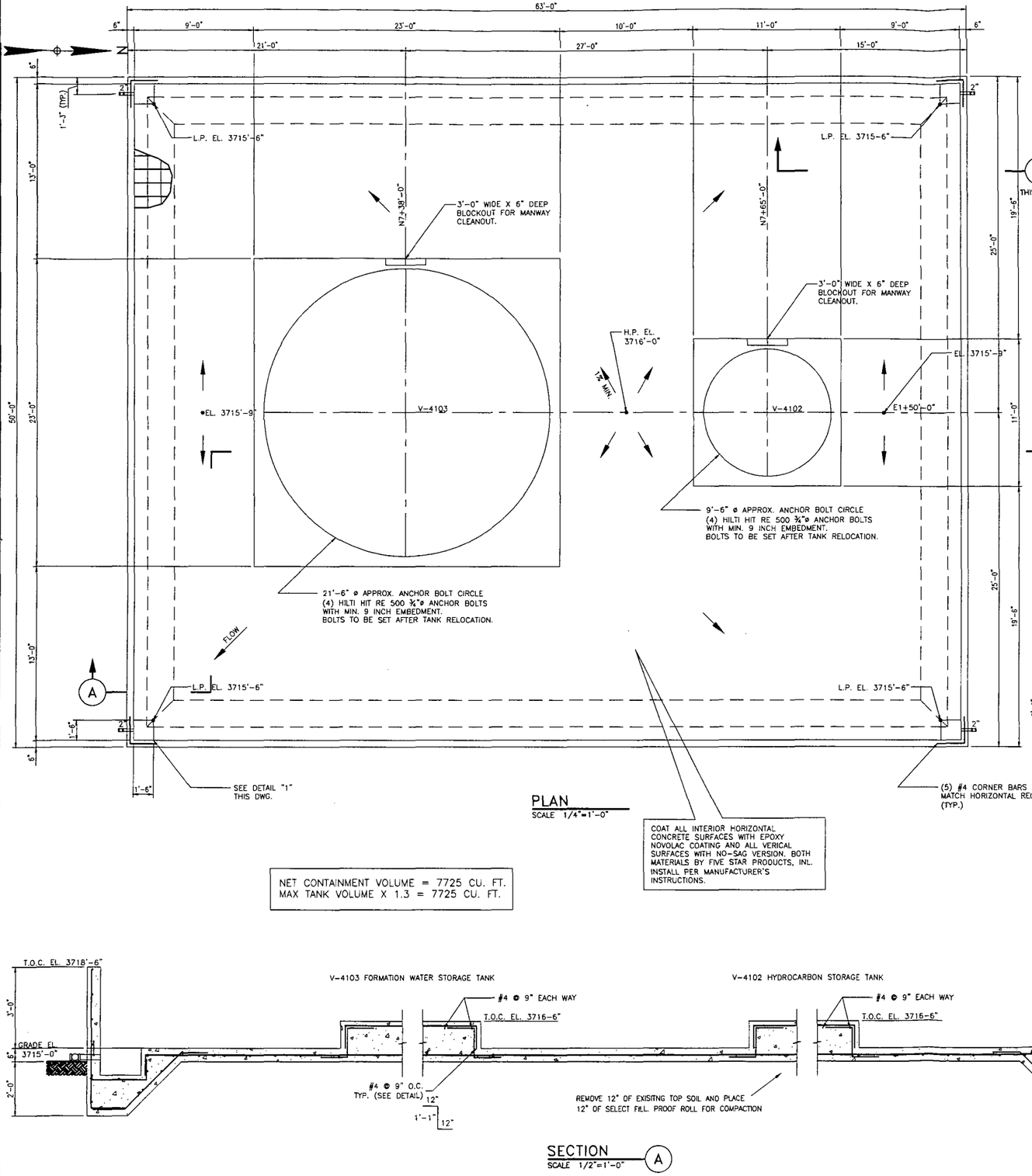
EPNG
WASHINGTON RANCH STORAGE FACILITY
EDDY COUNTY, NEW MEXICO

ORIGINATOR: E. SHANNON	DRAWING CATEGORY: 1
APPROVED BY: RLS 11/19/10	

FIGURE **2**

ATTACHED IMAGES: Images: 37008.jpg Images: New Mexico State Map.bmp
ATTACHED XREFS:
ALBUQUERQUE, NM
CAD FILE: G:\Environ\CURRENT WORK FOLDER PROJECTS\109637 - EPNG Pipeline Hydro Test Discharge Permits\7 - wash ranch\Figures\ LAYOUT: Layout1

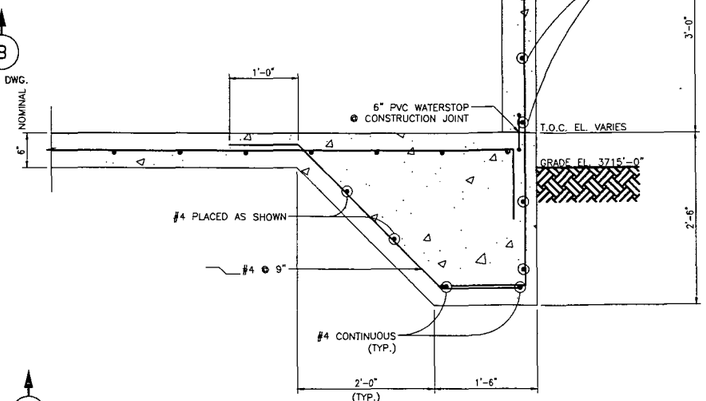
APPENDIX B
New Containment System



PLAN
SCALE 1/4"=1'-0"

NET CONTAINMENT VOLUME = 7725 CU. FT.
MAX TANK VOLUME X 1.3 = 7725 CU. FT.

COAT ALL INTERIOR HORIZONTAL CONCRETE SURFACES WITH EPOXY NOVOLAC COATING AND ALL VERICAL SURFACES WITH NO-SAG VERSION. BOTH MATERIALS BY FIVE STAR PRODUCTS, INC. INSTALL PER MANUFACTURER'S INSTRUCTIONS.



SECTION
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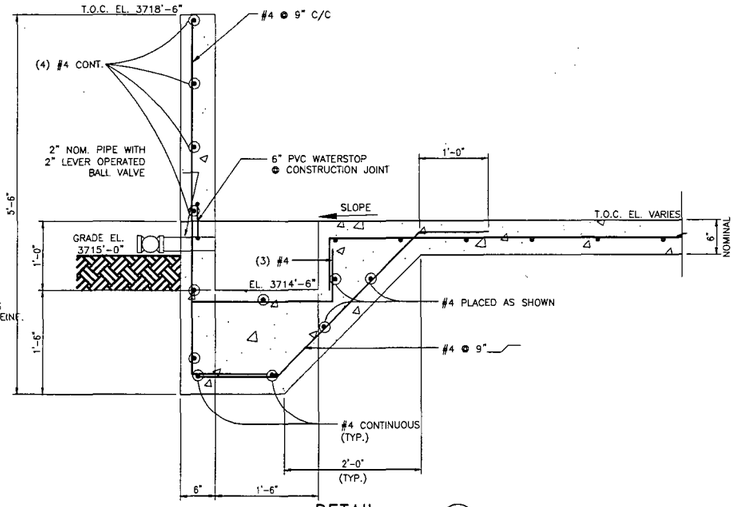
THIS DWG.
B

A
THIS DWG.



DETAIL
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(TYP. 4 PLACES)
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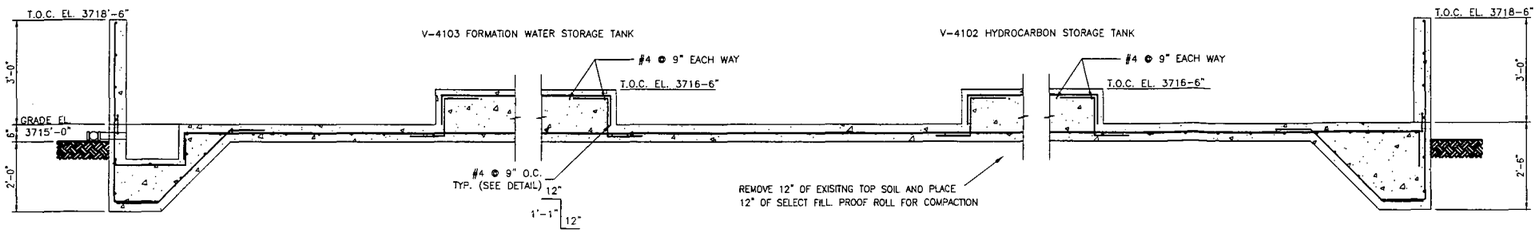

SECTION
SCALE 1/2"=1'-0"
A

REFERENCE DRAWINGS

GENERAL NOTES

1. ALL CONCRETE SHALL HAVE A MINUMUM 28 DAY COMPRESSIVE STRENGTH OF 4000 PSI.
2. CEMENT SHALL CONFORM TO ASTM C-150, TYPE I OR II.
3. ANCHOR BOLTS SHALL BE ASTM A36 STEEL, COMPLETE WITH 2 HEX NUTS & STD. WASHER.
4. ALL EXPOSED CONCRETE EDGES SHALL HAVE A ¾" CHAMFER.
5. FOUNDATIONS SHALL BE SUPPORTED ON EXISTING SUBGRADE AT THE ELEVATIONS INDICATED ON THIS DRAWING. THE NATIVE SOIL SHALL BE SCARFIED TO A DEPTH OF 8" BELOW THE BASE OF ALL FOUNDATIONS. THE SCARIFIED SOIL SHALL BE BROUGHT TO WITHIN ± 3% OF OPTIMUM MOISTURE AND COMPACTED TO NOT LESS THAN 95% OF MAXIMUM DRY DENSITY. OPTIMUM MOISTURE AND MAXIMUM DRY DENSITY SHALL BE DETERMINED IN ACCORDANCE WITH ASTM D698 OR D1557.
6. FILL MATERIAL (IF REQUIRED) SHALL BE FREE FROM ROOTS, GRASS, CLAY, CLAY LUMPS, ROCKS LARGER THAN 3" OR OTHER DELETERIOUS MATERIALS. FILL MATERIAL SHALL HAVE A PLASTICITY INDEX LOWER THAN 15 AND THE FOLLOWING PHYSICAL CHARACTERISITCS:

SIEVE SIZE	% PASSING BY WEIGHT
3 - INCH	100
3/4 - INCH	70-100
NO. 4	40-100
NO. 200	5-35

7. ALL STEEL REINFORCING BARS ARE DEFORMED BILLET PER ASTM A615. GRADE 60.

NO.	DATE	BY	DESCRIPTION	PROJ. ID	APPR.
0	10/10	MP	ADDED CONTAINMENT AREA	148761	

REVISIONS

elpaso Natural Gas

WASHINGTON RANCH STORAGE
FORMATION WATER STORAGE/HYDROCARBON TANK
CONTAINMENT AREA

Division:	TUCSON	Op. Area:	CARLSBAD
State:	NEW MEXICO	Co./Par.:	EDDY
Section:	34	Township: 25S	Range: 24E
Drafter: MP	Date: 10-07-2010	Project ID: 148761	Type: ACAD
Chk'd: JB	Date: 10-07-2010	Scale: AS SHOWN	
Appr:	Date:	Filename: WRS-01-M0034.dwg	
WRS-01-M0034		Sheet: 1 of 1	Rev: 0

11/9/2010 1:44:11 PM Issued For Construction
Nov 09, 2010 - 1:44PM

APPENDIX C
Laboratory Service Report, Domestic Water at Washington Ranch

elpaso

LABORATORY SERVICE REPORT

REQUESTOR:	Ginest, Chad O.	**REPORT DATE:**	10/28/2008
	Carlsbad, NM	**REQUEST NO:**	2008091274
	(505) 234-5415	**APPROVED BY:**	Campbell, Darrell
		PENDING REQ. ID:	2008091274
DEPARTMENT:	Midland Division		
DISTRIBUTION:	Benham, Jack A; Charlet, Larry; Shipley Jr., Winford F. [Fred]; Thompson, Glen; Whitney, Mark P.		
PERFORMED BY:	Columbia Analytical Services		

Request Description: Domestic water (SDWA) @ Washington Ranch.
Date Received: 9/25/2008
Date Completed: 10/28/2008

Sample No: 1 Sampled By: Mark Whitney Sample Date: 9/24/2008 12:15:00 PM
Received Vol.: Received Date: 9/25/2008
Description:
Analysis: WP Domestic Water - SDWA TWGC
Purpose: Disposal/Environmental Concerns
Matrix: Water
Location: EPNG - Midland - Carlsbad - 6595 - 0000+0 - Washington Ranch Compressor Station - Bathroom Sink

Data: See attached sheet(s).

Comments:

Sample:	1
Metals	
Aluminum (mg/l)	0.18
Barium (mg/l)	0.0999
Beryllium (mg/l)	< 0.0005
Boron (mg/l)	< 0.10
Cadmium (mg/l)	< 0.0020
Calcium (mg/l)	59
Chromium (mg/l)	< 0.0050
Copper (mg/l)	0.0615
Iron (mg/l)	1.5
Magnesium (mg/l)	25
Manganese (mg/l)	0.0544
Nickel (mg/l)	< 0.0020
Potassium (mg/l)	< 2.0
Silver (mg/l)	< 0.0050
Sodium (mg/l)	5.4
Zinc (mg/l)	0.073
Antimony (mg/l)	< 0.0020
Arsenic (mg/l)	< 0.0030
Lead (mg/l)	0.0077
Selenium (mg/l)	< 0.0020

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Sample:	1
Thallium (mg/l)	< 0.0005
Hardness (mg/l)	250
Mercury (mg/l)	< 0.0002
Anions	
Bromide (mg/l)	< 0.50
Chloride (mg/l)	5.3
Nitrate (as N) (mg/l)	0.92
Nitrite (as N) (mg/l)	< 0.020
Sulfate (mg/l)	50
Fluoride (mg/l)	< 0.50
General Analyses	
Alkalinity, Bicarbonate (As CaCO3) (mg/l)	200
Alkalinity, Carbonate (As CaCO3) (mg/l)	< 20
Alkalinity, Hydroxide (As CaCO3) (mg/l)	< 20
Alkalinity, Total (As CaCO3) (mg/l)	200
Cyanide, Total (mg/l)	< 0.020
Spec. Conductance @25 C (µmhos/cm)	510
Chromium, Hexavalent (mg/l)	< 0.010
pH	8
Temperature °C.	22.8
Silica (mg/l)	12
Total Dissolved Solids (mg/l)	280
Total Suspended Solids (mg/l)	< 10
Turbidity (NTU)	9.9
Asbestos (MFL)	< 1.0
Radiochemical Activity	
Gross Alpha (pCi/L)	0.9+/-0.5
Gross Beta (pCi/L)	<3.3
Radium 226 (pCi/L)	<0.5
Radium 228 (pCi/L)	<0.4
Total Radium (pCi/L)	<0.5
504.1 Analysis	
1,2-Dibromo-3-chloropropane (DBCP) (µg/l)	< 0.0096
1,2-Dibromoethane (EDB) (µg/l)	< 0.0096
508.1 Analysis	
Aldrin (µg/l)	< 0.011
Aroclor 1016 (µg/l)	< 0.053
Aroclor 1221 (µg/l)	< 0.11
Aroclor 1232 (µg/l)	< 0.11
Aroclor 1242 (µg/l)	< 0.11
Aroclor 1248 (µg/l)	< 0.11
Aroclor 1254 (µg/l)	< 0.11
Aroclor 1260 (µg/l)	< 0.11
Chlordane (µg/l)	< 0.11
Dieldrin (µg/l)	< 0.011
Endrin (µg/l)	< 0.011
gamma-BHC (Lindane) (µg/l)	< 0.011

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Sample:	1
Heptachlor (µg/l)	< 0.011
Heptachlor epoxide (µg/l)	< 0.011
Methoxychlor (µg/l)	< 0.011
Toxaphene (µg/l)	< 0.11
515.4 Analysis	
2,4,5-TP (Silvex) (µg/l)	< 0.050
2,4-D (µg/l)	< 0.10
Dalapon (µg/l)	< 1.0
Dicamba (µg/l)	< 0.20
Dinoseb (µg/l)	< 0.20
Pentachlorophenol (µg/l)	< 0.040
Picloram (µg/l)	< 0.10
524.2 Analysis	
1,1,1,2-Tetrachloroethane (µg/l)	< 0.5
1,1,1-Trichloroethane (µg/l)	< 0.5
1,1,2,2-Tetrachloroethane (µg/l)	< 0.5
1,1,2-Trichloroethane (µg/l)	< 0.5
1,1-Dichloroethane (µg/l)	< 0.5
1,1-Dichloroethene (µg/l)	< 0.5
1,1-Dichloropropene (µg/l)	< 0.5
1,2,3-Trichlorobenzene (µg/l)	< 0.5
1,2,3-Trichloropropane (µg/l)	< 0.5
1,2,4-Trichlorobenzene (µg/l)	< 0.5
1,2,4-Trimethylbenzene (µg/l)	< 0.5
1,2-Dibromo-3-chloropropane (µg/l)	< 0.5
1,2-Dibromoethane (µg/l)	< 0.5
1,2-Dichlorobenzene (µg/l)	< 0.5
1,2-Dichloroethane (µg/l)	< 0.5
1,2-Dichloropropane (µg/l)	< 0.5
1,3,5-Trimethylbenzene (µg/l)	< 0.5
1,3-Dichlorobenzene (µg/l)	< 0.5
1,3-Dichloropropane (µg/l)	< 0.5
1,4-Dichlorobenzene (µg/l)	< 0.5
2,2-Dichloropropane (µg/l)	< 0.5
2-Chlorotoluene (µg/l)	< 0.5
4-Chlorotoluene (µg/l)	< 0.5
4-Isopropyltoluene (µg/l)	< 0.5
Benzene (µg/l)	< 0.5
Bromobenzene (µg/l)	< 0.5
Bromochloromethane (µg/l)	2
Bromodichloromethane (µg/l)	1.6
Bromoform (µg/l)	< 0.5
Bromomethane (µg/l)	< 0.5
Carbon tetrachloride (µg/l)	< 0.5
Chlorobenzene (µg/l)	< 0.5
Chloroethane (µg/l)	1.4
Chloroform (µg/l)	< 0.5
Chloromethane (µg/l)	< 0.5
cis-1,2-Dichloroethene (µg/l)	< 0.5
cis-1,3-Dichloropropene (µg/l)	

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Sample:	1
Dibromochloromethane (µg/l)	2.4
Dibromomethane (µg/l)	< 0.5
Dichlorodifluoromethane (µg/l)	< 0.5
Ethylbenzene (µg/l)	< 0.5
Hexachlorobutadiene (µg/l)	< 0.5
Isopropylbenzene (µg/l)	< 0.5
m,p-Xylene (µg/l)	< 0.5
Methyl tert-butyl ether (µg/l)	< 0.5
Methylene chloride (µg/l)	< 0.5
Naphthalene (µg/l)	< 0.5
n-Butylbenzene (µg/l)	< 0.5
n-Propylbenzene (µg/l)	< 0.5
o-Xylene (µg/l)	< 0.5
sec-Butylbenzene (µg/l)	< 0.5
Styrene (µg/l)	< 0.5
tert-Butylbenzene (µg/l)	< 0.5
Tetrachloroethene (µg/l)	< 0.5
Toluene (µg/l)	< 0.5
trans-1,2-Dichloroethene (µg/l)	< 0.5
trans-1,3-Dichloropropene (µg/l)	< 0.5
Trichloroethene (µg/l)	< 0.5
Trichlorofluoromethane (µg/l)	< 0.5
Trihalomethanes, Total (µg/l)	7.4
Vinyl chloride (µg/l)	< 0.5
Xylenes, Total (µg/l)	< 0.5
525.2 Analysis	
Alachlor (µg/l)	< 0.076
Atrazine (µg/l)	< 0.11
Benzo(a)pyrene (µg/l)	< 0.022
Butachlor (µg/l)	< 0.055
Di(2-ethylhexyl)phthalate (µg/l)	< 0.64
Di(2-ethylhexyl)adipate (µg/l)	< 0.64
Hexachlorobenzene (µg/l)	< 0.11
Hexachlorocyclopentadiene (µg/l)	< 0.11
Metolachlor (µg/l)	< 0.095
Metribuzin (µg/l)	< 0.22
Propachlor (µg/l)	< 0.080
Simazine (µg/l)	< 0.053
531.1 Analysis	
3-Hydroxycarbofuran (µg/l)	< 0.50
Aldicarb (µg/l)	< 0.50
Aldicarb Sulfone (µg/l)	< 0.50
Aldicarb Sulfoxide (µg/l)	< 0.50
Carbaryl (µg/l)	< 0.50
Carbofuran (µg/l)	< 0.50
Methomyl (µg/l)	< 0.50
Oxamyl (µg/l)	< 0.50
547 Analysis	
Glyphosate (µg/l)	< 6.0

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Sample:	1
548.1 Analysis	
Endothall (µg/l)	< 5.0
549.2 Analysis	
Diquat (µg/l)	< 0.40
1613-B Analysis	
2,3,7,8-TCDD (pg/l)	< 0.230

APPENDIX D
Excerpts from the 2008 EPNG Environmental Handbook

Notes:

Spill and Release Control, Cleanup and Reporting

What is a Spill or Release?

A spill is an unauthorized release of product, raw materials, chemicals or waste outside any secondary containment and into the environment. Spills can occur as a result of leaks, accidents or third party incidents. Spills that occur inside of secondary containment are not considered spills to the environment and are not subject to agency notification. Nonetheless, spills should still be reported to the Environmental Department and the procedures listed below should be followed.

Spill or Release Reporting Procedures

1. Begin spill response and reporting activities upon finding a spill or release to the environment. Notify Facility Management and the Environmental Department as soon as practicable.
2. Report any spill or release of the following materials regardless of location (on-property or off-property) to the Environmental Department:
   - Oil or petroleum products
   - Produced water/brine
   - Hazardous substances or hazardous wastes
   - Chemicals
   - Unplanned natural gas (flaring or venting) if required by permit or State regulation
   - Asbestos-containing materials
   - Smoke or excessive opacity
3. Be prepared to give the following information to the Environmental Department:
   - The identity of the material released;
   - Estimate of the quantity released;
   - The location, time, and date the release occurred or was discovered;
   - Description of how the release occurred (e.g., equipment failure);
   - The extent of injuries, if any;
   - Possible hazards to human health or the environment outside the facility;
   - Immediate action taken in response to the release;
   - Names and numbers of the persons to be contacted for further information.
4. If applicable, follow any additional spill notification procedures in your facility Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure.
5. The following releases require immediate **(within 1 hour of discovery)** notification to the National Response Center (NRC):
   - Any petroleum product released into streams, rivers, lakes or dry washes

- A release that exceeds the reportable quantity (RQ) of any CERCLA hazardous substances in any 24-hour period which is not fully contained
- A release of a hazardous substance or hazardous waste which occurs during transportation
- A release of hazardous waste which contains a reportable quantity of a hazardous substance

6. The Environmental Department is responsible for making initial notifications of RQ releases to applicable regulatory agencies and for handling any follow-up reporting requirements. Facility Management is responsible for verbal reports to agencies if the Environmental Department cannot be reached.
7. Reportable Quantity spill events will be entered into the Company's Comprehensive Incident Report Tracking System (CIRTS) and updated as needed for ongoing cleanups.

Initial Spill or Release Response

1. **Be sure that Company personnel responding to a release have the appropriate level of training and the proper Personal Protective Equipment (PPE).**
2. Eliminate or control the spill or release by closing valves, blowing down, or other means.
3. Initiate Emergency Operating Procedures (EOP) as appropriate.
4. Identify media (e.g., soil, water, etc.) affected by the spill and the exact location, e.g., legal description.
5. Identify the material spilled or released. The MSDS may provide information about the material spilled and the proper safety precautions to use.
6. Alert personnel of danger and evacuate personnel and/or public from the areas where there may be an immediate danger to life or health. Emergency responders may need to be used to evacuate public areas where conditions warrant.
7. Barricade or isolate the spill area as needed to keep unauthorized personnel out.

Spill or Release Control and Cleanup

1. To prevent pollutants from entering storm water runoff, routine housekeeping should include the removal or remediation of hydrocarbon impacted soil/gravel.
2. Control and clean up the spill or release using procedures outlined in your facility's Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure, if applicable. The minimum response activities include:
   - Contact the Safety Department or refer to the MSDS for help in the selection and use of PPE.
   - Assemble the required response equipment including protective clothing and gear, heavy equipment (e.g., backhoe), absorbent material (e.g., cement, oil absorbent, pads, sand), and empty DOT- approved containers (e.g., drums).
   - Contain the spill area using booms, soil berms, ditches, or similar means.
   - Remove all absorbed material or liquid contained by diking and place in DOT- approved containers. Use pumps as needed.
   - Use rags and cleansing agents as needed to clean spill response equipment.
   - Decontaminate all reusable equipment and place decontamination wastes in containers.
   - Label all containers properly.
   - Transfer all containers to a temporary and secure storage area or the facility- designated waste storage area.
   - Arrange with the Environmental Department for help in sampling spill wastes and their proper disposal.
   - Replace used spill kit response equipment with new equipment.
3. Keep a copy of any required report and all other documents associated with a spill or release including Federal, State and local forms in the facility SPCC or Spills & Releases files.

For Further Information

Refer to the following procedures in this Handbook:

- Air Permits
- Asbestos
- Emergency Operations Procedure (EOP) (outside this handbook)
- Facility Spill Prevention, Control and Countermeasures (SPCC) plan (outside this handbook)
- Labeling
- Sampling and Analysis
- Waste Characterization

Notes:

Spill and Release Control, Cleanup and Reporting

SPILLS

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NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

June 13, 2007

Mr. Glen Thompson
El Paso Natural Gas Company
3300 North "A" Building
Suite 200
Midland, Texas 79706

Re: **Discharge Permit GW-006**
El Paso Natural Gas Company
Washington Ranch Compressor Station
Eddy County, New Mexico

Dear Mr. Thompson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the El Paso Natural Gas (EPNG) Company (owner/operator) Washington Ranch Compressor Station located in the SE/4 of Section 34, Township 25 South, Range 24 East, NMPM, Eddy County, New Mexico, under the conditions specified in the enclosed **attachment to the discharge permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter, including permit fees.**

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

If you have any questions, please contact Brad A. Jones of my staff at (505) 476-3487 or E-mail brad.a.jones@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/baj
Attachments-1
xc: OCD District II Office, Artesia

ATTACHMENT TO THE DISCHARGE PERMIT
EL PASO NATURAL GAS COMPANY, WASHINGTON RANCH COMPRESSOR STATION (GW-006)
DISCHARGE PERMIT APPROVAL CONDITIONS

June 13, 2007

Please remit a check for $1700.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. However, the owner/operator still owes the required $1700.00 renewal permit fee for a gas compressor station greater than 1001 horsepower.

2. **Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on March 26, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA1978} and civil penalties may be assessed accordingly.***

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its December 14, 2006 discharge plan renewal application and January 24, 2007 addendum, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. **Above Ground Tanks:** The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain

fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh

water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: N/A

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transfer or shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure: The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: El Paso Natural Gas Company, (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

EL PASO NATURAL GAS
Company Name-print name above

CHAD GINEST
Company Representative- print name

C. Ginest
Company Representative- signature

Title CARLSBAD AREA OPERATIONS MANAGER

Date: 6-25-07

elpaso Natural Gas

December 14, 2006

Via Federal Express# 7901 3603 7281

Mr. Wayne Price
Environmental Bureau Chief
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: El Paso Natural Gas Company
Washington Ranch Gas Storage Facility
Discharge Plan Renewal Application

Dear Mr. Price:

Enclosed please find two (2) executed copies (one original and one copy) of a renewal application form and El Paso Natural Gas Company's (EPNG) Washington Ranch Gas Storage Facility Discharge Plan. We have also enclosed both an application filing fee of $100.00 as well as the permit fee of $1,700 in accordance with NMWQCC guidelines. An additional copy of the application and Discharge Plan is being provided to the District Office under separate cover.

If you have any questions concerning this submission or require additional information or clarification, please contact me at your convenience at (432) 686-3268. I can also be reached via email at glen.thompson@elpaso.com.

Respectfully submitted,
El Paso Natural Gas Company

Glen Thompson
Principal Environmental Representative

Attc

cc: Via Federal Express# 7901 3603 8303
NMOCD, District Office #2
Mike Bratcher, Environmental Program Manager
131 West Grand Ave.
Artesia, NM 88210

Chad Ginest – EPNG
Sandra Miller – EPNG

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,GAS PLANTS, REFINERIES, COMPRESSOR, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

(Refer to the OCD Guidelines for assistance in completing the application)

☐ New ☒ Renewal ☐ Modification

1. Type: Gas Plant
2. Operator: El Paso Natural Gas Company

   Address: 493 Washington Ranch Road, Carlsbad, NM 88220 c/o 4305 National Parks Highway, Carlsbad, NM 88220

   Contact Person: Chad Ginest Phone: 505-234-5415
3. Location: 3 /4 4 /4 Section 34 Township 25S Range 24E, NMPM

   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
   Information on the facility is attached.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
   A description of the facility is attached.
6. Attach a description of all materials stored or used at the facility.
   A description of stored materials is attached.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
   A description of effluent/wastes are attached.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
   A description of waste streams and collection/treatment/disposal procedures is attached.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
   No modifications have been implemented since the last permit other than those described in attached text. No modifications are planned.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
    Routine inspection and maintenance methods employed are described in the attached documentation.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
    See text for discussion.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
    Geologic/hydrological information was presented in the original permit application and is referenced by this document.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
    The facility is currently operational and no plans for closure are pending. See attached.
14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Chad Ginest Title: Carlsbad Area Operations Manager

Signature: C. D. Date: 12-13-6

E-mail Address: chad.ginest@elpaso.com

	Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
	CY Reimbursement Project _____ Tax ___	064	01						1
21		064	01		2329	900000	2329134		2
5	Gross Receipt Tax	092	13	1300	1696	900000	4169134		3
3	Air Quality Title V	248	14	1400	9696	900000	4969014		4
4	PRP Prepayments	248	14	1400	9696	900000	4969015		5
2	Climax Chemical Co.	248	14	1400	9696	900000	4969248		6
6	Circle K Reimbursements	339	27	2700	1696	900000	4169027		7
7	Hazardous Waste Permits	339	27	2700	1696	900000	4169339		8
8	Hazardous Waste Annual Generator Fees	341	29		2329	900000	2329029	1800 00	10
10	Water Quality - Oil Conservation Division	341	29	2900	1696	900000	4169029		11
11	Water Quality - GW Discharge Permit	631	31	2500	1696	900000	4169031		12
12	Air Quality Permits	851	33		2919	900000	2919033		13
13	Payments under Protest	652	34		2349	900000	2349001		*14
14	Xerox Copies	652	34		2349	900000	2349002		15
15	Ground Water Penalties	652	34		2349	900000	2439003		16
16	Witness Fees	652	34		2349	900000	2349004		17
17	Air Quality Penalties	652	34		2349	900000	2349005		18
18	OSHA Penalties	652	34		2349	900000	2349006		19
19	Prior Year Reimbursement	652	34		2349	900000	2349009		20
20	Surface Water Quality Certification	652	34		2349	900000	2349012		21
21	Jury Duty	652	34		2349	900000	2349014		22
22	CY Reimbursements (i.e. telephone)	783	24	2500	9696	900000	4969201		*23
23	UST Owner's List	783	24	2500	9696	900000	4969202		*24
24	Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969203		*25
25	UST Maps	783	24	2500	9696	900000	4969205		*26
26	UST Owner's Update	783	24	2500	9696	900000	4969207		*28
28	Hazardous Waste Regulations	783	24	2500	9696	900000	4969208		*29
29	Radiologic Tech. Regulations	783	24	2500	9696	900000	4969211		*30
30	Superfund CERLIS List	783	24	2500	9696	900000	4969213		31
31	Solid Waste Permit Fees	783	24	2500	9696	900000	4969214		32
32	Smoking School	783	24	2500	9696	900000	4969222		*33
33	SWQB - NPS Publications	783	24	2500	9696	900000	4969228		*34
34	Radiation Licensing Regulation	783	24	2500	9696	900000	4969301		*35
35	Sale of Equipment	783	24	2500	9696	900000	4969302		*36
36	Sale of Automobile	783	24	2500	9696	900000	4969614		**37
37	Lust Recoveries	783	24	2500	9696	900000	4969615		**38
38	Lust Repayments	783	24	2500	9696	900000	4969801		39
39	Surface Water Publication	783	24	2500	9696	900000	4969242		40
40	Exxon Reese Drive Ruidoso - CAF	957	32	9600	1696	900000	4164032		41
41	Emerg. Hazardous Waste Penalties NOV	987	05	0500	1696	900000	4169005		42
42	Radiologic Tech. Certification	989	20	3100	1696	900000	4169020		44
44	Ust Permit Fees	989	20	3100	1696	900000	4169021		45
45	UST Tank Installers Fees	991	26	2600	1696	900000	4169026		46
46	Food Permit Fees								43
43	Other								

TOTAL 1800 00

Gross Receipt Tax Required

** Site Name & Project Code Required

ontact Person: Wayne Price Phone: 476-3490 Date: 12/18/06

eceived in ASD By: _____ Date: _____ RT #: _____ ST # : _____

FSB025
Revised 07/07/00

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

[illegible] check No. [redacted] dated 12/13/06

[illegible] 1800.00

[illegible] El Paso Natural Gas

[illegible] GW-006

[illegible] Lawrence Romero Date 12/18/06

[illegible] Lawrence Romero Date 12/18/06

Received in ASD [illegible] Date

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other ___

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund

AMEC EARTH & ENVIRONMENTAL, INC.
EL PASO IMPREST
125 MONTOYA ROAD
EL PASO, TX 79932
425-820-4669

[redacted]
19-709/1250

DATE 12-13-06

PAY TO THE ORDER OF NMED Water Quality Management Fund $1700.00

One thousand seven hundred & 00/100 DOLLARS

HSBC BANK USA, N.A.
SEATTLE, WA 98101

TWO SIGNATURES REQUIRED OVER $1000

FOR 0717000180

AMEC EARTH & ENVIRONMENTAL, INC.
EL PASO IMPREST
125 MONTOYA ROAD
EL PASO, TX 79932
425-820-4669

[redacted]
19-709/1250

DATE 12-13-06

PAY TO THE ORDER OF NMED Water Quality Management Fund $100.00

One hundred and 00/100 DOLLARS

HSBC BANK USA, N.A.
SEATTLE, WA 98101

TWO SIGNATURES REQUIRED OVER $1000

FOR 0717000180

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/22/02,

or cash received on 9/4/02 in the amount of $ 1700.00

from EL PASO NATURAL GAS CO.

for _____ GW-006
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Ed Martin Date: 9/4/02

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility ____ Renewal ____

Modification ____ Other _____
(specify)

Organization Code 521.07 Applicable FY ~~2004~~ 2003

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ____

EL PASO NATURAL GAS COMPANY
P.O. BOX 4430
HOUSTON, TX 77210-4430

CHECK DATE 08/22/2002 CHECK NUMBER [redacted]

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION
1220 S ST FRANCIS DR
SANTA FE, NM 87505

REMITTANCE ADVICE **RETAIN FOR YOUR RECORDS**
Refer Payment Inquires to EPGTR - 713-420-4200

VENDOR 0000002667
STATE OF NEW MEXICO

Voucher ID	Invoice Number	Invoice Date	Description	Discount	Paid Amount
00139715	CKREQ020820A	08/20/2002	FOR DISCHARGE PLAN GW-006	0.00	1,700.00
			TOTAL	$0.00	$1,700.00

EL PASO NATURAL GAS COMPANY
P.O. BOX 4430
HOUSTON, TX 77210-4430

CITIBANK DELAWARE
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

CHECK DATE 08/22/2002
62-20
311

CHECK NUMBER [redacted]

Amount
***$1,700.00

VOID AFTER ONE YEAR

Pay ***ONE THOUSAND SEVEN HUNDRED AND XX / 100 US DOLLAR***

To The Order Of STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
1220 S ST FRANCIS DR
SANTA FE, NM 87505

H. Grant Curtis
Authorized Signature

[redacted]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/20/02,
or cash received on 3/26/02 in the amount of $ 100.00
from EL PASO NATURAL GAS CO.
for GW-006
(Facility Name)
Submitted by: _____ (OP No.) Date: _____
Submitted to ASD by: Sal Martin Date: 3/26/02
Received in ASD by: _____ Date: _____
Filing Fee ✓ New Facility ___ Renewal ___
Modification ___ Other _____
(specify)
Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.
Full Payment ✓ or Annual Increment ___

EL PASO NATURAL GAS COMPANY
P.O. BOX 4430
HOUSTON, TX 77210-4430

CITIBANK DELAWARE
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

CHECK DATE 03/20/2002
CHECK NUMBER [redacted]
62-20
311
Amount
***$100.00
VOID AFTER ONE YEAR

Pay ***ONE HUNDRED AND XX / 100 US DOLLAR***

To The Order Of
STATE OF NEW MEXICO
WATER QUALITY FUND
1220 SOUTH ST FRANCIS
SANTA FE, NM 87505

H. Brent Austin
Authorized Signature

[redacted]

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Betty Rivera
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

July 23, 2002

CERTIFIED MAIL
RETURN RECEIPT NO. 3929-9499

Mr. Robert St. John
El Paso Natural Gas Co.
3300 North "A" Building 2
Midland, TX 79705

RE: Discharge Plan Renewal GW-006
El Paso Natural Gas Co.
Washington Ranch Gas Storage Facility
Eddy County, New Mexico

Dear Mr. St. John:

The ground water discharge plan renewal GW-006 for the El Paso Natural Gas Co. Washington Ranch Gas Storage Facility located in the SW/4 SE/4 of Section 34, Township 25 South, Range 24 East, NMPM, Eddy County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. **Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within thirty (30) days of receipt of this letter. Please note new mailing address below.**

The discharge plan renewal application letter, dated March 21, 2002, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve El Paso Natural Gas Co. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve El Paso Natural Gas Co. of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open tanks (exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered non-hazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, El Paso Natural Gas Co. is required to notify the Director of

any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on March 26, 2007, and El Paso Natural Gas Co. should submit an application in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan renewal application for the El Paso Natural Gas Co. Washington Ranch Gas Storage Facility is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application is assessed a filing fee of $100.00. There is a renewal flat fee assessed for gas storage facilities of $1,700.00. We have received the filing fee and the flat fee is due upon receipt of this approval.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

Xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-006
EL PASO NATURAL GAS CO.
WASHINGTON RANCH GAS STORAGE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
July 23, 2002

1. Payment of Discharge Plan Fees: **The $100.00 filing fee has been received. The $1,700.00 flat fee is due upon receipt of this approval.** All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.

2. Commitments: El Paso Natural Gas Co. will abide by all commitments submitted in the discharge plan renewal application letter dated March 21, 2002 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis. **Rule 712 Waste:** Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
    1. the waste stream is identified, and authorized, as such in the discharge plan, and;
    2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.

4. Drum Storage: All drums containing material other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing

tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All below grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: El Paso Natural Gas Co. shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then El Paso Natural Gas Co. shall: take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.

16. Closure: The OCD will be notified when operations of the Washington Ranch Gas Storage Facility are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

El Paso Natural Gas Co.

Print Name: _____

Signature: _____

Title: _____

Date: _____

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-006
EL PASO NATURAL GAS CO.
WASHINGTON RANCH GAS STORAGE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
July 23, 2002

1. Payment of Discharge Plan Fees: **The $100.00 filing fee has been received. The $1,700.00 flat fee is due upon receipt of this approval.** All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.

2. Commitments: El Paso Natural Gas Co. will abide by all commitments submitted in the discharge plan renewal application letter dated March 21, 2002 and these conditions for approval.

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    1. the waste stream is identified, and authorized, as such in the discharge plan, and;
    2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.

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tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

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16. Closure: The OCD will be notified when operations of the Washington Ranch Gas Storage Facility are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

17. Conditions accepted by: El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

El Paso Natural Gas Co.

Print Name: PATRICK V CARSON

Signature:

Title: CARLSBAD AREA MANAGER

Date: 8-20-02

ATTACHMENT TO THE DISCHARGE PLAN GW-006 RENEWAL
EL PASO NATURAL GAS COMPANY
WASHINGTON RANCH GAS STORAGE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(April 11, 1997)

1. Payment of Discharge Plan Fees: The $690 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. EPNG Commitments: EPNG will abide by all commitments submitted in the discharge plan application dated February 3, 1997.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing

to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. Test results will be submitted to the OCD Santa Fe Division office within 30 days of testing.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. Test results will be submitted to the OCD Santa Fe Division office within 30 days of testing.

10. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

11. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

    Any non-exempt contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.

13. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

14. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. Certification: EPNG, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EPNG further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

EL PASO NATURAL GAS COMPANY

by _____
Title

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 8, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-922

Mr. Donald R. Payne
El Paso Natural Gas Company
100 North Stanton
El Paso, Texas 79901

RE: Discharge Plan GW-006
Washington Ranch Gas Storage Facility
Eddy County, New Mexico

Dear Mr. Payne:

The ground water discharge plan renewal GW-006, for the El Paso Natural Gas Company (EPNG) Washington Ranch Gas Storage Facility located in the SW/4 SE/4, of Section 34, Township 25 South, Range 24 East, NMPM, Eddy County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan as approved March 30, 1987, the renewal as approved March 31, 1992, and the discharge plan renewal application dated February 3, 1997. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 10 working days of receipt of this letter.**

The discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve EPNG of liability should operations result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. EPNG is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.G.4., this plan is for a period of five years. This approval will expire on March 26, 2002, and EPNG should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the El Paso Natural Gas Company Washington Ranch Gas Storage Facility is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $50 plus a flat fee of $690 for compressor stations. The OCD received the filing fee on March 19, 1997. The flat fee is due upon receipt of this approval. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/mwa
Attachment

xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN GW-006 RENEWAL
EL PASO NATURAL GAS COMPANY
WASHINGTON RANCH GAS STORAGE FACILITY
DISCHARGE PLAN APPROVAL CONDITIONS
(April 11, 1997)

1. Payment of Discharge Plan Fees: The $690 flat fee shall be submitted upon receipt of this approval. The required flat fee may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

2. EPNG Commitments: EPNG will abide by all commitments submitted in the discharge plan application dated February 3, 1997.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing

to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. Test results will be submitted to the OCD Santa Fe Division office within 30 days of testing.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. Test results will be submitted to the OCD Santa Fe Division office within 30 days of testing.

10. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

11. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

    Any non-exempt contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.

13. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

14. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. Certification: EPNG, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EPNG further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

EL PASO NATURAL GAS COMPANY

by_____
Title

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 5/1/97,

or cash received on ______________ in the amount of $ 690.00

from EPNG

for Washington Ranch (Facility Name) GW-006 (DP No.)

Submitted by: ______________________ Date: __________

Submitted to ASD by: R C Anderson Date: 5-23-97

Received in ASD by: ______________________ Date: __________

Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other ______________ (specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTT

EL PASO NATURAL GAS COMPANY
P.O. Box 1492
El Paso, TX 79978

PAYABLE AT
CITIBANK DELAWARE
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

DATE 05/01/97
VOID AFTER 1 YEAR
62-20/311

[redacted]

PAY AMOUNT
$690.00***

PAY: ****SIX HUNDRED NINETY AND XX / 100 US DOLLAR****

TO THE ORDER OF NEW MEXICO ENVIRONMENT DEPT

Water Quality Management
Oil Conservation Division
2040 S Pacheco
Santa Fe, NM 87505

H. Brent Austin
Authorized Signature

[redacted]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 1/30/97,

or cash received on _____ in the amount of $ 50.00

from EPNG

for Washington Ranch C.S. GW-006
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R. C. Chandler Date: 3/19/97

Received in ASD by: _____ Date: _____

Filing Fee XR New Facility ___ Renewal ___

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

IS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM

EL PASO NATURAL GAS COMPANY
P.O. Box 1492
El Paso, TX 79978

PAYABLE AT
CITIBANK DELAWARE
A Subsidiary of Citicorp
One Penn's Way
New Castle, DE 19720

DATE 01/30/97
VOID AFTER 1 YEAR
62-20/311

[redacted]

PAY AMOUNT
$50.00***

PAY: ****FIFTY AND XX/100 US DOLLAR****
TO THE ORDER OF NMED WATER QUALITY MANAGEMENT

2040 S Pacheco
Santa Fe, NM 87505

H. Brent Austin
Authorized Signature

COPYSAN- ANTI-FRAUD PROTECTION - PATENTS 4,210,346; 4,227,720; 4,310,180; 5,197,785

[redacted]

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 1/16/92,

or cash received on 2/7/92 in the amount of $ 50.00

from El Paso Natural Gas Co

for Washington Ranch (Facility Name) GW-6 (DP No.)

Submitted by: [signature] Date: 2/7/92

Submitted to ASD by: _____ Date: _____

Received in ASD by: [signature] Date: 2/7/92

Filing Fee X New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 80

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

EL PASO NATURAL GAS COMPANY
EL PASO, TEXAS

CONTROL NO. [redacted]

232 CBD

62-20
311

01/16/92
Date

PAYABLE AT
CITIBANK - DELAWARE
WILMINGTON, DEL
PAY TO THE ORDER OF

NEW MEXICO ENERGY MINERALS
AND NATURAL RESOURCES DEPT
P O BOX 26110
SANTA FE NM 87502

PAY AMOUNT
$50.00

Void After 1 Year

Thomas E. Kabat
Authorized Signatory

[redacted]

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4/9/92,

or cash received on 4/13/92 in the amount of $ 690.00

from El Paso Natural Gas Co

for Washington Ranch (Facility Name) SW-06 (DP No.)

Submitted by: [signature] Date: 4/13/92

Detach and retain this statement for your records

EL PASO NATURAL GAS COMPANY

REMITTANCE ADVICE

Vendor Number 017349 001

Check Date 01/16/92

Check Number [redacted]

VOUCHER NUMBER	INVOICE NUMBER	AMOUNT		
		Invoice	Discount	Net
REFER PAYMENT INQUIRIES TO ACCOUNTS PAYABLE (915) 541-5354				
VOUCHER NO	INVOICE NO	GROSS	DISCOUNT	NET
000028589	CKREQ920114	50.00	.00	50.00
WATER DISCHARGE APPLICATION FOR WASHINGTON RANCH, NEW REQUIREMENT CALL FOR A $50.00 FILING FEE				
	TOTALS	50.00	.00	50.00

Detach and retain this statement for your records

EL PASO NATURAL GAS COMPANY

REMITTANCE ADVICE

Vendor Number
018111 001

Check Date
04/09/92

Check Number
[redacted]

VOUCHER NUMBER	INVOICE NUMBER	AMOUNT		
		Invoice	Discount	Net
REFER PAYMENT INQUIRIES TO ACCOUNTS PAYABLE (915) 541-5354				
VOUCHER NO	INVOICE NO	GROSS	DISCOUNT	NET
000057975	CKREQ920406	690.00	.00	690.00
FILING FEES				
	TOTALS	690.00	.00	690.00

Washington Ranch

FM SS0044 (REV. 8-90)

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800

March 31, 1992

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-574

Mr. Martin A. Fong
Compliance Engineer
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

RE: Approval of Discharge Plan GW-6 Renewal
EPNG Washington Ranch Gas Storage Facility
Eddy County, New Mexico

Dear Mr. Fong:

The **discharge plan renewal GW-6 for EPNG Washington Ranch Storage Facility** located in the SW/4 SE/4, Section 34, Township 25 South, Range 24 East, NMPM, Eddy County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The renewal application consists of the original discharge plan as approved March 26, 1982; renewal of the discharge plan approved March 30, 1987; the renewal application dated February 4, 1992; and the materials dated March 27, 1992, submitted as supplements to the application.

The discharge plan renewal was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3-109.A. Please note Sections 3-109.E and 3-109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface water, ground water, or the environment which may be actionable under other laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan is for a period of five (5) years. This approval will expire March 26, 1997, and you should submit an application for renewal in ample time before this date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the EPNG Washington Ranch Gas Storage Project is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus one-half of the flat fee or six-hundred and ninety (690) dollars for gas compressor stations greater than 3000 Horsepower.

The OCD has received your $50 filing fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval. The flat fee (total payment or installment) is due upon receipt of this letter.

Please make all checks out to the **NMED - Water Quality Management** and send to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/kmb
Attachment

cc: Mike Williams, OCD Artesia Office
Chris Eustice, OCD Hobbs Office

ATTACHMENT TO DISCHARGE PLAN GW-7 6 APPROVAL
EPNG WASHINGTON RANCH GAS STORAGE PROJECT
DISCHARGE PLAN REQUIREMENTS
(March 31, 1992)

1. Payment of Discharge Plan Fees: The $690 flat fee (either total payment or installment) will be paid upon receipt of this approval letter.

2. Berming of Tanks: The Lube Oil Storage Tank, Ambitrol Storage Tank, and Glycol Storage Tank will be bermed by the first quarter of 1993.

3. Saddle Tanks: The horizontal saddle tanks containing Lube Oil and Varsol will have concrete curb-type containment installed by the first quarter of 1993.

4. Sump Inspection: All pre-existing sump at this facility will be cleaned out and visually inspected on an annual basis. Any new sumps or below-grade tanks will be approved by the OCD prior to installation.