GW - 8

PERMITS, RENEWALS, & MODS

elpaso Natural Gas

November 17, 2009

UPS Tracking# 1Z 6R4 V49 02 5238 9227

New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 476-3492 *office*
(505) 476-3462 *fax*

Re: El Paso Natural Gas Company
Monument Compressor Station GW-008
Lea County, New Mexico

Mr. Leonard Lowe:

El Paso Natural Gas Company (EPNG) is forwarding you the signed "Attachment – Discharge Permit Approval Conditions". An additional copy has also been included for your records. EPNG received the approval letter and attachments from the New Mexico Oil Conservation Division on October 30, 2009. Please let me know if you have any additional questions or comments in regards to the attachments for Discharge Permit GW-008.

Respectfully,
El Paso Natural Gas Company

Glen Thompson
Principal Environmental Representative

Enc

Cc: Kenny Morrow – Plains Area Operations Manager
Sandra Miller – Manager of Western Pipelines Environmental Dept.

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Vacant
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

October 26, 2009

Mr. Glenn Thompson
3300 North A Street, Building 2, Suite 200
Midland, Texas 79705

Re: Renewal Discharge Permit, GW-008
Monument Compressor Station, El Paso Natural Gas
NW/4 Section 1, Township 20 South, Range 36 East, NMPM,
Lea County, New Mexico

Dear Mr. Thompson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves **El Paso Natural** Gas's discharge permit for the above referenced site contingent upon 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 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 Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@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,

Glenn von Gonten
Acting Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT
DISCHARGE PERMIT
APPROVAL CONDITIONS

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 flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. The flat fee for a compressor station with horsepower greater than 1001 HP is $1700.00 and was submitted and processed on with the OCD. Please submit a signed copy of the permit and return to the OCD within 30 days.

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 September 20, 2014** 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, NMSA 1978} 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 May 2009 discharge plan application, 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 Part 35 Waste: Pursuant to OCD Part 35 (19.15.35.8 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 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 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. The OCD does not consider covering contaminated areas a remediation of the spill/release.

16. OCD Inspections: The OCD performed an inspection of this facility at any time. Findings will be noted here and addressed accordingly.

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 transferor 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 Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (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 CO.
Company Name-print name above

KENNETH L. MORROW
Company Representative- print name

Kenneth L Morrow
Company Representative- Signature

Title AREA MANAGER

Date: 11-04-09

New Mexico Energy, Minerals and Natural Resources Department

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Governor
Joanna Prukop
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Mark Fesmire
Division Director
Oil Conservation Division

October 26, 2009

Mr. Glenn Thompson
3300 North A Street, Building 2, Suite 200
Midland, Texas 79705

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If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@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,

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Acting Environmental Bureau Chief

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secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

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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.

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16. OCD Inspections: The OCD performed an inspection of this facility at any time. Findings will be noted here and addressed accordingly.

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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 transferor 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.

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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."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Tuesday, May 26, 2009 10:59 AM
To: 'Thompson, Glen D'
Cc: 'Marco Wikstrom'
Subject: GW-008, Monument CS Administratively Complete
Attachments: GW-008, Admin Complete Letter.pdf; GW-008, Renewal Draft Permit.pdf; GW-008, OCD PN.pdf; Renewal WQCC PN Rules.pdf

Mr. Thompson,

The OCD has determined your application for GW-008, Monument Compressor Station to be Administratively Complete.

Attached are documents referencing this first milestone in this renewal process.

Please submit your notice for publishing. Once the notice is published submit the proof of publication affidavit to our office.

I have attached the WQCC rules for renewal public noticing for your review. Note all fonts in red as they pertain to renewals ONLY.

Technical review shall commence.

Thank you.

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/

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

May 26, 2009

Dear Mr. Thompson:

Re: Discharge Plan Renewal Permit GW-008
El Paso Natural Gas
Monument Compressor Station
Lea County, New Mexico

The New Mexico Oil Conservation Division (NMOCD) has received El Paso Natural Gas's request, initial and facility fee, dated May 14, 2009, to renew GW-008 for their Monument Compressor Station located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

The New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC was satisfied and demonstrated to the NMOCD. Submit the proof of publication affidavit to the OCD office once received. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe
Environmental Engineer

LRL/lrl

xc: OCD District I Office, Hobbs

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

May 26, 2009

Mr. Glenn Thompson
3300 North A Street, Building 2, Suite 200
Midland, Texas 79705

Re: Renewal Discharge Permit, GW-008
El Paso Natural Gas
NW/4 Section 1, Township 20 South, Range 36 East, NMPM,
Lea County, New Mexico

Dear Mr. Thompson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the **El Paso Natural Gas.,** (owner/operator) for the above referenced site contingent upon 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 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 Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@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,

Glenn von Gonten
Acting Environmental Bureau Chief

Attachments-1
xc: OCD District Office

ATTACHMENT

DISCHARGE PERMIT

APPROVAL CONDITIONS

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 flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. The flat fee for a compressor station is $1700.00 and was submitted and processed on with the OCD. Please submit a signed copy of the permit and return to the OCD within 30 days.

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 September 20, 2014** 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, NMSA 1978} 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 May 2009 discharge plan application, 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 Part 35 Waste: Pursuant to OCD Part 35 (19.15.35.8 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 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 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. ** The OCD does not consider covering contaminated areas a remediation of the spill/release **

16. OCD Inspections: The OCD performed an inspection of this facility on Monty, Day, Year. Mr Man provided the inspection. All photographs referenced below are located in the attachment of this permit. The inspection concluded the following:

1. **Photo 1:**

El Paso Natural Gas shall resolve these concerns and report within **XX days, by Month, Day, Year**. The report shall be submitted, with photographs, to the Environmental Bureau Oil Conservation Division identifying the resolutions to the concerns.

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 transferor 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 Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator) I, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **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."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- Signature

Title_____

Date:_____

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-008) El Paso Natural Gas company, 3300 North A Street, Building 2, Suite 200, Midland Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Compressor Station, located in the NW/4 of Section 1, Township 20 South, Range 36 East, NMPM, Lea County. The facility transports natural gas for customer demand. Approximately 27,000 gallons of used and new oil are generated and stored in onsite. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 40 feet, with a total dissolved solids concentration of approximately 707 – 4230 mg/L. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this **26th** day of April 2009.

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

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

RECEIVED
2009 may 15 AM 11 31

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: Compressor Station (Monument Compressor Station, GW-8)
2. Operator: El Paso Natural Gas

   Address: 2316 West Bender Blvd., Hobbs, NM 88240

   Contact Person: Kenny Morrow Phone: (575) 492-2380
3. Location: /4 NW/4 Section 1 Township 20S Range 36E
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
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: Kenny Morrow Title: Plains Area Operations Manager

Signature: Kenny Morrow Date: 05-14-2009

E-mail
Address: Kenneth.Morrow@ElPaso.com

KLEINFELDER
Bright People. Right Solutions.

8300 Jefferson NE, Suite B
Albuquerque, NM
87113

p| 505.344.7373
f| 505.344.1711

kleinfelder.com

May 19, 2009
File No. 93014.4 – ALB09LT001
Reference: 93014.4-ALB09RP001

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

SUBJECT: Application for a Discharge Permit Renewal
El Paso Natural Gas Company Monument Compressor Station (GW-8)
Lea County, New Mexico

Dear Mr. Lowe:

Kleinfelder West, Inc. (Kleinfelder) on behalf of the El Paso Natural Gas Company (EPNG) is pleased to submit for your review, one original and one copy of the attached discharge permit application and supporting documents for a discharge permit renewal for the Monument Compressor Station, GW-8.

Kleinfelder has included the required information for renewal as outlined in Title 20, Chapter 6, Part 2, NMAC, and "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations."

Public Notice will be published in the Hobbs News Sun newspaper in accordance with NMAC 20.6.2.3108.

A check for $1,800 to cover the filing fee and permit fee will be sent under a separate cover.

The following are attached:

- Discharge Permit Application;
- Public Notice text in both Spanish and English;
- Discharge Plan with Attachments.

Should you have any questions, please feel free to contact Marco Wikstrom or David Janney (Kleinfelder) at (505) 344-7373, or Glen Thompson (EPNG) at (432) 686-3268.

Sincerely,
KLEINFELDER WEST, INC.

Marco Wikstrom
Staff Geologist

Reviewed by:

Melani K. Oakley, M.S.
Environmental Group Manager

C: Mr. Glen Thompson, EPNG

Public Notice

Application for a Discharge Permit Renewal for the Monument Compressor Station (GW-8), Lea 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), 2316 W. Bender Blvd., Hobbs, NM 88240 has submitted a renewal application for the Monument compressor station which is located in the NW-1/4 of Section 1, Township 20 south, Range 36 east, in Lea County, NM. The facility is located approximately 11.8 miles southwest of Hobbs, NM and 2.5 miles west of State Highway 8. The mailing address for the Monument compressor station is El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

The Monument compressor station is part of a network that transports an amount of natural gas that varies according to customer demand. 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 27,000 gallons of new and used oil from aboveground and belowground 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 NMOCD approved facilities.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of 40 feet below the ground surface. This aquifer system has a total dissolved solids concentration of between 707 and 4,230 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 NM.

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

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 NM Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future notices for the Monument compressor facility upon request.

Aviso público

Uso para una renovación del permiso de la descarga para la estación del compresor del monumento (GW-8), condado del pasto, Nuevo México

El Paso Natural Gas (EPNG) da por este medio el aviso que el uso siguiente del permiso de la descarga se ha sometido de acuerdo con la subdivisión B, C, y E del código administrativo de 20.6.2.31 08 Nuevo México.

El Paso Natural Gas Company (EPNG), 2316 W. Bender Blvd., Hobbs, NM 88240 ha presentado una solicitud de la renovación para la estación del compresor del monumento que está situada en el NW/4 de la sección 1, el municipio 20 del sur, se extiende 36 del este, en condado del pasto, Nuevo México. La facilidad está situada aproximadamente 11.8 millas de sudoeste de Hobbs, del nanómetro y de 2.5 millas al oeste de la carretera de estado ocho. La dirección del correo para la estación del compresor del Monument es El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

La estación del compresor del Monument es parte de una red que transporte una cantidad de gas natural que varíe según demanda de cliente. No se sabe ni se anticipa ningunas descargas intencionales o inadvertidas que podrían afectar a la superficie o al agua subterránea en la facilidad. Las descargas potenciales en la estación se limitan a aproximadamente 27.000 galones de aceite nuevo y usado de los tanques de almacenaje sobre el suelo y subterráneos. Los tanques se equipan de la contención secundaria y de indicadores llanos líquidos para prevenir derramamientos. Los líquidos de proceso tales como agua y aceite usado asociados a operaciones diarias son contenidos por un sistema del drene de la facilidad, transferidos a los tanques de almacenaje, después reciclados o dispuestos por las instalaciones aprobadas NMOCD.

La primera agua subterránea probablemente que se afectará por un escape, una descarga accidental, o un derramamiento existe en una profundidad de 40 pies debajo de la superficie de tierra. Esta sistema del acuífero tiene una concentración total de los sólidos en suspensión entre de 707 y 4230 miligramos por litro o mayor.

El plan de la descarga sometido a los esquemas de NMOCD cómo el agua producida, el aceite usado, y la basura serán manejados correctamente, incluyendo la dirección, almacenaje, y disposición final. El plan también incluye los procedimientos para la gerencia apropiada de escapes, de descargas accidentales, y de derramamientos para proteger las aguas del estado de Nuevo México.

Para la información adicional, ser colocado en una lista de personas a quienes se mandan propaganda facilidad-específica para los avisos futuros, o someter los comentarios satisfacen entran en contacto con:

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

La energía de Nuevo México, los minerales y el departamento de los recursos naturales aceptarán comentarios y declaraciones del interés con respecto a este uso y proporcionarán los avisos futuros para la facilidad del compresor del Monument a petición.

MONUMENT COMPRESSOR STATION DISCHARGE PLAN
EL PASO NATURAL GAS
Prepared by Kleinfelder West, Inc., Albuquerque, NM

Attachments:

Table 1:

- Groundwater Quality and Analytical Results

Appendix A:

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

Appendix B:

- 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) Monument Compressor Station GW-8 (Monument) is utilized for the compression of pipeline quality and field quality natural gas. Monument is part of a network that transports an amount of natural gas that varies according to customer demand. Compression is required to move natural gas through the pipelines for delivery to EPNG customers. A site plan of Monument is included as Figure 3.

Monument consists of seven natural gas-fueled internal combustion compressor drives with a total of 10,500 International Standards Organization (ISO) horsepower (hp), and associated equipment.

Total site combined compressor rated horsepower is 10,500 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	Kenneth Morrow, Area Manager El Paso Natural Gas Company Plain Operating Area 2316 W. Bender Blvd. Hobbs, NM 88240 Office: (575) 492-2380 Cell: (575) 390-3716 1-800-334-8047 (24-hour emergency notification)
Or **Local Representative (Alt.)**	Tim Howell El Paso Natural Gas Company 2316 W. Bender Blvd. Hobbs, NM 88240 (575) 492-3128
Operator	El Paso Natural Gas Company Plains Operating Area (Monument)
Physical Address	El Paso Natural Gas Company Plains Operating Area (Monument) Approximately 3.5 miles southwest of Monument, New Mexico, and two miles west of State Highway No. 8
Mailing Address	El Paso Natural Gas Company Plains Operating Area 2316 W. Bender Blvd. Hobbs, NM 88240

Item 3

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

Lea County, New Mexico
NW/4, Section 1, Township 20 South, Range 36 East

Latitude: 32 Degrees, 36 Minutes, and 22 Seconds North
Longitude: 103 Degrees, 18 Minutes, and 31 Seconds West

A site location map and a topographic map are attached in Appendix A (Figure 1).

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) 686-3268 G. Thompson or alternate contact (719) 520-4350 S. D. Miller

Item 5

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

To accomplish natural gas compression Monument utilizes the following:

- Two (2) compressor buildings (A-Plant and B-Plant) equipped with building basements and sumps that drain to the classifier;
- Seven (7) natural gas-fueled reciprocating compressor engines with a combined site rating of 10,500 ISO hp, with compressors;
  - Five (5) Cooper Bessemer GMV-10TF engines with five (5) C8B14 compressors in the A-Plant building;
  - Two (2) Cooper Bessemer GMW-10TF engines with one (1) C8BW-20 and one (1) CBFW-20 compressor in the B-Plant building;
- Four (4) inlet scrubbers for the natural gas stream consisting of one scrubber for the pipeline quality natural gas and three scrubbers for the field quality natural gas;
- One (1) fuel gas filter for each compressor building;
- One (1) cooling tower to cool the natural gas stream;
- Three (3) jacket water and oil-cooling fin-fan structures (one for A-Plant and two for B-plant);
- One (1) 21,000-gallon below grade classifier (installed in 2007);
- Two (2) 8,818-gallon aboveground fresh oil tanks;
- One (1) 350-gallon aboveground sulfuric acid tank;
- One (1) 250-gallon aboveground inhibitor tank;
- Two (2) 3,807-gallon aboveground jacket cooling water tanks;
- One (1) 9,030-gallon aboveground used oil tank;
- One (1) 16,800-gallon aboveground raw water tank;
- One (1) 8,400-gallon aboveground treated water tank (treated via reverse osmosis);
- One (1) reverse osmosis water treatment system;
- One (1) below grade pipe for transporting water solutions to an offsite permitted injection well (Rice Engineering);
- Two (2) 23-gallon building sumps built into the compressor building basements (one in each basement);
- One (1) station generator used supply electrical power to Monument in case of utility power failure; and
- One (1) 1,050-gallon septic holding tank.

Compressor Buildings
The two compressor buildings housing the compressor engines and compressors (A-Plant and B-Plant) are 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 basements and sumps, and discharged into the 21,000-gallon below grade classifier. Location of the compressor buildings is illustrated in Figure 2.

Compressors, Engines, and Ancillary Equipment
Natural gas compressed by reciprocating compressors does not produce wastewater. The compressor engines, compressors, 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 discharged into the 21,000-gallon classifier. From the classifier used oil is sent to the 9,030-gallon used oil AST, and water solutions are sent to the Rice Engineering System Line where it is transported offsite and placed into their permitted injection well.

The rate of used oil generated from the compressor engines, compressors, and scrubber blow-downs is 64,000 gallons or less per year of operation (approximately 175 gallons per day). The majority of the oil comes from the three field gas scrubbers. If field gas is not being compressed the volume of used oil would be substantially less. This oil is drained into the 9,030-gallon used oil aboveground storage tank (AST) and removed as needed by an oil recycler. EPNG currently has an oil recycling contract with SemGroup Energy Partners (Abilene, Texas Service Office) which recycles the used oil.

Natural Gas Scrubbers (inlet and fuel)
All inlet gas is passed through suction scrubbers on the upstream side of the compressors. One scrubber is used for pipeline quality natural gas, and three scrubbers are used for field quality natural gas in a multiple stage process. Also, fuel gas filters remove 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 classifier.

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 then 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 would be 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 into the classifier. After the scrubber filters are drained they are stored in a separate container. As needed, they are transported to an industrial solid waste landfill or recycled.

Cooling Tower
Evaporative cooling tower water is used to cool compressed pipeline gas for transmission. The cooling tower is located on the western portion of the site (Figure 2). Cooling tower water is recycled as much as possible, but some is blown down and replaced to prevent total dissolved solids (TDS) buildup. The Station cooling tower blowdown is approximately 10,000 gallons per day, or 7 gallons per minute. The blowdown water is discharged directly into the Rice Engineering Disposal System Line where it is transported offsite and placed into their permitted injection well.

Fin-Fans

Three fin-fan structures, one for A-Plant and two for B-Plant, are used to cool jacket cooling water and oil for the compressor engines. These structures are located to the northeast of their respective compressor buildings (Figure 2).

21,000-Gallon Below Grade Classifier

One 21,000-gallon below grade classifier is used to separate used oil from water solutions at Monument. The classifier is located in the southern portion of the site (Figure 2). Used oil is routed to the 9,030-gallon used oil AST, and water solutions are routed to the Rice Engineering Disposal System Line where it is transported offsite and placed into their permitted injection well. The classifier is double-walled with leak detection. This classifier is inspected once a month by onsite personnel. The new double wall classifier replaced an older single-wall classifier of the same volume in 2007. As of May 4th 2009 the old classifier was still onsite, but has been removed from the ground and was awaiting disposal/recycling.

8,818-Gallon Fresh Oil Tanks

Two 8,818-gallon fresh oil ASTs are used to supply the compressors with fresh oil as it is consumed with use. These tanks are located in the northwest portion of the site (Figure 2). Both tanks reside in concrete-lined secondary containment which is capable of holding the contents of both tanks. 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.

350-Gallon Acid Tank

One 350-gallon acid AST is used to store sulfuric acid. This acid is used as an additive for cooling tower water. The acid tank resides in concrete-lined secondary containment which is capable of holding the contents of the tank.

250-Gallon Inhibitor AST

One 250-gallon inhibitor AST is used to store inhibitor solution. The inhibitor is used as an additive for cooling tower water. This tank is located to the south of the cooling towers (Figure 2). The inhibitor tank resides in concrete-lined secondary containment which is capable of holding the contents of the tank.

3,807-Gallon Jacket Cooling Water Tanks

Two 3,807-gallon jacket cooling water tanks are used to store water solutions used to cool the compressor engines. One tank is located to the east side of each compressor building (A-Plant and B-Plant). Neither tank has secondary containment.

9,030-Gallon Used Oil AST

One 9,030-gallon used oil AST is used to store used oil. The tank is located in the southern portion of the Monument site (Figure 2). The used oil tank receives used oil from the 21,000-gallon classifier. 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. The former used oil below grade tank was removed from the ground and removed from service in 2007. As of May 4th 2009 the old used oil below grade tank was still onsite, and was awaiting disposal/recycling.

16,800-Gallon Raw Water Tank

One 16,800-gallon raw water AST is located on the east side of the Station (Figure 2). This tank is used to store water for station operations. Water for this tank is received from EPNG-owned wells located approximately five miles north of Monument.

8,400-Gallon Treated Water Tank
One 8,400-gallon aboveground treated water tank (RO Tank) is located on the east side of the Station next to the Raw Water Tank (Figure 2). This tank is used to store water that has been treated via the reverse osmosis system.

Reverse Osmosis Water Treatment System
One reverse osmosis water treatment system, housed inside the auxiliary building (Figure 2), is used to treat water for jacket cooling, station restrooms, and other uses. This water is stored in the 8,400-gallon treated water tank.

Rice Engineering Disposal System Line
The Rice Engineering Disposal System Line is used to carry water solutions from the 21,000-gallon below grade classifier and cooling tower to an offsite permitted injection well operated by the Rice Operating Company. The Rice Operating Company maintains this line.

23-Gallon Building Sumps
Two below-grade 23-gallon building sumps are used to collect used oil/water/detergent mixtures from the building drain system and building basements. These sumps are built into the basement structures of the compressor buildings. Oil/water/detergent mixtures from the sumps are drained to the 21,000-gallon classifier.

Auxiliary Generator
One auxiliary generator is used to supply essential electrical needs at Monument in case of utility power failure. This generator is located within the auxiliary building. Other generators within the auxiliary building have been disabled and are no longer in use.

1,050-Gallon Septic Holding Tank
One 1,050-gallon below grade holding tank is used to dispose of sewage from the four station restrooms. The tank is located just outside the Monument fence on the northwest side of the site, (Figure 2). Solids are stored in the holding tank and removed by a permitted sewage contractor as needed. Liquids are routed to the classifier.

Underground Drain Lines
All underground piping and drain lines 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 Monument site has good natural drainage to the southeast. 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, Monument 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, Monument 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 station drain and sump system to the 21,000-gallon classifier.

Additional Information

The Monument site plan (Figure 2) 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	9,030 gallons	Southern portion of the site	Concrete-lined berm
Double-wall steel below grade tank	Classifier	Used oil and water solution mixtures	Liquid	21,000 gallons	Southern portion of the site	Double-wall construction with leak detection
Steel AST	Fresh oil tank	New Lube Oil	Liquid	8,818 gallons	West of office building	Concrete lined berm (shared with other fresh oil tank)
Steel AST	Fresh oil tank	New Lube Oil	Liquid	8,818 gallons	West of office building	Concrete lined berm (shared with other fresh oil tank)
Various size stainless steel vessels	None	Nalco Trasar 3DT199, Nalco Stabrex ST70, Nalco Trasar 3DT187, and Unichem 7156	Liquid	40 to 160 gallons of each onsite at any time	East side of cooling tower and within pump rooms	Stainless steel secondary containment for each container
Plastic tank	Acid tank	Sulfuric acid	Liquid	350 gallons	Southeast of cooling tower	Concrete lined berm
Plastic tank	Inhibitor tank	Unichem 7156 inhibitor solution	Liquid	250 gallons	South of cooling tower	Concrete lined berm
55-gallon drums	None	Diesel fuel and lubricants (diesel fuel used for tractor)	Liquid	Three to six drums at any given time	Northeast of cooling tower	Concrete lined and curbed area
Lockers, shelving, or on floor within portable secondary containment	None	Small quantities of paints, lubricants, detergents, cleaning supplies and other consumables	Liquids	Less than five gallons	Inside auxiliary building, compressor buildings, pump rooms, shop, and storage building.	None, or within portable secondary containment

Item 7

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

Source	Type of Effluent	Volume	Quality
Building sumps, scrubber blow-downs, and engine drains	Used engine oil, scrubber blow down	1,506 barrels per year (approximately 63,200 gallons per year or 173 gallons per day) majority is scrubber blow down	Used oil, scrubber blow down
Building sumps	Water	200 gallons per day	Water, and water with detergents
Cooling tower blow-down	Water with high total dissolved solids (TDS)	10,000 gallons per day	Water solution
Oil and scrubber filters, fuel gas filters	Regulated solid waste	27 cubic feet per day	Metal, paper, cloth, and non-hazardous waste
Domestic trash, empty containers and drums*	Trash	15 cubic feet per day	Paper, metal, plastic, food waste
Station Restrooms	Sewage	Less than 100 gallons per day	Liquid and sewage solids

*EPA Clean 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 building sumps and to the 9,030 gallon used oil AST via the 21,000-gallon classifier	9,030 gallon AST	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently SemGroup Energy Partners, Abilene, TX)
Scrubber blow-down	Drained to the 21,000 gallon classifier where it is routed to the 9,030 gallon used oil AST	9,030 gallon AST	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently SemGroup Energy Partners, Abilene, TX)
Cooling tower blow-down	Drain line	Drained directly offsite	Routed via an underground drain line	Rice Engineering injection well
Wash down water	Drained to the building sumps to the 21,000-gallon classifier	21,000 gallon classifier	Routed to an offsite injection well	Rice Engineering injection well
Wash down water with detergents	Drained to the building sumps to the 21,000-gallon classifier	21,000 gallon classifier	Routed to an offsite injection well	Rice Engineering injection well
Oil and scrubber filters, fuel gas filters	Scrubber filters drained	Container	Removed as needed by an approved hauler	Approved recycling facility (currently the Quell Petroleum recycling facility)
Empty containers and drums*, domestic trash	Trash collected in waste can, fuel gas filters drained and bagged	Two onsite dumpsters	Removed once a week by an approved hauler (currently Waste Management)	Approved landfill (currently the Lea County Landfill)
Domestic Sewage	Restroom drain system	Solids stored in a 1,050-gallon septic tank, liquids routed to the 21,000 gallon classifier	Solids removed by a septic contractor as needed (once every several years)	Solids disposed in accordance with NMED guidelines, liquids to the Rice Engineering injection well

*EPA Clean 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 Plains Operating Area Office (see address under Item 2).

Hazardous Waste
No RCRA-listed hazardous wastes are generated at Monument.

Domestic Sewage
Four restroom facilities containing wash basins and toilets are installed at the station. Sewage treatment consists of a 1,050-gallon septic tank that is used to store solids. Liquids are routed to the 21,000-gallon classifier.

Other Solid Waste
Solid waste is placed into two portable disposal dumpsters that are emptied by a solid waste contractor once per week (every Wednesday). Used oil filters are drained to the 9,030-gallon used oil AST and placed into plastic bags before disposal in the station dumpsters. Used scrubber filters are drained to the 9,030-gallon used oil tank and placed into a 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.

SemGroup Energy Partners (Permitted recycling facility for crude and used oil; EPA number TXD065022295)
5809 Santa Fe St.
Abilene, TX 79605
Phone Number: (800) 535-4012

Rice Operating Company (Rice Engineering System)
122 West Taylor
Hobbs, NM 88240
Phone Number: (575) 631-1258

Quell Petroleum (Railroad Commission of Texas permitted recycling facility for scrubber and oil filters)
Attn. Robert Brown
P.O. Box 1552
1.5 miles Southwest of Penwell, Texas
Monahans, TX 78756
Phone Number: (432) 943-8400

Lea County Regional Landfill (approved landfill for domestic waste)
Hobbs, NM
Phone Number: (575) 394-9109

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.

Monument 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, Monument 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 as required by the EPNG procedures outlined in the EPNG Environmental handbook (Appendix B), and 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 B). 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, classifier, 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

The Monument Station is located in an area with little topographic relief. Rocks below the Station consists of clastic, carbonate, and evaporate sedimentary rocks ranging from Ordovician through Triassic in age. The Permian-age formations are an important local source of oil and natural gas. These rocks are draped by alluvial sediments of Quaternary age ranging from 20 to 60 feet in thickness consisting of sand, gravel, silt, and clay.

Site Hydrology

The Monument Station is located in the Pecos River Basin in southern Lea County, New Mexico. The basin has no perennial streams, but there are a few ephemeral streams and broad drainages. Runoff from the site flows southeast.

Site Hydrogeology

The Ogallala Formation, containing the Ogallala aquifer, is the principal source of domestic and industrial water in the area. The Ogallala Formation overlies the relatively impermeable Chinle Formation and dips to the southeast, generally parallel to the underlying Chinle Formation and present-day subsurface. The Ogallala aquifer is unconfined in some areas where it comes in contact with Pleistocene alluvium. Groundwater in the vicinity of the station is encountered at a depth of approximately 40 feet below the ground surface (New Mexico Office of the State Engineer, Water Administration Technical Engineering Resource System [iWATERS] database accessed on May 5, 2009). The general hydraulic gradient of 10 to 12 feet per mile (approximately 0.002 ft/ft) generally flows to the southeast (Cronin, 1969). The lateral movement of groundwater in this aquifer has been estimated to range from two inches per day (Cronin, 1969) to more than a foot per day (Minton, no date).

Water Quality

Water quality of the Ogallala aquifer in the area is mostly of slightly saline to moderately saline as defined as water containing 1,000 to 10,000 milligrams per liter (mg/L) of total dissolved solids (TDS) (Hem, 2005). Water above 3,000 mg/L TDS is considered water of limited use (Howells, 1990). According to the New Mexico State Engineer's Office, groundwater in this formation is deteriorating in quality (Boyer et al., 1980). Water samples collected by EPNG in January 1981 from eight privately-owned shallow wells in the vicinity of Monument had TDS values ranging between 707 and 4230 mg/L (Table 1).

Groundwater from formations below the Ogallala Formation contains higher concentrations of dissolved solids, primarily chloride and sulfate salts (Bureau of Reclamation, 1976). Triassic-age formations have also yielded acceptable potable water but in low to moderate quantities. The deeper Permian formation contains water of saline to brine quality. These waters are generally not used for domestic purposes, but may be used for injection into oil and gas fields for secondary recovery.

Flooding Potential

Monument is located in the Pecos River Basin in an area of low precipitation and high evaporation. In southern Lea County, New Mexico, the basin has no perennial streams, but there are a few ephemeral streams and broad shallow drainages. Most precipitation quickly soaks into the soil or evaporates. The land surface at the site has little relief, but topography suggests that site runoff is generally to the southeast. Site topographic slope is approximately 0.27 degrees or 0.005 ft/ft, dipping southeast (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 Monument.

According to the National Oceanic and Atmospheric Administration (NOAA) Hydrometeorological Design Studies Center Precipitation Frequency Data Server, the 5-year, 10-year, 25-year, 50-year, and 100-year, 24-hour storm precipitation levels for the nearby town of Hobbs, New Mexico, are estimated at 3.60 inches, 4.33 inches, 4.45 inches, 6.17 inches, and 7.06 inches, respectively.

Wells

According to the iWATERS database (accessed on May 5, 2009) there are likely seven wells within a one mile radius, three wells within ½-mile radius, and no wells within ¼-mile radius of the Monument site. Of the three wells between ¼-mile and ½-mile from the site, two of the listed wells are domestic wells and one is a natural resource exploration well. It is unknown if any of these wells are active.

Additional Information

Monument 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

Boyer, D. G., D. McQuillan, and M.S. Goad, *New Mexico Surface Impoundment Assessment*, Water Pollution Control Bureau, New Mexico Environmental Improvement Division, Santa Fe, NM, 1980.

Cronin, J. G., *Ground Water in the Ogallala Formation in the Southern High Plains of Texas and New Mexico*, Hydrologic Investigations, Atlas HA-330, USGS, Washington, DC, 1969.

Hem, J. D., *Study and Interpretation of the Chemical Characteristics of Natural Water*, Geological Survey Water-Supply Paper 1473, Reprinted from the 1970 edition, University Press of the Pacific, 2005.

Howells, L., *Base of Moderately Saline Ground Water in San Juan County, Utah*, Utah Department of Natural Resources Technical Publication no. 94,35 p. 1990.

Kleinfelder, *Eunice "B" Compressor Station Discharge Plan, El Paso Natural Gas,* Kleinfelder West, Inc., 2008

Minton, E. G., *General Ground Water Supply on the High Plains of New Mexico*, Lea County Ground Water Conservation, Lovington, NM, no date.

Nicholson, A. and A Clebsch, *Geology and Ground Water Conditions in Southern Lea County, New Mexico*, Ground Water Report No. 6, State Bureau of mines and Mineral Resources, New Mexico Institute of Mining and Technology, Socorro, NM, 1961.

Saylor, L. A., *Eunice Compressor Station Discharge Plan*, El Paso Natural Gas Company, 1993.

St. John, R. H., *Monument Gas Compressor Station Discharge Plan, GW – 008*, El Paso Natural Gas Company, 2004.

U.S. Bureau of Reclamation, *Eastern New Mexico Water Supply Project, New Mexico*, Final Environmental Statement, Department of the Interior, Washington, DC, 1976.

Table 1
Groundwater Quality and Analytical Results

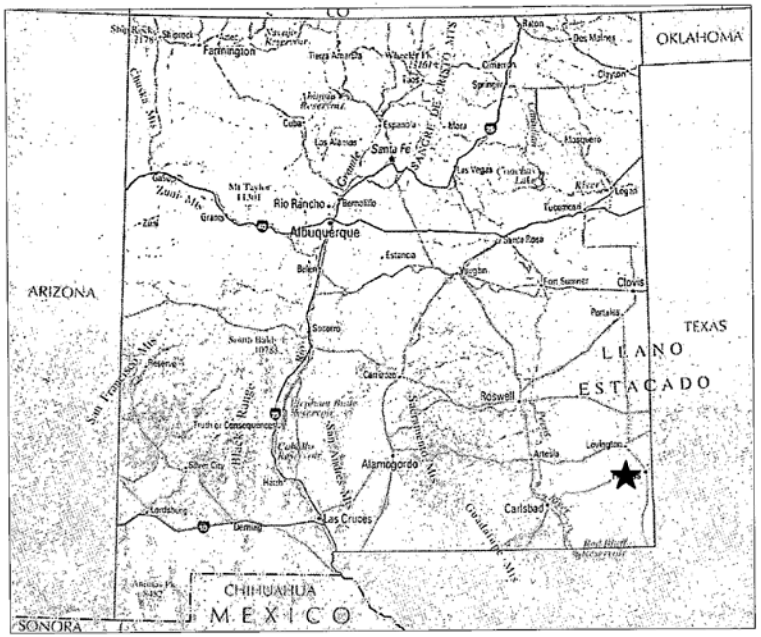
Table 1, Groundwater Quality and Analytical Results, (from El Paso Natural Gas, Eunice Compressor Station Discharge Plan 1993)

Analyses of Well Water from the Ogallala Formation
Located near El Paso Natural Gas Company's Eunice and Monument Plants

Constituent	Well Designation[1]							
	L[1]	M[2]	N[3]	P[4]	Q[5]	R[6]	S[7]	T[8]
Sulfate (SO_4), mg/L	124	1780	145	72	480	140	380	1480
Chloride (Cl), mg/L	1383	1078	220	35	407	89	145	624
Nitrate (NO_3 as N), mg/L	0	0	4.5	3	5	9.5	0	0
Specific Conductance, mmhos/cm	4100	4800	1100	495	2010	850	1560	4000
pH	7.2	7.15	7.8	7.75	7.85	8.1	8.7	8.05
Total Dissolved Solids, mg/L	3801	4230	874	396	1684	707	1172	3162
Chromium (Cr), mg/L	.01	.01	0	0	.01	0	0	.01
Copper (Cu), mg/L	.05	.05	.05	0	.05	0	0	0
Iron (FE), mg/L	.03	.01	0	0	.01	.01	0	.01
Manganese (Mn), mg/L	.17	.10	0	0	.03	.02	0	.03
Zinc (Zn), mg/L	.10	.75	.10	.70	1.25	.10	0	.05

1/ Windmill 1/4 mile East of Monument Plant (East of Union Texas Britt Well #3).
2/ Windmill 1/2 to 3/4 miles SE of Eunice Plant.
3/ Windmill one mile NW of Monument Plant.
4/ Jim Cooper Ranch Home one mile NW of Monument Plant.
5/ Windmill 1/4 to 1/2 mile SE of Eunice Plant.
6/ Sam Hardy Home 1/4 mile East of Eunice Plant. (Continental Oil Company, East 1/2 mile of house).
7/ Deck Ranch windmill 1/4 mile NW of Eunice Plant.
8/ Millard Deck Ranch windmill 1/2 mile North of Eunice Plant.

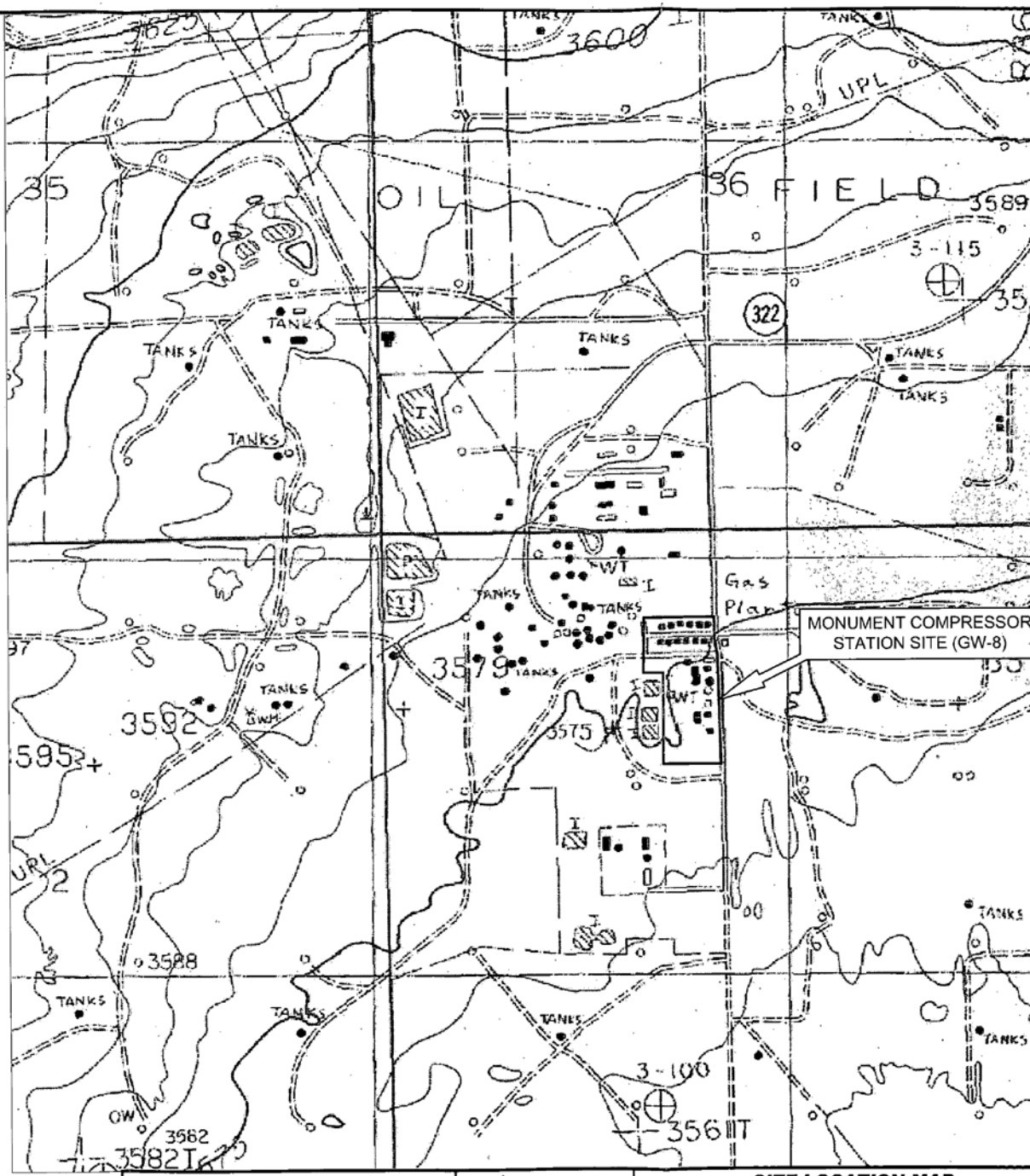
APPENDIX A
Figures



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

LEGEND

★ APPROXIMATE SITE LOCATION



N

1000 0 500 1000 ft

SCALE: 1 inch = 1000 feet

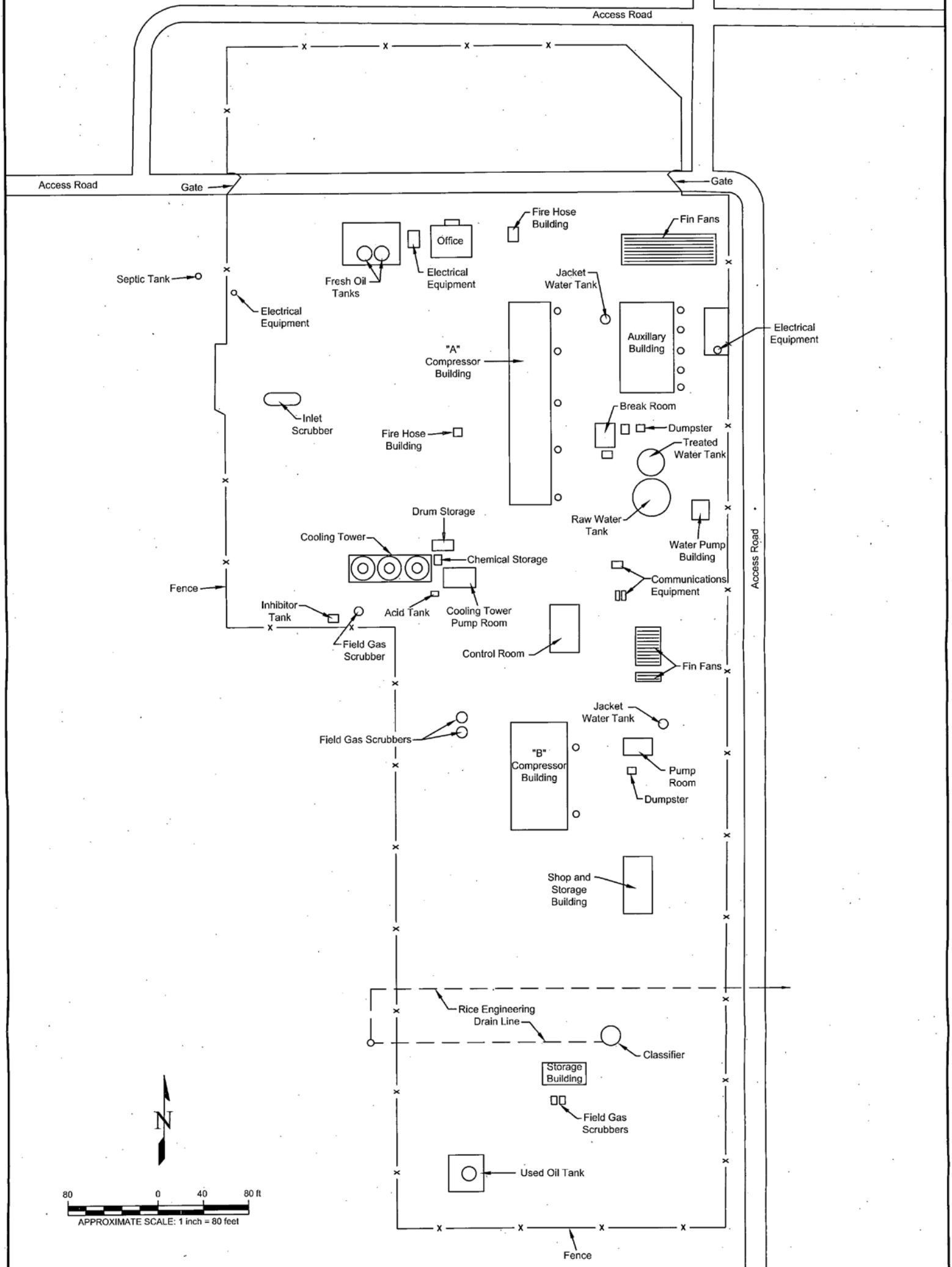
KLEINFELDER
Bright People. Right Solutions.
www.kleinfelder.com

PROJECT NO.	93014
DRAWN:	MAY 2009
DRAWN BY:	PD
CHECKED BY:	MW
FILE NAME:	93014_01_0.dwg

SITE LOCATION MAP

EPNG
MONUMENT COMPRESSOR STATION
LEA COUNTY, NEW MEXICO

ORIGINATOR: M. WIKSTROM	DRAWING CATEGO
APPROVED BY:	1



PROJECT NO. 93014

SITE PLAN

FIGURE

APPENDIX B
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

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

REMITTANCE ADVICE

CHECK DATE	05/13/2009
CHECK NUMBER	07574918
VENDOR NUM	0000002667

WATER QUALITY MANAGEMENT FUND
C/O OIL CONSERVATION DIVISION
1220 S SAINT FRANCIS DR
SANTA FE, NM 87505

RECEIVED
2009 MAY 14 AM 9 47

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00374088	CKREQ090513	05/13/2009	0.00	1,800.00
	GW-8 Monument Permital Renewal and Filing Fee			
		TOTAL	$0.00	$1,800.00

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No ___ dated 5/13/09

or cash received on _____ in the amount of $ 1800.00

from El Paso Natural Gas

for GW-08

Submitted by: Kimberly Romero Date: 5/15/09

Submitted to ASD by: Kimberly Romero Date: 5/15/09

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund:

Full Payment _____ or Annual Increment _____

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

August 8, 2007

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

RECEIVED
AUG 13 2007

Re: **Discharge Permit GW-008**
El Paso Natural Gas Company
Monument Compressor Station
Lea 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) Monument Compressor Station (GW-008) located in the NW/4 of Section 1, Township 30 South, Range 36 East, NMPM, Lea 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
Cc: OCD District I Office, Hobbs

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

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

August 8, 2007

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

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El Paso Natural Gas Company
Monument Compressor Station
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Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/baj
Attachments-1
Cc: OCD District I Office, Hobbs

ATTACHMENT TO THE DISCHARGE PERMIT
EL PASO NATURAL GAS COMPANY, MONUMENT COMPRESSOR DISCHARGE PERMIT APPROVAL CONDITIONS
August 8, 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 September 20, 2009** 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 May 21, 2004 discharge plan renewal application, 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 Plan and Financial Assurance:** Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

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 CO.
Company Name-print name above

KENNETH MORROW
Company Representative- print name

Kenneth 2 Morrow
Company Representative- signature

Title PLAINS AREA OPERATIONS MANAGER

Date: 8-15-07

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 8/20/07

or cash received on _____ in the amount of $ 1700.00

from El Paso Natural Gas Co.

for GW-008

Submitted by: Lawrence Romero Date: 8/28/07

Submitted to ASD by: [illegible] Date: 8/28/07

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 20, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 357 870 164

Tom J. Martinez
El Paso Natural Gas Company
3300 North A Street, Suite 200
Midland, Texas 79705

RE: Discharge Plan GW-008 Renewal
Monument Compressor Station

Dear Mr. Martinez:

The ground water discharge plan GW-008 for the El Paso Natural Gas Company, Monument Compressor Station located in the Northwest Quarter of Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico, **is hereby approved under the conditions contained in the enclosed attachment.** The discharge plan consists of the original plan approved on October 11, 1983, renewed on June 6, 1989, renewed on December 6, 1993 and the application for renewal dated December 10, 1998. 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 El Paso Natural Gas Company 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 provides: "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., El Paso Natural Gas Company 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 September 20, 2004** and El Paso Natural Gas Company 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 application for the El Paso Natural Gas Company facility is subject to WQCC Regulation 3114 discharge plan fees. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $50 plus a flat renewal fee of $690.00 for Gas Compressor Stations containing greater than 3000 Horsepower. The OCD has received the $50.00 filing fee. 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.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). 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 Anderson
Environmental Bureau Chief

RA/lwp
Attachment-1

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-008
El Paso Natural Gas Company, Monument Compressor Station
located in NW/4 Sec 1-Ts20S-R36E
Lea County, New Mexico
DISCHARGE PLAN APPROVAL CONDITIONS
(September 20, 1999)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been submitted, please submit the **$690.00** required flat fee for renewal, which 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. Commitments: **El Paso Natural Gas Company** will abide by all commitments submitted in the discharge plan application dated December 10, 1998 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 characterization per 40 CFR Part 261.

4. 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.

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 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.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than February 28, 2000 and every 5 years, from tested date, thereafter. 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.

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 not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which 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 **Hobbs** 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. 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.

16. Certification: El Paso Natural Gas Company by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein and 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

Print Name:_____

Signature: _____

Title: _____

Date:_____

ATTACHMENT TO THE DISCHARGE PLAN GW-008
El Paso Natural Gas Company, Monument Compressor Station
located in NW/4 Sec 1-Ts20S-R36E
Lea County, New Mexico
DISCHARGE PLAN APPROVAL CONDITIONS
(September 20, 1999)

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been submitted, please submit the **$690.00** required flat fee for renewal, which 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. Commitments: **El Paso Natural Gas Company** will abide by all commitments submitted in the discharge plan application dated December 10, 1998 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 characterization per 40 CFR Part 261.

4. 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.

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 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.

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Accepted:

El Paso Natural Gas Company

Print Name: Thomas P. Morgan

Signature: Thomas P. Morgan

Title: V.P. Transmission Operations

Date: 3 March 2000

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 9/2/93,
or cash received on 9/9/93 in the amount of $ 50.00
from El Paso Natural Gas Company
for Monument Gas Plant GW-8
(Facility Name) (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: Kathy Brown Date: 9/9/93
Received in ASD by: Angie Allen Date: 9/9/93

Filing Fee X New Facility ___ Renewal ___
Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 94

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

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

CONTROL NO.
232 CBD
62-20
311

CHECK NO. [redacted]

09/02/93
Date

PAY TO THE ORDER OF

NEW MEXICO WATER QUALITY
MANAGEMENT
P O BOX 2088
SANTA FE NM 87504

PAY AMOUNT
$50.00
Void After 1 Year

John M. Green Jr.
Authorized Signatory

[redacted]