

GW - 46

**PERMITS,
RENEWALS,
& MODS**

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, April 05, 2012 4:34 PM
To: 'Thompson, Glen D'
Cc: VonGonten, Glenn, EMNRD
Subject: GW-046, EUNICE "A" EPNG CLOSURE PLAN RESPONSE
Attachments: GW-046, 02.21.12 LETTER.pdf

Mr. Glenn Thomas,

RE: Request for Eunice "A" Compressor Station (GW-046)

The NMOCD Santa Fe office submitted a letter to El Paso Natural Gas Rescinding GW-046, see attachment.

GW-046 is therefore closed. NMOCD will not review the submitted closure request dated February 25, 2012.

The submitted report will be submitted to the GW-046 database for record.

If you have any questions please feel free to contact Glenn von Gonten at 505-476-3488.

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/>



New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary

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

Jami Bailey
Division Director
Oil Conservation Division



FEBRUARY 21, 2012

Mr. Robert St. John
El Paso Natural Gas
Washington Ranch C.S.
1550 Wind Way, Odessa TX, 79761

Dear Mr. St. John:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that one of your facilities with an expired or soon to be expired permit does not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permit for **GW - 046** (Eunice A C.S.) is hereby rescinded and you are not required to proceed with the renewal of this expired or soon to expire WQCC Discharge Permit. OCD will close this permit in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste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

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

Thank you for your cooperation.



Jami Bailey
Director

JB/ll

Lowe, Leonard, EMNRD

From: VonGonten, Glenn, EMNRD
Sent: Friday, June 24, 2011 11:17 AM
To: Thompson, Glen D; Lowe, Leonard, EMNRD
Cc: Hansen, Edward J., EMNRD; Sanchez, Daniel J., EMNRD
Subject: RE: Eunice A Compressor Station (GW-46)

Mr. Thompson,

OCD hereby approves EPNG's request for a two-year extension for Phases 3, 4, & 5. If you have any questions, please call me at 505-476-3488.

Glenn

From: Thompson, Glen D [<mailto:Glen.Thompson@ElPaso.com>]
Sent: Thursday, June 23, 2011 9:32 AM
To: Lowe, Leonard, EMNRD
Cc: VonGonten, Glenn, EMNRD
Subject: RE: Eunice A Compressor Station (GW-46)

Here is a copy of the Closure Report.

From: Thompson, Glen D
Sent: Wednesday, June 22, 2011 6:41 PM
To: Lowe, Leonard, EMNRD
Cc: VonGonten, Glenn, EMNRD
Subject: Eunice A Compressor Station (GW-46)

Per our discussion this afternoon, El Paso Natural Gas (EPNG) is requesting an amendment to the Closure Report for EPNG's Eunice A Compressor Station formerly under the discharge permit GW-46. A schedule of activities was included in the Closure Report which detailed the decommissioning of the facility through the site investigation, demolition, and re-vegetation. EPNG is requesting a two-year extension of the following phases:

- Phase 3 – all listed items excluding the environmental assessment
- Phase 4 which is the demolition of those structures
- Phase 5 which is the re-vegetation of the property occupied by the structures.

As you are aware, EPNG has already submitted and received approval by the NMOCD for the work plan for completing those sub-surface remediation activities this year. Those activities are currently under way. If you have any additional questions please call me.

Glen Thompson
Principal Environmental Representative
El Paso Natural Gas
(432) 333-5518 office

THIS E-MAIL AND ANY MATERIALS TRANSMITTED WITH IT MAY CONTAIN CONFIDENTIAL OR PROPRIETARY MATERIAL FOR THE SOLE USE OF THE INTENDED RECIPIENT. ANY REVIEW, USE, DISTRIBUTION OR DISCLOSURE BY OTHERS IS STRICTLY PROHIBITED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR AUTHORIZED TO RECEIVE THE

INFORMATION FROM THE RECIPIENT, PLEASE NOTIFY THE SENDER BY REPLY E-MAIL
AND DELETE ALL COPIES OF THIS MESSAGE.

DEC 23 2003

December 9, 2003

Mr. Ed Martin
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

certified mail 7002 2410 0000 1351 6363

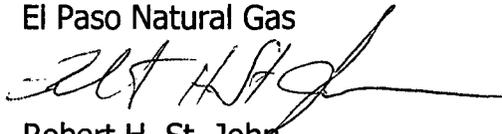
RE: Conditions of Approval
El Paso Natural Gas
Eunice A Compressor Station (GW-46)
Lea County, New Mexico

Dear Mr. Martin:

As requested in a letter dated November 17, 2003 from the New Mexico Oil Conservation Division (NMOCD), El Paso Natural Gas (EPNG) is enclosing an executed copy of the Conditions of Approval for Discharge Plan GW-046 for the above-referenced facility. Should conditions change at the facility, EPNG will contact the NMOCD for revisions to the permit application.

If you have any questions, please contact me at 432.686.3268.

Sincerely,
El Paso Natural Gas



Robert H. St. John
Principal Environmental Scientist

Cc: Kenneth Morrow – Plains Area Manager, EPNG
Sandra Miller – Manager, Pipelines West Environmental Department

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-046
EL PASO NATURAL GAS CO.
EUNICE A COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
November 17, 2003

1. Payment of Discharge Permit Fees: The OCD has received the \$1,700.00 permit fee and has also received the \$100.00 filing fee.
2. Commitments: El Paso Natural Gas Co. will abide by all commitments submitted in the discharge permit renewal application letter dated September 11, 2003 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD-approved facility. Only exempt oilfield wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD-approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis. Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
 1. the waste stream is identified, and authorized, as such in the discharge permit, and;
 2. existing process knowledge of such waste stream does not change without notification to the Oil Conservation Division.
4. Drum Storage: All drums containing material other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb-type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above-Ground Tanks: All above-ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the division, must be placed within an impermeable, bermed enclosure.

7. Above-Ground Saddle Tanks: Above-ground saddle tanks must have impermeable pad and curb-type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums, and containers must be clearly labeled to identify their contents.
9. Below-Grade Tanks/Sumps: All below-grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak detection into the design. All below-grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction 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 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, which 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 Aztec District Office.

14. Transfer of Discharge Permit: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: El Paso Natural Gas Co. shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then El Paso Natural Gas Co. shall take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge permit to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.
16. Closure: The OCD will be notified when operations at the Eunice A Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Conditions accepted by: El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Co. further acknowledges that the division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

El Paso Natural Gas Co.

Print Name: Kenneth C. Morrow

Signature: Kenneth C. Morrow

Title: Area Manager

Date: 12-8-03



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

November 17, 2003

Lori Wrotenbery

Director

Oil Conservation Division

CERTIFIED MAIL

RETURN RECEIPT NO. 7001-1940-0004-3929-9956

Mr. Robert H. St. John
El Paso Natural Gas Co.
3300 North "A" Building, Suite 200
Midland, TX 79705

RE: Discharge Permit Renewal GW-046
El Paso Natural Gas Co.
Eunice A Compressor Station
Lea County, New Mexico

Dear Mr. St. John:

The ground water discharge permit renewal GW-046 for the El Paso Natural Gas Co. Eunice A Compressor Station located in the NW/4 NW/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within thirty (30) days of receipt of this letter.** New mailing address appears below.

The discharge permit renewal application letter, dated September 11, 2003, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge permit is renewed pursuant to Section 3109.C. Note Section 3109.G, which provides for possible future amendment of the permit. Be advised that approval of this permit does not relieve El Paso Natural Gas Co. of responsibility should operations result in pollution of surface water, groundwater or the environment. Nor does it relieve El Paso Natural Gas Co. of its responsibility to comply with any other governmental authority's rules and regulations.

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

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

Mr. Robert H. St. John
GW-046
November 17, 2003
Page 2

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

Pursuant to Section 3109.H.4, this permit is for a period of five years. This permit will expire on October 11, 2008, and El Paso Natural Gas Co. should submit an application in ample time before that date. Section 3106.F of the regulations states that 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.

The discharge permit renewal application for the El Paso Natural Gas Co.'s Eunice A Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge permit application is assessed a filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor stations with greater than 1,000 horsepower of \$1,700.00.

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,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/eem
Attachment

Xc: OCD Hobbs Office

US Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only. No Insurance Coverage Provided)	
RECEIVED	
OFFICIAL USE	
Postage	\$ DEC 02 2003
Certified Fee	OIL CONSERVATION DIVISION
Return Receipt Fee (Endorsement Required)	Postmark Here
Restricted Delivery Fee (Endorsement Required)	SANTA FE, NM 87504
Total Postage & Fees	\$
Sent To MR. R.H. ST. JOHN, EL PASO NAT. GAS Street, Apt. No.; or PO Box No. 3300 NORTH A ST. STE. 200 City, State, ZIP+4 MIDLAND, TX 79705	
PS Form 3800, January 2001 See Reverse for Instructions	

9566 6266 3929 9956
7001 1940 0004 4000 0417 1001
GW-046

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-046
EL PASO NATURAL GAS CO.
EUNICE A COMPRESSOR STATION
DISCHARGE PERMIT APPROVAL CONDITIONS
November 17, 2003

1. Payment of Discharge Permit Fees: The OCD has received the \$1,700.00 permit fee and has also received the \$100.00 filing fee.
2. Commitments: El Paso Natural Gas Co. will abide by all commitments submitted in the discharge permit renewal application letter dated September 11, 2003 and these conditions for approval.
3. Waste Disposal: All wastes will be disposed of at an OCD-approved facility. Only exempt oilfield wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD-approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis. Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
 1. the waste stream is identified, and authorized, as such in the discharge permit, and;
 2. existing process knowledge of such waste stream does not change without notification to the Oil Conservation Division.
4. Drum Storage: All drums containing material other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb-type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above-Ground Tanks: All above-ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the division, must be placed within an impermeable, bermed enclosure.

7. Above-Ground Saddle Tanks: Above-ground saddle tanks must have impermeable pad and curb-type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums, and containers must be clearly labeled to identify their contents.
9. Below-Grade Tanks/Sumps: All below-grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak detection into the design. All below-grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge permit and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction 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 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, which 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 Aztec District Office.

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

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

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

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

El Paso Natural Gas Co.

Print Name: _____

Signature: _____

Title: _____

Date: _____

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-046
EL PASO NATURAL GAS COMPANY
EUNICE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(March 29, 1999)

1. **Payment of Discharge Plan Fees:** The \$50.00 filing fee has been received by the OCD. There is a required renewal flat fee equal to one-half of the original flat fee for compressor station facilities. The renewal flat fee required for this facility is \$690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.
2. **El Paso Natural Gas Company Commitments:** El Paso Natural Gas Company will abide by all commitments submitted in the discharge plan renewal 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 a minimum of every 5 years. The permittee 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:** 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. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of fresh waters, public health and the environment, and are cost effective. 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 Eunice Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Eunice Compressor Station 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. El Paso Natural Gas Company 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: *Thomas P. Morgan*
Thomas P. Morgan
EL PASO NATURAL GAS COMPANY
Thomas P. Morgan
by V. P. Transmission Operations
Title



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

March 29, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-077

Mr. Tom J. Martinez
El Paso Natural Gas Company
3300 North A Street, Building #2, Suite 200
Midland, Texas 79705

RE: Discharge Plan Renewal GW-046
El Paso Natural Gas Company
Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Martinez:

The ground water discharge plan renewal GW-046 for the El Paso Natural Gas Company Eunice Compressor Station located in the Lots 6, 11 and 14 of Section 5, Township 21 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 discharge plan as approved October 11, 1983, modification to the Discharge Plan approved March 4, 1985, the renewal approved June 6, 1989, the renewal approved December 3, 1993 and the renewal application 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 renewal application 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.

Mr. Tom J. Martinez
GW- 046 Eunice Compressor Station
March 29, 1999
Page 2

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., El Paso Natural Gas 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 renewal plan is for a period of five years. This renewal will expire on **October 11, 2003**, 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 .

The discharge plan renewal application for the El Paso Natural Gas Company Eunice Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50. There is a renewal flat fee assessed for compressor station facilities equal to one-half of the original flat fee or \$690.00 for compressor stations in excess of 3000 horsepower. The OCD has received the filing fee.

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

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf
Attachment

xc: OCD Hobbs Office

Z 357 870 077

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to <i>Tom Martinez</i>	
Street & Number <i>EPNG</i>	
Post Office, State, & ZIP Code <i>Midland</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>GW-046</i>

PS Form 3800, April 1995

**ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-046
EL PASO NATURAL GAS COMPANY
EUNICE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(March 29, 1999)**

1. **Payment of Discharge Plan Fees:** The \$50.00 filing fee has been received by the OCD. There is a required renewal flat fee equal to one-half of the original flat fee for compressor station facilities. The renewal flat fee required for this facility is \$690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval.
2. **El Paso Natural Gas Company Commitments:** El Paso Natural Gas Company will abide by all commitments submitted in the discharge plan renewal 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 a minimum of every 5 years. The permittee 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:** 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. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of fresh waters, public health and the environment, and are cost effective. 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 Eunice Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Eunice Compressor Station 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. El Paso Natural Gas Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

EL PASO NATURAL GAS COMPANY

by _____
Title



11/28/88

EPNG BANICK



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