GW - 71-0

PERMITS, RENEWALS, & MODS

Lowe, Leonard, EMNRD

From: Smith, David [DRSmith@eprod.com]
Sent: Tuesday, March 06, 2012 6:44 AM
To: Lowe, Leonard, EMNRD
Subject: RE: GW-071 Chaco G.P.
Attachments: Chaco-7 copy.jpg; Bisti Tank Location.png

Leonard, this is an older aerial photo – it shows the Bisti Tanks on the right side of the photo. You can also see the Ballard Ponds and the South Pond (now closed). I have attached another photo that shows the Federal (Navajo) land.

Will you be able to visit the site during the Ballard Pond closures? I talked with our contractor yesterday, and they should have the liners out late this week, or early next week. Thanks.

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, March 05, 2012 5:37 PM
To: Smith, David
Subject: RE: GW-071 Chaco G.P.

Mr. Smith,

Are the Bisti Tanks associated with Chaco G.P.?
Is that located on Federal (Reservation) land?

llowe

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

From: Smith, David [mailto:DRSmith@eprod.com]
Sent: Monday, March 05, 2012 4:23 PM
To: Lowe, Leonard, EMNRD
Subject: Re: GW-071 Chaco G.P.

No, not much identified so far. I will give you a call again tomorrow to update you. There is a small area of PSH at the Bisti Tanks, we are pending Navajo approval of a work plan to investigate it.

David R. Smith, P.G.
Senior Environmental Scientist
Enterprise Products Operating LLC
1100 Louisiana, Rm 13.037
Houston, TX 77002-5227
Office: (713) 381-2286
Mobile: (713) 501-8136
Email: drsmith@eprod.com

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Monday, March 05, 2012 05:06 PM
To: Smith, David
Subject: GW-071 Chaco G.P.

Mr. Smith,

Good afternoon,

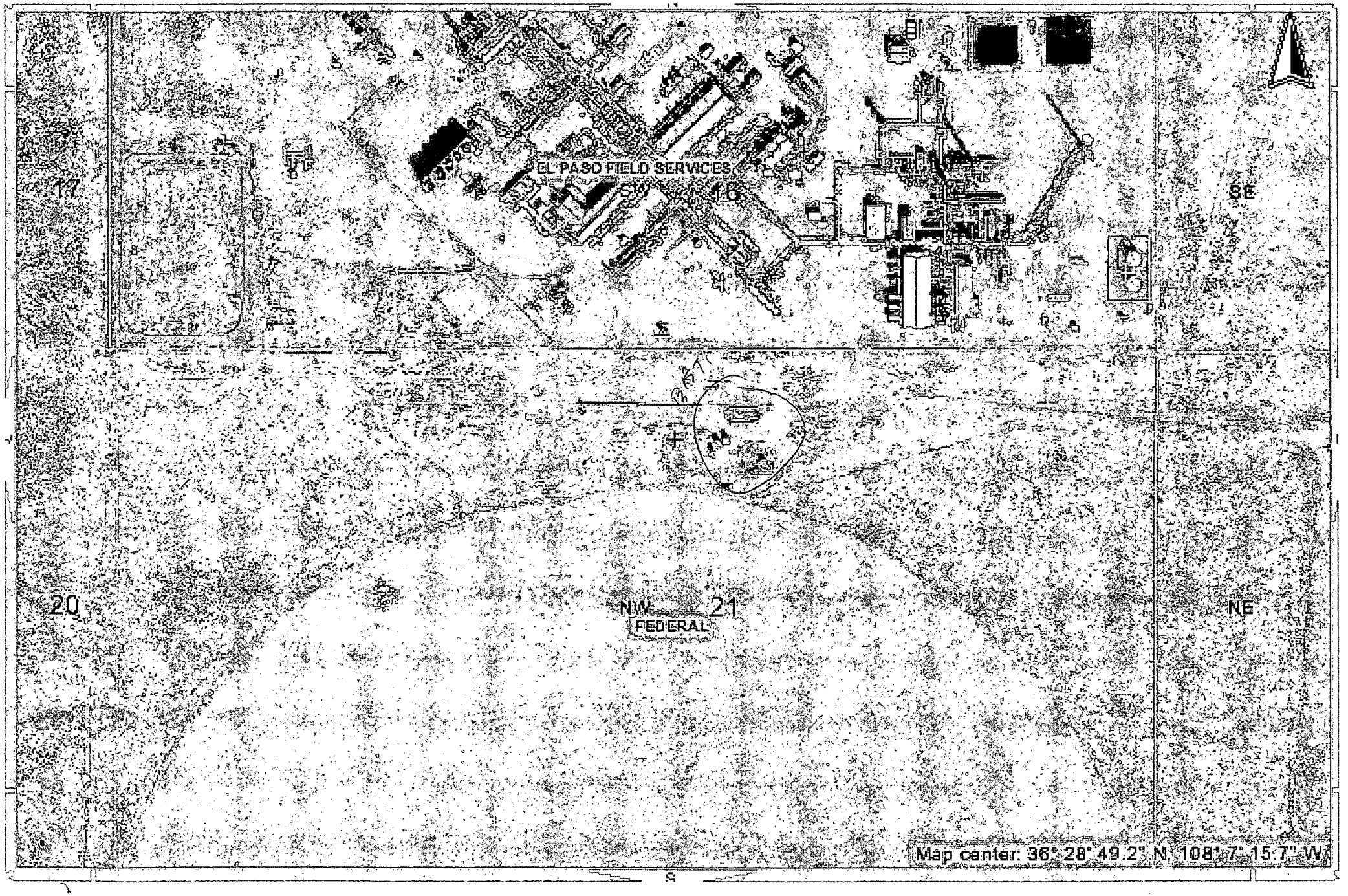
The reason for my calls (voicemails).

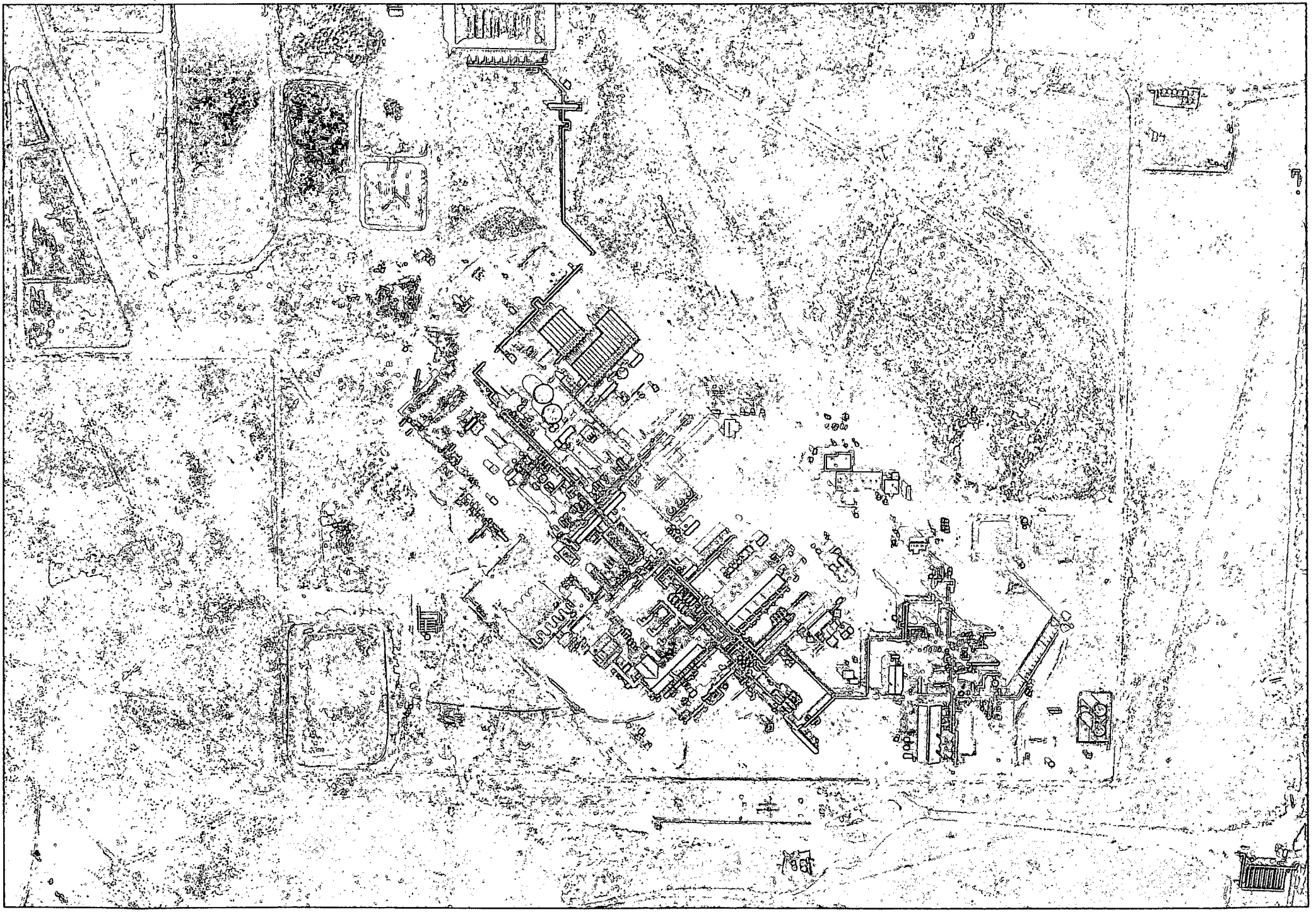
For GW-071, Chaco Gas Plant. I know there are more than one "remediation work going on at this site.

Are there any groundwater contamination work going on at this site? For clarification.

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/


EL PASO FIELD SERVICES
17
SW
16
SE
20
NW
21
FEDERAL
NE
Map center: 36° 28' 49.2" N, 108° 7' 15.7" W



ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 7/3/09

or cash received on _____ in the amount of $ 4000 00

from Enterprise Products

for GW-71

Submitted by: Lawrence Romero Date: 8/5/09

Submitted to ASD by: Lawrence Romero Date: 8/5/09

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 _____

Enterprise Products™

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

July 29, 2009

Return Receipt Requested
7008 3230 0002 4442 7510

New Mexico Oil Conservation Division
Water Quality Management
Attn: Glenn von Gonten
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Chaco Gas Plant (GW-071)
Enterprise Field Services LLC/Enterprise Products Operating LLC

Dear Mr. von Gonten:

Enclosed for your handling is the referenced Discharge Plan Renewal that has been signed as directed by your letter of July 14. Also enclosed is a check in the amount of $4,000.

Should you have questions or need additional information, please contact Ms. Runell Seale from our Permitting Group at 505-599-2124 or me directly at 713-381-6595.

Yours truly,

Shiver J. Nolan
Senior Compliance Administrator

/sjn

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.381.6500

1100 LOUISIANA STREET
HOUSTON, TX 77002-5227
www.epplp.com

Enterprise Products™

Enterprise Products Operating LLC
P.O. Box 4735
Houston, Texas 77210

PAGE: 1 of 1

DATE: July 3, 2009
TRACE NUMBER: 6336816553229786
CHECK NUMBER: [redacted]

00010 CKS 6A 09183 - 0003229786 NNNN 1835100005010 X14581 C
STATE OF NEW MEXICO
C/O OIL CONSERVATION DIVISION
1220 SOUTH ST FRANCIS DR
SANTA FE NM 87505-4225

DATE	INVOICE NO.	DESCRIPTION	INVOICE AMOUNT	DISCOUNT	NET AMOUNT
06/30/09	400000JUN09	ENTERPRISE FIELD SERVICESCHACO GAS PLANT GW071 NM	$4,000.00	$0.00	$4,000.00
		TOTALS	**$4,000.00**	**$0.00**	**$4,000.00**

PLEASE DETACH BEFORE DEPOSITING CHECK

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 gas plant is $4000.00. Return a signed copy of the permit conditions within 30 days. Checks should be made out to the New Mexico Water Quality Management Fund.

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 May 18, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, 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 December 2008 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 June 11, 2009. Mr. Don Fernald and Mr. Max Blackwood witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

1. **Photo 1 – 4:** Two lined produced water ponds are located on the east side of the facility grounds and were found to have fluids within their leak detection system. Owner/operator shall immediately investigate the cause of fluids within the system. The second pond, (photo 3) has oil present. Owner/operator shall remove any oil from the pond immediately and properly dispose of.
2. **Photo 5 – 6:** An unused below-grade tank is empty and its leak detection system was verified dry. Owner/Operator shall identify tank as not in use.
3. **Photo 7:** Owner/operator shall identify this conduit and its purpose. At the time of inspection it was unidentifiable.
4. **Photo 8 – 13:** Several sumps were holding liquids and had sediment. This was previously noted in the July 17, 2002 OCD inspection. All sumps are meant to catch fluids and must be drained within 72 hours. Owner/operator shall keep these sumps cleaned.
5. **Photo 14 – 15:** The secondary corner sealants were deteriorating. Owner/operator shall fix all breaches within the containment.
6. **Photo 16 – 17:** This air compressor below-grade tank had fluids within its leak detection system. Owner/operator shall determine why fluids are collecting in the leak detection system and verify tank integrity. The discharge plan application noted in section 10. (Inspection, Maintenance and Reporting) that all tanks were to be inspected on a monthly basis. At the time of inspection OCD determines that these leak detection systems had not been inspected. Owner/operator shall, record and report any releases of these below-grade tanks on a routine basis.
7. **Photo 18 – 22:** These below-grade tanks were verified to have no fluids within its leak detection system. BGT, (photo 10) had no covering. Owner/operator shall properly cover all below grade tanks as to prevent unnecessary accumulation of fluids and overflow.
8. **Photo 23 – 26:** The staging area for used filter drainage had standing fluids and containment problems. Photo 26 shows fluids from the containment area seeping through the blocks. Owner/operator shall remove the fluids and clean the containment

area and then investigate the failed integrity of the containment. Owner/operator shall submit all findings and conclusions to the OCD.

9. **Photo 27 – 31:** There were several areas with visible stained soils within the facility's yard. Owner/operator shall follow best management practices to prevent such future discharges. When such discharges occur owner/operator shall address them in accordance with the discharge plan application. These stained areas were noted in the July 17, 2002 inspection.
10. **Photo 33 – 38:** There are two unlined ponds on the north part of the facility and an unused lined pond adjacent to the two. After the July 17, 2002 inspection, OCD required the owner/operator to submit a closure plan for the contact water pond, but we have not received it. Owner/operator will submit a closure plan for the unused lined pond in photo 35 – 37.
11. **Photo 38 – 39:** There were several piles of spent carbon filter media lying on the ground. OCD was informed that they have been there for an extended period of time. Condition 6.B indicates that no waste shall be on site greater than 180 days unless granted permission by the OCD. Owner/operator shall dispose of all waste in accordance with its permit.

Enterprise shall resolve all **items by September 4, 2009** and submit their findings to the OCD for review.

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

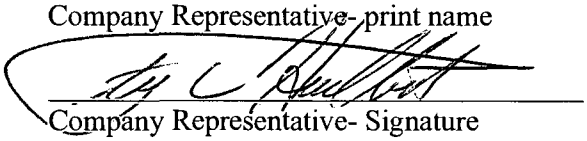
Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information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

Enterprise Field Services LLC

Company Name-print name above

Terry L. Hurlburt

Company Representative- print name



Company Representative- Signature

Title Senior Vice President - Operations

Date: 7/29/2009

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

GW-071
PERMITS

July 14, 2009

Mr. Clay Roesler
P.O. Box 2521
Houston, Texas 77252-2521

Re: Discharge Permit Renewal
Chaco Gas Plant (GW-071)
SE/4 Section 16, Township 26 North, Range 12 West, NMPM
San Juan County, New Mexico

Dear Mr. Roesler:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves **Enterprise Field Services, LLC./Enterprise Products Operating LLC.** 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 gas plant is $4000.00. Return a signed copy of the permit conditions within 30 days. Checks should be made out to the New Mexico Water Quality Management Fund.

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 May 18, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, 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 December 2008 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 June 11, 2009. Mr. Don Fernald and Mr. Max Blackwood witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

1. **Photo 1 – 4:** Two lined produced water ponds are located on the east side of the facility grounds and were found to have fluids within their leak detection system. Owner/operator shall immediately investigate the cause of fluids within the system. The second pond, (photo 3) has oil present. Owner/operator shall remove any oil from the pond immediately and properly dispose of.
2. **Photo 5 – 6:** An unused below-grade tank is empty and its leak detection system was verified dry. Owner/Operator shall identify tank as not in use.
3. **Photo 7:** Owner/operator shall identify this conduit and its purpose. At the time of inspection it was unidentifiable.
4. **Photo 8 – 13:** Several sumps were holding liquids and had sediment. This was previously noted in the July 17, 2002 OCD inspection. All sumps are meant to catch fluids and must be drained within 72 hours. Owner/operator shall keep these sumps cleaned.
5. **Photo 14 – 15:** The secondary corner sealants were deteriorating. Owner/operator shall fix all breaches within the containment.
6. **Photo 16 – 17:** This air compressor below-grade tank had fluids within its leak detection system. Owner/operator shall determine why fluids are collecting in the leak detection system and verify tank integrity. The discharge plan application noted in section 10. (Inspection, Maintenance and Reporting) that all tanks were to be inspected on a monthly basis. At the time of inspection OCD determines that these leak detection systems had not been inspected. Owner/operator shall, record and report any releases of these below-grade tanks on a routine basis.
7. **Photo 18 – 22:** These below-grade tanks were verified to have no fluids within its leak detection system. BGT, (photo 10) had no covering. Owner/operator shall properly cover all below grade tanks as to prevent unnecessary accumulation of fluids and overflow.
8. **Photo 23 – 26:** The staging area for used filter drainage had standing fluids and containment problems. Photo 26 shows fluids from the containment area seeping through the blocks. Owner/operator shall remove the fluids and clean the containment

area and then investigate the failed integrity of the containment. Owner/operator shall submit all findings and conclusions to the OCD.

9. **Photo 27 – 31:** There were several areas with visible stained soils within the facility's yard. Owner/operator shall follow best management practices to prevent such future discharges. When such discharges occur owner/operator shall address them in accordance with the discharge plan application. These stained areas were noted in the July 17, 2002 inspection.
10. **Photo 33 – 38:** There are two unlined ponds on the north part of the facility and an unused lined pond adjacent to the two. After the July 17, 2002 inspection, OCD required the owner/operator to submit a closure plan for the contact water pond, but we have not received it. Owner/operator will submit a closure plan for the unused lined pond in photo 35 – 37.
11. **Photo 38 – 39:** There were several piles of spent carbon filter media lying on the ground. OCD was informed that they have been there for an extended period of time. Condition 6.B indicates that no waste shall be on site greater than 180 days unless granted permission by the OCD. Owner/operator shall dispose of all waste in accordance with its permit.

Enterprise shall resolve all **items by September 4, 2009** and submit their findings to the OCD for review.

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.

OCD Inspection: Enterprise Chaco Gas Plant GW - 071

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Don Fernald and Max Blackwood

Date: 06.11.09 Time: 8:50 – 11:30

Photo 1: 1 produced water pond.

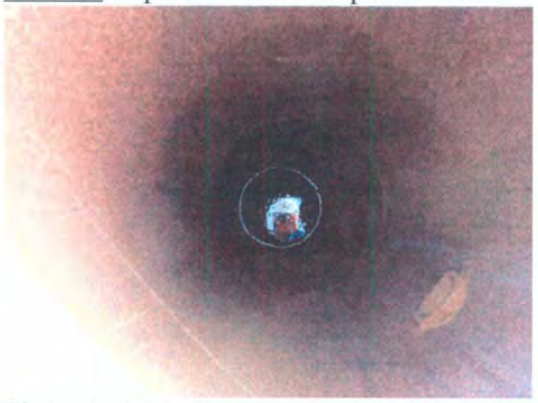


Photo 2: 1 produced water pond leak detection system with fluids.

Photo 3: 2 produced water pond with oil on top.

Photo 4: 2 produced water pond leak detection system with fluids.

Photo 5: An empty BGT located between both produced water ponds.

Photo 6: Leak detection of BGT, verified dry.

Photo 7: Unknown conduit located south of two produced water ponds.

Photo 8: sump in secondary containment full of sediments.

Photo 9: Sump full of fluids.

Photo 10: Sump full of fluids.

Photo 11: Sump full of sediments.

Photo 12: Dirty sump.

Photo 13: Dirty sump.

Photo 14: Secondary containment for large Tank 28 & 29 needs work.

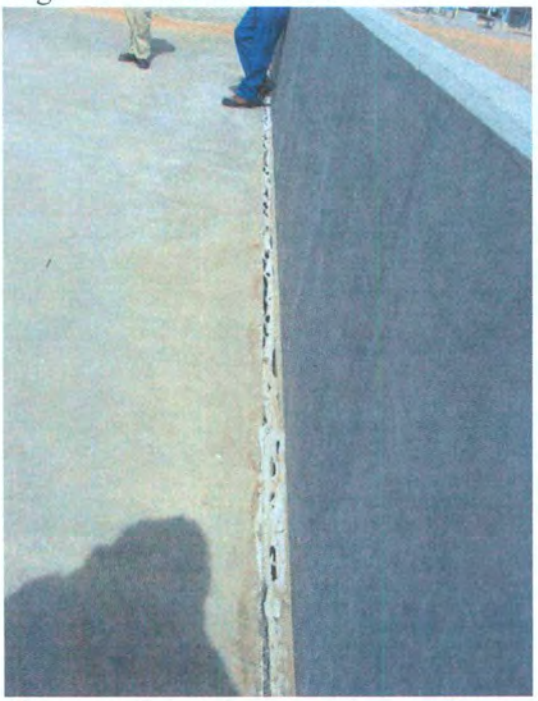


Photo 15: Secondary containment inner corners does not have integrity.

Photo 16: Air compressor BGT leak detection.

Photo 17: Air compressor BGT, fluids at capacity in leak detection system.

Photo 18: BGT near compressor, leak detection verified dry.

Photo 19: BGT near compressor, no lid. Leak detection verified dry.

Photo 20: 1 of 3 BGT, leak detection verified dry.

Photo 21: 2 of 3 BGT, leak detection verified dry.

Photo 22: 3 of 3 BGT, leak detection verified dry.

Photo 23:

Photo 24: Filter drain area. Used filters.

Photo 25: Filter drain area.

Photo 26: Leaks from secondary containment for filter drain.

Photo 27: Discharges on ground.

Photo 28: Discharges on ground.

Photo 29: Discharges on ground.

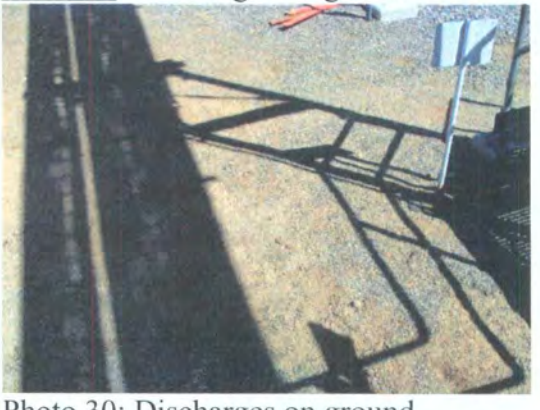


Photo 30: Discharges on ground.

Photo 31: Discharge on ground.

Photo 32: Discharges on ground.

Photo 33: 1 unlined evaporation pond.

Photo 34: 2 unlined evaporation pond.

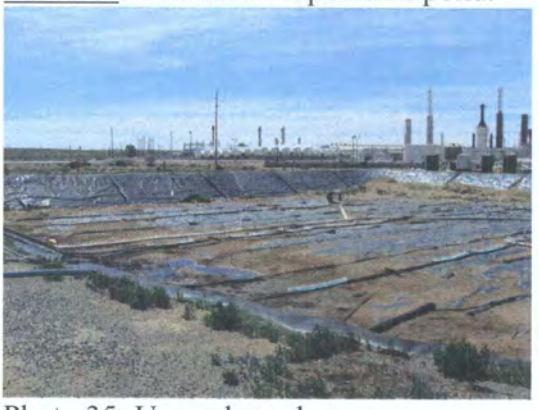


Photo 35: Unused pond.

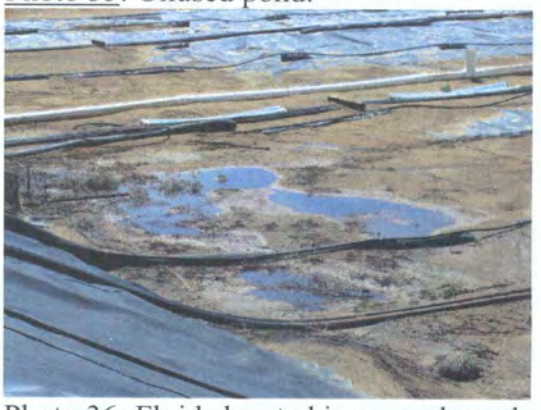


Photo 36: Fluids located in unused pond.

Photo 37: Unused lined pond.

Photo 38: Used plant waste mounds.

Photo 39: Used plant waste on ground.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, March 02, 2009 10:05 AM
To: Roesler, Clayton; 'Seale, Runell'
Cc: Powell, Brandon, EMNRD; Perrin, Charlie, EMNRD
Subject: GW-071-0, Admin. Complete Chaco GP
Attachments: GW-071, Admin Complete Letter.pdf; GW-071-0, Draft Permit.pdf; GW-071-0, OCD PN.pdf

Mr. Roesler,

The submitted discharge plan application for the Chaco Gas Plants, GW-071-0 has been determined to be administratively complete.

Please provide an applicant version of the public notice for review by the OCD.

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/

New Mexico Energy, Minerals and Natural Resources Department

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

Mark Fesmire
Division Director
Oil Conservation Division

March 2, 2009

Dear Mr. Clay Roesler:

Re: Discharge Plan Renewal Permit GW-071-0
Enterprise Field Services, LLC
Chaco Gas Plant
San Juan County, New Mexico

The New Mexico Oil Conservation Division (NMOCD) has received Enterprise Field Services request, initial filing fee, dated December 18, 2008, to renew GW-071-0 for the Chaco Gas Plant located in SE/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete.

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. Please submit your applicant version of the public notice for review. 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 III Office, Aztec

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

Mark Fesmire
Division Director
Oil Conservation Division

March 2, 2009

Mr. Clay Roesler
P.O. Box 2521
Houston, Texas 77252-2521

Re: **DRAFT** Discharge Permit Renewal
Chaco Compressor Station (GW-071-0)
SE/4 Section 16, Township 26 North, Range 12 West, NMPM,
San Juan County, New Mexico

Dear Mr. Roesler:

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 **Enterprise Field Services, LLC.,** (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 45 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.

The final permit should be issued in approximately 45 days. 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,

Wayne Price
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 Gas Plant is $4000.00. Please submit this amount along with the signed permit. Checks should be made out to the New Mexico Water Quality Management Fund. Return a signed copy of the permit conditions with 45 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 May, 18, 2012** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. ***Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, 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 December 2008 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.

16. OCD Inspections: The OCD will perform an inspection of this facility.

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)

DRAFT

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."

_____

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-071-0) Enterprise Field Services, LLC, P.O. Box 2521, Houston TX 77252, has submitted a renewal application for the previously approved discharge plan for their Chaco Gas Plant, located in the SE/4 of Section 16, Township 26 North, Range 12 West, NMPM, San Juan County. The facility is a natural gas compression station and cryogenic natural gas liquids extraction plant. Approximately 500 bbls/month of waste water, 8500 bbls/month produced water, and 20,000 gallons/year of used oil are generated and stored in onsite. These fluids are not to be intentionally discharged to the ground. If accidental discharge occurs immediate recovery/reclamation shall be implemented. Fluids, other then clean water, including dry chemicals, shall be stored within secondary containment and properly bermed. Waste shall be properly maintained and manifested. A copy of the discharge permit once renewed shall be on location at all times and made familiar to all facility personal. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 220 feet, with a total dissolved solids concentration of approximately 560 - 1000 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 1st day of March 2009.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No: _____ dated 12/18/08

or cash received on _____ in the amount of $ 100 00

from Shiver J. Noland

for GW-71

Submitted by: Laurence Romero Date: 12/29/08

Submitted to ASD by: Laurence Romero Date: 12/29/08

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 _____

Enterprise Products™

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC
ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

December 18, 2008

8623 4321 1885
Federal Express

New Mexico Oil Conservation Division
Environmental Bureau
Attn: Jim Griswold/Wayne Price
1220 South St. Francis Drive
Santa Fe, NM 87505

RE: Groundwater Discharge Renewal Application
Chaco Gas Plant – GW-071

Dear Messrs. Griswold-Price:

Enclosed for your review and handling are the referenced Discharge Plan Application with plan details. Also enclosed is a check, payable to NMED Water Quality Management Fund, in the amount of $100 which covers the application fee for the permit.

Should you have questions or need additional information, please contact me at (713) 803-5470 or Ms. Runell Seale of my staff at (505) 599-2124.

Sincerely,

Clayton A. Roesler
Manager, Environmental Permitting

/sjn
attachments
cc: OCD-District 3, 1000 Rio Brazos Blvd., Aztec, NM 87410

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.880.6500

2727 NORTH LOOP WEST
HOUSTON, TX 77008-1044
www.epplp.com

713-880-6595
SHIVER J. NOLAN
EPCO
2727 N LOOP W
HOUSTON, TX 77008

[redacted]

DATE 12-18-2005

56-1551
441
5277485501557

PAY TO THE ORDER OF HMED - Water Quality Fund $ 100.00

One Hundred Dollars

DOLLARS

Security Features Included Details on Back

JPMorganChase
JPMorgan Chase Bank, N.A.
Columbus, OH

VALID UP TO 2500 DOLLARS

MEMO Chaco G007-2 Shiver J Nolan

[redacted]

SPECIALTY BLUE

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

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: **Chaco Gas Plant 0 GW-071-0 4**
2. Operator: **Enterprise Field Services, LLC, Owner: Enterprise Products Operating, LLC, Operator**

   Address: **P. O. Box 4324, Houston, TX 77210-4324**

   Contact Person: **Clay Roesler, Manager-Environmental Permitting Phone: 713-803.5470**
3. Location: SE/4 Section 16 Township 26N Range 12W
   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: Mary E. Hebert Title: Environmental Director

Signature: Date: 12/18/2008

E-mail Address: mhebert@epco.com

Chaco Gas Plant

SW/4 of Section 16, Township 26N, Range 12W
San Juan County, New Mexico

GROUNDWATER DISCHARGE PLAN– GW 071-2

This document constitutes a renewal for the Groundwater Discharge Plan (GW071-2) for the Chaco Gas Plant in San Juan County, New Mexico. This Groundwater Discharge Plan has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (rev 12-95) and the New Mexico Water Quality Control Commission (WQCC) regulations, 20.6.2.3.104 and 3-106 NMAC.

1. Type of Operation

The Chaco Gas Plant is a natural gas compression station and cryogenic natural gas liquids extraction plant. The site rated horsepower of this facility is 148,163 hp.

2. Operator/Legally Responsible Party

Operator/Owner:
Enterprise Field Services LLC, Owner (EFS)
Enterprise Products Operating LLC, Operator (EPO)
P. O. Box 4324
Houston, TX 77210-4324

Legally Responsible Party:
Terry L. Hurlburt, Senior Vice President-Operations
P. O. Box 4324
Houston, TX 77210-4324
713-880-6595

Local Representative:
Don Fernald, Field Environmental Scientist
614 Reilly Ave.
Farmington, NM 87401
505.599.2141

3. Facility Location

SE/4, S16, T26N, R12W, San Juan County, NM
Latitude N 36.4858" Longitude W 108.1200"
See Figure 1, Site Location Map (Topo Map) and Figure 2, Site Survey (Plat)

4. Landowner

Enterprise Field Services LLC
P. O. Box 4324
Houston, TX 77210
713-880-6595

5. Facility Description

The Chaco Gas Plant is a natural gas compression station and cryogenic natural gas liquids extraction plant. The gas enters the plant via underground pipelines and is compressed to approximately 900 pounds per square inch, then processed through an expander plant operating at cryogenic temperatures to remove condensable liquid hydrocarbons (propane and heavier). The condensed liquids are transferred to the Mid-America Pipeline Company liquids pipeline and the liquid free natural gas is discharged into the El Paso Natural Gas Company and Trans-Western Pipeline company transportation pipelines. See Figure 3 Site Layout Map.

6. Materials Stored or Used at the Facility

Tank Contents	Solid or Liquid	Tank Capacity-Max Volume Stored	Location-See Site Layout Map
Gasoline	Liquid	1,000 gallons	Tank # 1
Non-Exempt contact water	Liquid	42,000 gallons	Tank #3
Produced Water	Liquid	9,200 gallons	Tank #4
Methanol	Liquid	100 gallons	Tank #5
Triethylene Glycol	Liquid	3780 gallons	Tank #6
VRU Bullet Condensate	Liquid	91,370 gallons	Tank #7
54GO	Liquid	150 gallons	Tank #8a,8b,8c
Ambritrol	Liquid	2730 gallons	Tank #9
Lube Oil for GE Turbines	Liquid	8820 gallons	Tank #10
Lube Oil for Bisti 8 Engine	Liquid	3360 gallons	Tank #11
Lube Oil for B Plant Engine	Liquid	8734 gallons	Tank #12
Diesel for standby compressor	Liquid	1000 gallons	Tank #13
H2SO4-Cooling Tower water treatment	Liquid	550 gallons	Tank #14
Biocide	Liquid	750 gallons	Tank #15

Tank Contents	Solid or Liquid	Tank Capacity-Max Volume Stored	Location-See Site Layout Map
Sodium Hypochlorite-Water Treatment	Liquid	800 gallons	Tank #16
Methanol	Liquid	500 gallons	Tank #21
Used Oil	Liquid	21,000 gallons	Tank #22
Used Oil (Sumps)	Liquid	(3) 1,000 gallons each	Tanks #23a, 23b, 23c
Methanol (Bullets)	Liquid	(5) 91,000 gallons each	Tank #24a,24,b, 24c,24,d, 24e, see site layout map
Y Grade NGL (Bullets)	Liquid	(4) 105,000 gallons each	Tank #25a,25b,25c,25d
Condensate	Liquid	168,000 gallons	Tank #28
Condensate	Liquid	168,000 gallons	Tank #29
Lube Oil	Liquid	500 gallons	Tank #30
Lube Oil	Liquid	500 gallons	Tank #31
Lube Oil	Liquid	(3) 8734 gallons	Tank #32
Lube Oil	Liquid	4500 gallons	Tank #34
Corrosion Inhibitor	Liquid	105 gallons	Tank #36
Lube Oil	Liquid	(2) 350 gallons	Tank #37a, 38b
Diesel	Liquid	500 gallons	Tank #38
Solvent	Liquid	500 gallons	Tank #39
Ambritrol	Liquid	300 gallons	Tank #40
Sodium Hypochlorite-Water Treatment	Liquid	500 gallons	Tank #41
Bromine-Water Treatment	Liquid	400 gallons	Tank #42
Biocide–Cooling water treatment	Liquid	410 gallons	Tank #43
Sulfuric Acid	Liquid	500 gallons	Tank #44
Amine	Liquid	20,000 gallons	Tank #45
Used Oil (UST)	Liquid	1000 gallons	Tank #46
Oil/Water Separator	Liquid	1000 gallons	Tank #47
Bromine	Liquid	400 gallons	Tank #48
Propane	Liquid	3600 gallons	SE corner, near condensate tanks

7. Sources and Quantities of Effluent and Waste Solids Generated at the Facility

7A. Source & Quantity

Process Fluid/Waste	Source	Quantity (Ranges)	Additives
Used Oil	Equipment maintenance	20,300 gallons/year	None
Amine	Equipment maintenance	None	None
Stormwater	Rainfall	< 10"/year	None
Non-contact wastewater	Cooling towers, plant inlet water filter backwash, and turbine inlet air washer blow down.	20,000 barrels/month	Sodium Hypochlorite and sulfuric acid and biocide.
Non-exempt wastewater	Hydrocarbon separators	500 barrels/month	Biodegradable soap and water w/traces of hydrocarbons
Produced water/Exempt wastewater	Pigging operations, extraction process and 3 phase separators	5200 barrels/month	None
Exempt hydrocarbon liquids	Liquid slug catcher	8500 barrels/month	None
Used Oil Filters	Equipment maintenance	640 annually	None
Used Amine Filters	Equipment maintenance	1100 annually	None
Used Glycol Filters	Equipment maintenance	190 annually	None
Spent Carbon Filter Media	Amine Filtration System	20 yards/year	Amine in small quantities
Spill residue	Incidental spills	Incident dependent	Incident dependent
Sorbent Material and rags	Incidental spill/leaks and equipment wipe-down	Incident dependent	None
Solid Waste (trash)	Office production	300 pounds/month	None
Domestic Sewage	Office Restrooms		None, not commingled with any other wastes

7B. Quality Characteristics

Process Fluid/Waste	NM WASTE STATUS	Analytical Process	Toxic Pollutants
Used Oil	Non-Exempt	Profiled, recycled	None
Amine	Exempt	NA	None
Storm water	Exempt	NA	None
Non-contact wastewater	Exempt	Not required	None
Non-exempt wastewater	Non-Exempt	TCLP analysis/annually	None
Produced Water/Exempt wastewater	Exempt	Profiled at disposal facility according to NMOCD regulations.	None
Exempt hydrocarbon liquids	Exempt	Not required, sold as a product.	None
Used Oil Filters	Non-exempt	TCLP required analysis / Profiled annually	None
Used Amine Filters	Non-exempt	TCLP required analysis / Profiled annually	None
Used Glycol Filters	Non-exempt	TCLP required analysis / Profiled annually	None
Spent Carbon Filter Media	Exempt	Profiled annually	None
Spill residue Non-Exempt Oil	Non-exempt	RCRA 8 metals. In the event of a release or spill impacting soil, analytical testing will be completed and completion of Form C-138 prior to transport of impacted media to an NMOCD approved landfarm.	None
Spill residue Exempt (Produced water or condensate)	Exempt	Complete Certification of waste (Form C-138) and transport impacted media to an NMOCD approved landfarm.	None
Sorbent Material and rags	Non-exempt	Tested and profiled prior to disposal	None
Solid Waste (trash)	Exempt	Not required	None
Domestic Sewage	Exempt	Not required	None

7 (C). Commingled Waste Streams

Liquids from the Cryogenic Plant open drain system are commingled with the effluents from the Cryogenic Plant closed drain system. All of the liquids from the Cryogenic Plant open drain system flow by gravity through buried 2"-3" carbon steel lines into an atmospheric pressure, below-grade, 20-bbl, double-walled, carbon steel tank. The liquids are then pumped from this tank into the Cryogenic Plant closed drain system. This system flows to a knock-out (KO) drum. Liquids from the KO drum flow by level control into the Chaco Plant lube oil drain system.

All commingled effluent streams from the Chaco Plant lube oil drain system flow through a below-grade, double-walled heavy oil/water separator, and all of the commingled effluent streams from the Chaco Plant process area drain system flow through a below-grade, double-walled light oil/water separator. The separated oil is piped to an aboveground tank, from where it is transferred to an off-site location for recycling. The separated water from both classifiers is piped to a third below-grade, double-walled tank and then to an aboveground skimmer tank. The oil fraction from the skimmer tank is piped to the slop oil tank, and the contact water is piped to an AGT for off-site disposal.

The used oil filters, used process filters and rags, and absorbent pads are also commingled waste streams. They are put into a waste container and removed by Waste Management as special waste and disposed off-site.

Domestic sewage is not commingled with any other wastes.

No other waste streams are commingled.

8. Description of Current Liquid and Solid Waste Collection/Storage/Disposal Procedures

Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids
CHACO GAS PLANT

PROCESS FLUID/WASTE	COLLECTION & STORAGE SYSTEM	CONTAINER CAPACITY/ DESCRIPTION	NM Waste STATUS	DESCRIPTION OF FINAL DISPOSITION
Used Oil	Collected via closed drain line system through an oil/water classifier into AGT for storage until removed for recycling.	21,000 gallons	Non-exempt	Recycled: Transported by Safety Kleen Systems, Inc. to facility Sec 10, T10N, R3E, NM. EPA ID #NMD 000 804 294, NM and/or Thermal Fluids, Inc. to recycling facility located at 9010 Bates Road SW Albuquerque, NM EPA #NMD986674141.
Amine	Sump	20 barrels	Exempt	Pumped back to process area for reuse.
Stormwater	Unlined pond in northwest corner of facility and a bermed area in the southwest corner of facility grounds	NA	NA	Allowed to evaporate from ponding areas or percolate into unpaved areas of the facility.
Non-contact wastewater	Evaporation ponds	750,000 square feet surface area	Exempt	On-site earthen ponds
Contact wastewater/ Non-exempt wastewater	Aboveground storage tank	1500 barrels	Non-exempt	Transported to Key Four Corners Inc facility (OCD Permit #9) at UL E,S2-T29N, R12W, San Juan County for evaporation/disposal.
Produced Water/Exempt wastewater	Evaporation Ponds	Two – one acre ponds	Exempt	Transported by truck and disposed at Basin Disposal facility (OCD Permit #5) at UL F, S3, T29N, R11W San Juan County for evaporation/disposal.
Exempt Hydrocarbon Liquids	Above-ground storage tanks	(2) 4000 barrels tanks	Exempt	Transported offsite by Western Refining for further processing as product.
Used Oil filters	Special waste dumpster	(2) 8-yard steel bins	Non-exempt	Transported by Waste Management to San Juan County Regional landfill facility and/or Thermal Fluids, Inc. to recycling facility located at 9010 Bates Road SW Albuquerque, NM EPA #NMD986674141.
PROCESS	COLLECTION &	CONTAINER	NM Waste	DESCRIPTION OF FINAL DISPOSITION

FLUID/WASTE	STORAGE SYSTEM	CAPACITY/ DESCRIPTION	STATUS	
Used Amine Filters	Special waste dumpster	(2) 8-yard steel bins	Non-exempt	Transported by Waste Management to San Juan County Regional landfill facility and/or Thermal Fluids, Inc. to recycling facility located at 9010 Bates Road SW Albuquerque, NM EPA #NMD986674141.
Used Glycol Filters	Special waste dumpster.	(2) 8-yard steel bins	Non-exempt	Transported by Waste Management to San Juan County Regional landfil and/or Thermal Fluids, Inc. to recycling facility located at 9010 Bates Road SW Albuquerque, NM EPA #NMD986674141.
Spent Carbon Filter Media	Removed directly from process vessel	Process Vessel	Exempt	Trucked from process vessel directly to Transit Waste facility at Bondad Landfill in LaPlata County, Colorado.
Spill Residue – with used oil (i.e. soil, gravel	No storage on-site. Immediate cleanup of all spill residue	NA	Non-exempt	Transported off-site for disposal or landfarming as warranted. Well be profiled before removal. Will be sent to Envirotech or Tierra Landfarms, San Juan County, NM.
Spill Residue- with condensate (i.e. soil, gravel	No storage on-site. Immediate clean-up of all spill residue	NA	Exempt	Transported off-site for disposal or landfarming as warranted. Will be profiled before removal. Will be sent to Envirotech or Tierra Landfarms, San Juan County, NM.
Municipal Waste	Steel container	1.5 yards	Exempt	Disposed of by Waste Management at the San Juan County Regional Landfill.
Absorbent Pads	Special waste dumpster	(2) 8-yard steel bins	Non-exempt	Transported by Waste Management to San Juan County Regional landfill and/or Thermal Fluids, Inc. to recycling facility located at 9010 Bates Road SW Albuquerque, NM EPA #NMD986674141.
Domestic Sewage	4 leach fields on separate septic systems	(3) 1000 gallon systems built in 1957. (1) 1000 gallon system for Cryo Plant built in 1996	Regulated by NMED	Solids removed by Serrano's Portable Toilets of Bloomfield, NM

There are 10 groundwater monitoring wells within the property boundary. Wells 2,3,4,5,6,7 are sampled on an annual basis, wells 1 and 8 are sampled semi-annually and wells 9 and 10 are sampled quarterly. These are monitoring for contamination from the North and South Contact Water Ponds. Please refer to letters dated November 12, 1993 and May 15, 1997 from El Paso Field Services to the NMOCD.

Hydrostatic testing of facility piping is conducted every five (5) years to ensure the integrity of the passive drain line piping at this facility. The testing consists of plugging the outlet of the line(s) at the confluence with the sub-grade waste water storage tank located in the concrete vault. A pipe riser is placed prior to the confluence that extends several feet above ground to achieve a minimum of three (3) pounds per square inch (psi) hydrostatic water pressure once the passive drain lines are filled with water. The hydrostatic test is conducted for a one (1) hour period to determine that the water level in the riser pipe is static which is indicative of pipeline integrity. The last test was conducted from June 7, 2007, to June 21, 2007. Schematic diagrams showing the drain system piping was submitted with the 1997 renewal and is incorporated by reference. A copy of the test data is included with this renewal.

All tanks and chemical storage areas are designed to contain at minimum a volume of 33% greater than the total volume stored. In the event of interconnected tanks, volume of the containment will be 33% greater than the combined volume of the tanks.

9. Proposed Modifications

The wash rack formerly used for cleaning drums has been removed from the facility. No modifications are planned at this time.

10. Inspection, Maintenance and Reporting

Operator and/or contract personnel operate and maintain the equipment at the facility. The facility is manned 24 hours a day. Regular inspections of plant process and storage units are performed as part of normal plant operations. Any evidence of spills/leaks is routinely reported to supervisory personnel, and a facility technician will be on call 24 hours per day, 7 days per week, 52 weeks per year.

The BGT's at this facility are double lined steel vessels with leak detection. The AGT and BGT tanks will be inspected monthly. Leaks will be reported to the NMOCD in accordance with Rule 116 (19.15.C.116 NMAC) and WQCC regulation (20.6.2.1203 NMAC) regulations.

Storm water is allowed to percolate into unpaved areas of the facility, or is diverted to Pond #7 in the northwest corner of the facility or to a bermed area in the southwest corner of the facility; see Figure 2, Site Map.

Storm water controls at this facility include concrete secondary containment for bulk storage of stored chemicals. Storm water is pumped out of berms and taken to a non-exempt water tank located onsite. Storm water from the rest of the location enters a drainage ditch and drains to the storm water pond . The drainage system used to convey the storm water to the ponding area is hydro tested to a minimum of three pounds per square inch every five years and documented as shown in Appendix A.

Following are the best management practices (BMPs) that are used to prevent or mitigate pollution to storm water from facility operations:

- All waste materials and debris will be properly disposed of on an ongoing basis in appropriate containers and locations for collection and remove from the site.
- Temporary storage of potential pollutant sources will be located in areas with appropriate controls for storm water protection. This would include ensuring all containers are sealed/covered and otherwise protected from contact with precipitation.
- Periodic inspection of channels and culverts shall be performed at least twice annually and after any major precipitation event.
- Sediment deposits and debris will be removed from the channels and culverts as necessary and any erosion damage at the outfall (if any) will be repaired or controlled.
- Conduct inspections of the facility on a regular basis as part of the preventive maintenance site check. Such inspections will include the visual assessment of corroded or damaged drums and tanks, broken or breached containment structures, collapsed or clogged drainages or drain lines.

11. Spill/Leak Prevention and Reporting Procedures

Spills/Leaks could occur from pipelines or equipment within the facility in the event of a major failure of one of the components. Spills/Leaks could occur from various storage tanks. Spill containment berms around above ground storage tanks are designed to contain 1-1/3 times the volume of the tank or the combined volume of interconnected tanks. The majority of process and storage units at the Chaco Gas Plant have underground drains or natural diversions which will direct any unplanned spills or releases to existing waste management areas. The process areas in the facility are concrete lined and curbed to prevent contamination of ground soil or ground water. This facility meets requirements for CFR 40 Part 112 (SPCC).

In the event of a release, the Pipeline Control Department personnel report the release to facility technicians who determine the extent of the problem, who then notify the Operator's Environmental Department. The Environmental Department then determines reportable quantity and reports the release to the appropriate agencies as required by statutes/regulations. Records of spills, leaks, or other pollutant discharges, if any, and inspections and maintenance activities will be maintained by the Operator for at least one year.

Spills and leaks of reportable quantity are reported to the NMOCD pursuant to NMOCD Rule 116 and WQCC Section 1203 using the NMOCD form C141 and/or verbal notification; see Appendix C for specific reporting guidelines and contact numbers.

12. Site Characteristics

A complete discussion of the hydrogeological characteristics at and near the site was provided in the discharge plan approved in May 1992. Since that information is unchanged it is incorporated into the plan by reference.

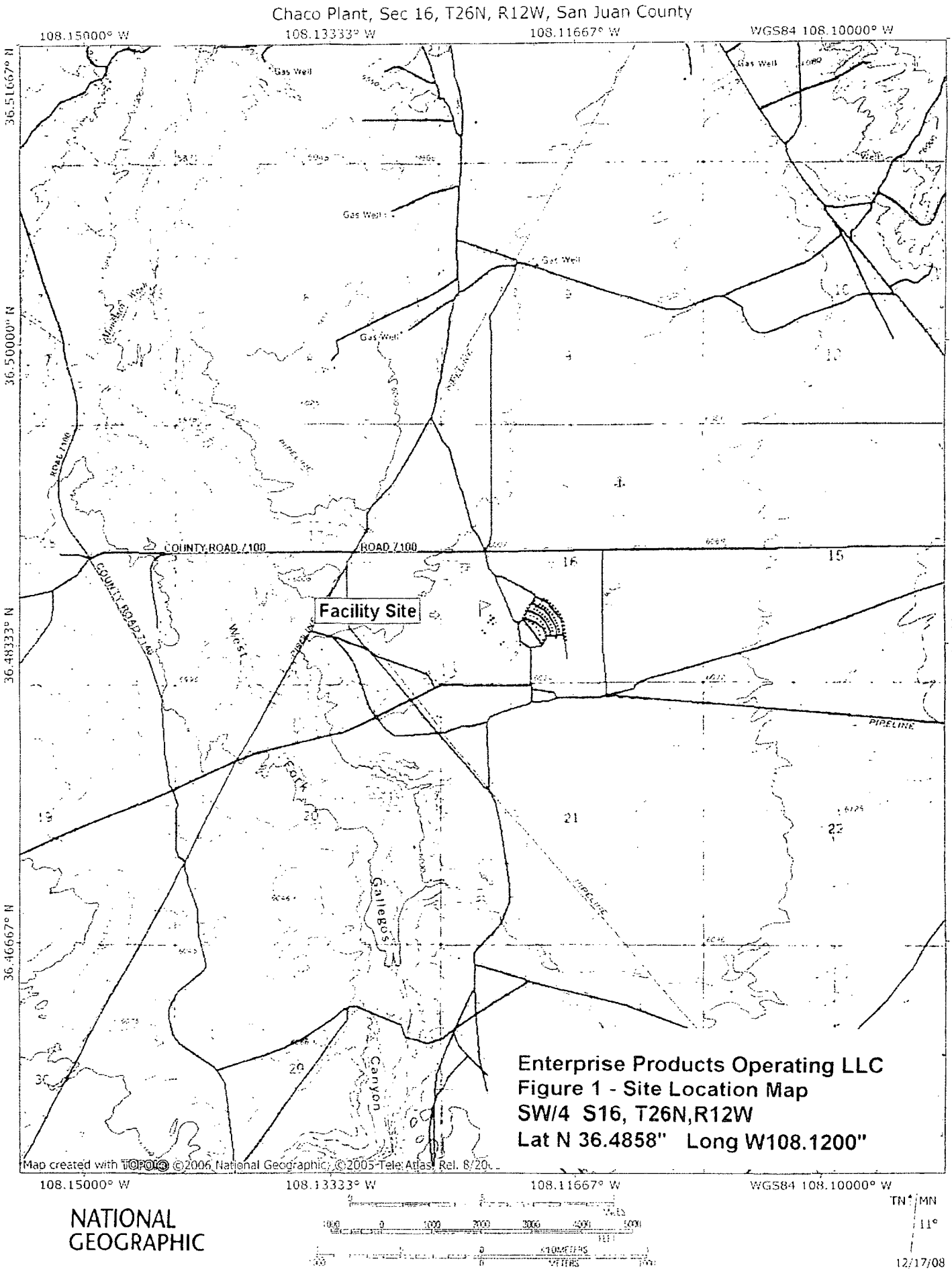
This report indicates that Stone et al (1983) estimates groundwater to lie at a depth of approximately 220 feet below the plant site. It also indicates that the total dissolved solids (TDS) reported from this aquifer ranges from 560 to 1000 ppm (Thorn et al, 1990).

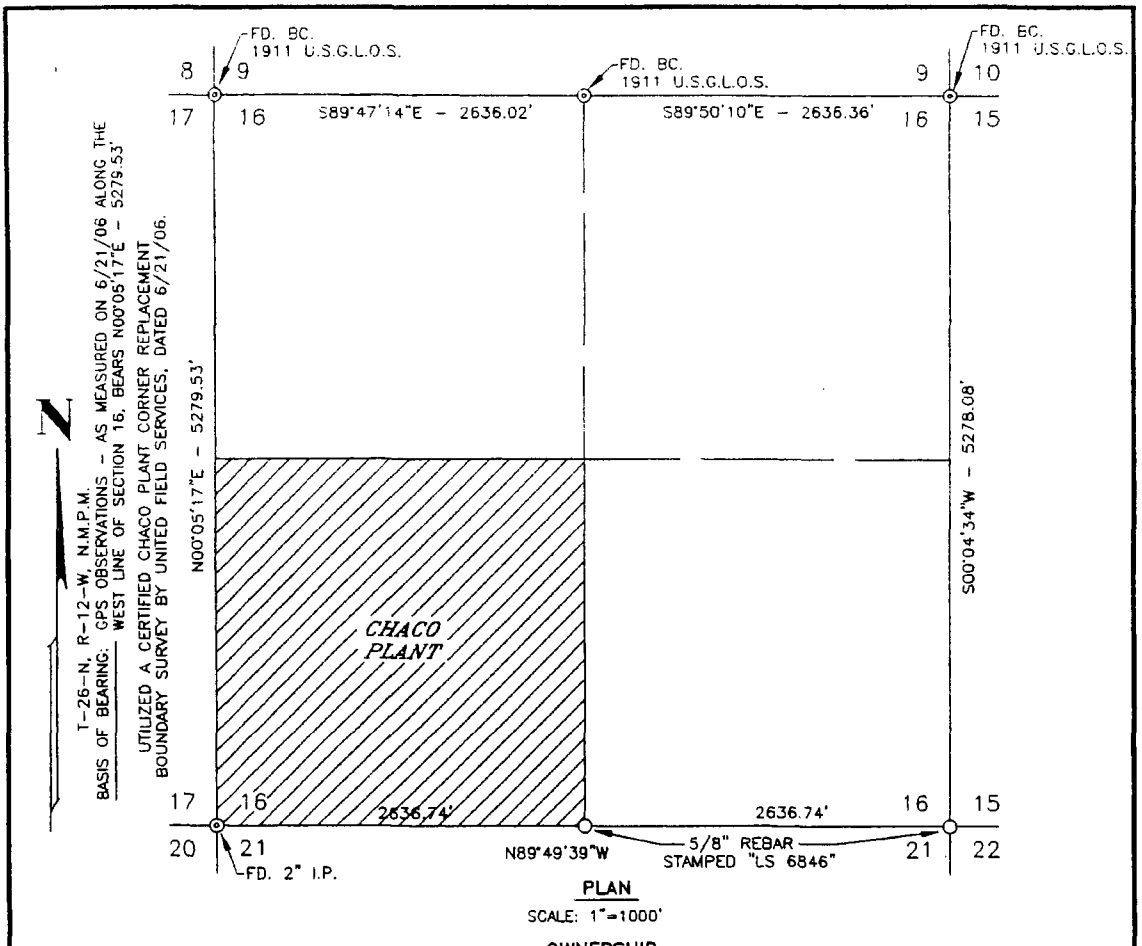
The facility lies outside of the 500-year flood plain. See attached FEMA Map. Flood Protection: Surface water runoff from the area surrounding the site will be diverted around the facility into the natural drainage path.

13. Additional Information

Any unauthorized release or discharge will be reported to the NMOCD in accordance with NMOCD Rule 116, 19.15.C.116 NMAC.

Closure of facility when abandoned will meet current NMOCD guidelines and will conform to WQCC Section 3107.A.11 regulations. Reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC 6.2.3103 water quality standards should Enterprise choose to permanently close the facility. Closure measure will include removal or closure in place of the underground piping and equipment. The tanks will be emptied before removal. Potentially toxic materials or effluents will be removed from the site and properly disposed. Potential sources of toxic pollutants will be inspected. Contaminated soil if discovered will be reported under NMOCD Rule 116 and 20 NMAC 6.2.1203 procedures and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.


Chaco Plant, Sec 16, T26N, R12W, San Juan County
108.15000° W
108.13333° W
108.11667° W
WGS84 108.10000° W
36.51667° N
36.50000° N
36.48333° N
36.46667° N
Gas Well
COUNTY ROAD 7100
ROAD 7100
COUNTY ROAD 7100
Facility Site
PIPELINE
West
Fork
Gallegos
Canyon
Enterprise Products Operating LLC
Figure 1 - Site Location Map
SW/4 S16, T26N,R12W
Lat N 36.4858" Long W108.1200"
Map created with TOPO! ©2006 National Geographic, ©2005 Tele Atlas, Rel. 8/20
NATIONAL GEOGRAPHIC
TN
MN
11°
12/17/08



PLAN

SCALE: 1"=1000'

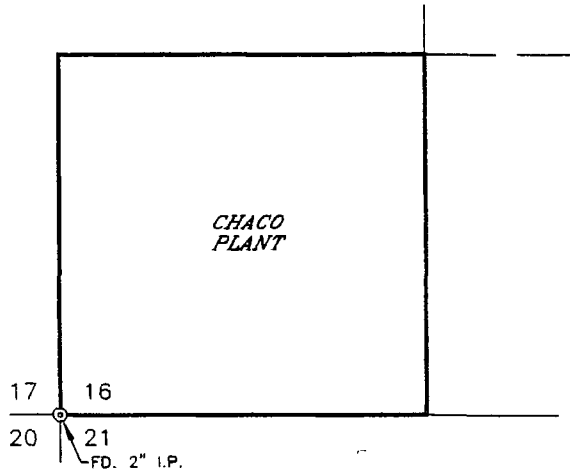
OWNERSHIP

SUBDIVISION	OWNER	LESSEE	ROD(S)	ACRE(S)
SW/4, SEC. 16	ENTERPRISE FIELD SERVICES, LLC			159.788

CHACO PLANT
SW/4, SEC. 16.

TOTAL AREA
6960374 SQ. FT.
159.788 AC.

LOCATION: SW COR. SEC. 16
LAT.: (WGS) 36°28'52.51N
LONG.: (WGS) 108°07'33".06 W



DETAIL
SCALE: 1"= 1000'

REF. DWG.:

REVISIONS

NO.	DATE	BY	CHK	ENG. REC.		DATE
1	12/17/08	R. SEALE		DRAWN	MD	12/08
				CHECKED		
				CHECKED		
				PROJ. APP.		
				SURVEYED		
				CAD NO.		
NO.	DATE	TO	W.O.	R/W NO.		
		PRINT RECORD		W.O.		

ENTERPRISE FIELD SERVICES LLC

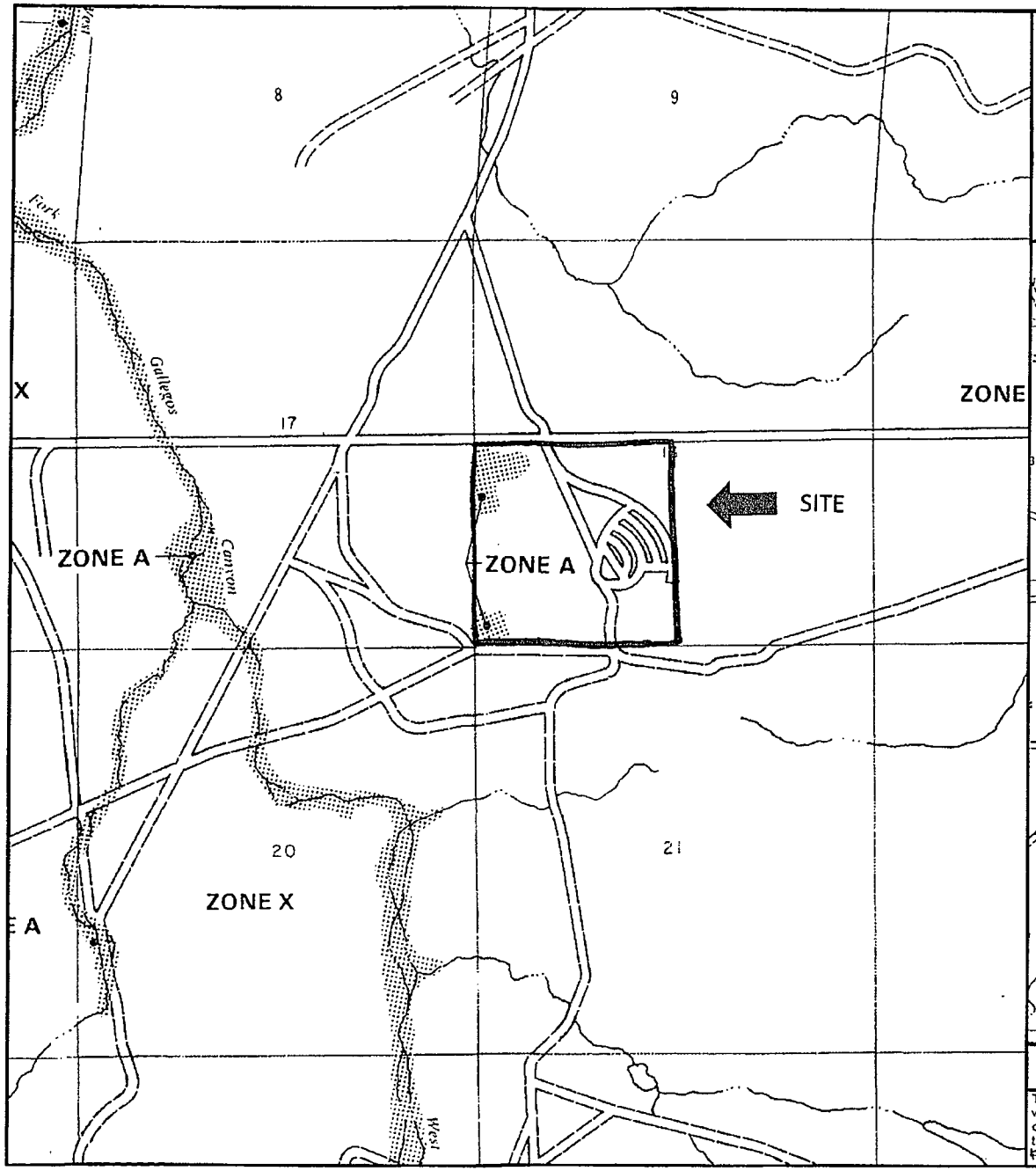
CHACO PLANT LOCATION

SW/4, SEC. 16, T-26-N, R-12-W, N.M.P.M.
SAN JUAN COUNTY, NEW MEXICO

SCALE | DWG. NO. 5212.0-005 | REV.

ENTFM92 (Rev. 12/05)

Figure 2 - Site Survey Plat



APPROXIMATE SCALE

2000 0 2000 FEET

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

SAN JUAN COUNTY,
NEW MEXICO
UNINCORPORATED AREAS

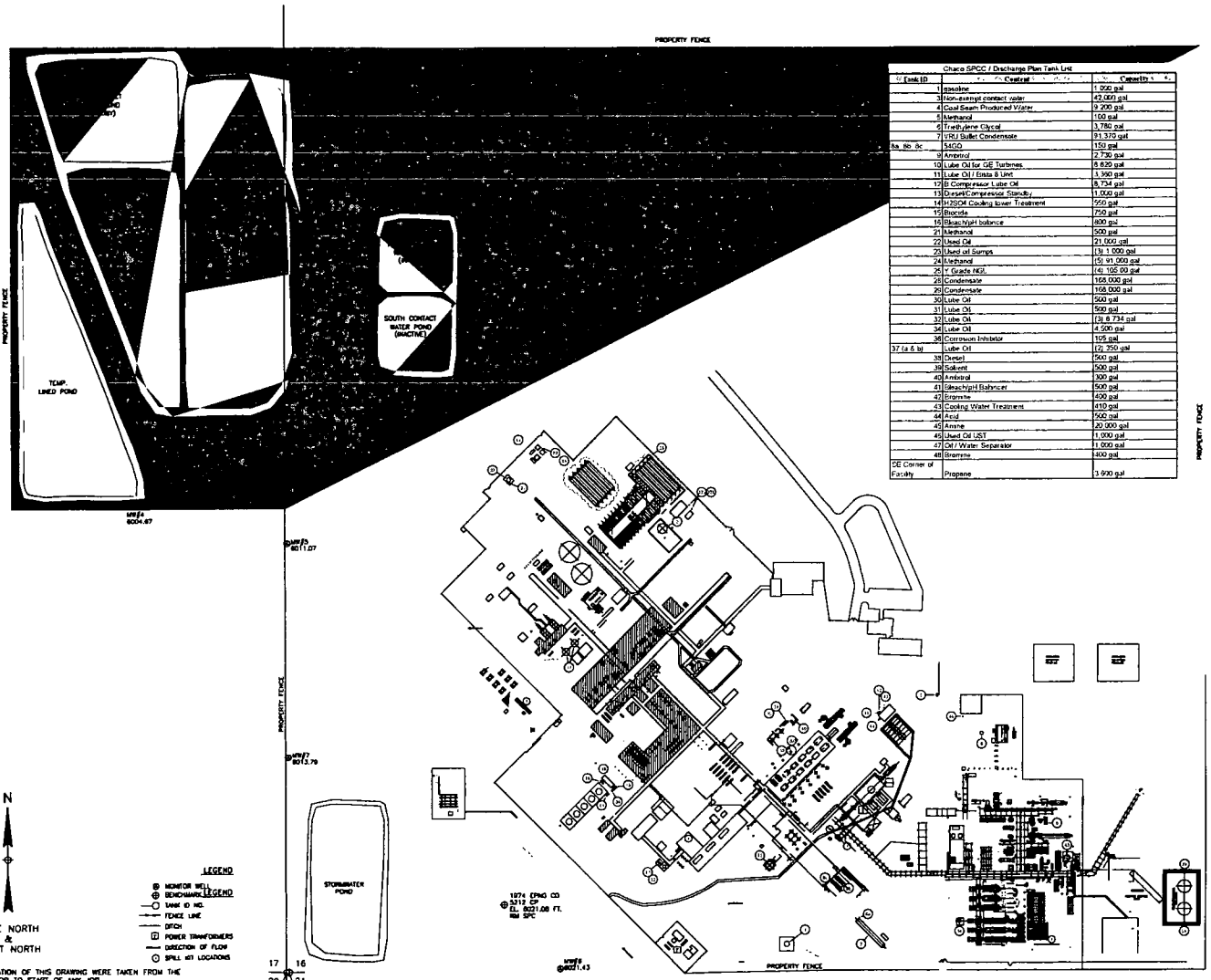
PANEL 875 OF 1450
(SEE MAP INDEX FOR PANELS NOT PRINTED)

PANEL LOCATION

COMMUNITY-PANEL NUMBER
350064 0875

EFFECTIVE DATE:
AUGUST 4, 1988

Federal Emergency Management Agency



Chaco SPCC / Discharge Plan Tank List			
Tank ID		Content	Capacity
	1	gasoline	1,000 gal
	3	Non-exempt contact water	42,000 gal
	4	Coal Seam Produced Water	9,200 gal
	5	Methanol	100 gal
	6	Triethylene Glycol	3,780 gal
	7	VRU Sulfet Condensate	91,370 gal
8a, 8b, 8c		SASO	150 gal
	9	Ambrinol	2,730 gal
	10	Lube Oil for GE Turbines	8,820 gal
	11	Lube Oil / Esso 8 Unit	3,360 gal
	12	B Compressor Lube Oil	8,734 gal
	13	Dresser Compressor Standby	1,000 gal
	14	H2SO4 Cooling tower Treatment	550 gal
	15	Biocide	750 gal
	16	Bleach/pH balance	800 gal
	21	Methanol	500 gal
	22	Used Oil	21,000 gal
	23	Used oil Sumps	(3) 1,000 gal
	24	Methanol	(5) 91,000 gal
	25	Y Grade NGL	(4) 105.00 gal
	28	Condensate	168,000 gal
	29	Condensate	168,000 gal
	30	Lube Oil	560 gal
	31	Lube Oil	500 gal
	32	Lube Oil	(3) 8,734 gal
	34	Lube Oil	4,500 gal
	36	Corrosion Inhibitor	105 gal
37 (a & b)		Lube Oil	(2) 350 gal
	38	Diesel	500 gal
	39	Solvent	500 gal
	40	Ambitrol	300 gal
	41	Bleach/pH Balancer	500 gal
	42	Bromine	400 gal
	43	Cooling Water Treatment	410 gal
	44	Acid	500 gal
	45	Amine	20,000 gal
	45	Used Oil UST	1,000 gal
	47	Oil / Water Separator	1,000 gal
	48	Bromine	400 gal
SE Corner of Facility		Propane	3,900 gal

N

TRUE NORTH & PLANT NORTH

NOT IN SERVICE

LEGEND

- MONITOR WELL
- BENCHMARK LEGEND
- TANK ID NO.
- FENCE LINE
- DITCH
- POWER TRANSFORMERS
- DIRECTION OF FLOW
- SPILL HOT LOCATIONS

NOTES:

1. ALL DIMENSIONS, ELEVATIONS AND LOCATIONS USED IN THE CREATION OF THIS DRAWING WERE TAKEN FROM THE BEST INFO. AVAILABLE. CONTRACTOR TO VERIFY DIMENSIONS PRIOR TO START OF ANY JOB.
2. THE UTILITY WATER SYSTEM THAT WAS SHOWN ON THE ORIGINAL DRAWING BY THIS NAME WAS NOT SHOWN ON THESE DRAWINGS WHICH WERE DONE TO UPDATE THE POWER GAS SYSTEM. IT IS SUGGESTED THAT THESE DRAWINGS BE RENUMBERED OR THAT ENTERPRISE ADD THE FIREWATER TO THESE DRAWINGS.

REV.	DATE	REVISION	BY	CHK'D	ENGR.
2	10/30/08	RECONSTITUTED DRAWING USING 2CH-8-P440 AS BASE PLOT PLAN	RB		RB
1	10/08	CHANGED LOCD FR. EL PASO TO FLD. SERVICES	MD		

NOTES:

1. MONITOR WELL ELEVATIONS SHOWN ARE ALL TOP OF CASING HEIGHTS. BASIS OF ELEVATION: B.M. CAP NEAR SW CORNER OF SECTION 16, T29N, R12W, N.M.P.M.
2. CRYOGENIC TEG REGEN SYSTEM & BTEX S NOT SHOWN.

ENTERPRISE FIELD SERVICES LLC

ENTERPRISE

LOCATION OF TANKS SEC. 16, T16N, R12W, N.M.P.M. SPCC & DISCHARGE PLAN MAP

CHACO PLANT — SAN JUAN, NM

DRAWN: MD — DATE: 12/15/87

JA NO.	FILE NAME CH-08-P0440
AFE NO.	SCALE 1"=100'
BASE NO.	08412
DWG. NO.	CH-1-P129 / 2

PLOT TIME: December 17 2008 - 2:29 pm

220

Hydrostatic Line Testing Form

Testing Company: Envirotech, Inc.	
Client: Enterprise Field Services LLC	
Facility Name/Location: Chaco Plant	
Description of Test:	Low pressure hydrostatic line test on contact drain system to determine the presence of leaks.
Description of System:	Steel Pipe
Test Requirements:	Hydrostatic pressure test on contact drainage systems in accordance to the State of New Mexico, Minerals, Natural Resources Department - Oil Conversation Division Discharge Plan Requirements. Hydrostatic pressure test performed on contact drain system at 3 pounds per square inch for a period of one hour.
Test Medium: Water	**Test Pressure:** 7' WC
Test Date: 6/22/07	**Test Start:** **Test Completed:**
Test Notes: GH4-1, LO6-1, LO6-2, Control Room, Bisti #8 comp. D2-2, D4-1, D2-1, LO4-1,	
Review and Approvals:	
Signed by (Operations) **Date**	**Test Completed by (signed)** **Date** 6/22/07
	Jeffrey Miles
Name Printed by (Operations)	**Contractor Representative (printed)**

Hydrostatic Line Testing Form

Testing Company: Envirotech, Inc.	
Client: Enterprise Field Services LLC	
Facility Name/Location: Chaco Plant	
Description of Test:	Low pressure hydrostatic line test on contact drain system to determine the presence of leaks.
Description of System:	Steel Pipe
Test Requirements:	Hydrostatic pressure test on contact drainage systems in accordance to the State of New Mexico, Minerals, Natural Resources Department - Oil Conversation Division Discharge Plan Requirements. Hydrostatic pressure test performed on contact drain system at 3 pounds per square inch for a period of one hour.
Test Medium: Water	**Test Pressure:** 7' WC
Test Date: 6/19/07	**Test Start:** 10:00 **Test Completed:** 11:00
Test Notes: Port #2, L.O, Lp6-1, RC2-1, Port #3, C3000, C200, C1000, AC4-1, AC4-2, I4-1, I2-3, I2-2, I2-1, C Plant	
Review and Approvals:	
Signed by (Operations) **Date**	**Test Completed by (signed)** **Date** 6/19/07
	Jeffrey Miles
Name Printed by (Operations)	**Contractor Representative (printed)**

Hydrostatic Line Testing Form

Testing Company: Envirotech, Inc.	
Client: Enterprise Field Services LLC	
Facility Name/Location: Chaco Plant	
Description of Test:	Low pressure hydrostatic line test on contact drain system to determine the presence of leaks.
Description of System: Steel Pipe	
Test Requirements:	Hydrostatic pressure test on contact drainage systems in accordance to the State of New Mexico, Minerals, Natural Resources Department - Oil Conversation Division Discharge Plan Requirements. Hydrostatic pressure test performed on contact drain system at 3 pounds per square inch for a period of one hour.
Test Medium: Water	**Test Pressure:** 7' WC
Test Date: 6/14/07	**Test Start:** 3:00 **Test Completed:** 4:00
Test Notes: Port #1 LA, LO6-1, Port #2	
Review and Approvals:	
Signed by (Operations) Date	**Test Completed by (signed)** Date 6/14/07
	Jeffrey Miles
Name Printed by (Operations)	**Contractor Representative (printed)**

Hydrostatic Line Testing Form

Testing Company: Envirotech, Inc.	
Client: Enterprise Field Services LLC	
Facility Name/Location: Chaco Plant	
Description of Test:	Low pressure hydrostatic line test on contact drain system to determine the presence of leaks.
Description of System:	Steel Pipe
Test Requirements:	Hydrostatic pressure test on contact drainage systems in accordance to the State of New Mexico, Minerals, Natural Resources Department - Oil Conversation Division Discharge Plan Requirements. Hydrostatic pressure test performed on contact drain system at 3 pounds per square inch for a period of one hour.
Test Medium: Water	**Test Pressure:** 7' WC
Test Date: 6/12/07	**Test Start:** 4:15 **Test Completed:** 5:15
Test Notes: Lube oil dump, Steam Rack, oil Filter Drain, LO6-1, AS4-1 Shipping Pump House, SP4-1, AT4-1, WO4-1,	
Review and Approvals:	
Signed by (Operations) **Date**	**Test Completed by (signed)** **Date** 6/12/07
	Jeffrey Miles
Name Printed by (Operations)	**Contractor Representative (printed)**

Hydrostatic Line Testing Form

Testing Company: Envirotech, Inc.	
Client: Enterprise Field Services LLC	
Facility Name/Location: Chaco Plant	
Description of Test:	Low pressure hydrostatic line test on contact drain system to determine the presence of leaks.
Description of System:	Steel Pipe
Test Requirements:	Hydrostatic pressure test on contact drainage systems in accordance to the State of New Mexico, Minerals, Natural Resources Department - Oil Conversation Division Discharge Plan Requirements. Hydrostatic pressure test performed on contact drain system at 3 pounds per square inch for a period of one hour.
Test Medium: Water	**Test Pressure:** 7' wc
Test Date: 6/7/07	**Test Start:** 4:05 **Test Completed:** 5:05
Test Notes: Lines Tested PA8-1 From O.C.S To Storage Area. 3" PVC From oil drum Storage AS4-1, FH6-1, BHA-1 (To Port.)	
Review and Approvals:	
Signed by (Operations) **Date**	**Test Completed by (signed)** **Date** 6/7/07
	Jeffrey Miles
Name Printed by (Operations)	**Contractor Representative (printed)**

Enterprise Products™

RECEIVED

2008 AUG 25 PM 1 37

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

August 15, 2008

7007 2680 0002 9458 8778
Return Receipt Requested

New Mexico Oil Conservation Division
Wayne Price, Environmental Bureau Chief
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: Release Notification – Enterprise Field Services LLC

Dear Mr. Price,

Enterprise Field Services LLC is hereby providing written notification in accordance to Subsection B, Paragraph (1), and Subparagraph (d) of 19.15.3.116 NMAC for two releases that occurred in San Juan County, NM.

If you have questions or need additional information, please call Don Fernald, Environmental Scientist (505) 599-2124 or me directly at (713) 880-6518.

Kutz CS: GW-186
Chaco GP GW-71

Yours truly,

Mary E. Hebert
Director, Environmental Compliance

/sjn
enclosures: C-141 Form / Kutz CS
C-141 Form / BC 30" Crossover
cc: Mr. Brandon Powell, Deputy Inspector, NMOCD/Aztec, NM

P. O. BOX 4324
HOUSTON, TX 77210-4324
713.880.6500

2727 NORTH LOOP WEST
HOUSTON, TX 77008-1044
www.epplp.com

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

State of New Mexico
Energy Minerals and Natural Resources

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

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Repo

Name of Company: Enterprise Field Services LLC	Contact: Don Fernald
Address: c/o Environmental Dept. P.O. Box 4324 Houston, Texas 77210-4324	Telephone No. 505-599-2124
Facility Name: Blanco-Chaco 30" Crossover Pipeline	Facility Type: Pipeline

Surface Owner: Private	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
	20	28 N	11 W					San Juan

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release: Intentional pipeline blow down / maintenance	Volume of Release: 3.6 Mcf	Volume Recovered: n/a
Source of Release: Maintenance – Natural Gas Release	Date and Hour of Occurrence 8/19/08 – 6:00 AM	Date and Hour of Discovery N/A
Was Immediate Notice Given? ☒ Yes ☐ No ☐ Not Required	If YES, To Whom? Brandon Powell / NMOCD Aztec, NM	
By Whom? Don Fernald	Date and Hour: 8/15/08 – 1:50 PM	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse. N/A	

If a Watercourse was Impacted, Describe Fully.*
N/A

Describe Cause of Problem and Remedial Action Taken.*
Planned maintenance on pipeline.

Describe Area Affected and Cleanup Action Taken.*
N/A

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	OIL CONSERVATION DIVISION	
Printed Name: Don Fernald	Approved by District Supervisor:	
Title: Environmental Scientist	Approval Date:	Expiration Date:
E-mail Address: dfernald@eprod.com	Conditions of Approval:	Attached ☐
Date: 8-15-08 Phone: 505-599-2124		

* Attach Additional Sheets If Necessary

Jones, Brad A., EMNRD

From: Seale, Runell [RSeale@eprod.com]
Sent: Wednesday, March 19, 2008 10:46 AM
To: Jones, Brad A., EMNRD; Price, Wayne, EMNRD
Cc: Jordan, Doug; Cain, Peter
Subject: Updates on status of Discharge Plans - Enterprise Field Services

Hello Brad and Wayne,

This is to follow up on a phone conservation that Brad and I had today on status of projects:

1. Gonzales Mesa Compressor Station (GW-299): I have addressed the concerns on Solid Waste handling with the NMED and we are OK the way we are proposing to handle. I believe that I can forward a memo referencing this after review in our Houston office. After another meeting with CSI, I have made additional clarification on handling of wastes at this facility and we will be sending revisions to the plan as soon as Houston reviews. As stated you would prefer a full copy substitute (as opposed to only the pages that are changed) for ease of recording keeping on revisions.

2. Reed Canyon Compressor Station (GW-300): The same revisions will need to be made to this document. I will do that next week.

3. Chaco Plant Discharge Plan (GW-071-2): This plan has been prepared and is in review at the field level with the operations staff. This should be finished late next week and then sent to Houston for review, signature and submittal to you.

4. Manzanares Compressor Station (GW-301): This plan is up next for review and renewal. It expires on June 8, 2008 and I will begin review of the renewal application the week of March 31, 2008.

Runell A. Seale

Specialist, Environmental Permitting
EPCO, Inc., providing services to
Enterprise Products Operating LLC and TEPPCO
614 Reilly Ave.
Farmington, NM 87401
505 599-2124 office
505 599-2538 fax
505 320-2816 cell
e-mail: rseale@eprod.com

elpaso Field Services

September 6, 2002

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

RE: Chaco Plant Discharge Plan, Number GW-071

Dear Sir:

Please find attached the Approval Conditions to the above referenced Discharge Plan. The Approval Conditions were signed by Mr. Troy Chamberlain, Plant Superintendent on September 4, 2002. For whatever additional information you may need, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Principal Environmental Scientist

cc: Denny Foust – NMOCD – Aztec, NM
Troy Chamberlain
Max Blackwood
Chaco Plant Disch. Plan file

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-071
EL PASO FIELD SERVICES
CHACO GAS PLANT
DISCHARGE PLAN APPROVAL CONDITIONS
August 28, 2002

1. Payment of Discharge Plan Fees: Twenty-five (25) dollars has been applied to this discharge permit. **Total due upon receipt of this approval is $4,075.00.** All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.

2. Commitments: El Paso Field Services will abide by all commitments submitted in the discharge plan renewal application letter dated, February 22, 2002, and these conditions for approval.

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

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

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. The inlet/outlet of these tanks should be kept within the 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. These labels should contain the generic information (common chemical name) pertaining to the material inside the container.

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

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

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

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to

prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years. All areas within the confines of the plant property should be free of spilled material.

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

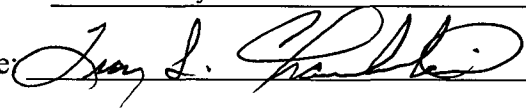
15. Storm Water Plan: El Paso Field Services shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then El Paso Field Services shall: take immediate actions to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

16. Closure: The OCD will be notified when operations of the Chaco Gas Plant 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 Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services 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 Field Services

Print Name: Troy L. Chamberlain

Signature: 

Title: Plant Superintendent

Date: September 4, 2002

EL PASO
FIELD SERVICES

May 15, 1997

Mr. Pat Sanchez
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe. NM 87505

RE: El Paso Field Services Co. Chaco Plant
Discharge Plan GW-071

Dear Pat:

Please find enclosed one copy of the Chaco Plant Discharge Plan Requirements, signed by Mr. Gerry Hoover, Chaco Plant Superintendent. If you need any additional information regarding these conditions, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays
Sr. Environmental Scientist

cc: S. D. Miller/J. S. Sterrett/R. D. Cosby/Chaco Regulatory File

RECEIVED
MAY 2 7 1997
Environmental Bureau
Oil Conservation Division

ATTACHMENT TO DISCHARGE PLAN GW-071
El Paso Energy Company - Chaco Gas Plant
DISCHARGE PLAN REQUIREMENTS
(May 1, 1997)

1. **El Paso Energy Company Commitments:** El Paso Energy Company will abide by all commitments submitted in the application from El Paso Energy Company dated March 4, 1997, and this approval letter with conditions of approval from OCD dated May 1, 1997.

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

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

3. **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.

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

5. **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.

6. **Tank Labeling**: All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

7. **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 that do not have secondary containment and leak detection 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 /or sumps.

8. **Underground Process/Wastewater Lines**: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

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

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

10. **Spill Reporting**: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the Aztec OCD District Office at (505)-334-6178.

12. **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.

13. **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.

14. **Certification:** El Paso Energy Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Energy 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 groundwater, human health and the environment.

Accepted:

El Paso Energy Company

By _____

Title

HACO PLANT SUPERINTENDENT

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

December 21, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-604

Mr. Patrick Marquez
El Paso Natural Gas Company
P.O. Box 4990
Farmington, New Mexico 87499

Re: Modification of Discharge Plan (GW-71)
Chaco Gas Plant
San Juan County, New Mexico

Dear Mr. Marquez:

The New Mexico Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request dated October 23, 1995 to modify the previously approved ground water discharge plan for the Chaco Gas Plant located in Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico. The ground water discharge plan consists of the May 16, 1993 discharge plan renewal and the October 23, 1995 application for modification. The discharge plan was submitted pursuant to Water Quality Control Commission Regulations. It is approved pursuant to section 3109.A. which provides for future amendments of the plan. Please be advised that approval of this plan does not relieve EPNG of liability should their operation result in pollution of the ground water, surface water or the environment.

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

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

Pursuant to sections 3109.F. and 3109.G.4., this approval is a modification of the existing discharge plan, which will expire October 4, 1996, and an application for renewal should be submitted in ample time before that date. ← May 18, 1997 DWB

The discharge plan application for the El Paso Natural Gas Company's Chaco Gas Plant is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan modification will be assessed a fee equal to the filing fee of fifty ($50) dollars plus the flat rate of one thousand sixty-seven dollars and fifty cents ($1667.50) for gas processing plant discharge plan modification. The fifty dollar filing fee was received by the OCD on October 23, 1995. The one thousand sixty-seven dollars and fifty cents ($1667.50) flat fee has not been received by the OCD and is due upon receipt of this approval.

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

On behalf of the staff of the OCD, I wish to thank EPNG and their staff for cooperating during this discharge plan review.

Sincerely,

William J. LeMay
Director

WJL/cee

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN MODIFICATION APPROVAL
AL PASO NATURAL GAS COMPANY
CHACO GAS PROCESSING PLANT (GW-71)
DISCHARGE PLAN REQUIREMENTS

1. Fee Payment: The one thousand six hundred sixty-seven dollar and fifty cents ($1667.50) flat fee for the discharge plan modification shall be paid in full upon receipt of this approval letter.

2. Previous Conditions: Requirements from the May 18, 1994 discharge plan approval and the September 14, 1994 discharge plan modification approval will remain effective.

3. Drum Storage: All drums will be stored on pad and curb type containment.

4. Sump Inspection: All pre-existing sumps will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.

5. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.

6. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.

7. Spills: All spills and/or leaks will be reported to the OCD Santa Fe and appropriate district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

8. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections.

9. Previous Conditions: Requirements from the May 18, 1992 discharge plan approval and the September 14, 1994 discharge plan modification approval will still remain effective.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 13, 1994

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

CERTIFIED MAIL
RETURN RECEIPT NO. P 176 012 244

Mr. Kris Sinclair
Compliance Engineer
El Paso Natural Gas Company
P.O. Box 1492
El Paso, TX 79978

Re: Discharge Plan GW-071
EPNG Chaco Canyon Gas Processing Plant
San Juan County, New Mexico

Dear Mr. Sinclair,

The modification to groundwater discharge plan GW-071, for the El Paso Natural Gas' (EPNG) Chaco Canyon Gas Processing Plant, located in Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the May 16, 1993 discharge plan renewal, the application for modification received by the OCD on dated July 14, 1993 and supplemental information dated November 17, 1993, March 28, 1994, August 1, 1994 and August 16, 1994.

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

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

Please note that Section 3-104 of the regulations requires that

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

Pursuant to Sections 3-109.F and 3-109.G.4., this approval is a modification of the existing discharge plan, which will expire May 18, 1997, and an application for renewal should be submitted in ample time before that date.

The discharge plan application for the El Paso Natural Gas' Chaco Canyon Gas Processing Plant is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of one thousand six hundred sixty seven dollars and fifty cents ($1667.50) for gas processing plant discharge plan modification. The fifty (50) dollar filing fee was received by the OCD on June 23, 1993. The one thousand six hundred sixty seven dollars and fifty cents ($1667.50) flat fee has not been received by the Oil Conservation Division, and should be submitted on receipt of this approval.

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

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

Sincerely,

William J. LeMay
Director

WJL/rca
Attachments

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-071 APPROVAL
EL PASO NATURAL GAS COMPANY
CHACO CANYON NATURAL GAS PROCESSING PLANT
DISCHARGE PLAN REQUIREMENTS
(September 14, 1994)

1. Fee Payment: The one thousand six hundred sixty seven dollar and fifty cent ($1667.50) flat fee for the discharge plan modification shall be paid upon receipt of this approval letter.

2. Drum Storage: All chemical and lubrication drums shall be stored on pad and curb type containment.

3. Sump Inspection: All pre-existing single-lined sumps at this facility will be cleaned and visually inspected on an annual basis. The inspections will coincide with the annual scheduled plant shutdown.

   Any new or rebuilt sumps or below-grade tanks will incorporate leak detection in their designs and will be approved by the OCD prior to installation.

4. Construction Schedule: The construction schedule listed in Section 6.0 of the May 14, 1992 response to comments for the 1992 discharge plan renewal will be adhered to except as noted below to accommodate the modification.

5. Contact Waste Water: All contact wastewater will be routed to a lined pond to be constructed in 1994. The design, location and schedule of construction of the lined pond shall consistent with EPNG's August 16, 1994 submittal.

   The contact water discharged to the lined pond shall be annually sampled, and a report submitted to the OCD, for the constituents listed in WQCC Regulation 3-103.A except for the radioactive species.

6. Non-contact Waste Water: All non-contact waste water will be discharged to Ponds 3,4,5,6. Pond 8 is to be used only for emergency overflow during winter conditions when pondwater evaporation is at a minimum and the other ponds are reaching capacity, and drained as soon as feasible, based on evaporation of the other ponds. Closure plans for Ponds 1 and 2 shall be submitted for approval prior to closure.

   The non-contact waste water discharged from the 20" discharge line shall be sampled initially for BTEX, WQCC metals, organics, major anions/cations, and TDS. After the initial sampling, the non-contact water shall be tested quarterly for WQCC metals, major anions/cations, ~~organics~~ and TDS. Sample results shall be submitted to the OCD annually along with the contact water sample results.

RDT

7. Monitor Wells: The monitor wells shall be sampled quarterly for WQCC metals, major anions/cations, organics and TDS, and sample results shall be submitted to the OCD annually along with the contact water sample results.

8. Sampling Frequency: After a minimum of four sample runs as required in conditions 6 and 7, EPNG may submit for OCD approval a request to alter the number of samples required as a minor modification to the discharge plan.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

May 18, 1992

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-598

Mr. Larry R. Tarver, Vice President
North Region
El Paso Natural Gas Company
P.O. Box 1492
El Paso, Texas 79978

RE: Discharge Plan GW-71
Chaco Canyon Gas Processing Plant
San Juan County, New Mexico

Dear Mr. Tarver:

The groundwater discharge plan GW-71 for the El Paso Natural Gas Company Chaco Canyon Gas Processing Plant located in Section 16, Township 26 North, Range 12 West, NMPM, San Juan County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the discharge plan application dated November 15, 1991 and correspondence dated May 14, 1992 submitted as a supplement to the application.

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

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

Please note that section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with

the terms and conditions of the plan". Pursuant to Section 3-107.c. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire May 18, 1997 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the El Paso Natural Gas Company Chaco Canyon Gas Processing Plant is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat rate based on the type of facility.

The OCD has received your $50 filing fee. The flat fee for a discharge plan for a gas processing plant is $3335.00 and may be paid in a single payment or in equal installments over the duration of the plan. The flat fee (either total payment or first installment) is due upon receipt of this approval.

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

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

Sincerely,

William J. LeMay
Director

WJL/rca

xc: OCD Aztec Office

ATTACHMENT TO DISCHARGE PLAN GW-71 APPROVAL
EL PASO NATURAL GAS COMPANY CHACO CANYON GAS PROCESSING PLANT
DISCHARGE PLAN REQUIREMENTS
(May 18, 1992)

1. Payment of Discharge Plan Fees: The $3335.00 flat fee or first installment will be paid upon receipt of this approval.

2. Drum Storage: All drums will be stored on pad and curb type containment.

3. Sump Inspection: All pre-existing sumps at this facility will be cleaned and visually inspected on an annual basis. The inspections will coincide with the annual scheduled plant shutdown. Any new sumps or below-grade will be approved by the OCD prior to installation and will incorporate leak detection in their designs.

4. Construction Schedule: The completion dates for the proposed tasks as detailed in Section 6.0 of the plan application will be as stated in the May 14, 1992 correspondence.