GW -

PERMITS, RENEWALS, & MODS

State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

John Bemis
Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



AUGUST 14, 2012

Mr. Richard Duarte El Paso Natural Gas Company 8725 Alameda Park Drive Albuquerque, NM 87113

Dear Mr. Richard Duarte:

Based on your responses given in the "Oil & Gas Facilities Questionnaire for Determination of a WQCC Discharge Permit" and a file review, the Oil Conservation Division (OCD) has determined that two of your facilities with an expired or soon to be expired permit do not require a Water Quality Control Commission (WQCC) Discharge Permit. This means that the WQCC Discharge Permits GW-092-(Rio Vista CS) and GW-231 (Lincoln "B" CS) are hereby rescinded and you are not required to proceed with the renewal of these expired or soon to expire WQCC Discharge Permits. OCD will close these permits in its database.

Because this WQCC Discharge Permit is no longer valid, you may be required to obtain a separate permit(s) for other processes at your facility, such as: pits, ponds, impoundments, below-grade tanks; waste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

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

Thank you for your cooperation.

Jame (Jaile

Jami Bailey

Director

JB/gvg



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November 16, 2011

File No.: 122626.001-ALB11LT001

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

Subject:

Discharge Application and Discharge Plan for Permit Renewal; El Paso Natural Gas Company; Rio Vista Compressor Station in San Juan County (GW # 092)

Dear Mr. Lowe:

Kleinfelder West, Inc. (Kleinfelder) is pleased to submit for your review the attached discharge plan for discharge permit renewal. The attached information is being submitted on behalf of the El Paso Natural Gas Company (EPNG).

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

- Check for \$100.00 (check number 2550) made out to the New Mexico Environment Department Water Quality Management Fund for the filing fee;
- Discharge Plan Application;
- Discharge Plan;
- Draft Public Notice text in both Spanish and English; and
- Draft Letter of Notification to Property Owner.

Please note that no planned or routine chemical or water discharges to the ground occur at this facility, and that EPNG views this process as part of its Best Management Practices.

Please review the attached information. If you have any questions, please contact Mr. Richard Duarte, EPNG at 505-831-7763 or Eileen Shannon, Kleinfelder at 505-344-7373.

Respectfully submitted,

KLEINFELDER WEST, INC.

Karin Hagen, CEM Staff professional II Reviewed by:

Eileen L. Shannon, PG Project Manager 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

E-mail Address: Ricardo.Duarte@ElPaso.com

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Submit Original
Plus 1 Copy
to Santa Fe
1 Copy to Appropriate
District Office

Revised June 10, 2003

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

AND CRUDE OIL PUMP STATIONS (Refer to the OCD Guidelines for assistance in completing the application) ☐ New □ Renewal Modification 1. Type: Rio Vista Compressor Station GW-092 2. Operator: El Paso Natural Gas Company Address: 8725 Alameda Park NE, Albuquerque, NM 87113 Contact Person: Richard Duarte Phone: 505-831-7763 3. Location: SE 1/4 SW 1/4 Section 27 Township 29N Range 11W Submit large scale topographic map showing exact location. Attach the name, telephone number and address of the landowner of the facility site. See Attached Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. See Attached 6. Attach a description of all materials stored or used at the facility. See Attached 7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. See Attached Attach a description of current liquid and solid waste collection/treatment/disposal procedures. See Attached Attach a description of proposed modifications to existing collection/treatment/disposal systems. See Attached 10. Attach a routine inspection and maintenance plan to ensure permit compliance. See Attached 11. Attach a contingency plan for reporting and clean-up of spills or releases. See Attached 12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. See Attached 13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. See Attached 14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief. Name: Richard Duarte Title: Senior Environmental Engineer Signature: Rochard Breat Date: Nov. 16, 20//

RIO VISTA COMPRESSOR STATION DISCHARGE PLAN EL PASO NATURAL GAS Prepared by Kleinfelder West, Inc., Albuquerque, NM November 16, 2011

Attachments:

Appendix A:

- Figure 1, Site Location Map, Rio Vista Compressor Station
- Figure 2, Aerial Photograph of the Rio Vista Compressor Station
- Figure 3, Property Boundaries, Rio Vista Compressor Station
- Figure 4, Facility Diagram, Rio Vista Compressor Station

Appendix B:

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

Item 1

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

The El Paso Natural Gas Company (EPNG) Rio Vista Compressor Station (Rio Vista CS) is utilized for compression of pipeline quality natural gas, and is part of the EPNG Number 3218 and 1202 pipelines (Figure 1). This compressor station is part of a network that moves natural gas from northwestern New Mexico to end users in the southwestern United States. The amount of natural gas transported varies depending on customer demand. Compression is required to move natural gas through the pipeline for delivery to EPNG customers. This is an automated site which is inspected by EPNG personnel at least once per week while in operation. NO PLANNED OR ROUTINE CHEMICAL OR WATER DISCHARGES TO THE GROUND OCCUR AT THIS FACILITY.

Rio Vista CS consists of two Solar Saturn 10 T1200 gas turbine compressors rated at 885 International Standards Organization (ISO) horsepower (hp) and one Solar Centaur 50 T5502 gas turbine compressor, rated at 3,775 ISO hop and their associated equipment.

EPNG also operates a 250 kilowatt (kW) generator for auxiliary electrical power on an as-needed basis. This generator is driven by a Caterpillar Model 3408, 338 hp reciprocating natural gas powered engine. Rio Vista CS's primary electrical power is generated when the turbines are operating via a turbine-powered generator and purchased-power is used otherwise. The auxiliary generator is only used during regional electrical power failures.

Total site combined compressor rated horsepower is 5,545 hp. Combined with the auxiliary generator, it is 5,883 hp.

Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party Sam Armenta, Albuquerque Division Director

El Paso Natural Gas Company

8725 Alameda Park NE Albuquerque, NM 87113

Local Representative Richard Duarte, Senior Environmental Engineer

El Paso Natural Gas Company

8725 Alameda Park NE Albuquerque, NM 87113

(505) 831-7763

Or

Alt. Local Representative/Operator Russell S. Pyeatt, Station Manager

El Paso Natural Gas Company Rio Vista Compressor Station

P.O. Box 127

Bloomfield, NM 87413

(505) 632-6001

1-800-334-8047 (24-hour emergency notification)

Physical Address El Paso Natural Gas Company

#81 County Road 4990 Bloomfield, NM 87413

1.5 miles south of Broadway Avenue in Bloomfield, NM, 4/10th mile east of

Highway 550 on County Road 4990

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Mailing Address

El Paso Natural Gas Company
P.O. Box 127
Bloomfield, NM 87413
(505) 632-6001, Russell S. Pyeatt, Manager
1-800-334-8047 (24-hour emergency notification)

Item 3

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

San Juan County, New Mexico SE ¼ of the SW ¼ of Section 27, Township 29 North, Range 11 West

Latitude: 36 Degrees, 41 Minutes, and 37 seconds North Longitude: 107 Degrees, 58 Minutes, and 46 Seconds West

A topographic map and aerial photograph are attached in Appendix A (Figures 1, 2, and 3).

Item 4

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

United States of America Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401 (505) 599-8900

Item 5

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

To accomplish natural gas compression, Rio Vista CS utilizes the following:

- Two (2) Solar Saturn 10 T1200 gas turbine compressor units rated at 885 hp (ISO) each;
- One (1) Solar Centaur 50 T5502 gas turbine compressor unit rated at 3,775 hp (ISO);
- One (1) inlet filter for the natural gas stream (scrubber) for each compressor;
- One (1) fuel gas filter for each turbine unit;
- One (1) auxiliary generator driven by a Caterpillar Model 3408, 338-hp reciprocating natural gas powered engine;
- One (1) 8,000-gallon steel above ground storage tank (AST) (V-9112) used for lube oil storage;
- One (1) 1,000-gallon steel oil/wastewater underground storage tank (UST) (V-9107);
- And two (2) 200-gallon steel oil day tanks.

Gas Compressors

The buildings that house the turbines have been installed in such a manner as to ensure containment of leaks, spills, and wash down water. Any spill or wash down water from cleaning operations is contained and discharged into the 1,000-gallon UST (V-9107) via the building sumps.

Natural gas that is compressed using centrifugal compressors does not produce wastewater. The turbines and ancillary equipment are washed on an as-needed basis and any used oil, wash down water, or biodegradable detergents such as Tide or dishwashing soap from cleaning operations will be contained and discharged into the 1,000-gallon UST, then removed from the site by an oil recycler. No solvents are used or stored at Rio Vista CS.

Used oil is generated from the turbines and auxiliary generator at a rate of approximately 40 gallons (or less) per 8,000 hours of operation (0.12 gallons per day) This oil is drained into the above-mentioned

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1,000-gallon UST. EPNG currently has an oil recycling contract with Mesa Oil (Farmington service office) to recycle the oil/wash water mixtures.

Natural Gas Scrubbers (inlet and fuel)

All inlet gas is passed through suction scrubbers on the upstream side of each of the compressors. Also, fuel gas filters remove minimal liquids and other foreign matter from the natural gas before entering the gas turbines or auxiliary generator. Any waste materials generated by the suction scrubbers and fuel gas filters are discharged into the 1,000-gallon UST.

Filters from this operation are replaced as needed. The filters are characterized as prescribed by 20 NMAC 3.1, Subpart 14, Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas industry. If any filter is characterized as NORM-regulated, it would be stored in properly labeled UN/DOT-approved 55-gallon metal drums for disposal at an approved facility. To date, no filters have been characterized as NORM-regulated at Rio Vista CS.

Scrubber and fuel gas filters determined to be non-NORM-regulated are placed in plastic bags and disposed of as solid waste.

Auxiliary Generator

Rio Vista CS contains a 250 kW generator for auxiliary electrical power which is driven by a Caterpillar Model 3412, 338 hp natural gas fueled reciprocating engine. This generator is only used when electrical power is not available from either the compressor generator or utility power. Oil consumption for his generator is very low and is limited to periodic oil changes. Oil for the generator is manually served. Used oil from the generator is placed into the 1,000-gallon UST (V-9107).

8,000-Gallon Lube Oil Above Ground Storage Tank (AST)

An 8,000-gallon steel AST (V-9112) is used to store lube-oil on-site for the three gas turbines. This tank is filled by lube oil contractors using tank trucks. When tank filling is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tanks. EPNG also requires that the tank truck operator be in direct radio or telephone contact with the station operator. Secondary containment is composed of a concrete-lined berm designed to contain spills.

Day Tanks

Two (2) 200-gallon steel day tanks (ASTs) are used to automatically replenish gas turbine compressor oil levels with lubricating oil as volume diminishes with use. One tank is used to replenish the Centaur 50 T5502 gas turbine and the other tank is used to replenish both Saturn 10 T1200 gas turbines. The day tanks are housed within the compressor buildings which contain floor sumps that drain into the 1,000-gallon oil/wastewarter UST. Secondary containment is provided by the floor sumps.

Underground Drain Lines

Underground drain lines are hydrostatically tested every five years during the annual station shutdown. Duration of hydrostatic testing is at least 30 minutes and piping is subjected to at least three (3) pounds per square inch (PSI) above operating pressure during the test. The last hydrostatic test was conducted at Rio Vista CS in January 2009. EPNG will provide the New Mexico Oil Conservation Division (NMOCD) with a notice of testing and results of the test findings.

1,000-gallon Underground Storage Tank (UST)

The 1,000-gallon UST (V-9107) receives wash down water, used oil, and biodegradable detergents from the compressor building drains, suction scrubber, and the fuel gas filter. This is a double-walled steel tank that is equipped with a liquid level indicator and automated leak detection equipment. In the event of a leak, a red light illuminates atop the tank and the station computer receives an alert. The UST is hydrostatically tested annually. The last hydrostatic test on this tank was conducted in January 2009. The tank is emptied as needed by used oil recycling contractors. When the tank is emptied, drip pans are placed under all connection points between the tank truck and lube oil tank. EPNG also requires that the tank truck operator be in direct radio or telephone contact with the station operator.

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Storm Water and Other Precipitation

Located in an alluvial region on a slight ridge, Rio Vista CS has good natural drainage. Any storm water runoff from the compressor area is collected in a gravel-lined ditch that drains onto the rangeland. Storm water runoff does not commingle with process fluids.

Wash Down Water

As necessary, Rio Vista CS utilizes high-pressure water-jets or high-pressure steam to remove solid particulate matter such as dust, dirt, weeds, etc., from fin-fans, process vessels or piping (not contained within a building). No detergents or cleaning solutions are used for this procedure and no process fluids intermingle with this water. This wash water is contained.

Additional Information

A diagram of the Rio Vista CS (Figure 4) shows the location of fences, property boundaries, pits, berms, dikes, tanks, and other pertinent information.

No significant changes have been made to Rio Vista CS's effluent sources or process fluids since the last discharge permit was submitted.

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

Container	ID	Material	Form	Volume	Location	Containment
Steel AST	V-9112	Turbine lube oil	Liquid	8,000 gailons	South of Control Building	Concrete containment
Steel UST	V-9107	Used oil and water	Liquid	1,000 gallons	Northeast of Control Building	Double-wall construction and automated alert system
Steel AST Day Tank	N/A	Turbine lube oil	Liquid	200 gallons	Compressor Building	Compressor building sump
Steel AST Day Tank	N/A	Turbine lube oil	Liquid	200 gallons	Compressor Building	Compressor building sump
Steel paint locker	N/A	Very small quantities of paints, lubricants, detergents, and other cleaning supplies	Liquids	Less than 5 gallons	Inside Compressor Building	Paint locker sump

Item 7

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

Source	Type of Effluent	Volume	Quality
Compressor building sumps, scrubber blowdown, and engine drains	Used engine oil, wash down water, detergents	Three (3) barrels per year (approximately 0.35 gallons per day)	Used lube oil, water, and water with detergents
Oil and scrubber filters, fuel gas filters, domestic trash	Solid waste	Two (2) cubic yards per year; about one (1) cubic foot per week, or 0.14 cubic feet per day	Metal and paper filters, domestic trash such as paper, plastic wrappers, food waste, etc.

Item 8

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

Type of Effluent	Collection	Storage	Hauler	Disposition
Used oil	Drained to the building sump, and/or immediately to the 1,000-gallon UST	Steel 1,000-gallon UST (V-9107)	Removed upon request by Mesa Oil, Inc.	Recycled by the Mesa Oil Hydrocarbon Recovery Facility
Wash down water	Drained the building sump, then immediately to the 1,000-gallon UST	Steel 1,000-gallon UST (V-9107)	Removed upon request by Mesa Oil, Inc.	Recycled by the Mesa Oil Hydrocarbon Recovery Facility
Wash down water with detergents	Drained the building sump, then immediately to the 1,000-gallon UST	Steel 1,000-gallon UST (V-9107)	Removed upon request by Mesa Oil, Inc.	Recycled by the Mesa Oil Hydrocarbon Recovery Facility
Oil and scrubber filters, fuel gas filters, domestic trash	Oil filters hot- drained to 1,000- gallon UST for 12 hours and bagged; scrubber filters bagged; domestic trash collected in waste can	Dumpster	Removed once per week by Waste Management of Farmington	Approved Landfill
Batteries	Maintained and disposed of by contractor	No storage onsite; batteries are immediately replaced by contractor	NGH Power Systems	Battery cores recycled by NGH Power Systems

Non-Exempt, Non-Hazardous Waste

Used oil is collected as needed from the used oil storage tank and removed from the site by Mesa Oil or Safety Kleen. When the tank is emptied, drip pans are placed under all connection points between the tank truck and tank. EPNG also requires that the tank truck operator be in direct radio or telephone

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contact with the station operator. Disposal records are maintained at the EPNG Bloomfield office (see address under Item 2.)

New lube oil is brought to the site by vendors as needed and stored in the 8,000-gallon lube oil storage tank (V-9112). When the lube oil tank is filled, EPNG requires the same procedures as when emptying the used oil tank (outlined in the above paragraph).

Any wash down water from the turbine or compressor inside the building is collected within the building sumps and discharged into the 1,000-gallon used oil tank (V-9107).

Hazardous Waste

No RCRA-listed hazardous wastes are expected to be generated at Rio Vista CS other than lead-acid wet cell batteries. When the auxiliary generator starting batteries require replacement, the old battery cores are exchanged at a local auto parts retailer. Inverter batteries that are used for the uninterrupted power system (UPS) are maintained, replaced, and recycled as needed by NGH Power Systems (Albuquerque). No batteries are stores onsite that are not in use.

Other Solid Waste

Solid waste is disposed of via a dumpster that is emptied by Waste Management of Farmington once per week. Used oil filters are hot-drained into the 1,000-gallon used oil tank (V-9107) for 12 hours and placed into plastic bags before disposal in the dumpster. Used scrubber filters are placed into plastic bags before disposal in the dumpster. These non-regulated solid wastes are disposed of by Waste Management of Farmington.

Names, addresses, and phone numbers of currently used NMED and NMOCD-approved transporters/disposal facilities.

Waste Management of Farmington (solid waste) 101 Spruce Street Farmington, NM Phone Number: (505) 327-6284

Safety Kleen Systems (used oil recycling) 4210 A Hawkins Road Farmington, NM 87401 Phone Number: (505) 327-9070

Mesa Oil, Inc. (used oil recycling) 20 Lucero Road Belen, NM 87002-7053 Phone Number: (505) 861-2691

NGH Power Systems (lead-acid batteries) 3500 Richmond Drive NE, Suite B Albuquerque, NM 87107

Phone Number: (505) 345-0523

Item 9

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

No modifications to the Rio Vista CS are necessary to meet NMOCD requirements. EPNG will notify NMOCD of any planned facility expansion, process modification, or production increase that could result in a significant modification in discharges from this facility.

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Item 10

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

Rio Vista CS has fully automated equipment and controls, and is designed to minimize onsite chemicals. Liquids stored onsite are placed within secondary containment that will prevent or mitigate any unplanned releases into the environment. When in operation, this site is visually inspected by EPNG personnel a minimum of once per week and underground piping in hydrostatically tested every five years. The 1,000-gallon UST is hydrostatically tested annually, and is equipped with a liquid level indicator and automated leak detection equipment that alerts the operator is a leak were to occur. If the station is not in operation, a visual inspection is conducted as necessary.

Verbal and written notifications of leaks or spills are made to the NMOCD according to NMOCD Rule 16. Any release of a chemical with a reportable quantity regulated by Title 40 CFR Part 300 through 372 is reported to the National Response Center and, when applicable, to the NMED.

Item 11

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

EPNG will handle all spills and leaks immediately as required by the EPNG procedures outlined in the EPNG Environmental handbook (applicable portions included in Appendix B), and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and Water Quality Control Commission (WQCC) regulations, WQCC section 1203.

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

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

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

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

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

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

EPNG contingency plans provide verbal and written notification of reportable leaks or spills to be made in accordance with OCD Rule 116 and New Mexico Water Quality Control Commission (NMWQCC) Section 1203 guidelines within the time limits set by NMOCD. Reportable releases regulated by the Code of

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November 16, 2011

Federal Regulations, Title 40, Parts 300 and 372 will be reported to the National Response Center, and where appropriate, the NMED.

Item 12

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

Site Geology and Geomorphology

Rio Vista CS is located on a bluff 1,800 feet south of, and at an elevation 120 feet above, the San Juan River in the San Juan River Basin (Figure 1). Elevation of the site is 5,540 feet above mean sea level. The Hammond diversion ditch is located on this bluff and is approximately 600 feet north of, and 20 feet lower in elevation than, the compressor station. Based on geotechnical site assessment, Rio Vista CS is built upon an alluvial cover which drapes the Nacimiento Formation. The Nacimiento Formation (bedrock) is encountered between 12 and 28 feet below the ground surface.

The alluvium on this site consists of fine to coarse sand, clays, and varying combinations of sand and clay. The soils tend to be weak, compressible, and moderately permeable. These soils, ranging from 2 to 14 feet in thickness, are fine to medium grained and generally soft at the surface, becoming moderately consolidated with depth.

Slope of the terrain in the vicinity of Rio Vista CS is approximately 140 feet per mile (or 1.5 degrees), dipping north toward the San Juan River.

Site Hydrogeology and Water Quality

Aquifers in the area occur predominantly in interbedded sandstone and shale. The major aquifer underlying Rio Vista CS is in the Upper San Juan Watershed. This watershed is part of the San Juan Hydrologic Unit and is in an area of low precipitation and high evaporation.

Average depth to water in the vicinity of Rio Vista CS is 30 feet below ground surface (New Mexico Office of the State Engineer, Water Administration Technical Engineering Resource System [WATERS] Database). Potentiometric surface and groundwater flow is assumed to dip north toward the San Juan River, as groundwater surface elevation closer to the river is lower. This is evidenced by well log data from the New Mexico Office of the State Engineer, WATERS Database.

Groundwater is highly mineralized and total dissolved solids (TDS) typically exceed 1,200 milligrams per liter (mg/L). TDS values within a few miles of the site range from 2,250 mg/L to 4,775 mg/L (USGS Water Quality Samples for the Nation Database; wells located at 36°01′52″N, 107°54′14″W and 36°00′53″N, 107°29′01″W respectively). One driller that installed a well within a ¼-mile of Rio Vista CS (well number SJ-2148) reported in the well log that "the water taste[d] very bitter" (no water quality measurements were recorded for this well".

Domestic Wells

According to the New Mexico Office of the State Engineer WATERS Database, checked in October 2011, there are 26 active domestic or municipal wells installed within a one-mile radius of Rio Vista CS. Twelve (12) of those wells are located in or near the town of Bloomfield, across the San Juan River from the station. Five (5) domestic or municipal wells have the potential of being affected by a release from Rio Vista CS, due to being on the same side of the San Juan River, and down-gradient from the station. The five wells that could potentially be affected are numbered SP-04489, SJ-00588, SP-04491, SP-00498, and SJ-00700.

Surface Water Hydrology and Flooding Potential

Flooding of Rio Vista CS has never been recorded. The most severe flood in the area was recorded in Farmington on September 6, 1909, when the San Juan River crested at 12.30 feet, a flood stage more than 100 feet below the elevation of Rio Vista CS (from the National Oceanic and Atmospheric

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Administration [NOAA] Advanced Hydrologic Prediction Service). Rio Vista CS is sited on a slight ridge that is well drained. Flooding at the site is unlikely, and the station is not located on a floodplain.

Annual precipitation in the vicinity of Rio Vista CS averages 8.5 inches per year. The 10-year, 25-year, 50-year, and 100-year, 24-hour storm rainfall amounts were estimated to be 1.7, 2.0, 2.4, and 2.6 inches, respectively. Rainfall frequency data were obtained from the NOAA Atlas 2 Precipitation – Frequency Atlas of the Western United States, Volume IV, New Mexico.

Additional Information

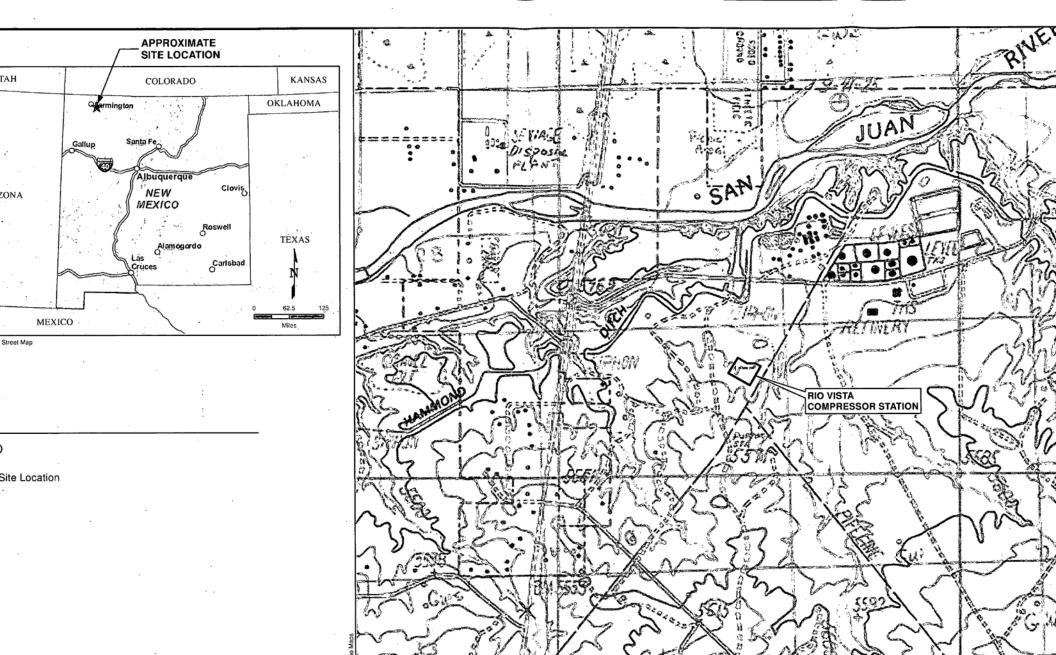
Rio Vista CS does not contain any active unlined surface impoundments, pits, leach fields, injection wells, drying beds, solids disposal, or land farms.

Item 13

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

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

APPENDIX A Figures



500

NAD 1983

UTM Zone 12N, meters

500

1,000

KLEINFELDER

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www.kleinfelder.com

SITE LOCATION MAP

Rio Vista Compression Station El Paso Natural Gas Company

Bloomfield, New Mexico

DRAWING CA

ORIGINATOR: K. HAGAN

APPROVED BY: EZS (1-16-1)

PROJECT NO.: 122626

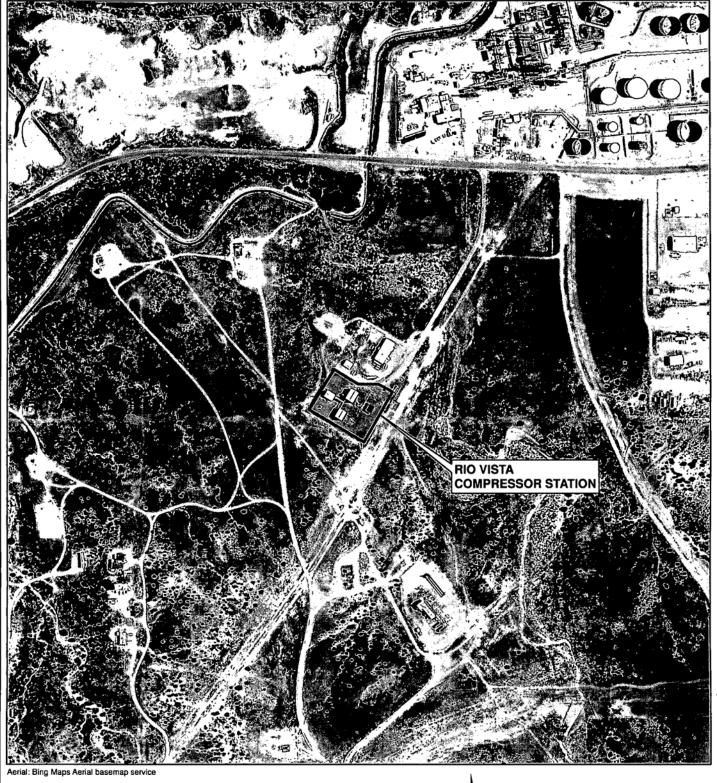
DRAWN: OCT 2011

DRAWN BY: KFH CHECKED BY: ES

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DRAWN BY: KFH

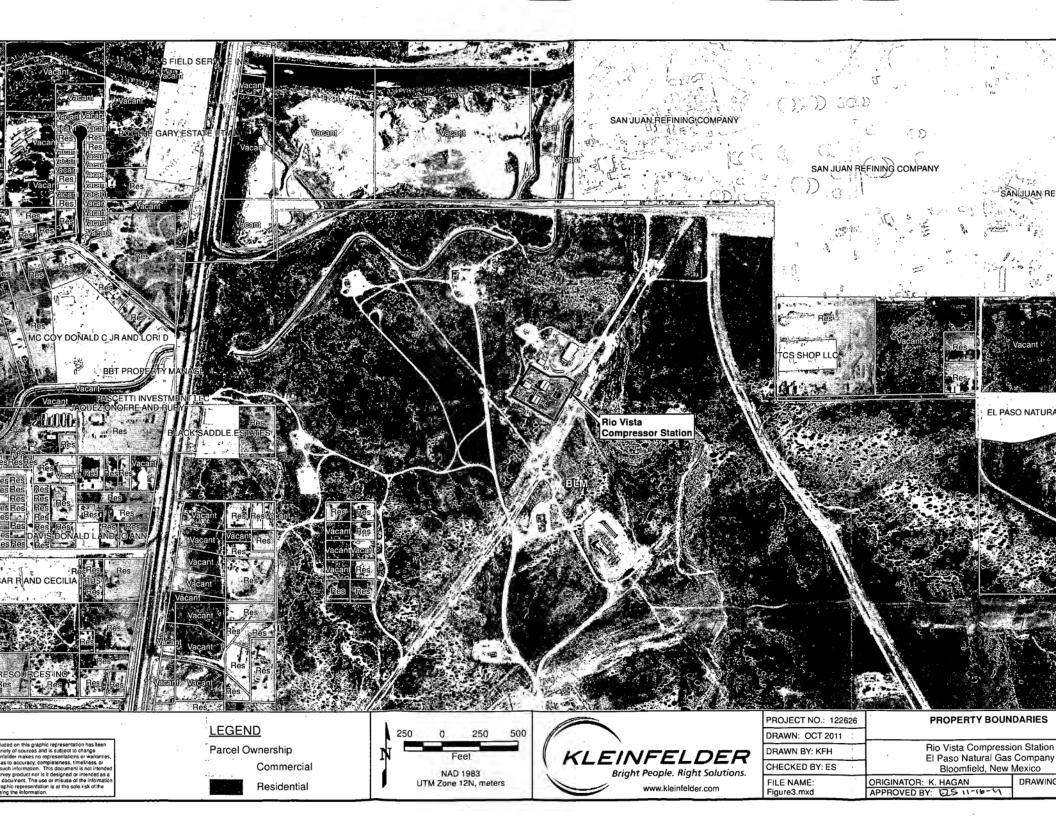
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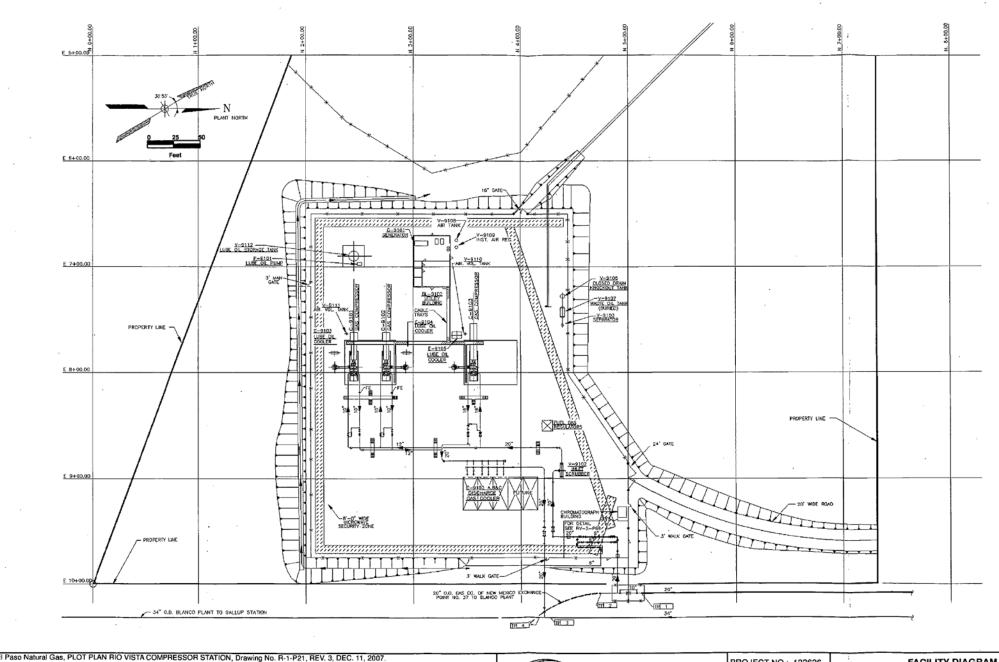
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AERIAL PHOTOGRAPH

Rio Vista Compression Station El Paso Natural Gas Company Bloomfield, New Mexico FIGURE

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PROJECT NO.: 122626 DRAWN: NOV 2011 DRAWN BY: KFH

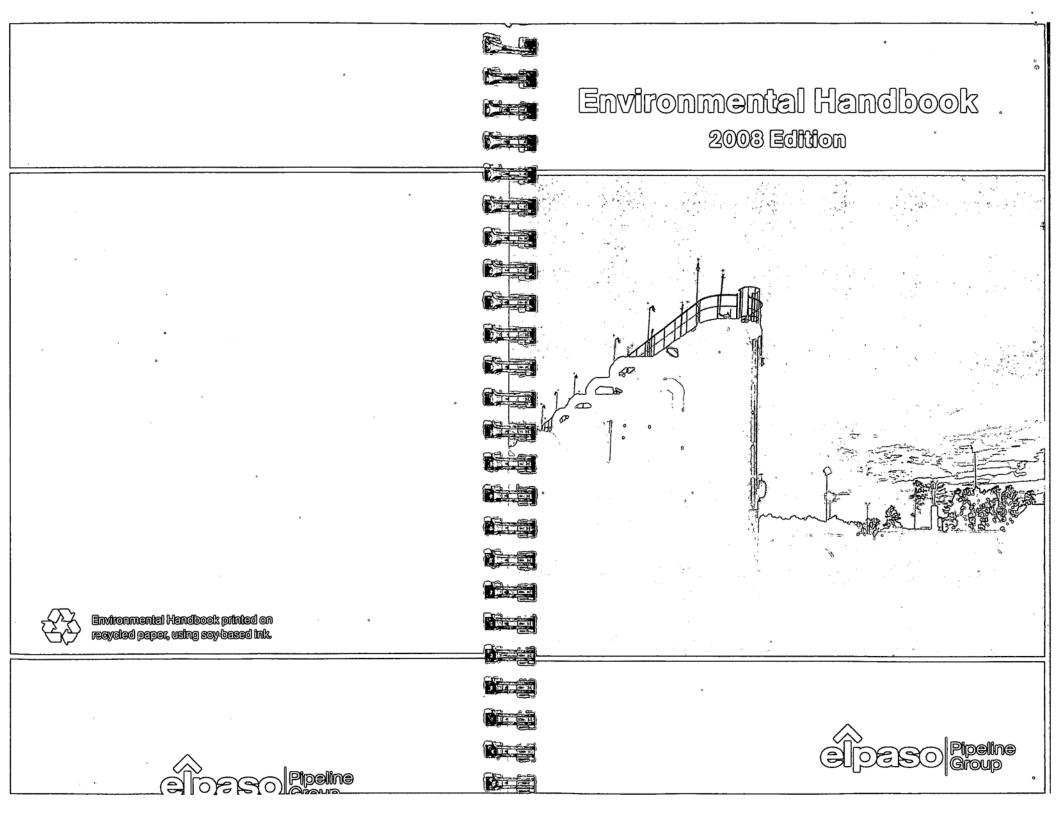
FACILITY DIAGRAM

Rio Vista Compression Station El Paso Natural Gas Company CHECKED BY: ES Bloomfield, New Mexico DRAWING CATEGO

FILE NAME: ORIGINATOR: K. HAGAN Figure4.mxd APPROVED BY: EUS 11-16-11

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APPENDIX B Excerpts from the 2008 EPNG Environmental Handbook



Weed and Pest Control Notes:

Spill and Release Control, Cleanup and Reporting

What is a Spill or Release?

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

Spill or Release Reporting Procedures

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

SPILLS

Spill and Release Control, Cleanup and Reporting

- A release that exceeds the reportable quantity (RQ) of any CERCLA hazardous substances in any 24-hour period which is not fully contained
- A release of a hazardous substance or hazardous waste which occurs during transportation
- A release of hazardous waste which contains a reportable quantity of a hazardous substance
- The Environmental Department is responsible for making initial notifications of RQ releases to applicable regulatory agencies and for handling any follow-up reporting requirements. Facility Management is responsible for verbal reports to agencies if the Environmental Department cannot be reached.
- Reportable Quantity spill events will be entered into the Company's Comprehensive Incident Report Tracking System (CIRTS) and updated as needed for ongoing cleanups.

Initial Spill or Release Response

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

Spill or Release Control and Cleanup

- To prevent pollutants from entering storm water runoff, routine housekeeping should include the removal or remediation of hydrocarbon impacted soil/gravel.
- Control and clean up the spill or release using procedures outlined in your facility's Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure, if applicable. The minimum response activities include:
 - Contact the Safety Department or refer to the MSDS for help in the selection and use of PPE.
 - Assemble the required response equipment including protective clothing and gear, heavy equipment (e.g., backhoe), absorbent material (e.g.,

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Spill and Release Control, Cleanup and Reporting

- cement, oil absorbent, pads, sand), and empty DOT- approved containers (e.g., drums).
- Contain the spill area using booms, soil berms, ditches, or similar means.
- Remove all absorbed material or liquid contained by diking and place in DOT- approved containers. Use pumps as needed.
- Use rags and cleansing agents as needed to clean spill response equipment.
- Decontaminate all reusable equipment and place decontamination wastes in containers.
- Label all containers properly.
- Transfer all containers to a temporary and secure storage area or the facility- designated waste storage area.
- Arrange with the Environmental Department for help in sampling spill wastes and their proper disposal.
- Replace used spill kit response equipment with new equipment.
- Keep a copy of any required report and all other documents associated with a spill or release including Federal, State and local forms in the facility SPCC or Spills & Releases files.

For Further Information

Refer to the following procedures in this Handbook:

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

	Notes:
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Aviso Público

Aplicación para la Renovación de Permiso de Descarga para la Estación de Compresor Rio Vista (GW-092) en el Condado de San Juan, Nuevo México

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

El Paso Natural Gas Company (EPNG), 8725 Alameda Park NE, Albuquerque NM 87113 ha presentado una solicitud de renovación para el plan de descarga previamente aprobado para la Estación de Compresor Rio Vista (GW-092) la cual está localizada en el SE-1/4 de el SW-1/4 de la Sección 27, Township 29 Norte, Range 11 Oeste, en el condado de San Juan, Nuevo México. Las Instalaciones están situadas al sur de la ciudad de Bloomfield, Nuevo México, a ½-milla al este the la Carretera 550, y a 0.3-millas al sur de la Calle 4990. La dirección de correo postal para la Estación de Compresor Rio Vista es El Paso Natural Gas, Apartado Postal (P.O. Box) 127, Bloomfield, NM 87413.

La Estación de Compresor Rio Vista es utilizada para comprimir gas natural con calidad de línea de distribución, y es parte de las líneas de distribución números 3218 y 1201 de EPNG. No se conoce de descargas intencionales o involuntarias que pudiesen afectar aguas subterráneas o superficiales en las instalaciones. Potenciales descargas en la estación se limitan aproximadamente a 8,000 galones de aceite nuevo para motor de turbina en un tanque de almacenamiento superficial y 1,000 galones de aceite jusado contenidos en un tanque de almacenamiento subterráneo. Ambos tanques están equipados con contenedores secundarios para evitar derrames, indicadores de nivel de líquido, y el tanque subterráneo esta equipado con alarmas de contenido secundario. Fluidos del proceso como agua y aceite usado asociados con las operaciones diarias son contenidas por un sistema de drenaje de la instalación, transfiriéndolos el tanque de almacenamiento subterráneo, y posteriormente reciclados o desechados por el Distrito de Conservación del Petróleo de Nuevo México (NMOCD) y/o instalaciones aprobadas.

El agua subterránea que probablemente será afectada primero por una fuga, descarga accidental, o por un derrame, está presente a una profundidad aproximada de 30 pies debajo de la superficie de tierra. Este sistema del acuífero tiene una concentración total de sólidos disueltos de 1,200 miligramos por litro o mayor.

El plan de descarga presentado especifica cómo será el buen manejo de agua producida y de agua de descarga, incluyendo su manejo, almacenaje, y disposición final de los mismos. El plan también incluye los procedimientos para el manejo apropiado de fugas, descargas accidentales, y derrames para la protección de las aguas del Estado de Nuevo México.

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

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

Teléfono: (505) 476-3492

El Departamento de Energía, Minerales y Recursos Naturales de Nuevo México aceptará comentarios y declaraciones de interés correspondientes a esta aplicación y proporcionará futuras notificaciones bajo petición para la Estación de Compresor Rio Vista.

Public Notice

Application for Discharge Permit Renewal for the Rio Vista Compressor Station (GW-092), San Juan County, New Mexico

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

El Paso Natural Gas Company (EPNG), 8725 Alameda Park NE, Albuquerque NM 87113 has submitted a renewal application for the previously approved discharge plan for the Rio Vista compressor station (GW-092) located at the SE 1/4 of the SW 1/4, Section 27, Township 29 North, Range 11 West, in San Juan County, New Mexico. The facility is located due south of the city of Bloomfield, NM, ½-mile east of highway 550, and 3/10th-mile south of road 4990. The mailing address for the Rio Vista compressor station is El Paso Natural Gas, P.O Box 127, Bloomfield, NM 87413.

The Rio Vista compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG Number 3218 and 1202 pipelines. No intentional or inadvertent discharges that could affect surface or groundwater are known at the facility. Potential discharges at the station are limited to approximately 8,000 gallons of new turbine engine oil from an aboveground storage tank and 1,000 gallons of used oil from an underground storage tank. Both of these tanks are equipped with secondary containment to prevent spills, liquid level indicators, and the underground storage tank is equipped with secondary containment alarms. Process fluids such as water and used oil associated with daily operations are contained by a facility drain system, transferred to the below ground storage tank, then recycled or disposed of by a NMOCD-approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill is present at a depth of 30 feet below the ground surface. This shallow aquifer system has a total dissolved solids concentration of 1,200 mg/L or greater.

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

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

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

Phone: (505) 476-3492

The New Mexico Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future notices for the Rio Vista compressor facility upon request.

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Certified Letter Number:

November 16, 2011

United States of America Bureau of Land Management 1235 La Plata Hwy Farmington, NM 87401

RE: Public Notice of Discharge Permit Renewal

To: Farmington Office of the Bureau of Land Management

In compliance with Subsection B of 20.6.2.3108 New Mexico Administrative Code, El Paso Natural Gas Company located at 8725 Alameda Park NE, Albuquerque NM 87113 would like to notify the property owner of a discharge permit renewal application for the Rio Vista Compressor Station (GW-92).

The renewal process, administered through the New Mexico Oil Conservation Division (NMOCD) was put in place to ensure that New Mexico's environment and groundwater are protected.

The NMOCD will accept any comments and statements of interest regarding this notice and create a facility-specific mailing list for persons who wish to receive future notices. Contact information for NMOCD is listed on the attached Public Notice.

Respectfully submitted;

Richard Duarte Senior Environmental Engineer El Paso Natural Gas Company 8725 Alameda Park NE Albuquerque NM 87113

Attachments: Public Notice (English version)

Public Notice (Spanish version)

permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

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

- **22.** Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.
- 23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

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

El Paso Natural Gas	
Company Name-print name above	
Richard Duarte	
Company Representative- print name	
Ruchard Brat	
Company Representative- Signature	-
Title Principal Eur. Rep.	_
Date: 6/24/08	



Bill Richardson

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



May 9, 2008

Mr. Richard Duarte El Paso Natural Gas Company 3801 Atrisco Blvd., NW Albuquerque, N.M. 87120

Re: Discharge Permit Renewal

Rio Vista Compressor Station (GW-092)

SE/4 SW/4 Section 27, Township 29 North, Range 11 West, NMPM,

San Juan County, New Mexico,

Dear Mr. Duarte:

Pursuant to the Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the El Paso Natural Gas Company (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.

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

If you have any questions, please contact 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-2

xc: OCD District Office

ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for a compressor station with a horsepower rating of greater than 1001 horse power is \$1700.00. Please submit this amount along with the signed certification item 23 of this to the OCD. 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 January 17, 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 February 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 Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.
- **B.** Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.
- 7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.
- 8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.
- 9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.
- 10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

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

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

- **B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.
- C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.
- **D.** The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

- A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.
- **B.** The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.
- 13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that

inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

- 14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.
- 15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.
- 16. OCD Inspections: The OCD inspected the facility on April 21, 2008. The OCD has determined this facility to be in good standing condition, adhering to all conditions within its Discharge Permit, except for Condition 12. The OCD is still waiting on EPNG's underground pipeline hydrostatic pressure testing results conducted in August 2007. EPNG has 30 days to submit these results. EPNG needs to notify OCD 72 hours prior to all testing. Note: This discharge plan application was submitted past its renewal date. El Paso Natural Gas will be served penalties if this occurs during its next renewal process.
- 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. <u>An unauthorized discharge is a violation of this permit.</u>
- 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."

Company Name-print name above
Company Representative- print name
Company Representative- Signature
Title
Date:

Lowe, Leonard, EMNRD

From:

Lowe, Leonard, EMNRD

Sent:

Thursday, March 06, 2008 11:09 AM

To:

Ricardo.Duarte@ElPaso.com

Cc:

'Marco Wikstrom'; Craig Corey

Subject:

GW-092, Administratively Complete

Attachments: GW-092, Admin Complete Letter.pdf; GW-092, Draft Permit.pdf; GW-092 OCD PN.pdf;

Renewal WQCC PN Rules.pdf; Renewal PN Flow Chart.pdf

Mr Richard Duarte,

The submitted Discharge Plan renewal application for the El Paso Natural Gas Company, Rio Vista Compressor Station has been determined to be Administratively Complete.

Attached are the Administratively Complete Letter, Draft Permit and OCD version of the public notice for your records.

I have also attached the WQCC public notice rules and the renewal application process for your interest.

Mr. Marco Wikstrom and I are working on the applicant public notice that has yet to be approved.

If you have any questions please feel free to contact me.

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/

"If there is no such thing as a stupid question, what kind of questions do stupid people ask?"



Bill Richardson

Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



March, 6th, 2008

Mr. Richard Duarte

Re: Discharge Plan Renewal Permit GW-092

El Paso Natural Gas Company Rio Vista Compressor Station San Juan County, New Mexico

Dear Mr. Richard Duarte:

The New Mexico Oil Conservation Division (NMOCD) has received El Paso Natural Gas Company's request and initial fee, dated February 15, 2008, to renew GW-092 for the El Paso Natural Gas Company's Rio Vista Compressor Station located in the SE/4 SW/4 of Section 27, Township 29 North, Range 11 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. 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 6th, 2008

Mr. Richard Duarte El Paso Natural Gas Company 3801 Atrisco Blvd., NW Albuquerque, N.M. 87120

Re: DRAFT Discharge Permit Renewal

Rio Vista Compressor Station (GW-092)

SE/4 SW/4 Section 27, Township 29 North, Range 11 West, NMPM,

San Juan County, New Mexico,

Dear Mr. Duarte:

Pursuant to the Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the El Paso Natural Gas Company (owner/operator) for the above referenced site contingent upon the conditions specified in the enclosed Attachment to the Discharge Permit. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.

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

If you have any questions, please contact 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

LWP/lrl

Attachments-1

xc: OCD District Office



ATTACHMENT- DISCHARGE PERMIT APPROVAL CONDITIONS

- 1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (see WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for a compressor station with a horsepower rating zero to 1000 horsepower is \$400.00. Please submit this amount along with the signed certification item 23 of this document after the final permit is issued in approximately 45 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 January 17, 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 February 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 Rule 712 Waste: Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.
- **B.** Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.
- 7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.
- 8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.
- 9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.
- 10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

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

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

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

- **B.** All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.
- C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.
- D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

- A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.
- B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.
- 13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking

water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only, must be permitted by the New Mexico Environment Department (NMED).

- 14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.
- 15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.
- **16. OCD Inspections:** The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections.
- 17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.
- 18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An</u> 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."

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-092) El Paso Natural Gas Company's Richard Duarte, Senior Environmental Engineer,3801 Atrisco Blvd. NW, Albuquerque, NM 87120 has submitted a renewal discharge plan application for their Rio Vista compressor station, located in the SE/4 SW/4 of Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The facility is located south of Bloomfield, N.M., approximately 0.38 miles south of the San Juan River and ½ mile east of highway 550. The facility provides compression of pipeline quality natural gas via the San Juan cross-over pipeline. Approximately 8000 gallons of used lube oil, 1000 gallons of oil/waste water and 400 gallons of new oil will be stored onsite in above storage tanks (AST). These containers shall be placed upon cemented, bermed areas. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 30 feet, with a total dissolved solids concentration of approximately 1,200 – 4,775 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 espan®l, 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 6^{th} day of March 2008.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

SEAL

Mark Fesmire, Director

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No dated
or cash received on in the amount of \$ 1800 00
from EL PASO MATURA GAS CO.
for GW-92
Submitted by: Aurence Parero Date: 2/19/08
Submitted to ASD by: Jaurena Power Date: 2/19/08
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



February 15, 2008 File No. 83253.2 – ALB08RP001

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

Discharge Application and Discharge Plan for Permit Renewal; El Paso Natural Gas Company; Rio Vista Compressor Station in San Juan County (GW # 092)

Dear Mr. Lowe:

Kleinfelder West, Inc. (Kleinfelder) is pleased to submit for your review the attached discharge plan for discharge permit renewal. The attached information is being submitted on behalf of the El Paso Natural Gas Company (EPNG).

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

The following is attached:

- · Discharge Plan Application;
- Discharge Plan;
- Public Notice text in both Spanish and English; and
- Check for \$1,800.00 (check number 7552522) made out to the New Mexico Environment Department Water Quality Management Fund to cover the filing fee and discharge permit.

Should you have any questions, please feel free to contact Marco Wikstrom or Craig Corey at (505) 344-7373.

Sincerely,

KLEINFELDER WEST, INC.

Marco Wikstrom Staff Geologist Reviewed by:

Barbara Everett P. Program Manager 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 Submit Original Plus 1 Copy to Santa Fe 1 Copy to Appropriate District Office

Revised June 10, 2003

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 ☐ Renew	val Modification
1. Type: Compressor Station Rio Vista Con	upressor Station GW-092
2. Operator: El Paso Natural Gas	
Address: 3801 Atrisco Blvd. NW, Albuquerque, NM 87	120
Contact Person: Richard Duarte	Phone: (505) 831-7763
	27 Township 29 North Range 11 West hic map showing exact location.
4. Attach the name, telephone number and address of the lan	ndowner of the facility site.
 Attach the description of the facility with a diagram indic Attached 	cating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the Attached	facility.
	aste solids. Average quality and daily volume of waste water
Attach a description of current liquid and solid waste coll Attached	lection/treatment/disposal procedures.
Attached Attach a description of proposed modifications to existing Attached	g collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensu Attached	ure permit compliance.
11. Attach a contingency plan for reporting and clean-up of s Attached	spills or releases.
12. Attach geological/hydrological information for the facilit	ty. Depth to and quality of ground water must be included.
Attached 13. Attach a facility closure plan, and other information as is rules, regulations and/or orders. Attached	
14. CERTIFICATIONI hereby certify that the information best of my knowledge and belief.	submitted with this application is true and correct to the
Name: Richard Duarte	Title: Senior Environmental Engineer
Signature: Richard Brat	Date: 2/15/08
F-mail Address: Ricardo Duarte@FIPaso.com	

Item.1

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

The El Paso Natural Gas Company (EPNG) Rio Vista Compressor Station (Rio Vista) is utilized for compression of pipeline quality natural gas, and is part of the EPNG Number 3218 and 1202 pipelines (Figure 1). This pumping station is part of a network that moves natural gas from northwestern New Mexico to end users in the southwestern United States. The amount of natural gas transported varies depending on customer demand. Compression is required to move natural gas through the pipeline for delivery to EPNG customers. This is an automated site which is inspected by EPNG personnel at least once per week while in operation.

The Rio Vista Station consists of two Solar Saturn 10 T1200 gas turbine compressors rated at 885 International Standards Organization (ISO) horsepower (hp) and one Solar Centaur 50 T5502 gas turbine compressor, rated at 3,775 ISO hp and their associated equipment.

EPNG also operates a 250 kilowatt (kW) generator for auxiliary electrical power on an as-needed basis. This generator is driven by a Caterpillar Model 3408, 338 hp reciprocating natural gas powered engine. The Station's primary electrical power is generated when the turbines are operating via a turbine-powered generator and purchased-power is used otherwise. The auxiliary generator is only used during regional electrical power failures.

Total site combined compressor rated horsepower is 5,545 hp. Combined with the auxiliary generator it is 5,883 hp.

Item 2

Name of operator or legally responsible party and local representative.

Thomas P. Morgan, Vice President Legally Responsible Party

El Paso Natural Gas Company

2 North Nevada Ave.

Colorado Springs, Colorado 80903

Local Representative Richard Duarte

El Paso Natural Gas Company

3801 Atrisco Blvd. NW Albuquerque, NM 87120

(505) 831-7763

Or

Sandra D. Miller Local Representative (Alt.)

2 North Nevada Ave.

Colorado Springs, Colorado 80903

El Paso, TX 79978

83253.2-ALB08RP001 02/12/08 Page 1 of 12

Operator

El Paso Natural Gas Company

Physical Address

#81 County Road 4990 Bloomfield, NM 87413

1.5 miles south of Broadway Ave. in Bloomfield, NM, 4/10th mile east of Highway 550 on County Road

4990

Mailing Address

El Paso Natural Gas Company

P. O. 127

Bloomfield, NM 87413

(505) 632-6001, Russell S. Pyeatt, Manager 1-800-334-8047 (24 hour emergency notification)

item 3

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

San Juan County, New Mexico SE/4 of the SW/4 of Section 27, Township 29 North, Range 11 West

Latitude: Longitude: 36 Degrees 41 Minutes 37 Seconds North 107 Degrees 58 Minutes 46 Seconds West

A topographic map and aerial photograph are attached in Appendix A Figures (1, 2, & 3).

Item 4

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

United States of America Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401 (505) 599-8900

Item 5

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

To accomplish natural gas compression, the Rio Vista Station utilizes the following:

- Two Solar Saturn 10 T1200 gas turbine compressor units rated at 885 hp (ISO) each;
- One Solar Centaur 50 T5502 turbine gas turbine compressor unit rated at 3,775 hp (ISO);

83253.2-ALB08RP001

02/12/08

- One inlet filter for the natural gas stream (scrubber) for each compressor;
- One fuel gas filter for each turbine unit;
- One auxiliary generator driven by a Caterpillar Model 3408, 338-hp reciprocating natural gas powered engine;
- One 8,000-gallon above ground storage tank (AST) used for lube oil storage;
- One 1,000-gallon oil/wastewater underground storage tank (UST) (V-9107); and
- Two 200-gallon oil day tanks.

Gas Compressors

The buildings that house the turbines have been installed in such a manner to ensure containment of leaks, spills and wash down water. Any spill or wash down water from cleaning operations are contained and discharged into the 1,000-gallon UST (V-9107) via the building sumps.

Natural gas that is compressed using centrifugal compressors does not produce wastewater. The turbines and ancillary equipment are washed on an as-needed basis and any used oil, wash down water, or biodegradable detergents such as Tide or dish soap from cleaning operations will be contained and discharged into the 1,000-gallon UST (V-9107), then removed from the site by an oil recycler. No solvents are used or stored at the Station.

Used oil is generated from the turbines and auxiliary generator at a rate of approximately 40 gallons (or less) per 8,000 hours of operation (0.12 gallons per day). This oil is drained into the above-mentioned 1,000-gallon UST. EPNG currently has an oil recycling contract with Mesa Oil (Farmington service office) to recycle the oil/wash water mixtures.

Natural Gas Scrubbers (inlet and fuel)

All inlet gas is passed through suction scrubbers on the upstream side of each of the compressors. Also, fuel gas filters remove minimal liquids and other foreign matter from the natural gas before entering the gas turbines or auxiliary generator. Any waste materials generated by the suction scrubbers and fuel gas filters are discharged into the 1,000-gallon UST.

Filters from this operation are replaced as needed. The filters are characterized as prescribed by 20 NMAC 3.1, Subpart 14, Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas industry.

If any filter is characterized as NORM-regulated it would be stored in properly labeled. UN/DOT-approved 55-gallon metal drums for disposal at an approved facility. To date, no filters have been characterized as NORM regulated at the Rio Vista Station.

Scrubber and fuel gas filters determined to be non-NORM regulated are placed in plastic bags and disposed of as solid waste.

Auxiliary Generator

The Rio Vista Station contains a 250 kilowatt (kW) generator for auxiliary electrical power which is driven by a Caterpillar Model 3412, 338 hp natural gas fueled reciprocating engine. This generator is only used when electrical power is not available from both the compressor generator and utility power. Oil consumption for this generator is very low and is limited to periodic oil changes. Oil for the generator is manually serviced. Waste oil from the generator is placed into the 1,000-gallon waste oil tank.

8,000-Gallon Lube Oil Above Ground Storage Tank (AST)

An 8,000-gallon AST (V-9112) is used to store lube-oil on-site for the three gas turbines. This tank is filled by lube oil contractors using tank trucks. When tank filling is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tank. EPNG also requires that the tank truck operator be in direct radio or telephone contact with the station operator. Secondary containment is composed of a concrete-lined berm designed to contain spills.

Day Tanks

Two AST day tanks are used to automatically replenish gas turbine compressor oil levels with lubricating oil as volume diminishes with use. One tank is used to replenish the Centaur 50 T5502 gas turbine and the other tank is used to replenish both Saturn 10 T1200 gas turbines. The day tanks are contained within the compressor buildings which house floor sumps that drain into the 1,000-gallon waste oil UST (V-9107). Secondary containment is provided by the floor sumps.

Underground Drain Lines

Underground drain lines are hydrostatically tested every five years during the annual station shutdown. Duration of hydrostatic testing is at least 30 minutes and piping is subjected to at least three pounds per square inch (PSI) above operating pressure during the test. The last hydrostatic test was accomplished at the Rio Vista Station in August 2007. EPNG will provide the New Mexico Oil Conservation Division (NMOCD) with a notice and results of the test findings.

1,000-gallon Underground Storage Tank (UST)

The 1,000-gallon UST (V-9107) receives wash down water, used oil, and biodegradable detergents from the compressor building drains, suction scrubber, and the fuel gas filter. This is a double-walled steel tank that is equipped with a liquid level indicator and automated leak detection equipment. It is hydrostatically tested annually. The last hydrostatic test on this tank was accomplished in August 2007. In the event of a leak a red light illuminates atop the tank and the station computer receives a visual alert. It is emptied as needed by waste oil recycling contractors. When tank emptying is accomplished drip pans are placed under all connection points between the tank truck and lube oil tank. EPNG also requires that the tank truck operator be in direct radio or telephone contact with the station operator.

Storm Water and Other Precipitation

Located in an alluvial region on a slight ridge, the Rio Vista Station has good natural drainage. Any storm water from the compressor area is collected in a gravel-lined ditch that drains onto the rangeland. Storm water does not commingle with process fluids.

Wash Down Water

As necessary, Rio Vista Station utilizes high-pressure water-jets or high-pressure steam to remove solid particulate matter such as dust, dirt, weeds, etc. from fin-fans, process vessels or piping (not contained within a building). No detergents or cleaning solutions are used for this procedure and no process fluids intermingle with this water. This wash water is not contained.

Additional Information

A diagram of the facility (Figure 4) shows the location of fences, property boundaries, pits, berms, dikes, tanks, and other pertinent information.

No significant changes have been made to the facility's effluent sources or process fluids since the last discharge permit was submitted.

Item 6

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

Container	ID	Material	Form	Volume	Location	Containment
Steel AST	V-9112	Turbine lube oil	Liquid	8,000 gallons	South of Control Building	Concrete containment
Steel UST	V-9107	Used oil and water	Liquid	1,000 gallons	Northeast of Control Building	Double wall construction and automated alert system
Steel AST		Turbine	Liquid	200	Compressor	Compressor
Day Tank		lube oil		gallons	building	building sump
Steel AST		Turbine	Liquid	200	Compressor	Compressor
Day Tank		lube oil		gallons	building	building sump
Steel paint locker		Very small quantities of paints, lubricants, detergents, and other cleaning supplies	Liquids	Less than 5 gallons	Inside compressor building	Paint locker sump

Item 7

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

Source	Type of Waste	Volume	Quality
Compressor building sumps, scrubber blowdown, and engine drains	Used engine oil, wash down water, detergents	3 barrels per year (approximately 0.35 gallons per day)	Used lube oil, water, and water with detergents
Oil and scrubber filters, fuel gas filters, domestic trash	Solid waste	2 cubic yards per year; about a cubic foot per week or 0.14 cubic feet per day	Metal and paper filters, domestic trash such as paper, plastic wrappers, food waste, etc.

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

Type of Effluent	Collection	Storage	Hauler	Disposition
Used oil	Drained to the building sump, and/or immediately to the 1,000 gallon UST	Steel 1,000 gallon UST (V- 9107)	Removed upon request by Mesa Oil	Recycled by the Mesa Oil Hydrocarbon Recovery Facility
Wash down water	Drained to the building sump, then immediately to the 1,000 gallon UST	Steel 1,000 gallon UST (V- 9107)	Removed upon request by Mesa Oil	Recycled by the Mesa Oil Hydrocarbon Recovery Facility
Wash down water with detergents	Drained to the building sump, then immediately to the 1,000 gallon UST	Steel 1,000 gallon UST (V- 9107)	Removed upon request by Mesa Environmental	Recycled by the Mesa Oil Hydrocarbon Recovery Facility
Oil and scrubber filters, fuel gas filters, domestic trash	Oil filters hot- drained to 1,000-gallon UST for 12 hours and bagged, scrubber filters bagged, domestic trash collected in waste can	Dumpster	Removed once a week by Waste Management of Farmington	Approved Landfill
Batteries	Maintained and disposed of by contractor	No storage onsite, batteries are immediately replaced by contractor	NGH Power Systems	Battery cores recycled by NGH

Non-Exempt, Non-Hazardous Waste

Used oil is collected as needed from the used oil storage tank and removed from the site by Mesa Oil or Safety-Kleen. When tank emptying is accomplished, drip pans are placed under all connection points between the tank truck and tank. EPNG also requires that the tank truck operator be in direct radio or telephone contact with the station operator. Disposal records are maintained at the EPNG Bloomfield office (see address under Item 2).

New lube oil is brought to the site by vendors as needed and stored in the 8,000-gallon lube oil storage tank (V-9112). When lube oil tank filling is accomplished, EPNG requires the same procedures as when emptying the waste oil tank (outlined in the above paragraph).

Any wash down water from the turbine or compressor inside the building is collected within the building sumps and discharged into the 1,000-gallon used oil tank (V-9107)

Hazardous Waste

No RCRA-listed hazardous wastes are expected to be generated at the Station other than lead-acid wet cell batteries. When the auxiliary generator starting batteries require replacement the old battery cores are exchanged at a local auto parts retailer. Inverter batteries that are used for the uninterrupted power system (UPS) are maintained, replaced, and recycled as needed by NGH Power Systems (Albuquerque). No batteries are stored onsite that are not in use.

Other Solid Waste

Solid waste is disposed of via a dumpster that is emptied by Waste Management of Farmington once per week. Used oil filters are hot-drained into the 1,000-gallon used oil tank (V-9107) for 12 hours and placed into plastic bags before disposal in the dumpster. Used scrubber filters are placed into plastic bags before disposal in the dumpster. These non-regulated solid wastes are disposed of by Waste Management.

Names, Addresses, and Phone Numbers of OCD Transporters/Disposal Facilities
Waste Management of Four Corners (solid waste)
101 Spruce St.
Farmington, NM
(505) 327-6284

Safety Kleen Systems (waste oil recycling) 4210 Hawkins Rd # A Farmington, NM 87401 (505) 327-9070

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Mesa Oil, Inc. (waste oil recycling) 20 Lucero Rd. Belen, NM 87002-7053 (505) 861-2691

NGH Power Systems (lead-acid batteries) 3500 Richmond Dr. NE, Suite B Albuquerque, NM 87107 (505) 345-0523

Item 9

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

No modifications to the Rio Vista Station are necessary to meet NMOCD requirements. EPNG will notify NMOCD of any planned facility expansion, process modification, or production increase that could result in a significant modification in discharges from this facility.

Item 10

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

The Rio Vista Station has fully automated equipment and controls, and is designed to minimize on-site chemicals. Liquids stored on-site are placed within secondary containment that will prevent or mitigate any unplanned releases into the environment. When in operation, this site is visually inspected by EPNG personnel a minimum of once per week and underground piping is hydrostatically tested every five years. The 1,000 gallon UST is hydrostatically tested annually and is equipped with a liquid level indicator and automated leak detection equipment that alerts the operator if a leak were to occur. If the station is not in operation a visual inspection is accomplished as necessary.

Verbal and written notifications of leaks or spills are made to the NMOCD according to NMOCD Rule 116. Any release of a chemicals with a reportable quantity regulated by Title 40 CFR Part 300 through 372 are reported to the National Response Center, and when applicable, to the NMED.

Item 11

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

EPNG will handle all spills and leaks immediately as required by EPNG procedures (Appendix B) and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and Water Quality Control Commission (WQCC) regulations, WQCC section 1203.

The facility has a contingency plan in-place and posted onsite (Appendix B). The plan provides guidance for, and identifies locations where leaks and spills may occur. Visual monitoring is conducted on a regular basis (at least weekly when operating) of above ground components, including all sumps, containment berms, and ASTs. As stated above, hydrostatic testing of buried components is conducted at least every five years, and the 1,000 gallon UST is hydrostatically tested annually.

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

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

Large spills are contained by the secondary containment system consisting of berms, sumps, and the waste oil tank. Where applicable, liquids and solid waste are segregated, characterized and managed accordingly.

Procedures for spill response and reporting are detailed in Appendix B, titled, "Spill and Release Control, Cleanup, and Reporting" in EPNG's Environmental Handbook. In the event of a spill, personnel are trained to notify EPNG's Environmental Department. The EPNG Environmental Department in turn will make the necessary notifications to regulatory agencies. A copy of the EPNG Environmental Handbook is located at the Rio Vista site and is readily available to site personnel.

The EPNG Environmental Compliance Manual is located on the EPNG Environmental web page. It contains spill reporting thresholds for fluids typically found at EPNG compressor stations. The manual also contains a decision tree to aid in proper reporting procedures, including notification guidelines for reporting to the NMOCD District Field Office, and if appropriate, procedures for reporting to the NMOCD Director.

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

Any waste generated will be characterized and profiled in accordance with NMAC 20.9.8.11 Approved landfill requirements or solid-waste facility requirements as outlined in NMAC 20.9.8.15 and Waste Management disposal requirements.

Item 12

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

Site Geology and Geomorphology

The Rio Vista Station is located on a bluff 1,800 feet south of, and at an elevation 120 feet above the San Juan River in the San Juan River Basin (Figure 1). Elevation of the site is 5,540 feet above sea level. The Hammond diversion ditch is located on this bluff and is approximately 600 feet north, and 20 feet lower in elevation than the compressor station. Based on geotechnical site assessment, the station is built upon an alluvium cover which drapes the Nacimiento Formation. Nacimeinto bedrock is encountered between 12 and 28 feet below the ground surface.

The alluvium on this site consists of fine to coarse sand, clays, and varying combinations of the two. The soils tend to be weak, compressible, and moderately permeable. These soils, ranging from 2 to 14 feet in depth, are fine to medium grained and generally soft at the surface, becoming moderately consolidated with depth.

Slope of the terrain in the vicinity of the Rio Vista station is approximately 140 feet per mile (or 1.5 degrees), dipping north toward the San Juan River.

Site Hydrogeology and Groundwater Quality

Aquifers in the area occur predominantly in interbedded sandstone and shale. The major aquifer underlying the station is in the Upper San Juan Watershed. This watershed is part of the San Juan Hydrologic Unit and is in an area of low precipitation and high evaporation.

Average depth to water in the vicinity of the station is 30 feet below ground surface (New Mexico Office of the State Engineer, Water Administration Technical Engineering Resource System (WATERS) Database). Potentiometric surface and groundwater flow is assumed to dip north toward the San Juan River, as groundwater surface elevation closer to the river is lower. This is evidenced by well log data from the New Mexico Office of the State Engineer, WATERS Database.

Groundwater is highly mineralized and total dissolved solids (TDS) typically exceed 1,200 milligrams per liter (mg/L). TDS values within a few miles of the site range from 2,250 mg/L to 4,775 mg/L (USGS Water Quality Samples for the Nation Database; wells located at N 36° 01' 52", W 107° 54' 14" and N 35° 00' 53", W 107° 29' 01" respectively). One driller that installed a well within a 1/4-mile of the Station (well number SJ-2148) reported in the well log that, "the water taste(d) very bitter" (no water quality measurements were recorded for this well).

Domestic Wells

According to the New Mexico Office of the State Engineer WATERS database, there have been 40 domestic wells installed within a one mile radius of the Rio Vista Station.

Twenty-six of those wells are located in or near the town of Bloomfield on the opposite side of the San Juan River. Three domestic wells have the potential of being affected by a release from the Rio Vista Station due to being on the same side of the San Juan River. The three wells that could potentially be affected are numbered SJ-1804, SJ-2148, and SJ-700. It is unknown how many of the wells are still active.

Surface Water Hydrology and Flooding Potential

Flooding of the Rio Vista Station has never been recorded. The most severe flood in the area was recorded in Farmington on September 6, 1909, when the San Juan River crested at 12.30 feet, a flood stage more than 100 feet below the elevation of the Rio Vista station (from the National Oceanic and Atmospheric Administration (NOAA) Advanced Hydrologic Prediction Service). The Rio Vista Station is sited on a slight ridge that is well drained. Flooding at the site is unlikely, and the Station is not located on a floodplain.

Annual precipitation in the vicinity of the Station averages 8.5 inches per year. The 10year, 25-year, 50-year and 100-year, 24-hour storm rainfall amounts were estimated to be 1.7, 2.0, 2.4 and 2.6 inches, respectively. Rainfall frequency data were obtained from the NOAA Atlas 2 Precipitation - Frequency Atlas of the Western United States Volume IV. New Mexico.

Additional Information

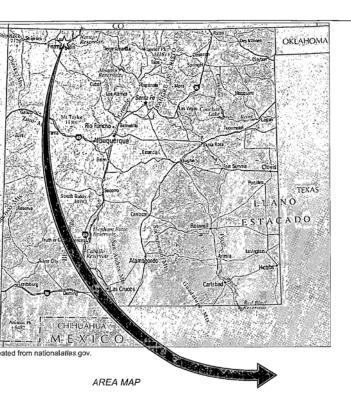
The Rio Vista Station does not contain any active unlined surface impoundments, pits, leach fields, injection wells, drying beds, solids disposal, or land farms.

Item 13

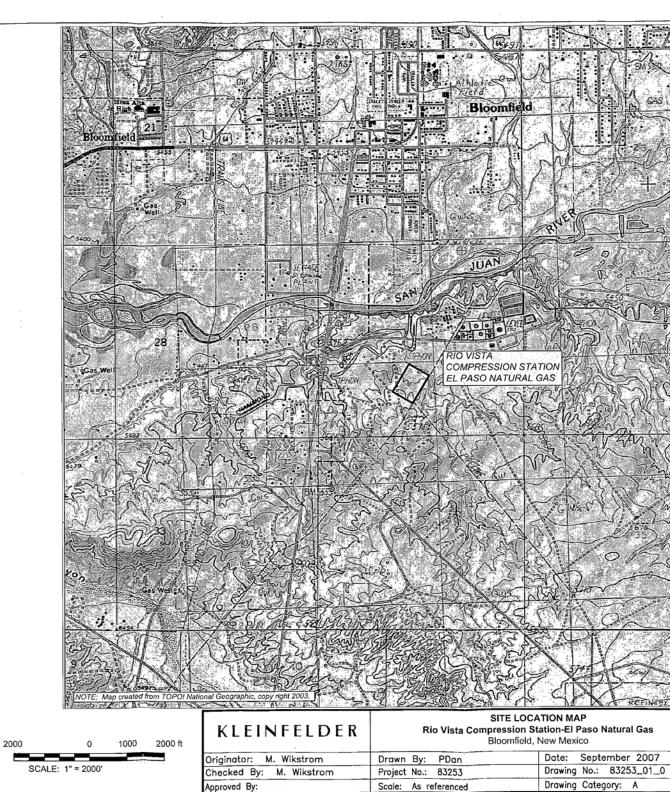
Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

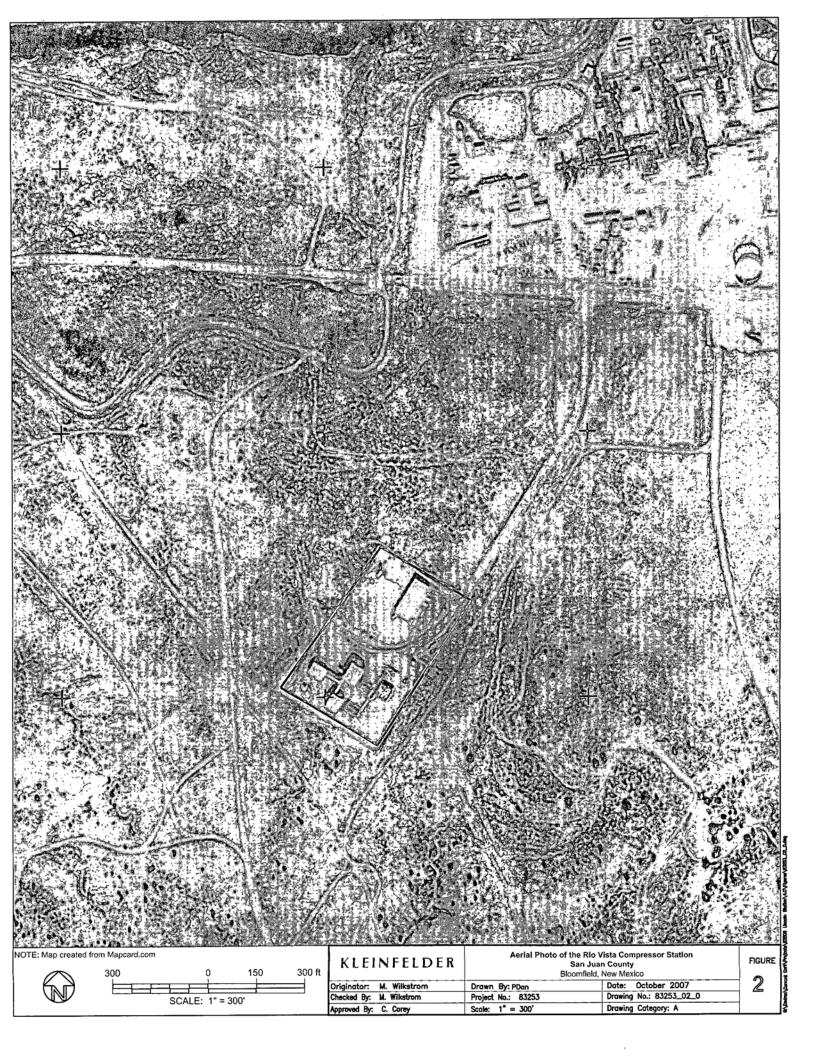
All reasonable and necessary measures will be taken to comply with 20 New Mexico Administrative Code (NMAC) 6.2.3103, Water Quality Standards. Should EPNG choose to permanently close the facility or close the facility for a period exceeding six months, closure measures will include removal, or closure in place, of all underground piping and equipment. All tanks will be emptied. All potential sources of toxic pollutants will be inspected and no potentially toxic materials or effluents will remain on site. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will occur and clean-up activities will commence. Post closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

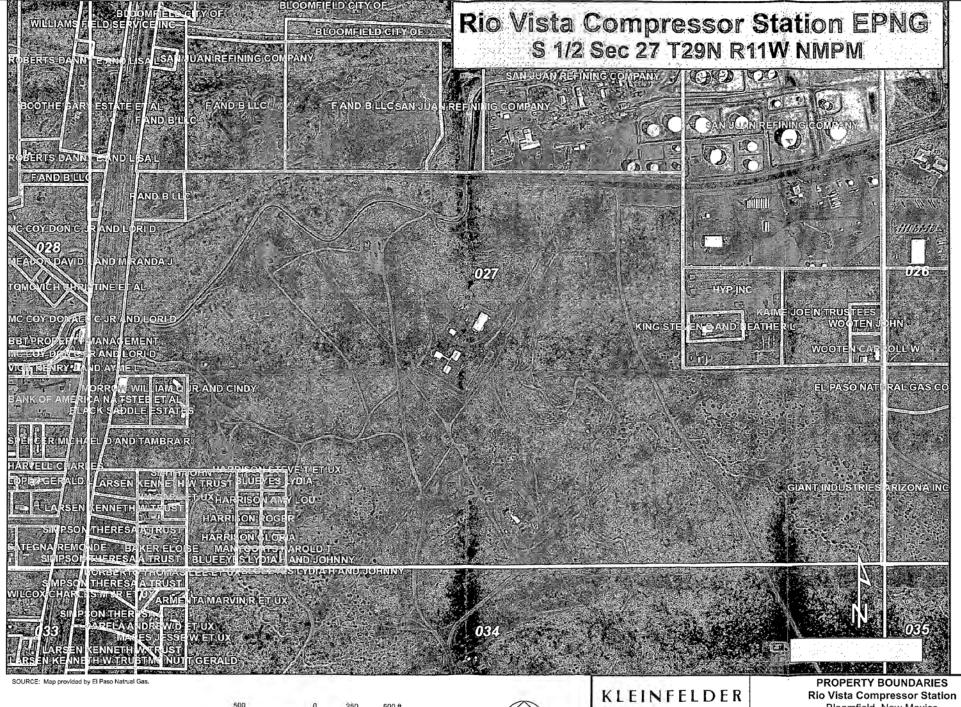
Appendix A Map, Aerial Photographs, and Drawing

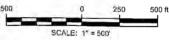


Site Location







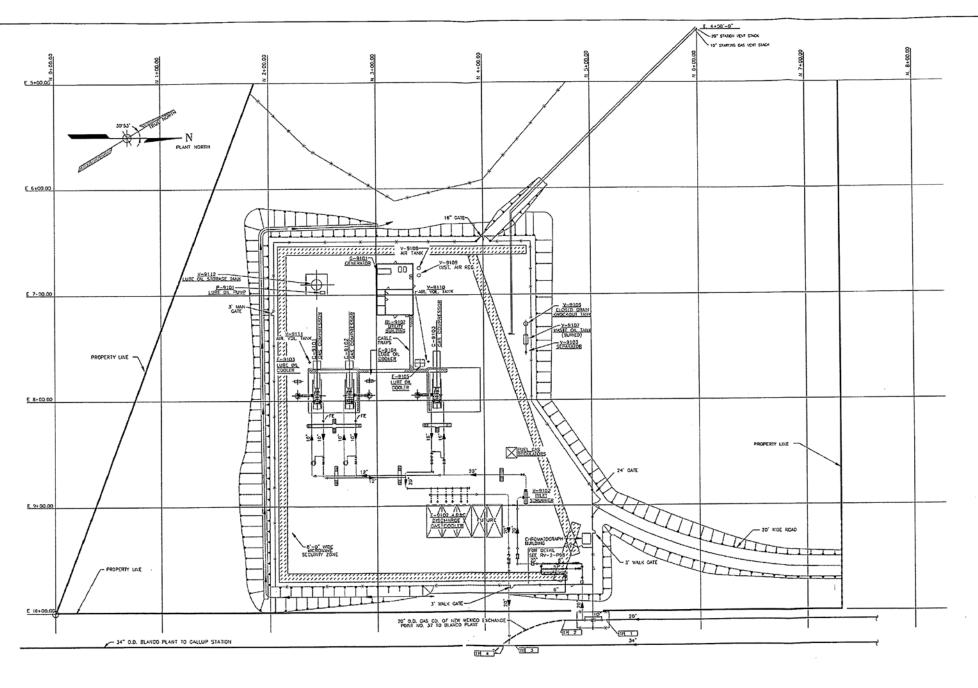


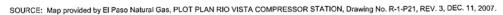


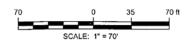
Bloomfield, New Mexico

Originator: M. Wikstrom Approved By: C. Corey

Drawn By: PDan	Date: January 2008
Project No.: 83253	Drawing No.: 83253_03
Scale: 1" = 500'	Drawing Category: A







KLEINFELDER	RIO VISTA COMPRESSOR STATION Site Diagram Bloomfield, New Mexico		
Originator: M. Wikstrom	Drawn By: PDan	Date: February 2008	
5 0	Project No.: 83253	Drawing No.: 83253_04_0	
Approved By: E. Shannon	Scale: 1" = 70'	Drawing Category: A	

Appendix B Spill and Release Control, Cleanup, and Reporting

EPNG Spill and Release Control, Cleanup and Reporting

What is a Spill or Release?

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

Spill or Release Reporting Procedures

- Begin spill response and reporting activities upon finding a spill or release to the environment. Notify Facility Management and the Environmental Department as soon as practicable.
- Report any spill or release of the following materials regardless of location (on property or off-property) to the Environmental Department:
 - · oil or petroleum products
 - hazardous substances or hazardous wastes
 - · chemicals
 - unplanned natural gas (flaring or venting) if required by permit or State regulation
 - · asbestos-containing materials
 - smoke or excessive opacity
- 3. Be prepared to give the following information to the Environmental Department:
 - · the identity of the material released;
 - estimate of the quantity released;
 - the location, time, and date the release occurred or was discovered;
 - description of how the release occurred (e.g., equipment failure);
 - the extent of injuries, if any;
 - possible hazards to human health, or the environment outside the facility;
 - immediate action taken in response to the release;

- names and numbers of the persons to be contacted for further information.
- 4. If applicable, follow any additional spill notification procedures in your facility Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure.
- 5. The following releases require immediate (within 1 hour of discovery) notification to the National Response Center (NRC):
 - any petroleum product released into streams, rivers, lakes or dry washes.
 - a release that exceeds the reportable quantity (RQ) of any CERCLA hazardous substances in any 24-hour period which is not fully contained
 - a release of a hazardous substance or hazardous waste which occurs during transportation
 - a release of hazardous waste which contains a reportable quantity of a hazardous substance
- 6. The Environmental Department is responsible for making initial notifications of RQ releases to applicable regulatory agencies and for handling any follow-up reporting requirements. The Environmental Department will input RQ spill events into the Company's Comprehensive Incident Report Tracking System (CIRTS).

Initial Spill or Release Response

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

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

For Further Information
Refer to the following procedures in this Handbook:

- · Air Permits
- Asbestos
- · Waste Characterization

Emergency Operations Procedure (EOP) (outside this handbook)
 Facility Spill Prevention, Control and Countermeasures (SPCC) plan (outside this handbook)

Public notices to be published in the Farmington Daily Times

Aviso Público

Uso para la renovación para la estación del compresor de Rio Vista, condado de San Juan, New México del permiso de la descarga

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

El Paso Natural Gas Company (EPNG), 3801 Atrisco Blvd. NW, Albuquerque NM 87102 ha sometido un uso de la renovación para el plan previamente aprobado de la descarga para la estación situada en el 1/4 sureste, sudoeste 1/4, sección 27, municipio 29 del compresor de Rio Vista del norte, se extiende 11 del oeste, NMPM, en el condado de San Juan, New México. La facilidad está situada 1.5 millas de sur de la avenida de Broadway. en Bloomfield, nanómetro, 4/10 milla al este de la carretera 550 en el camino 4990 del condado. La dirección del correo para la estación del compresor de Rio Vista es gas natural de El Paso Natural Gas (Rio Vista Station), #81 County Road 4990, Bloomfield, NM 87413.

La estación del compresor de Rio Vista se utiliza para la compresión del gas natural de la calidad de la tubería, y es parte de la tuberías de los números 3218 y 1202. No se sabe ningunas descargas intencionales o inadvertidas que podrían afectar la superficie o la agua subterránea en la facilidad. Las descargas potenciales en la estación se limitan a aproximadamente 40 galones de aceite usado por 8.760 horas de la operación (0.12 galones por el día de la operación). Los líquidos de proceso tales como agua y aceite usado se asociaron a operaciones diarias son contenidos por un sistema del dren de la facilidad, transferidos a un tanque de almacenaje de tierra antedicho, después reciclados o dispuestos por una facilidad aprobada NMOCD.

La primera agua subterránea probablemente que se afectará por un escape, una descarga accidental, o un derramamiento existe en una profundidad de 30 pies debajo de la superficie de tierra. Este sistema bajo del acuífero tiene una concentración disuelta total de los sólidos de aproximadamente 1.200 mg/l.

El plan de la descarga sometió contornos cómo la agua y la basura producidas serán manejadas correctamente, incluyendo la dirección, almacenaje, y la disposición final. El plan incluye los procedimientos para la gerencia apropiada de escapes, de descargas accidentales, y de derramamientos para proteger las aguas del estado de New México.

Para la información adicional, sera colocado en una lista que envía facilidad-específica para los avisos futuros, o someter los comentarios satisfacen el contacto:

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

Teléfono: (505) 476-3487

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

Public Notice

Application for Discharge Permit Renewal for the Rio Vista Compressor Station, San Juan County, New Mexico

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

El Paso Natural Gas Company (EPNG), 3801 Atrisco Blvd. NW, Albuquerque NM 87102 has submitted a renewal application for the previously approved discharge plan for the Rio Vista compressor station located at Township 29 North, Range 11 West, Southeast-1/4 of the Southwest-1/4 of Section 27, NMPM, in San Juan County, New Mexico. The facility is located due south of the city of Bloomfield, NM, ½-mile east of highway 550, and 3/10th-mile south of road 4990. The mailing address for the Rio Vista compressor station is El Paso Natural Gas, P.O Box 127, Bloomfield, NM 87413.

The Rio Vista compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG Number 3218 and 1202 pipelines. No intentional or inadvertent discharges that could affect surface or groundwater are known at the facility. Potential discharges at the station are limited to approximately 0.35 gallons per day. Process fluids such as water and used oil associated with daily operations are contained by a facility drain system, transferred to a below ground storage tank, then recycled or disposed of by a NMOCD approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of 30 feet below the ground surface. This shallow aquifer system has a total dissolved solids concentration of 1,200 mg/L or greater.

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

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

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

Phone: (505) 476-3487

The New Mexico Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future notices for the Rio Vista compressor facility upon request.

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowled	ge receipt of chec	k No.	dated 3/a
or cash received or	n 4/1/02	in the amount of	\$ 1.060.
from EL PASO	VATURAL GAS (<u>Co.</u>	
for Rio Vista C	?.s.	GW-09	Z
Submitted by:		Date:	P No.s
Submitted to ASD by	ED MARTIN	Date:	4/1/02
Received in ASD by:		Date:	
	New Facility		
	Other		
Organization Code To be deposited in Full Payment Paid 010 Fees with	or Annual I	Management Fund Increment 50 Filing Fee 30 RENEWAL	
DUE UNDER NEW FRE THIS CLECK PAYS BALANCE DUE	- System 100 - 1700 - 1800 - 740 - 740	FILING FEE RENEWAL	



NM WATER QUALITY MANAGEMENT FUND

NM OIL CONSERVATION DIVISION ENVIRONMENTAL BUREAU ATTN E MARTIN 1220 S ST FRANCIS DR SANTA FE, NM 87505

REMITTANCE ADVICE

RETAIN FOR YOUR RECORDS

VENDOR 0000002667

Refer Payment Inquires to EPGTR - 713-420-4200

NM WATER QUALITY MANAGEMENT FUND

Voucher ID	Invoice Number	Invoice Date	Description	Discount	Paid Amount
00126830	CKREQ020319	03/19/2002	RIO VISTA DP RENEWAL GW-92	0.00	1,060.00
					•
	•				
	•				
				1	
				1	
				}	
				.	
]	
TOTAL				\$0.00	\$1,060.00

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

CITIBANK DELAWARE A Subsidiary of Citicorp One Penn's Way New Castle, DE 19720 CHECK DATE 03/21/2002

62-20 311 Amount

***\$1,060.00

VOID AFTER ONE YEAR

Pay ***ONE THOUSAND SIXTY AND XX7 100 US DOLLAR***

To The Order Of NM WATER QUALITY MANAGEMENT FUND

NM OIL CONSERVATION DIVISION

ENVIRONMENTAL BUREAU ATTN E MARTIN

1220 S ST FRANCIS DR SANTA FE, NM 87505

Authorized Signature



March 27, 2002

Ed Martin, Engineer NMOCD – Environmental Bureau 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Overnight Mail FedEx Air Bill No. 7918 0350 6007

Re: Discharge Plan GW-092 Renewal; El Paso Natural Gas Company's Rio Vista Compressor, San Juan County, NM

Dear Mr. Martin:

Enclosed please find the documents with original signature relating to the renewal of GW-092. Also enclosed is EPNG Check No. 07458738, in the amount of \$1,060 for the unpaid balance of the renewal fee.

Please contact me at (505) 831-7763 if you have any questions regarding these renewal documents.

Sincerely,

Richard Duarte

Principal Environmental Engineer

Richard Dunt

Pipelines West - Environmental Department

Enclosures

Copy (with enclosures):

Denny G. Foust NMOCD – Environmental Bureau 1000 Rio Brazos Street Aztec, NM 87410 From: RICHARD DUARTE (505)831 - 7763 EL PASO NATURAL GAS COMPANY 3801 ATRISCO BLVD. NW

ALBUQUERQUE, NM, 87120



To: Ed Martin (505)476-3492 NM Oil Conservation Division Environmental Bureau 1220 South St. Francis Dr. Santa Fe, NM, 87505

SHIP DATE: 27MAR02 WEIGHT: 1 LBS

Ref: Sent by R. Duarté

TRK # 7918 0350 6007 5251

edEX STANDARD OVERNIGHT ABQ

THU AA Deliver by: 28MAR02

87505-NM-US 9A SAFA

Please fold this document in half and place it in the waybill pouch affixed to your shipment so that the barcode portion of the label can be read and scanned.

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- 2. Fold the printed page along the horizontal line.
- Place label in shipping label pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

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Ship to Same Recipient

Use of this system constitutes your agreement to the service conditions in the current FedEx service Guide, available upon request.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500. e.g. jewelpy, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-092 EL PASO NATURAL GAS CO. RIO VISTA COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS February 25, 2002

- 1. Payment of Discharge Plan Fees: Fifty dollars (\$50.00) of the \$100.00 filing fee has been received by the OCD. There is a required flat fee for natural gas compressor stations with horsepower rating greater than 1000 horsepower of \$1,700.00 upon receipt of this approval. Received with the application for renewal was \$690.00 of the flat fee. The additional \$1,010 for the flat fee and the \$50 still due for the filing fee are both due upon receipt of this approval. Total due and payable: \$1,060.00. 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. <u>Commitments:</u> El Paso Natural Gas Co. will abide by all commitments submitted in the discharge plan renewal application letter dated January 14, 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. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> 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 installed must be tested annually. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> 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. 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. <u>Class V Wells</u>: 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. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> 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: The facility will have an approved storm water run-off plan.
- 16. <u>Closure:</u> The OCD will be notified when operations of the Rio Vista Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. Conditions accepted by: El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

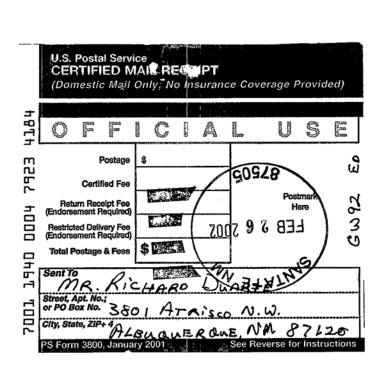
El Paso Natural Gas Co.

Print Name: Sam A. ARMENTA

Signature: Sam Q. Armenta

Title: DIRECTOR

Date: 3-20-02





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor Betty Rivera Cabinet Secretary

February 25, 2002

Lori Wrotenbery
Director
Oil Conservation Division

CERTIFIED MAIL
RETURN RECEIPT NO. 7923-4184

Mr. Richard Duarte El Paso Natural Gas Co. 3801 Atrisco NW Albuquerque, NM 87120

RE:

Discharge Plan Renewal GW-092

El Paso Natural Gas Co. Rio Vista Compressor Station San Juan County, New Mexico

Dear Mr. Duarte:

The ground water discharge plan renewal GW-092 for the El Paso Natural Gas Co. Rio Vista Compressor Station located in Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within thirty (30) days of receipt of this letter. Please note new mailing address below.

The discharge plan renewal application letter, dated January 14, 2002, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve El Paso Natural Gas Co. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve El Paso Natural Gas Co. of its responsibility to comply with any other governmental authority's rules and regulations.

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

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

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

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on January 17, 2007, and El Paso Natural Gas Co. should submit an application in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan renewal application for the El Paso Natural Gas Co. Rio Vista Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application will be assessed a fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1000 horsepower of \$1,700. Fees have been partially paid. See discharge plan approval condition #1.

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

Sincerely,

Roger C/Anderson

Chief, Environmental Bureau Oil Conservation Division

RCA/eem Attachment

cc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-092 EL PASO NATURAL GAS CO. RIO VISTA COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS February 25, 2002

- 1. Payment of Discharge Plan Fees: Fifty dollars (\$50.00) of the \$100.00 filing fee has been received by the OCD. There is a required flat fee for natural gas compressor stations with horsepower rating greater than 1000 horsepower of \$1,700.00 upon receipt of this approval. Received with the application for renewal was \$690.00 of the flat fee. The additional \$1,010 for the flat fee and the \$50 still due for the filing fee are both due upon receipt of this approval. Total due and payable: \$1,060.00. 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. <u>Commitments:</u> El Paso Natural Gas Co. will abide by all commitments submitted in the discharge plan renewal application letter dated January 14, 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. <u>Drum Storage:</u> All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
- 5. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.
- 7. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> 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 installed must be tested annually. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
- 10. <u>Underground Process/Wastewater Lines:</u> 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. 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. <u>Class V Wells</u>: 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. <u>Housekeeping:</u> All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

- 13. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Aztec District Office.
- 14. <u>Transfer of Discharge Plan:</u> 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: The facility will have an approved storm water run-off plan.
- 16. <u>Closure:</u> The OCD will be notified when operations of the Rio Vista Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
- 17. <u>Conditions accepted by:</u> El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

El Paso Natural Gas Co.	
Print Name:	
Signature:	
Title:	
Date:	



STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

DIL CONSERVATION DIVISION

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

October 18, 1996

CERTIFIED MAIL RETURN RECEIPT NO. P-288-258-665

Mr. Richard Daurte Senior Compliance Engineer El Paso Natural Gas Company (EPNG) 3801 Atrisco, NW Albuquerque, NM 87120

RE: Renewal of Discharge Plan GW-92

Rio Vista Compressor Station San Juan County, New Mexico

Dear Mr. Daurte:

The discharge plan renewal for the El Paso Natural Gas Company (EPNG) Rio Vista Compressor Station GW-92 located in Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan renewal consists of the application dated August 30, 1996, submitted by EPNG, the discharge plan approval letter from OCD dated January 17, 1992, and this approval letter with conditions of approval from OCD dated October 18, 1996. 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 five working days of receipt of this letter.

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

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 3104 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 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.

Mr. Richard Daurte EPNG GW-92 Page 2 October 18, 1996

Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. This approval will expire January 17, 2002, and an application for renewal should be submitted in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal approval.

The discharge plan renewal for the EPNG Rio Vista Compressor Station GW-92 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty dollars (\$50) and a flat fee of six-hundred and ninety dollars (\$690) for compressor stations in excess of 3,000 horsepower.

The \$50 filing fee has been received by the OCD as well as the \$690 flat fee.

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/pws

Attachment

xc:

P 288 258 465

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Sent to
Street & Number
Post Office, State, & ZIP Code

Postage

\$
Certified Fee

Special Delivery Fee

Special Delivery Fee
Restricted Delivery Fee

Return Receipt Showing to Whom & Date Delivered

Return Receipt Showing to Whom, Date, & Addresse's Address

TOTAL Postage & Fees
Postmark or Date

Mr. Denny Foust - OCD Aztec

Mr. Richard Daurte EPNG GW-92 Page 3 October 18, 1996

ATTACHMENT TO DISCHARGE PLAN RENEWAL GW-92 EPNG - Rio Vista Compressor Station DISCHARGE PLAN REQUIREMENTS

(October 18, 1996)

- 1. Payment of Discharge Plan Fees: The OCD has received full payment from EPNG for the filing and flat fees for the facility in the amount of \$740.
- 2. <u>EPNG Commitments:</u> EPNG will abide by all commitments submitted in the discharge plan renewal application dated August 30, 1996, the discharge plan approval letter from OCD dated January 17,1992, and this approval letter with conditions of approval from OCD dated October 18, 1996.
- 3. <u>Drum Storage</u>: 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.

- 4. <u>Process Areas</u>: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
- 5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.
- 6. <u>Above Ground Saddle Tanks</u>: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
- 7. 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.
- 8. <u>Below Grade Tanks/Sumps</u>: 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.

Mr. Richard Daurte EPNG GW-92 Page 4 October 18, 1996

- 9. <u>Underground Process/Wastewater Lines</u>: 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.
- 10. <u>Housekeeping</u>: 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.

- 11. **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. <u>Effluent Sampling/Disposal</u>: Since this is a mainline compressor station all effluents and wastes must be properly characterized for the presence of hazardous constituents before the wastes can be disposed of offsite. Since these wastes are non-exempt from RCRA Subtitle C regulations none of these effluents may be disposed of at OCD permitted Class II UIC injection wells.
- 15. <u>Certification:</u> El Paso Natural Gas Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Company, further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect groundwater, human health and the environment.

Accepted: El Paso Natural Gas Company	
by	
Title	



BRUCE KING

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

January 17, 1992

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-690-155-046

Mr. Larry R. Tarver, Vice President North Region El Paso Natural Gas Company 304 Texas Street El Paso, Texas 79901

RE: Discharge Plan GW-92

Rio Vista Compressor Station San Juan County, New Mexico

Dear Mr. Tarver:

The groundwater discharge plan GW-92 for the El Paso Natural Gas Company Rio Vista Compressor Station located in Section 27, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico is hereby approved. The discharge plan consists of the application dated November 1, 1991.

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.

Mr. Larry R. Tarver January 17, 1992 Page -2-

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire January 17, 1997 and you should submit an application for renewal in ample time before that date.

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

ACKNOWINDGEMENT OF RECKIPT OF CEECK/CASE

I hereby acknowledge receipt of che	eck No.	ted 10/30/9/,
or cash received on $11/5/91$		
, ,		30.00
from El Paso Natural Gas	Co	
for RIO VISTA Compressor St	ating GU	0-92
Submitted by: (Feeliley Notes)	dem Date: //	9/5/9/
Submitted to ASD by:	Date:	
Received in ASD by:	Date:	Application programmer and the state of the
Filing Fee X New Facility	y Renewal	_
Modification Other		nia.
•	(:pocify)	
Organization Code 521.07	Applicable FY 6	80
To be deposited in the Water Qual	ity Management Fund	
Full Payment or Annua	l Increment	
CONTRACTOR CAS COMPANY	CONTROL NO.	
EL PASO NATURAL GAS COMPANY EL PASO, TEXAS	148850 EN CBD	
		70/00/07
PAYASLE AT	62-20 311	10/30/91 Date
CITIBANK - DELAWARE WILMINGTON, DEL		
PAY TO THE ORDER OF	٦.	PAY AMOUNT
NEW MEXICO ENVIRONMENT DEPT		\$50.00
WATER QUALITY MARAGEMENT		Void After 1 Year
P O BOX 26110 SANTA FE RM 87502		
	The state of the s	
•	Author	Chames 8. Adds

80468		10/30/91	0/14	8830
VOUCHER	INVOICE		AMOUNT	
NUMBER	NUMBER	Invoice	Discount	Net
REFER PAYMEN' EN1848713	CKREQ911025	50.00	.00	50.00
FILING FEE (RIO VISTA DISCHA TOTALS	50.00	.00	50.00
-		·		
]