

GW - 147

**GENERAL
CORRESPONDENCE**

YEAR(S):
1993 - 1992

El Paso
Natural Gas Company

OIL CONSERVATION DIVISION
RECEIVED

'93 SEP 17 AM 8 55

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

September 10, 1993

New Mexico Oil Conservation Division
District II Office
P.O. Drawer DD
Artesia, NM 88211-719

Attn: Mr. Mike Williams

**Subject: Request for Variance to Division Rule Order R-8952.
Deming Compressor Station
Luna County, New Mexico**

Dear Mr. Williams:

On August 19, 1993, El Paso Natural Gas Company (EPNG) received OCD approval of the Groundwater Discharge Plan (GW-147) for the above station. The approval notice mentions the requirement to net, screen, or otherwise render exposed pits non hazardous to wildlife including migratory birds. EPNG is seeking variance to this requirement in view of the original request for exception submitted to your office in August 18, 1989 (copy attached).

As stated in the original application, the pit is not hazardous to migratory waterfowl because no oil-bearing wastewater is conveyed to the pond.

Should additional information be required, please contact me at 915/541-2164.

Sincerely,



Joe M. Narváez, P.E.

Attachment

c: New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fé, NM 87504-2088

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

File
DUCKS

August 18, 1989

New Mexico Oil Conservation Division
District II Office
P.O. Drawer DD
Artesia, NM 88211-0719

Attn: Mr. Mike Williams

Dear Mr. Williams:

Attached please find one Application for Exception to Division Rule R-8952. This application is made to exempt one brine pond located at El Paso Natural Gas Company's (EPNG) Deming Compressor Station. The pond receives only cooling tower blowdown and no oil-bearing wastewater is conveyed to the pond. It is EPNG's understanding that Rule R-8952 was promulgated to mitigate any health threats to migratory birds that may be associated with pits containing oil bearing wastewater. Because this pond does not contain oil-bearing wastewater, it is EPNG's belief that this pond should be exempted from the Rule. If you have any questions concerning this matter, please feel free to call me at 915/541-2323.

Very truly yours,

Philip L. Baca

Philip L. Baca, P.E.
Compliance Engineer

PLB:mts
Attachment

Submit 4 Copies
to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-134
Aug. 1, 1989

OIL CONSERVATION DIVISION

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

Permit No. _____

(For Division Use Only)

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

**APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule 711(I)**

Operator Name: El Paso Natural Gas Company

Operator Address: P. O. Box 1492, El Paso, Texas 79978

Lease or Facility Name Deming Compressor Station Location 32 23S 11W

Size of pit or tank: 300' x 435'
Ut. Ltr. Sec. Twp. Rge

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

The pit receives only cooling tower blowdown. No oil-bearing wastewater is conveyed to the pond.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

N/A - No oil-bearing wastewater piping is connected to the pond.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures: _____

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Philip L. Baca Title Compliance Engr. Date 8-18-89

Printed Name Philip L. Baca, P.E. Telephone No. 915/541-2323

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected _____

Approved by _____

Inspected by _____

Title _____

Date _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9-2-93,
or cash received on 9-17-93 in the amount of \$ 1380⁰⁰
from EL PASO NATURAL GAS Co.
for DEMLING COMPRESSOR STATION

Submitted by: _____ Date: _____
(Facility Name) (DP No.)

Submitted to ASD by: Ch. Entica Date: 9-20-93

Received in ASD by: Ange Alire Date: 9-20-93

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

Organization Code 521.07 Applicable FY 94

To be deposited in the Water Quality Management Fund.

Full Payment or Annual Increment _____



P.O. BOX 1492
EL PASO, TX 79978

PAYABLE AT
CITIBANK DELAWARE
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

CONTROL NO.

232 CBD

62-20
311

CHECK NO.

09/02/93
Date

PAY TO THE ORDER OF

NEW MEXICO WATER QUALITY
MANAGEMENT
P O BOX 2088
SANTA FE

NM 87504

PAY AMOUNT

\$1,380.00

Void After 1 Year

Authorized Signatory

EL PASO NATURAL GAS COMPANY

REMITTANCE ADVICE

Vendor Number
018111 001

Check Date
09/02/93

Check Number
[REDACTED]

VOUCHER NUMBER	INVOICE NUMBER	AMOUNT		
		Invoice	Discount	Net
REFER PAYMENT INQUIRIES TO ACCOUNTS PAYABLE (915) 541-5354				
VOUCHER NO	INVOICE NO	GROSS	DISCOUNT	NET
000251072	CKREQ930831	1,380.00	.00	1,380.00
DISCHARGE PLANT FILING FEE (DEMING)				
	TOTALS	1,380.00	.00	1,380.00
			GW 147	



P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

September 3, 1993

NMED - Water Quality Management
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504

RE: Discharge Plan (GW-147)
Deming Compressor Station
Luna County, New Mexico

Gentlemen:

The Attached check for \$ 1,380 is to cover the flat rate fee for the discharge plan of the above facility.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe M. Narvaez", with a horizontal line extending to the right.

Joe M. Narvaez
Senior Compliance Engineer

cc: P. L. Baca
M. R. Conley
J. R. Midkiff
R. P. Miller
S. Nunez
H. Van
File: Deming - Environmental

STATE OF NEW MEXICO
County of Bernalillo

ss

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, telephone (505) 827-5800:

(GW-148) - Meridian Oil Inc., Michael J. Frampton, Environmental representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge application for their Pump Mesa Compressor Station located in the SE/4 of Section 14, Township 31 North, Range 8 West, NMPM, Sna Juan County, New Mexico.

other accidental discharges to the surface will be managed. (GW-147) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted a discharge application for their Deming Compressor Station located in the SE/4 SE/4 Section 32, Township 23 South, range 11 West, NMPM, Luna County, New Mexico. Approximately 60,000 gallons per day of cooling tower blowdown water with total dissolved solids concentration of 77,000 mg/l is stored in an above ground double lined evaporation pond equipped with leak detection. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. the discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday thru Friday, prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission At Santa Fe, New Mexico, on this 24th day of June, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/William J. Lemay
WILLIAM J. LEMAY, Director
Journal: July 8, 1993

Dianne Berglund being duly sworn declares and says that she is National Advertising Sales Supervisor of The Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 8 day of July, 1993, and the subsequent consecutive publications on _____, 1993

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 8 day of July, 1993.

Bernadette Out
12-18-93

PRICE \$ 63.23
Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

LEGAL ADVERTISING

CERTIFICATE OF PUBLICATION

Legal Notice

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

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(GW-147) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Strees, El Paso, Texas 79901, has submitted a discharge application for their Deming Compressor Station located in the SE/4SE/4 Section 32, Township 23 South, Range 11 West, NMPM, Luna County, New Mexico. Approximately 60,000 gallons per day of cooling tower blowdown water with total dissolved solids concentration of 77,000 mg/l is stored in an above ground double lined evaporation pond equipped with leak detection. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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If no hearing is held, the Director will approve or disapprove the plan based on the in-

**STATE OF NEW MEXICO
COUNTY OF LUNA**

I, Sammy Lopez, do solemnly swear that I am the publisher or associate publisher of the Deming Headlight, newspaper published at Deming, Luna County, New Mexico, and that the article, a copy of which is hereto attached, was published in said Headlight for 1 time(s) consecutively.

First publication being on the 2nd day of July, 1993

hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 24th day of June, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
-s- William J. LeMay, Director
(No. 6259-11,7-2)

DEMING HEADLIGHT

By Patty Cicciotti
Gen. Mgr.

Sworn to and subscribed before me the 6th day of July, 1993

Merline S. Kenaley

My Commission expires: June 13, 1996



El Paso
Natural Gas Company

OIL CONSERVATION DIVISION
RECEIVED

'93 JUL 19

P.O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

July 9, 1993

New Mexico Oil Conservation Division
Attn: Mr. W. Olson
P.O. Box 2088
Santa Fe, N.M. 87504-2088

Re: Pond Closure at El Paso Natural Gas Company's Deming Compressor Station, Section 32, T-23-S, R-11-W, Luna County, New Mexico.

Dear Mr. Olson:

During our phone conversation of July 7, 1993, you requested additional information relative to EPNG's request for permission to close the subject pond. Specifically, you requested the following additional information:

- References relative to the depth to groundwater: The depth to groundwater was determined by using well log information for EPNG's water wells for the subject plant and information published in "Groundwater in Southwestern New Mexico - Tyrone, Big Hatchet Mountains, and Florida Mountains Region", by the New Mexico Geological Society (1970).
- The pond's location relative to a well head protection area: The pond is not in a wellhead protection area pursuant to NMOCD Order R-7940.
- Distance to the nearest surface water: The distance to the nearest surface water was determined by reviewing aerial photographs and USGS maps.

Please feel free to call me at 915/541-2323 should you require additional information.

Sincerely,

Philip L. Baca, P.E.
Manager,
Environmental Compliance



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
 Santa Fe, New Mexico 87505

STATE OF
 NEW MEXICO
 OIL
 CONSERVATION
 DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 1030	Date 7/6/93
---	-----------------------------------	-----------	-------------

<u>Originating Party</u>	<u>Other Parties</u>
Bill Olson - Envir. Bureau	Phil Baca - EPNG (915) 541-2323

Subject
 Pit closure - Deming Compressor

Discussion
 OCD reviewed 6/22 closure plan
 OCD needs documentation for depth to ground water & well head protection areas

Conclusions or Agreements
 He will submit info requested

Distribution
 file

Signed *Bill Olson*

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

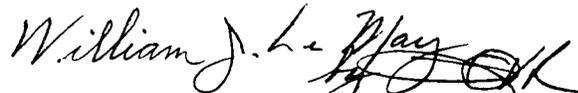
(GW-147) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Streets, El Paso, Texas 79901, has submitted a discharge application for their Deming Compressor Station located in the SE/4 SE/4 Section 32, Township 23 South, Range 11 West, NMPM, Luna County, New Mexico. Approximately 60,000 gallons per day of cooling tower blowdown water with total dissolved solids concentration of 77,000 mg/l is stored in an above ground double lined evaporation pond equipped with leak detection. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 5000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the director determines that there is significant public interest.

If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 24th day of June, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

A handwritten signature in cursive script, appearing to read "William J. Lemay". The signature is written in dark ink and is positioned above the printed name.

WILLIAM J. LEMAY, Director

SEAL

El Paso
Natural Gas Company

OIL CONSERVATION DIVISION
RECEIVED

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

'93 JUN 2 AM 9 14

June 22, 199³~~X~~

Mr. Roger Anderson
New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, NM 87504

Subject: Closeout of Abandoned Disposal Pond in Luna County, New Mexico

Dear Mr. Anderson:

El Paso Natural Gas Company (EPNG) plans to proceed with the closure of an abandoned wastewater disposal pond located at our Deming Compressor Station, Section 32 Township 23-S, Range 11-W, Luna County, New Mexico.

The abandoned pond has an "L" shape of 500 feet by 300 feet (long side) and 200 feet by 200 feet (short side). Use of the pond was discontinued when a new double-lined pond was built in 1989. The pond used to accumulate mostly cooling tower blowdown. A copy of recent analyses of the bottom of the pond is attached to this correspondence.

The use of the pond has not had an adverse effect on the environment. Depth to groundwater in this area is in excess of 400 feet and the nearest surface water is over 68 miles from the plant.

The attached scope of work describes the methods and procedures that will be followed to return, as best as possible, the empty pond to the original characteristics of the area.

If you have any questions or additional information is required, please contact me at 915/541-2164 or Phil Baca at 915/541-2323.

Sincerely,



Joe M. Narváez, P.E.

Attachments

BACKFILLING OF DEMING STATION POND - SCOPE OF WORK

Contractor shall backfill the dry pond using the earth available in the existing berms. This backfilling operation shall be gradual and uniform to allow placement of layers not more than 10 inches in depth (loose measurement) which shall be compacted to a density comparable with the adjacent undisturbed material.

The backfilling operation shall continue in successive layers for the full width of individual cross sections and in such lengths as are best suitable to the sprinkling and compaction methods used.

The layers may be formed by utilizing equipment which spread the material as it is dumped or the material may be spread by blading or other acceptable methods from the existing berms in such amounts that material is evenly distributed.

Minor quantities of rock encountered during backfilling operations shall be incorporated in the layers provided such rock is no greater than one half the thickness of the layer.

Each layer shall be uniform as to material density and moisture content before beginning compaction. Water required for sprinkling to bring the material to the moisture content necessary for maximum compaction shall be evenly applied and it shall be the responsibility of Contractor to secure a uniform moisture content throughout the layer by such methods as may be necessary. In order to facilitate uniform wetting of the material, Contractor may apply water at the material source if the sequence and methods used will not waste water. Such procedure shall be subject to the approval of El Paso.

Each layer shall be compacted to the required density by any method, type, and size of equipment which will give the required compaction. The depth of the layers prior to compaction, shall depend upon the type of sprinkling and compacting equipment used. Prior to, and in conjunction with the rolling operation, each layer shall be brought to the moisture content necessary to obtain the required density and shall be kept leveled with suitable equipment to ensure uniform compaction over the entire area.

After each layer is complete, tests will be made by El Paso as necessary. If the material fails to meet the density specified, the compaction method shall be altered on subsequent work to obtain the specified density. El Paso may order proof rolling to test the uniformity of compaction of the layers. All irregularities, depressions, weak or soft spots which develop shall be corrected by Contractor.

Construction of successive layers shall continue until the upper and final layer reaches an elevation of at least 18 inches above the surrounding natural grade level. The finished surface shall be reseeded and free of irregularities, weak or soft spots, or depressions that may allow collection of rain water.

SAMPLE KEY

SAMPLE NUMBER: S93-0229 LOCATION: DEMING STATION

MATRIX: SOIL

SAMPLE DESCRIPTION: COOLING TOWER BLOWDOWN POND-ABANDONED

S D CONTINUED:

S D CONTINUED:

SAMPLE TIME: 14:10 SAMPLE DATE: 05/04/93



General Laboratory Report

Lab Number : 46780
Plant/Generator Name : El Paso Natural Gas; Transmission Operations Lab
Sample Type : Soil; S93-0229
Date of Receipt : 05/06/93 Analyst:
Date of Report : 06/14/93 QC Checked: *Kathy Kreps*
Parameters for Analysis: TCLP Metals, Volatiles and Semi-Volatiles
Outside Lab : Sound Outside Lab Report No: 31904

Data:

This soil sample, numbered S93-0229, was analyzed for TCLP Metals, Volatiles and Semi-Volatiles by Sound Analytical Services. Copies of the results are attached.

Comments and Conclusions:

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

TRANSMITTAL MEMORANDUM

DATE: May 24, 1993

TO: Kathy Kreps, Burlington Environmental
Seattle Facility

PROJECT NAME: EPNG

LABORATORY NUMBER: 31904

Enclosed are one original and one copy of the Tier I data deliverables package for Laboratory Work Order Number 31904. One sample was received for analysis at Sound Analytical Services, Inc., on May 7, 1993.

If there are any questions regarding this data package, please do not hesitate to call me at (206) 922-2310.

Sincerely,



Lila A. Transue
Project Manager

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

Report To: Burlington Environmental
Seattle Facility

Date: May 24, 1993

Report On: Analysis of Soil

Lab No.: 31904

Page 1 of 3

IDENTIFICATION:

Sample received on 05-07-93

P.O. No. 33001

Project: EPNG

ANALYSIS:

Lab Sample No. 31904-1

Client ID: 46780

S93-0229

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311

Volatile Organics per EPA SW-846 Method 8240

Date Extracted: 5-14-93

Date Analyzed: 5-23-93

Compound	Concentration (mg/L)	PQL (mg/L)	Max. Conc. (mg/L)	Flags
Vinyl Chloride	ND	0.010	0.2	
Chloroform	0.006	0.005	6.0	
1,2-Dichloroethane	ND	0.005	0.5	
Carbon Tetrachloride	ND	0.005	0.5	
Benzene	ND	0.005	0.5	
Chlorobenzene	ND	0.005	100	
1,1-Dichloroethylene	ND	0.005	0.7	
Methyl Ethyl Ketone	ND	0.025	200	
Tetrachloroethylene	ND	0.005	0.7	
Trichloroethylene	ND	0.005	0.5	

ND - Not Detected

PQL - Practical Quantitation Limit

Volatile Surrogates

Surrogate	Percent Recovery	Control Limits
Toluene - D8	100	88 - 110
Bromofluorobenzene	87	86 - 115
1,2-Dichloroethane D4	100	76 - 114

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
 Project: EPNG
 Page 2 of 3
 Lab No. 31904
 May 24, 1993

Lab Sample No. 31904-1

Client ID: 46780
 S93-0229

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311
 Semivolatile Organics per EPA SW-846 Method 8270
 Date Extracted: 5-14-93
 Date Analyzed: 5-19-93

Compound	Concentration (mg/L)	PQL (mg/L)	Max. Conc. (mg/L)	Flags
1,4-Dichlorobenzene	ND	0.010	7.5	
Hexachloroethane	ND	0.010	3.0	
Nitrobenzene	ND	0.010	2.0	
Hexachlorobutadiene	ND	0.010	0.5	
2,4,6-Trichlorophenol	ND	0.010	2.0	
2,4,5-Trichlorophenol	ND	0.010	400	
2,4-Dinitrotoluene	ND	0.010	0.13	
Hexachlorobenzene	ND	0.010	0.13	
Pentachlorophenol	ND	0.051	100	
o-Cresol	ND	0.010	200	
m & p-Cresol	ND	0.010	200	
Pyridine	ND	0.010	5.0	

ND - Not Detected
 PQL - Practical Quantitation Limit

Semi-Volatile Surrogates

Surrogate Compound	Percent Recovery	Control Limits	
		Water	Soil
d ₅ -Nitrobenzene	64	35 - 114	23 - 120
2-Fluorobiphenyl	61	43 - 116	30 - 115
d ₁₄ -p-Terphenyl	73	33 - 141	18 - 137
d ₆ -Phenol	23	10 - 94	24 - 113
2-Fluorophenol	40	21 - 100	25 - 121
2,4,6-Tribromophenol	70	10 - 123	19 - 122

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
Project: EPNG
Page 3 of 3
Lab No. 31904
May 24, 1993

Lab Sample No. 31904-1

Client ID: 46780
S93-0229

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311

ICP Metals by EPA Method 6010

Date Extracted: 5-14-93

Date Analyzed: 5-17-93

<u>Parameter</u>	<u>Concentration (mg/L)</u>	<u>PQL</u>	<u>Max Conc., (mg/L)</u>
Arsenic	ND	0.10	5.0
Barium	0.47	0.005	100.0
Cadmium	ND	0.005	1.0
Chromium	0.13	0.01	5.0
Lead	ND	0.05	5.0
Selenium	ND	0.15	1.0
Silver	ND	0.01	5.0

Mercury by Cold Vapor AA Method 7470

Date Analyzed: 5-17-93

<u>Parameter</u>	<u>Concentration (mg/L)</u>	<u>PQL</u>	<u>Max Conc., (mg/L)</u>
Mercury	ND	0.002	0.2

ND - Not Detected

PQL - Practical Quantitation Limit

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

QUALITY CONTROL REPORT

TCLP VOLATILE ORGANICS
PER EPA SW-846 METHOD 8240

Client: Burlington Environmental, Seattle Office
Lab No: 31904qc3
Units: mg/L
Date: May 24, 1993

METHOD BLANK

Compound	Result	PQL	Flags
Vinyl Chloride	ND	0.010	
Chloroform	ND	0.005	
1,2-Dichloroethene	ND	0.005	
Carbon Tetrachloride	ND	0.005	
Benzene	ND	0.005	
Chlorobenzene	ND	0.005	
1,1-Dichloroethylene	ND	0.005	
Methyl Ethyl Ketone	ND	0.025	
Tetrachloroethene	ND	0.005	
Trichloroethylene	ND	0.005	

ND - Not Detected

PQL - Practical Quantitation Limit

VOLATILE SURROGATES

Surrogate	Percent Recovery	Control Limits	
		Water	Soil
Toluene - d8	96	86 - 115	81 - 117
Bromofluorobenzene	104	76 - 114	74 - 121
1,2-Dichloroethane d4	98	88 - 110	70 - 121

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

QUALITY CONTROL REPORT

TCLP SEMIVOLATILE ORGANICS PER EPA METHOD 8270

Client: Burlington Environmental, Seattle Office
 Lab No: 31904qc2
 Units: mg/L
 Date: May 24, 1993
 Blank No: S8695

METHOD BLANK

Compound	Result	PQL	Flags
1,4-Dichlorobenzene	ND	0.010	
Hexachloroethane	ND	0.010	
Nitrobenzene	ND	0.010	
Hexachlorobutadiene	ND	0.010	
2,4,6-Trichlorophenol	ND	0.010	
2,4,5-Trichlorophenol	ND	0.010	
2,4-Dinitrotoluene	ND	0.010	
Hexachlorobenzene	ND	0.010	
o-Cresol	ND	0.010	
m & p-Cresol	ND	0.010	
Pentachlorophenol	ND	0.051	
Pyridine	ND	0.010	

ND - Not Detected.

PQL - Practical Quantitation Limit

SEMIVOLATILE SURROGATES

Surrogate	Percent Recovery	Control Limits	
		Water	Soil
Nitrobenzene - d5	78	35 - 114	23 - 120
2-Fluorobiphenyl	67	43 - 116	30 - 115
p-Terphenyl-d14	82	33 - 141	18 - 137
Phenol-d6	29	10 - 94	24 - 113
2-Fluorophenol	49	21 - 100	25 - 121
2,4,6-TBP	72	10 - 123	19 - 122

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

QUALITY CONTROL REPORT

TCLP Metals

Client: Burlington Environmental, Seattle Office
Lab No: 31904qcl
Units: mg/L
Date: May 24, 1993

METHOD BLANK

Parameter	Result	PQL
Arsenic	ND	0.10
Barium	ND	0.005
Cadmium	ND	0.005
Chromium	ND	0.01
Lead	ND	0.05
Mercury	ND	0.002
Selenium	ND	0.15
Silver	ND	0.01

ND - Not Detected

PQL - Practical Quantitation Limit



El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

June 14, 1993

Mr. William J. LeMay
Director
Oil Conservation Division
310 Old Santa Fe Trail
State Land Office Building
Room 206
Santa Fe, NM 87501

RECEIVED
JUN 16 1993
OIL CONSERVATION DIV.

**Subject: Discharge Plan Requirement
Deming Compressor Station
Luna County, New Mexico**

Dear Mr. LeMay:

Please find enclosed a check for the fifty (50) dollar filing fee corresponding to the submittal of the discharge plan application for El Paso Natural Gas Company's (EPNG) Deming Compressor Station located in Luna County, New Mexico.

Per instructions of your letter dated February 19, 1993, three copies of the above application are also attached to this correspondence.

If you have any questions or additional information is required, please call me at (915) 541-2164, or Phil Baca at (915) 541-2323.

Sincerely,

Joe M. Narváez, P.E.

Enclosures (4)

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/15/93,
or cash received on 6/23/93 in the amount of \$ 50.00
from El Paso Natural Gas Co.

for Deming Compressor Station GW-147
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 6/23/93

Received in ASD by: Anne Alire Date: 6/23/93

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

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____



EL PASO NATURAL GAS COMPANY
EL PASO, TEXAS

CONTROL NO.

CHECK NO.



62-20
311

06-15-93
Date

PAYABLE AT
CITIBANK — DELAWARE
WILMINGTON, DEL

PAY TO THE ORDER OF

NMED - WATER QUALITY MANAGEMENT
STATE LAND OFFICE BUILDING
P.O. BOX 2088
SANTA FE, NM 87504

PAY AMOUNT
\$50.00*****

Jean M. Green, Jr.

Authorized Signatory





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



BRUCE KING
GOVERNOR

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

ANITA LOCKWOOD
CABINET SECRETARY

April 12, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-336

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

**RE: PIT CLOSURES
EL PASO NATURAL GAS COMPANY
LUNA COUNTY, NEW MEXICO**

Dear Mr. Fong:

The New Mexico Oil Conservation Division (OCD) has completed a review of the El Paso Natural Gas Company's (EPNG) November 5, 1992 "PIT CLOSURE PLAN FOR PITS OUTSIDE THE VULNERABLE GROUNDWATER ZONE, LOCATED NEAR DEMING, NEW MEXICO", December 2, 1992 "ADDITIONAL DATA REQUEST FOR EL PASO NATURAL GAS COMPANY'S (EPNG) PIT CLOSURE NEAR DEMING, NEW MEXICO" and March 18, 1993 "ADDITIONAL DATA REQUEST FOR EL PASO NATURAL GAS COMPANY'S (EPNG) PIT CLOSURES NEAR DEMING, NEW MEXICO". These documents provide the analytic results of potential contaminants for two unlined pipeline blowdown pits and one unlined turbine blowdown pit near Deming, New Mexico and the methods proposed for their closure.

The above referenced closure plan is hereby approved.

Please be advised that OCD approval does not relieve EPNG of liability should remaining contaminants result in actual contamination of surface waters or ground waters which may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve EPNG for compliance with any other federal, state and local laws and/or regulations.

Mr. Martin A. Fong
April 12, 1993
Page 2

If you have any questions, please do not hesitate to contact me at
(505) 827-5885.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Olson". The signature is written in dark ink and is positioned below the word "Sincerely,".

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Mike Williams, OCD Artesia District Supervisor

OIL CONSERVATION DIVISION
RECEIVED

MAR 22 09 10 46



El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

March 18, 1993

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Additional Data Request for El Paso Natural Gas Company's (EPNG) Pit Closures Near Deming, New Mexico.

This is in response to your letter dated December 3, 1992, in which you requested additional information necessary for completing OCD's evaluation of EPNG's Pit Closure Plan for three blowdown pits located near Deming, New Mexico. The data requested concerned the location of the pipeline and turbine blowdown pits, volumes and types of fluids discharged to each pit, the distance to the nearest fresh water well from each pit, and a hazardous waste characterization of the soils in each pit.

Pit Information

The following information includes the survey location for the three pits EPNG wishes to close:

Pipeline Blowdown Pits:

Globe-Miami Lines #2004/2005:

The blowdown pit is located in the SW/4 of Sec. 30, T-24S, R-12W. The pit measures approximately 10' x 12' in size and is approximately 2.5 feet in depth. The pit was used to blowdown trapped pipeline liquids in the subject pipelines. The approximate volume of liquids held in the pit was 110 gallons. Pipeline liquids at this point in the pipeline system primarily consist of compressor lubricating oils used in upstream compression equipment.

California Lines #1100/1103:

The blowdown pit is located in the NW/4 of Sec. 36, T-23S, R-13W. The pit measures approximately 36' x 34' in size and is approximately 4.0 feet in depth. The pit was used to blowdown trapped pipeline liquids in the subject natural gas transmission lines. The approximate volume of liquids held in the pit was 10,000 gallons. Pipeline liquids at this point in the system primarily consist of compressor lubricating oils used in upstream compression equipment.

Letter to Mr. Bill Olson
New Mexico Oil Conservation Division
March 18, 1993
Page 2

Turbine Blowdown Pit:

EPNG Compressor #4:

The turbine blowdown pit is located in the NW/4 of Sec. 3, T-25S, R-12W. The pit was designed to collect any trapped liquids from the Compressor #4 station piping and scrubbers. The pit is approximately 15' x 20' in size and approximately 2.0 feet in depth. Upon inspection of the pit on January 7, 1993, there were no visible signs that the pit was ever used. The pit did not contain any liquids, the soil was supporting growth of native vegetation, and the soil showed no indication of oil or petroleum staining. The Compressor #4 unit has not been in active operation since 1972.

Water Well Information

The following water well information was obtained from the State Engineer's Office in Deming, New Mexico:

Pipeline Blowdown Pits:

Globe-Miami Lines #2004/2005:

There are two fresh water wells on record in the same Township and Range as the Globe-Miami blowdown pit. One of the wells is owned by EPNG and is located in the SW/4 of Section 34, T-24S, R-12W. The EPNG well (Water Well #12) is approximately 3.5 miles away from the subject pit. The latest well test information, dated 6/13/91, indicates a 151 foot static water level based on a 30 minute pump test.

The second water well in the area of this pit is located in Section 21, T-24S, R-12W. Based on this information, the well is approximately 2.0 miles from the subject pit. State records indicate the well is owned by Jerome English, has a total depth of 414 feet, and a depth-to-groundwater of 205 feet.

California Lines #1100/1103:

There is one water well on record in the same Township and Range as the subject pit. The only well in the area of this pit is located in Section 29, T23-S, R13-W. Based on this information, the well is approximately 3.0 to 3.5 miles from the blowdown pit. State records indicate the well is owned by McDonald, has a total depth of 350 feet, and a depth-to-groundwater of 340 feet.

Turbine Blowdown Pit:

EPNG Compressor #4:

The closest water well to the turbine blowdown pit is the same water well #12 described for the Globe-Miami blowdown pit above. As mentioned, Company records indicate the static

Letter to Mr. Bill Olson
New Mexico Oil Conservation Division
March 18, 1993
Page 3

water level for this well to be 151 feet based on a 30 minute pump test. Water Well #12 is approximately 1/2 mile away from the turbine pit.

Soil Hazardous Waste Characterization

Soil samples were obtained from the two pipeline blowdown pits on January 7, 1993. Copies of the results for the soil samples are attached. Please note that the soil samples were not analyzed for herbicide and pesticide RCRA contaminants. Previous experience and knowledge of the process involved in pipeline liquid blowdown indicates that herbicide and pesticide RCRA contaminants would not be present. During a phone conversation in December of 1992, you had indicated that omitting testing for pesticides and herbicides would not pose a problem in evaluating EPNG's request for the subject pit closures if EPNG maintained in writing that such contaminants are not inherent in the process. EPNG believes this is the case. The performed soil analysis for the two pipeline blowdown pits did not indicate any other RCRA contaminant was present above the regulatory levels to classify the soil as a hazardous waste.

In addition, a soil sample and analysis was not performed for the turbine blowdown pit. As stated previously in this letter, upon inspection of the pit on January 7, 1993, it was evident that no discharge to the pit had occurred. There were no signs of pipeline liquids ever being in the pit and no oil stains in the surrounding soil were observed. The pit soil was able to support indigenous vegetation growth. The Compressor #4 unit has not been in active operation since 1972 and no attempt has been made to start up the turbine in over 15 years.

Based on the above described observations, EPNG would like to close the turbine pit without testing the soil for hazardous waste characteristics. If this is not agreeable with you, EPNG seeks authority to close the two pipeline blowdown pits based on the analysis results attached and relevant data provided in this letter.

In summary, I hope the furnished information answers your remaining questions so that evaluation of EPNG's request for the subject pit closures may continue. If you have any additional concerns with regards to this matter, please do not hesitate to contact me at 915/541-3057.

Sincerely,



Martin A. Fong
Compliance Engineer

Attachments

SAMPLE KEY

SAMPLE NUMBER: S93-0006 LOCATION: DEMING P/L DISTRICT
MATRIX: SOIL
SAMPLE DESCRIPTION: BLOW DOWN PIT
S D CONTINUED: COMPOSITE OF BOTTOM
S D CONTINUED:
SAMPLE TIME: 10:00 SAMPLE DATE: 01/07/93

SAMPLE KEY

SAMPLE NUMBER: S93-0007 LOCATION: DEMING P/L DISTRICT
MATRIX: SOIL
SAMPLE DESCRIPTION: BLOW DOWN PIT G-M LINE
S D CONTINUED:
S D CONTINUED:
SAMPLE TIME: 10:30 SAMPLE DATE: 01/07/93



BURLINGTON
ENVIRONMENTAL

General Laboratory Report

Lab Number : 44158
Plant/Generator Name : El Paso Natural Gas; Transmission Operations Lab
Sample Type : Soils; S93-0006 and S93-0007
Date of Receipt : 01/08/93 Analyst:
Date of Report : 02/23/93 QC Checked: *Kristin Deppas*
Parameters for Analysis: TCLP Metals and Organics (8240 and 8270 only)
Outside Lab : Sound Outside Lab Report No: 29533

Data:

These two samples of soil, numbered S93-0006 and S93-0007 were analyzed for TCLP Metals, Volatiles (8240) and Semi-Volatiles (8270) by Sound Analytical Services. Copies of the results are attached.

Comments and Conclusions:

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

Report To: Burlington Environmental
Seattle Facility

Date: February 1, 1993

Report On: Analysis of Soil

Lab No.: 29533

Page 1 of 6

IDENTIFICATION:

Samples received on 01-12-93

Project: El Paso

ANALYSIS:

Lab No. 29533-1

Client ID: S93-0006
44158-1

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311

Volatile Organics per EPA SW-846 Method 8240

Date Extracted: 1-18-93

Date Analyzed: 1-23-93

Compound	Concentration (mg/l)	PQL (mg/l)	Max. Conc. (mg/l)	Flags
Vinyl Chloride	ND	0.010	0.2	
Chloroform	ND	0.005	6.0	
1,2-Dichloroethane	ND	0.005	0.5	
Carbon Tetrachloride	ND	0.005	0.5	
Benzene	ND	0.005	0.5	
Chlorobenzene	ND	0.005	100	
1,1-Dichloroethylene	ND	0.005	0.7	
Methyl Ethyl Ketone	0.016	0.025	200	B, J
Tetrachloroethylene	ND	0.005	0.7	
Trichloroethylene	ND	0.005	0.5	

ND - Not detected.

PQL - Practical Quantitation Limit

Volatile Surrogates

Surrogate	Percent Recovery	Control Limits
Toluene - D8	104	88 - 110
Bromofluorobenzene	99	86 - 115
1,2-Dichloroethane D4	91	76 - 114

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
 Page 2 of 6
 Lab No. 29533
 February 1, 1993

Lab No. 29533-1

Client ID: S93-0006
 44158-1

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311
 Semivolatile Organics per EPA SW-846 Method 8270
 Date Extracted: 1-18-93
 Date Analyzed: 1-21-93

Compound	Concentration (mg/l)	PQL (mg/l)	Max. Conc. (mg/l)	Flags
1,4-Dichlorobenzene	ND	0.0099	7.5	
Hexachloroethane	ND	0.0099	3.0	
Nitrobenzene	ND	0.0099	2.0	
Hexachlorobutadiene	ND	0.0099	0.5	
2,4,6-Trichlorophenol	ND	0.0099	2.0	
2,4,5-Trichlorophenol	ND	0.0099	400	
2,4-Dinitrotoluene	ND	0.0099	0.13	
Hexachlorobenzene	ND	0.0099	0.13	
Pentachlorophenol	ND	0.05	100	
o-Cresol	ND	0.0099	200	
m & p-Cresol	ND	0.0099	200	
Pyridine	ND	0.0099	5.0	

ND - Not Detected

PQL - Practical Quantitation Limit

Semi-Volatile Surrogates

Surrogate Compound	Percent Recovery	Control Limits	
		Water	Soil
d ₅ -Nitrobenzene	74	35 - 114	23 - 120
2-Fluorobiphenyl	68	43 - 116	30 - 115
d ₁₄ -p-Terphenyl	74	33 - 141	18 - 137
d ₆ -Phenol	22	10 - 94	24 - 113
2-Fluorophenol	45	21 - 100	25 - 121
2,4,6-Tribromophenol	89	10 - 123	19 - 122

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
Page 3 of 6
Lab No. 29533
February 1, 1993

Lab No. 29533-1

Client ID: S93-0006
44158-1

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311

ICP Metals by Method 6010

Date Extracted: 1-18-93

Date Analyzed: 1-20-93

<u>Contaminant</u>	<u>Concentration (mg/l)</u>	<u>PQL</u>	<u>Max Conc., (mg/l)</u>
Arsenic	ND	0.1	5.0
Barium	0.69	0.005	100.0
Cadmium	ND	0.005	1.0
Chromium	ND	0.01	5.0
Lead	ND	0.05	5.0
Selenium	ND	0.15	1.0
Silver	ND	0.01	5.0

Mercury by Cold Vapor AA Method 7470

Date Analyzed: 1-22-93

<u>Contaminant</u>	<u>Concentration (mg/l)</u>	<u>PQL</u>	<u>Max Conc., (mg/l)</u>
Mercury	ND	0.002	0.2

ND - Not Detected

PQL - Practical Quantitation Limit

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
 Page 4 of 6
 Lab No. 29533
 February 1, 1993

Lab No. 29533-2

Client ID: S93-0007
 44158-2

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311
 Volatile Organics per EPA SW-846 Method 8240
 Date Extracted: 1-18-93
 Date Analyzed: 1-23-93

Compound	Concentration (mg/l)	PQL (mg/l)	Max. Conc. (mg/l)	Flags
Vinyl Chloride	ND	0.010	0.2	
Chloroform	ND	0.005	6.0	
1,2-Dichloroethane	ND	0.005	0.5	
Carbon Tetrachloride	ND	0.005	0.5	
Benzene	ND	0.005	0.5	
Chlorobenzene	ND	0.005	100	
1,1-Dichloroethylene	ND	0.005	0.7	
Methyl Ethyl Ketone	0.022	0.025	200	J, B
Tetrachloroethylene	ND	0.005	0.7	
Trichloroethylene	ND	0.005	0.5	

ND - Not detected.

PQL - Practical Quantitation Limit

Volatile Surrogates

Surrogate	Percent Recovery	Control Limits
Toluene - D8	105	88 - 110
Bromofluorobenzene	102	86 - 115
1,2-Dichloroethane D4	96	76 - 114

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
 Page 5 of 6
 Lab No. 29533
 February 1, 1993

Lab No. 29533-2

Client ID: S93-0007
 44158-2

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311
 Semivolatile Organics per EPA SW-846 Method 8270
 Date Extracted: 1-18-93
 Date Analyzed: 1-21-93

Compound	Concentration (mg/l)	PQL (mg/l)	Max. Conc. (mg/l)	Flags
1,4-Dichlorobenzene	ND	0.01	7.5	
Hexachloroethane	ND	0.01	3.0	
Nitrobenzene	ND	0.01	2.0	
Hexachlorobutadiene	ND	0.01	0.5	
2,4,6-Trichlorophenol	ND	0.01	2.0	
2,4,5-Trichlorophenol	ND	0.01	400	
2,4-Dinitrotoluene	ND	0.01	0.13	
Hexachlorobenzene	ND	0.01	0.13	
Pentachlorophenol	ND	0.051	100	
o-Cresol	ND	0.01	200	
m & p-Cresol	ND	0.01	200	
Pyridine	ND	0.01	5.0	

ND - Not Detected

PQL - Practical Quantitation Limit

Semi-Volatile Surrogates

Surrogate Compound	Percent Recovery	Control Limits	
		Water	Soil
d ₅ -Nitrobenzene	75	35 - 114	23 - 120
2-Fluorobiphenyl	70	43 - 116	30 - 115
d ₁₄ -p-Terphenyl	78	33 - 141	18 - 137
d ₆ -Phenol	38	10 - 94	24 - 113
2-Fluorophenol	36	21 - 100	25 - 121
2,4,6-Tribromophenol	80	10 - 123	19 - 122

Continued

SOUND ANALYTICAL SERVICES, INC.

Burlington Environmental, Seattle Facility
Page 6 of 6
Lab No. 29533
February 1, 1993

Lab No. 29533-2

Client ID: S93-0007
44158-2

Toxicity Characteristic Leaching Procedure (TCLP) Method 1311

ICP Metals by Method 6010
Date Extracted: 1-18-93
Date Analyzed: 1-20-93

<u>Contaminant</u>	<u>Concentration (mg/l)</u>	<u>PQL</u>	<u>Max Conc., (mg/l)</u>
Arsenic	ND	0.1	5.0
Barium	0.79	0.005	100.0
Cadmium	ND	0.005	1.0
Chromium	ND	0.01	5.0
Lead	ND	0.05	5.0
Selenium	ND	0.15	1.0
Silver	0.01	0.01	5.0

Mercury by Cold Vapor AA Method 7470
Date Analyzed: 1-22-93

<u>Contaminant</u>	<u>Concentration (mg/l)</u>	<u>PQL</u>	<u>Max Conc., (mg/l)</u>
Mercury	ND	0.002	0.2

ND - Not Detected

PQL - Practical Quantitation Limit

SOUND ANALYTICAL SERVICES


DENNIS L. BEAN

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206) 922-2310 - FAX (206) 922-5047

DATA QUALIFIER FLAGS

- ND: Indicates that the analyte was analyzed for but was not detected. The associated numerical value is the practical quantitation limit, corrected for sample dilution.
- J: The analyte was analyzed for and positively identified, but the associated numerical value is an estimated quantity.
- C: The identification of this analyte was confirmed by GC/MS.
- B: This analyte was also detected in the associated method blank. There is a possibility of blank contamination.
- E: The concentration of this analyte exceeded the instrument calibration range.
- D: The reported result for this analyte is calculated based on a secondary dilution factor.
- A: This TIC is a suspected aldol-condensation product.
- M: Quantitation Limits are elevated due to matrix interferences.
- S: The calibration quality control criteria for this compound were not met. The reported concentration should be considered an estimated quantity.
- X1: Contaminant does not appear to be "typical" product. Elution pattern suggests it may be _____.
- X2: Contaminant does not appear to be "typical" product. Further testing is suggested for identification.
- X3: Identification and quantification of peaks was complicated by matrix interference; GC/MS confirmation is recommended.
- X4: RPD for duplicates outside QC limits. Sample was re-analyzed with similar results. Sample matrix is nonhomogeneous.
- X4a: RPD for duplicates outside QC limits due to analyte concentration near the method practical quantitation limit/detection limit.
- X5: Matrix spike was diluted out during analysis.
- X6: Recovery of matrix spike outside QC limits. Sample was re-analyzed with similar results.
- X7: Recovery of matrix spike outside QC limits. Matrix interference is indicated by blank spike recovery data.
- X8: Surrogate was diluted out during analysis.
- X9: Surrogate recovery outside QC limits due to matrix composition.
- X10: Surrogate recovery outside QC limits due to high contaminant levels.

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

QUALITY CONTROL REPORT

TCLP Metals

Client: Burlington Environmental, Seattle Facility
Lab No: 29533qc1
Units: mg/l
Date: February 1, 1993

METHOD BLANK

Parameter	Blank Value	PQL
Arsenic	ND	0.1
Barium	ND	0.005
Cadmium	ND	0.01
Chromium	ND	0.05
Lead	ND	0.15
Mercury	ND	0.002
Selenium	ND	0.15
Silver	ND	0.01

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

QUALITY CONTROL REPORT

TCLP VOLATILE ORGANICS PER EPA SW-846 METHOD 8240

Client: Burlington Environmental, Seattle Facility
 Lab No: 29533qc2
 Units: mg/l
 Date: February 1, 1993

METHOD BLANK

Compound	Blank Value	PQL	FLAGS
Vinyl Chloride	ND	0.010	
Chloroform	ND	0.005	
1,2-Dichloroethene	ND	0.005	
Carbon Tetrachloride	ND	0.005	
Benzene	ND	0.005	
Chlorobenzene	ND	0.005	
1,1-Dichloroethylene	ND	0.005	
Methyl Ethyl Ketone	0.009	0.025	J
Tetrachloroethene	ND	0.005	
Trichloroethylene	ND	0.005	

ND = Not Detected

PQL = Practical Quantitation Limit

VOLATILE SURROGATES

Surrogate	Percent Recovery	Control Limits	
		Water	Soil
Toluene - d8	102	86 - 115	81 - 117
Bromofluorobenzene	106	76 - 114	74 - 121
1,2-Dichloroethane d4	99	88 - 110	70 - 121

SOUND ANALYTICAL SERVICES, INC.

SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS

4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

QUALITY CONTROL REPORT

TCLP SEMIVOLATILE ORGANICS PER EPA SW-846 METHOD 8270

Client: Burlington Environmental, Seattle Facility
Lab No: 29533qc3
Units: mg/l
Date: February 1, 1993
Blank No: SBLK08-S7422

METHOD BLANK

Compound	Blank Value	PQL	FLAGS
1,4-Dichlorobenzene	ND	0.01	
Hexachloroethane	ND	0.01	
Nitrobenzene	ND	0.01	
Hexachlorobutadiene	ND	0.01	
2,4,6-Trichlorophenol	ND	0.01	
2,4,5-Trichlorophenol	ND	0.01	
2,4-Dinitrotoluene	ND	0.01	
Hexachlorobenzene	ND	0.01	
Pentachlorophenol	ND	0.05	
o-Cresol	ND	0.01	
m & p-Cresol	ND	0.01	
Pyridine	ND	0.01	

ND = Not Detected.

PQL = Practical Quantitation Limit

SEMIVOLATILE SURROGATES

Surrogate	Percent Recovery	Control Limits	
		Water	Soil
Nitrobenzene - d5	93	35 - 114	23 - 120
2-Fluorobiphenyl	51	43 - 116	30 - 115
p-Terphenyl-d14	60	33 - 141	18 - 137
Phenol-d6	40	10 - 94	24 - 113
2-Fluorophenol	59	21 - 100	25 - 121
2,4,6-TBP	74	10 - 123	19 - 122



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



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

February 19, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-306

Mr. Phillip Baca, Manager
Region Compliance Engineering
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

**RE: Discharge Plan Requirement
Deming Compressor Station
Luna County, New Mexico**

Dear Mr. Baca:

Under the provision of the Water Quality Control Commission (WQCC) Regulations you are hereby notified that the filing of discharge plans is required for the Deming Compressor Station located in Luna County, New Mexico.

The notification of discharge plan requirement is pursuant to section 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in Section 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping.

A copy of the regulations is enclosed for your convenience. Also enclosed is an OCD guide to the preparation of discharge plans at compressor stations. The guidelines address berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Three copies of the discharge plan application should be submitted.

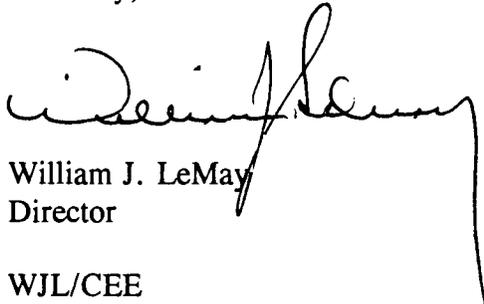
Mr. Phillip Baca
February 19, 1993
Page 2

The discharge plan application is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen hundred- eighty (1380) dollars for compressor stations with horsepower in excess of 3000 hp. The fifty (50) dollar filing fee is due when you submit the application. The flat rate fee is due upon approval of the discharge plan.

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

If there are any questions on this matter, please feel free to contact Chris Eustice at 827-5824.

Sincerely,



William J. LeMay
Director

WJL/CEE

Enclosure

cc: Roy Johnson



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



BRUCE KING
GOVERNOR

December 3, 1992

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

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-314

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

**RE: PIT CLOSURES
EL PASO NATURAL GAS COMPANY
LUNA COUNTY, NEW MEXICO**

Dear Mr. Fong:

The New Mexico Oil Conservation Division (OCD) has reviewed the El Paso Natural Gas Company's (EPNG) November 5, 1992 "PIT CLOSURE PLAN FOR PITS OUTSIDE THE VULNERABLE GROUNDWATER ZONE, LOCATED NEAR DEMING, NEW MEXICO" and December 2, 1992 "ADDITIONAL DATA REQUEST FOR EL PASO NATURAL GAS COMPANY'S (EPNG) PIT CLOSURE NEAR DEMING, NEW MEXICO". These documents request approval of a pit closure plan for two unlined pipeline blowdown pits and one unlined turbine blowdown pit near Deming, New Mexico.

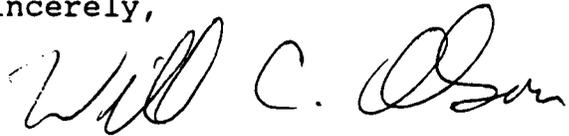
Since these pits are associated with the mainline transmission of natural gas, they are not exempt from hazardous waste provisions under federal RCRA subtitle C regulations. Consequently, the OCD requests that EPNG supply the OCD with the following information:

1. The volumes and types of fluids discharged to each pit.
2. The distance to the nearest fresh water well from each pit.
3. Complete hazardous waste characterization of the soils in each pit including laboratory analysis by the Toxic Characteristic Leaching Procedure (TCLP) method for all Toxic Characteristic (TC) hazardous constituents. Sampling must be performed using methods contained in the U.S. Environmental Protection Agency SW-846 "TEST METHODS FOR EVALUATING SOLID WASTE."

Mr. Martin A. Fong
December 3, 1992
Page 2

Submission of the above requested information will allow the review process to continue. If you have any questions, please do not hesitate to contact me at (505) 827-5885.

Sincerely,

A handwritten signature in cursive script that reads "William C. Olson". The signature is written in dark ink and is positioned above the typed name.

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Mike Williams, OCD Artesia District Supervisor



OIL CONSERVATION DIVISION
RECEIVED

'92 DEC: 4 AM 8 48

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

December 2, 1992

*File received
12/2/92*

Mr. Bill Olson
New Mexico Oil Conservation Division
Environmental Bureau
P. O. Box 2088
Santa Fe, New Mexico 87504

Subject: Additional Data Request for El Paso Natural Gas Company's (EPNG) Pit Closures Near Deming, New Mexico.

In our phone conversation on December 1, 1992, you requested additional information necessary for a full evaluation of EPNG's Pit Closure Plan for three blowdown pits located near Deming, New Mexico. The data requested concerned the location of the pipeline and turbine blowdown pits and the depth to groundwater in the general area.

The following information is the survey location for the three pits EPNG wishes to close:

Turbine Blowdown Pit:

EPNG Compressor #4: NW/4 of Sec. 3, T-23S, R-12W

Pipeline Blowdown Pits:

Globe-Miami Line #2004: SW/4 of Sec. 30, T-24S, R-12W

California Lines #1100/1103: SW/4 of Sec. 25, T-23S, R-13W

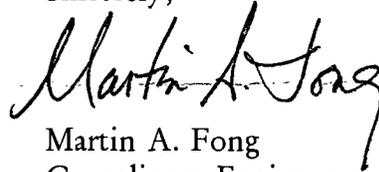
EPNG owns and operates three water supply wells in the general area. The latest static water level information for each well and its location is provided by the following:

	<u>Static Water Level</u>	<u>Date</u>
Water Well No. 6	170 ft. @ 24 hours	10/15/92
SE/4 of Sec. 34, T-23S, R-11W	184 ft. @ 30 minutes	6/12/91
Water Well No. 10	186 ft. @ 30 minutes	10/15/92
SE/4 of Sec. 32, T-23S, R-11W	178 ft. @ 30 minutes	6/12/91
Water Well No. 12	151 ft. @ 30 minutes	6/13/91
SW/4 of Sec. 34, T-24S, R-12W		

Letter to Mr. Bill Olson
New Mexico Oil Conservation Division
December 2, 1992
Page 2

I hope the provided information answers your request. If there are any questions concerning this matter, please feel free to contact me at 915/541-3057.

Sincerely,

A handwritten signature in cursive script that reads "Martin A. Fong". The signature is written in black ink and is positioned above the typed name and title.

Martin A. Fong
Compliance Engineer



State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
 Santa Fe, New Mexico 87505

STATE OF
 NEW MEXICO
 OIL
 CONSERVATION
 DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone	<input type="checkbox"/> Personal	Time 1355	Date 12/1/92
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<u>Originating Party</u>	<u>Other Parties</u>
Bill Olson - @ Envir Bureau	Martin Fong - EPNG (915) 541-3057

Subject
 Pit closure near Deming

Discussion
 OCD received fax w/ closure plan but need to know location (Sec, Township, Range, unit) and depth to ground water at site

Conclusions or Agreements
 He will supply.

Distribution _____ Signed Bill Olson

File: Deming P/L. Env.

El Paso
Natural Gas CompanyP. O. BOX 1402
EL PASO, TEXAS 79978
PHONE 915-541-2600

November 5, 1992

Certified Mail
Return Receipt Requested

Mr. Roy Johnson
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504

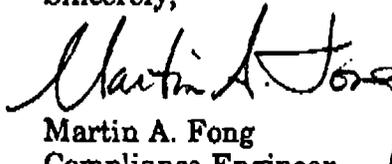
**Subject: Pit Closure Plan for Pits Outside the Vulnerable Groundwater Zone,
Located Near Deming, New Mexico.**

Dear Mr. Johnson:

El Paso Natural Gas Company (EPNG) provides the attached pit closure plan for two pipeline blowdown pits and one turbine blowdown pit located near Deming, New Mexico. The enclosed plan was prepared from EPNG's Pit Closure Plan for Pits Outside the existing Vulnerable Groundwater Zone in the San Juan Basin, as submitted to the OCD by letter dated March 11, 1992. The prototype pit closure plan for the San Juan Basin was reviewed and approved by the OCD on March 18, 1992.

Pit closure of the three blowdown pits will be performed in accordance to the submitted plan unless otherwise specified by the OCD. If there are any questions concerning this matter or if additional information is found necessary, please feel free to contact me at (915) 541-3057.

Sincerely,



Martin A. Fong
Compliance Engineer

Attachment

**Closure Plan for Pipeline and Turbine Blowdown
Pits Outside the Vulnerable Groundwater Zone**

**Prepared for:
New Mexico Oil Conservation Division
November 5, 1992**

**El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978
(915) 541-3057**

Closure Plan for Pipeline and Turbine Blowdown Pits Outside the Vulnerable Groundwater Zone

I. General Information

El Paso Natural Gas (EPNG) Company proposes to close three pits which lie outside the vulnerable groundwater zone. The plan was developed from EPNG's Pit Closure Plan for Pits Outside the existing Vulnerable Groundwater Zone in the San Juan Basin, as earlier submitted to the OCD. The three blowdown pits addressed by this pit closure plan are located in Luna County, New Mexico.

II. Closure Plan

The three blowdown pits addressed by this Pit Closure Plan are situated in Luna County, located near Deming, New Mexico. The subject pipeline blowdown pits were used to collect pipeline liquids, mostly lubricating oil used in upstream compressor stations, removed from EPNG's natural gas transmission lines. The turbine blowdown pit was used to collect liquids removed from the Station #4 Compressor station piping.

EPNG acknowledges that closing the subject blowdown pits in the manner described below does not relieve the Company from any potential future responsibilities. The pits to be considered for closure are outside the existing vulnerable groundwater zone and the proposed expanded zone.

The following functions will be performed for the blowdown pits to be closed:

1. An on-site EPNG inspector will coordinate all work activities to assure adherence to the provided closure plan.
2. All drain and blowdown line piping downstream of the primary shutoff valve will be disassembled and removed.
3. Any "duck netting" will be removed from the site.
4. All foreign material in the pit (rags, wood, metal, etc.) will be disposed of as solid waste.
5. The pits will be pumped free of liquids. The liquids will be removed from the site by vacuum truck, transported and sold to a Used Oil Recycler.
6. Once emptied of any scrap waste, the pits will be thoroughly tilled to a depth of 12 inches and backfilled with the berm soil.
7. The entire pit area will be crowned to a height of 4 inches above grade.

**Closure Plan for Pipeline and Turbine Blowdown
Pits Outside the Vulnerable Groundwater Zone**

8. Pit closure documentation sheets (see attached EPNG form) will be generated and copies provided to the New Mexico OCD District and Santa Fe Offices. The Location Pit Closure Report/Record forms will include the following information:
 - A. The location (Section, Township, and Range) of the earthen pit closed.
 - B. Time and dates pit work is commenced and completed.
 - C. The size of the pit.
9. All solid waste collected from the pits will be properly disposed of at the local Luna County Landfill or the NuMex Landfill, near Sunland Park, New Mexico.

III. Other Information

All correspondence regarding this plan and any questions concerning this matter should be directed to EPNG Transmission Operations, Environmental Compliance Engineering, at the address below:

Mr. Martin A. Fong
Compliance Engineer
Transmission Operations
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978
(915) 541-3057

Affirmation

I hereby certify that I am familiar with the information contained in this correspondence submitted as the Closure Plan for three blowdown pits located in Luna County, near Deming, New Mexico. The subject pits are outside the Vulnerable Groundwater Zone. The information herein is true, accurate, and complete to the best of my knowledge and belief.

Martin A. Fong
Signature

11-05-92
Date

Martin A. Fong
Printed Name

Compliance Engineer
Title

Location Pit Closure Report/Record

Well Name: _____

Meter Number: _____

Pipeline District: _____

Co-ordinate Information:
Unit: _____

Pit Size:
Length: _____

Section: _____

Width: _____

Township: _____

Range: _____

Duck Netting: Yes No

Fill Dirt: Yes No

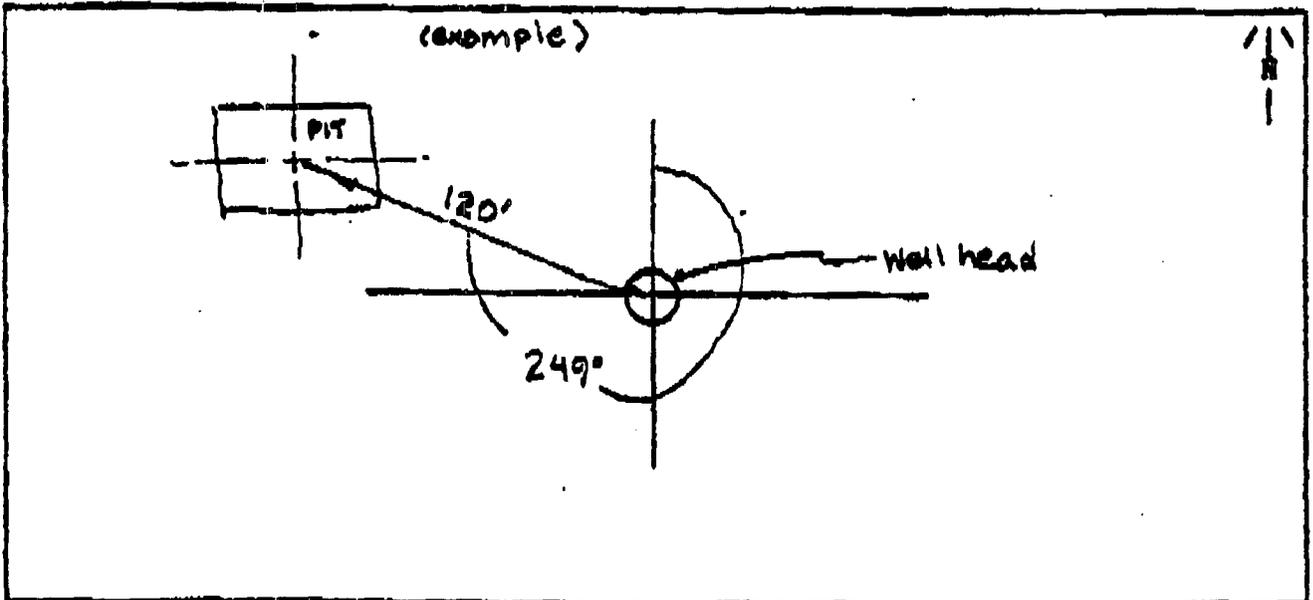
Approx. cu.yds.:

Date Started: _____

Vacuum Truck: Yes No

Date Completed: _____

Approx. Bbls:



Signature of Inspector

Remarks: _____

ChromP. O. BOX 4990
FARMINGTON, NEW MEXICO 87409
PHONE: 505 326-2041

VIA OVERNIGHT MAIL

March 11, 1992

Mr. Roger Anderson
Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504

Re: EPNG's Closure Plan for Pits Outside the Vulnerable Groundwater Zone

Dear Mr. Anderson:

Enclosed for your review is EPNG's Closure Plan for Pits Outside the existing Vulnerable Groundwater Zone. The plan was developed to reduce the number of open pits which provide an attractive location for unauthorized dumping. Thus, it is a measure that offers protection of surface waters and ground waters.

EPNG respectfully requests your approval as soon as possible. We anticipate this pit closure project to start as soon as we acquire your approval.

Should you or agency personnel have any information requests, please direct questions to myself at (915) 541-3531 or to Richard Duarte, (505) 599-2175.

Thank you for your prompt consideration to this matter.

Sincerely,

Richard Duarte for

W. David Hall, PE
Manager
Compliance Engineering
Field Services Division

enclosure

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNORPOST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87604
SDM 827-8600

March 13, 1992

CERTIFIED MAIL
RETURN RECEIPT NO. P-786-903-839

Mr. W. David Hall
Compliance Engineering Manager
Field Services Division
El Paso Natural Gas Company
P.O. Box 4990
Farmington, New Mexico 87499

RE: EPNG CLOSURE PLAN FOR PITS OUTSIDE THE VULNERABLE AREA

Dear Mr. Hall:

The New Mexico Oil Conservation Division (OCD) has completed a review of the El Paso Natural Gas Company (EPNG) March 11, 1992 "EPNG's Closure Plan For Pits Outside The Vulnerable Area Groundwater Zone".

The OCD approves of the above referenced closure plan with the following conditions:

1. The monthly schedule of pits to be closed will include information on the operator, lease name, well name, well number and location (ie. Township, Range Section and Unit Letter) of the pits.
2. The "Location Pit Closure Report/Record" will include information on:
 - a. Operator, lease name and well number.
 - b. Pit type (ie. Dohy pit, line drip pit)

The OCD commends EPNG for their initiative and commitment to operate in a manner that is protective of the environment. The OCD looks forward to working with you on implementing this plan.

Please be advised that OCD approval does not relieve you of liability should your operation result in actual pollution of surface waters, ground waters or the environment which may be actionable under other laws and/or regulations. In addition, this approval does not relieve you of responsibility for compliance with other city, county, state and federal laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

cc: Denny Foust, OCD Aztec Office



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

January 18, 1989

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-106-675-556

Mr. Loren E. Gearhart, P.E.
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

RE: Lined Disposal Pond
Deming Compressor Station

Dear Mr. Gearhart:

The Oil Conservation Division (OCD) has received and evaluated the application and construction design drawings you submitted for the proposed lined pond at the Deming Compressor Station. The pond is to accept primarily waste fluids from the compressor station.

The design and specifications of the lined pit are adequate for the protection of ground and surface water and approved with the following provision:

1. An adequate free board will be maintained at all times to prevent over-topping of the side wells.

The application was submitted pursuant to Rule 8 of the OCD Rules and Regulations and is approved pursuant to that rule. The application, dated December 14, 1988, was received by the OCD on December 16, 1988, and supplemental information, dated January 3, 1989, was received by the OCD on January 9, 1989.

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

If you have any questions, please do not hesitate to call Roger Anderson at (505) 827-5884.

Sincerely,

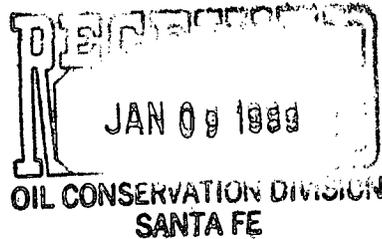
Victor L. Lyon

for William J. LeMay
Director

RCA/sl

cc: OCD Santa Fe District

January 3, 1989



Mr. Roger C. Anderson
New Mexico Oil Conservation Division
State Land Office
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

Subject: Lined Disposal Pond at El Paso Natural Gas Company's
Deming Compressor Station in Luna County, New Mexico

Dear Mr. Anderson:

In response to your request for information dated December 28, 1988 I submit the following for your review and evaluation.

Question 1: What is the media between the primary and secondary liner outside the leak detection sump?

Response 1: The material used between the liners is 100% polyester, needle-punched nonwoven 200 mil thick fabric that weighs 16 oz. per square yard. I have enclosed a sample for the fabric and a data sheet from the manufacturer. The fabric is continuous throughout the bottom of the pit including the sump. The fabric is also located beneath the secondary liner, including the sump, in lieu of course grained sand.

Question 1 (continued): If the geotextile membrane is considered to be equivalent to a conventional granular system with pipes it must meet the following criteria.

Criteria 1a: The membrane must have sufficient hydraulic transmissivity to permit rapid collection and removal of any migration of fluids in the space between the liners to the leak detection sump.

Response 1a: The transmissivity of QuilLine 160 is .042 gal/min/ft. of width.

Criteria 1b: The membrane must be chemically resistant the waste stored in the pit.

Response 1b: The polyester material is chemically resistant to the wastewater generated from the cooling tower blowdown. Polyester is a rot-proof polymer which does not have chemical binders which are subject to degradation.

Mr. Roger C. Anderson
New Mexico Oil Conservation Division
January 3, 1989
Page 2

Criteria lc: The membrane must be compatible with the liners.

Response lc: The polyester material is fully compatible with the hypalon primary and secondary liner material.

Criteria ld: The membrane must not compress under the maximum anticipated load caused by the fluids in the pond causing a decrease in hydraulic transmissivity.

Response ld: The filaments of the QuiLine geotextile are entangled by a mechanical process called needling. This process confers a high porosity even under heavy loads, a substantial capacity for deformation without plastic yield, and a high drainage capacity in both the vertical and horizontal plane.

Criteria le: The membrane must not allow direct contact of the primary liner with the secondary liner.

Response le: The density of the 16 oz/square yard material is high enough to keep the primary and secondary liners from coming in contact with each other.

Criteria lf: The membrane must cover all areas between the liners outside of the leak detection sump that are likely to be exposed to the fluids in the pit and must be continuous with permeable material in the sump.

Response lf: The membrane covers all areas between the liners outside the leak detection sump as well as being continuous with the permeable material in the sump.

Question 2: Please supply the type and grade of the primary and secondary liners.

Response 2: The primary liner is 60 mil hypalon and the secondary liner is 30 mil hypalon.

Question 3: Please supply information concerning Part F requirements for fencing and signs.

Response 3: A livestock proof fence will be constructed around the pit but not on the levee. A sign will be posted on the fence not less than 12" x 24" with lettering of not less than 2" which identifies the operator of the disposal pit, the location of the pit by quarter-quarter section, township, and ranges; and emergency telephone numbers.

Mr. Roger C. Anderson
New Mexico Oil Conservation Division
January 3, 1989
Page 3

Question 4: What are your maintenance and contingency plans pursuant to parts G and H of the guidelines?

Response 4: The leak detection sump will be inspected monthly for fluids and the plant superintendent will be responsible for making sure that the inspections are performed and that a log of the inspections be made available upon request. If fluids are found to be present, a sample will be taken and the results sent to the OCD. The plant superintendent will also be responsible for making sure that the outside walls of all levees be maintained in such a manner to prevent erosion and will also inspect the outside walls of the levees after any rainfall of consequence.

In the event of a liner failure, the pit liquids will be transferred to a temporarily lined pit while the pit liner is being repaired.

If you have any questions, please feel free to call me at 915/541-5341. Thanks.

Sincerely yours,



Loren E. Gearhart, P.E.
Sr. Environmental Engineer
Environmental & Safety Affairs Department

mts

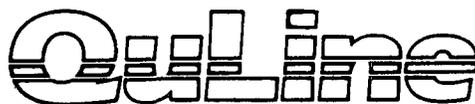
QULINE GEOTEXTILES

QULINE TYPE 4 GEOTEXTILES ARE 100% POLYESTER, NEEDLE-PUNCHED NONWOVEN ENGINEERING FABRICS. THEY ARE RESISTANT TO FREEZE-THAW CONDITIONS, SOIL CHEMICALS AND ULTRA-VIOLET EXPOSURE. QULINE GEOTEXTILES ARE DESIGNED FOR CONSTRUCTION PROJECTS REQUIRING: 1) SEPARATION, 2) TENSILE REINFORCEMENT, 3) PLANAR WATER FLOW AND, 4) FILTRATION.

QULINE GEOTEXTILES ARE AVAILABLE IN WIDTHS TO 25 FEET (UNSEAMED) AND WEIGHTS TO 100 OUNCES PER SQUARE YARD. QULINE IS THE GEOTEXTILE THAT YOU CAN SPECIFY WITH CONFIDENCE.

PHYSICAL PROPERTIES OF QULINE TYPE 4 GEOTEXTILES

PRODUCT	Q60	Q80	Q100	Q120	Q140	Q160	Q180	Q200
WEIGHT - oz./square yard (ASTM D-3776)	6	8	10	12	14	16	18	20
THICKNESS, mils (ASTM D-1777)	90	110	135	160	180	200	220	240
GRAB STRENGTH, LBS (ASTM D-4632)	160	225	290	330	395	500	560	650
GRAB ELONGATION, % (ASTM D-4632)	95	95	95	95	90	90	90	90
TRAP TEAR STRENGTH, lbs (ASTM D-4533)	85	100	110	125	150	170	200	230
PUNCTURE STRENGTH - 5/16", lbs. (ASTM D-3787)	85	120	140	155	180	210	240	270
MULLEN BURST STRENGTH, psi (ASTM D-3786)	325	430	500	600	690	770	850	925
WATER FLOW RATE, gal/min/square foot (ASTM D-4491)	190	175	160	145	130	120	110	100
PERMITTIVITY, sec ⁻¹ (ASTM D-4491)	2.58	2.38	2.18	1.97	1.77	1.63	1.50	1.36
COEFFICIENT OF PERMEABILITY, cm/sec	.32	.38	.40	.42	.46	.46	.48	.48
TRANSMISSIVITY, gal/min/foot width x 10 ⁻³	12	18	25	30	38	42	47	50
AOS, U.S. STANDARD SEIVE (CWO-02215 MOD)	70-100	70-100	70-100	100-140	100-140	120-170	120-170	140-230



NONWOVEN DIVISION OF WELLMAN, INC.

P.O. BOX 7809
 CHARLOTTE, N.C. 28241
 (704) 588-4307
 (800) 222-1075

GEOTEXTILES

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2099
STATE LAND OFFICE BUILDING
SANTA FE NEW MEXICO 87504
(505) 827-5800

December 28, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Loren E. Gearhart
Senior Environmental Engineer
EL PASO NATURAL GAS COMPANY
P. O. Box 1492
El Paso, Texas 7978

RE: Lined disposal pit
Deming Compressor Station

Dear Mr. Gearhart:

The Oil Conservation Division (OCD) has received your letter dated December 14, 1988 informing us of your plans to upgrade the existing disposal pit at the Deming Compressor Station. Pursuant to Rule 8 of the OCD Rules and Regulations, all lined pits and below grade tanks that may be used to contain fluids subject to the jurisdiction of the Division under the Oil and Gas Act must have OCD approval prior to use. Therefore, your submittal will be reviewed and evaluated as an application to construct and operate a lined disposal pit.

The following comments and requests are based on review of the application and its enclosed drawings and a phone conversation on December 21, 1988 with John Bridges, Henry Van, Donald Payne and me:

1. Part IV.C.2.d of the OCD Guidelines for Permit Application, Design, and Construction of Waste Storage/Disposal Pits (enclosed) states, if a drainage and sump leak detection is used, drainage pipes shall be installed between the primary and secondary liners in sufficient density so that no point in the pit is more than twenty (20) feet from a pipe and the material between the pipes shall be permeable enough to allow transport of fluids to the pipe.

The drawings submitted show a 27' x 16' leak detection sump in the middle of a 400' x 435' pit. The drawings further indicate that the primary and secondary liner in the rest of the pit are separated only by a $\frac{1}{2}$ inch thick 16 oz geotextile membrane with no drainage pipe, laterals, or permeable media.

Please indicate if a permeable media, such as a coarse grain sand, is placed between the primary and secondary liner outside of the leak detection sump.

If the $\frac{1}{2}$ inch thick, 16 oz geotextile membrane that is shown between the liners is considered to be equivalent to a conventional granular system with pipes it must meet the following criteria:

- a) The membrane must have sufficient hydraulic transmissivity to permit rapid collection and removal of any migration of fluids in the space between the liners to the leak detection sump.
- b) The membrane must be chemically resistant to the waste stored in the pit.
- c) The membrane must be compatible with the liners.
- d) The membrane must not compress under the maximum anticipated load caused by the fluids in the pond causing a decrease the hydraulic transmissivity.
- e) The membrane must not allow direct contact of the primary liner with the secondary liner.
- f) The membrane must cover all areas between the liners outside of the leak detection sump that are likely to be exposed to the fluids in the pit and must be continuous with the permeable material in the sump.

If you propose to use the geotextile membrane as an alternative to the conventional system, please supply information and data that meets the above criteria.

- 2) The type and grade of the primary and secondary liners was not included in the application. Please supply this information.
- 3) Fencing and signs were not discussed in the application. Please supply this information. Part F. of the guidelines contains these requirements.
- 4) A maintenance and contingency plan are required pursuant to Parts G and H of the guidelines. Please provide these plans.

Mr. Laren E. O'chart
December 28, 1988
Page 3

If you have any questions, please call me at (505) 827-5884.

Sincerely,



Roger C. Anderson
Environmental Engineer

Enc.

cc: R. Johnson - OCD Santa Fe.
J. Bridges - EPNG
H. Van - EPNG
D. Payne - EPNG

El Paso
Natural Gas Company

December 14, 1988

Mr. Roger C. Anderson
New Mexico Oil Conservation Division
State Land Office
310 Old Santa Fe Trail
Santa Fe, NM 87504

Subject: Upgrade of Existing Disposal at El Paso Natural Gas
Deming Compressor Station in Luna County, New Mexico

Dear Mr. Anderson:

El Paso Natural Gas Company (EPNG) is planning to upgrade an existing unlined disposal pit located in Section 32, T23S, R11W of Luna County about 10 miles west of Deming, New Mexico. This is not a new discharge nor is the character or location of the discharge being altered. The existing unlined pit and the lined pit are located on EPNG property at the Deming Compressor Station. When the lined pit is fully operational, the contents of the unlined pit will be allowed to evaporate. When the unlined pit is dry, the soil will be sampled that the pit closed if the results are satisfactory.

According to Part 1-201 of the New Mexico Water Quality Control Commission Regulations amended through November 17, 1983, a Notice of Intent to Discharge is not required. However, as a courtesy to the New Mexico Oil Conservation Division, I am enclosing two sets of Drawing Nos. 3-DE-1-M12 and 3-DE-1-M13. I would appreciate your comments and suggestions. Ground breaking for this job has already begun, so an early response would be helpful.

If you have any questions, please feel free to call me at 915/541-5341. Thank you.

Sincerely yours,



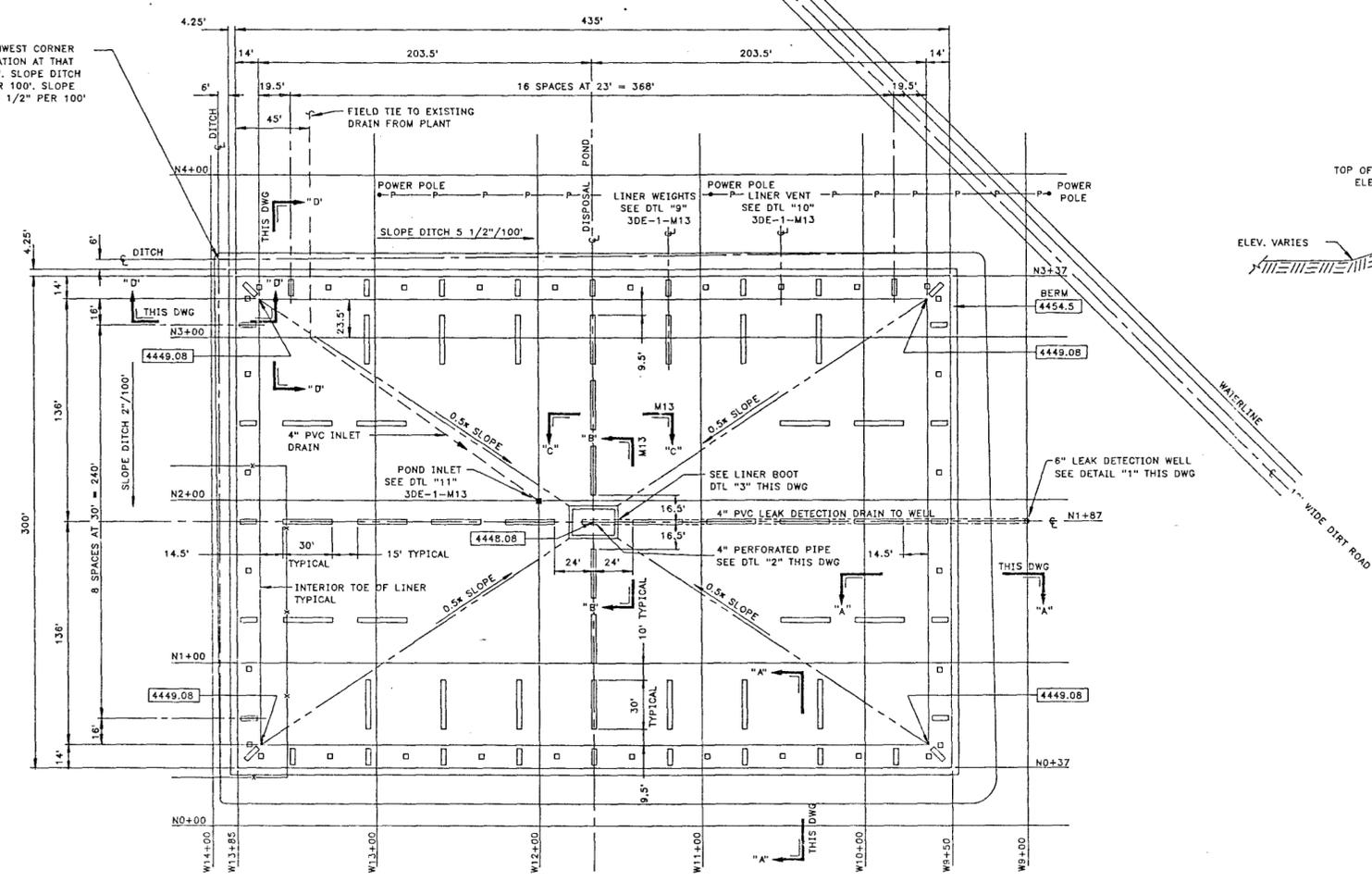
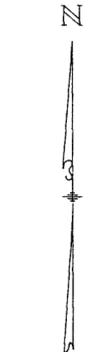
Loren E. Gearhart, P.E.
Senior Environmental Engineer
Environmental and Safety Affairs Department

LEG:cds

Enclosure

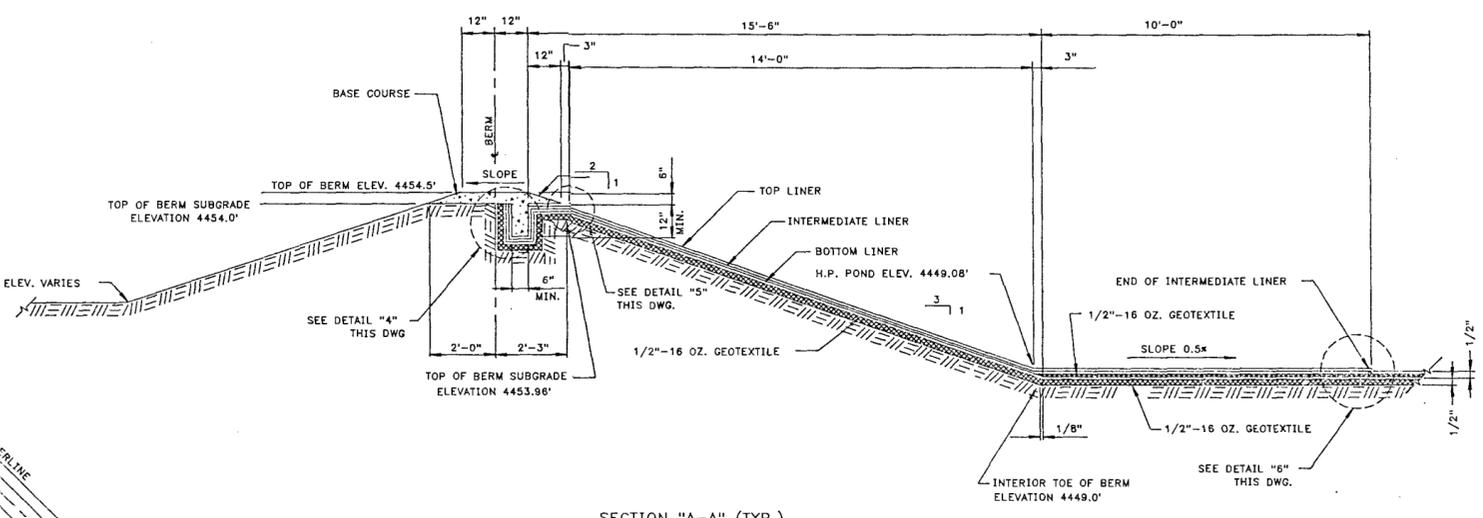
*Though no notice
of intent needed,
still needs review
either under OCB
rule 807 under
WQCC 1-202-*

BEGIN DITCH AT NORTHWEST CORNER BOTTOM OF DITCH ELEVATION AT THAT POINT IS TO BE 4451.0'. SLOPE DITCH DRAINING SOUTH 2" PER 100'. SLOPE DITCH DRAINING EAST 5 1/2" PER 100'

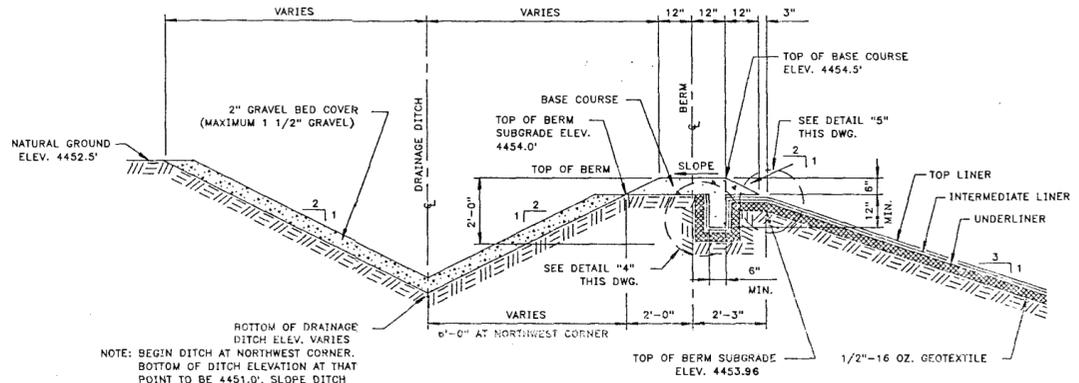


PLAN
SCALE: 1" = 50'

NOTES: BENCHMARK ELEVATION 4451.90 AT U.S.G.S. BRASS CAP N0+00, W26+54
INDICATES NEW FINISH ELEVATION

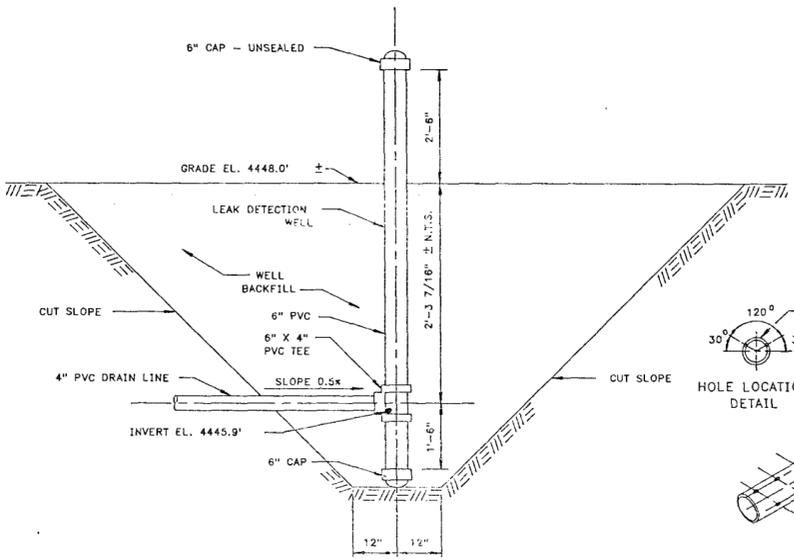


SECTION "A-A" (TYP.)
THIS DWG. SCALE: NONE

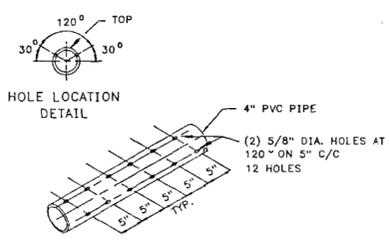


NOTE: BEGIN DITCH AT NORTHWEST CORNER. BOTTOM OF DITCH ELEVATION AT THAT POINT IS TO BE 4451.0'. SLOPE DITCH DRAINING SOUTH 2" PER 100'. SLOPE DITCH DRAINING EAST 5 1/2" PER 100'

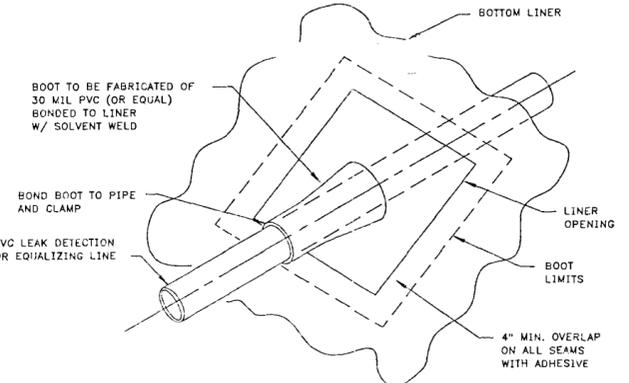
SECTION "D-D"
THIS DWG. SCALE: 3/8" = 1'-0"



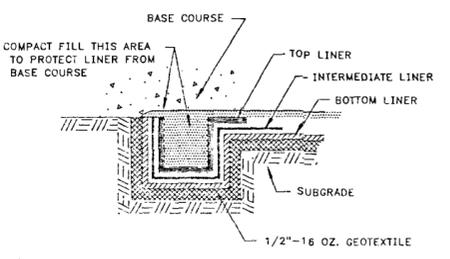
DETAIL "1"
LEAK DETECTION WELL
SCALE: 1/2" = 1'-0"



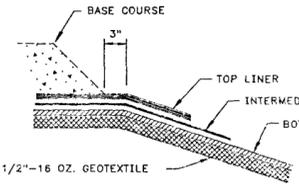
DETAIL "2"
PERFORATED PIPE
SCALE: NONE



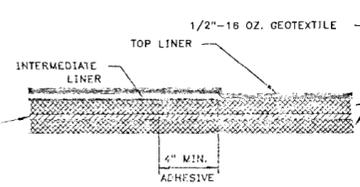
DETAIL "3"
BOOT
SCALE: NONE
THIS DWG.



DETAIL "4"
THIS DWG. SCALE: NONE

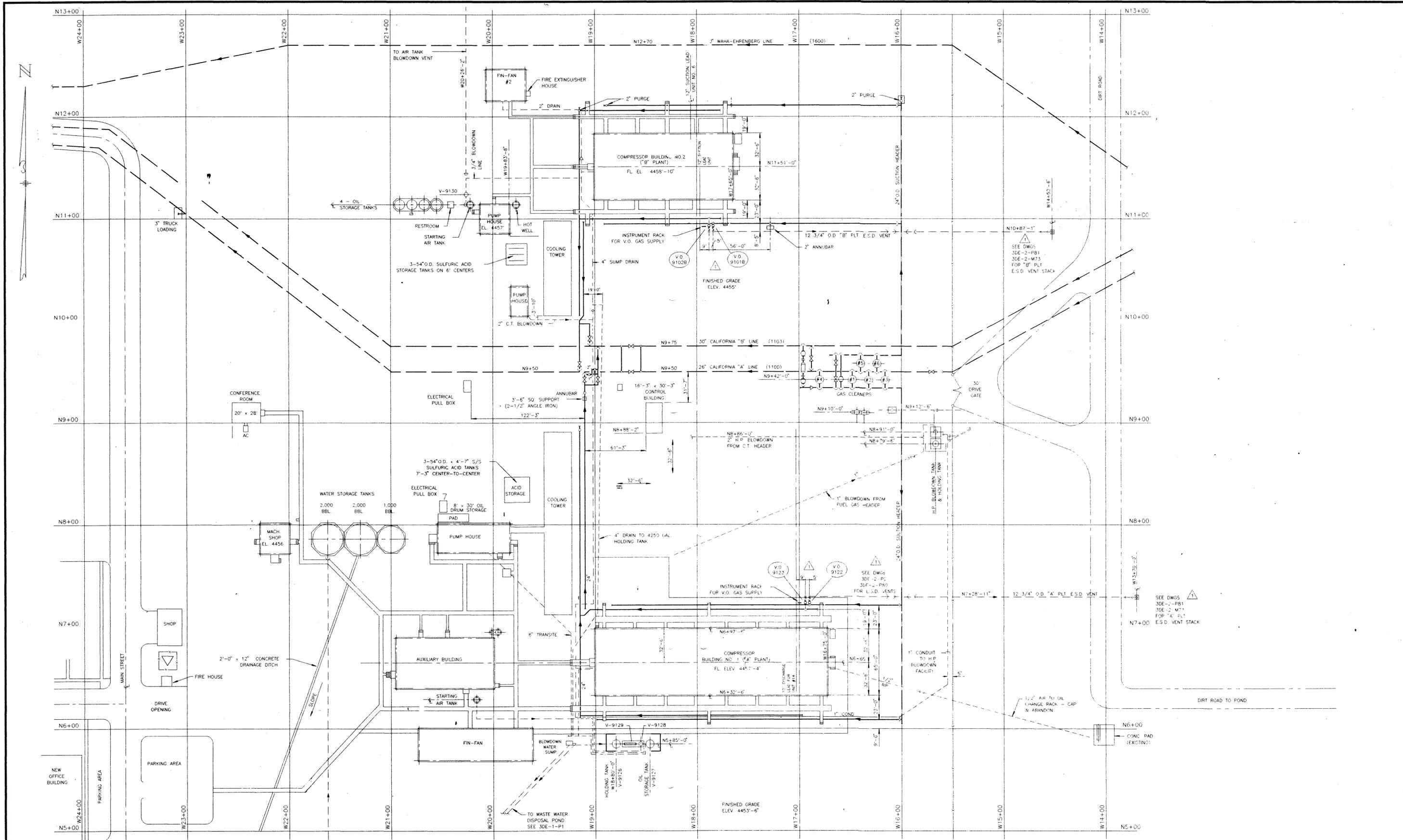


DETAIL "5"
THIS DWG. SCALE: NONE



DETAIL "6"
THIS DWG. SCALE: NONE

LEGEND		REFERENCE DRAWINGS		NO. DATE FY		DESCRIPTION		W.O. APP. PRT. ISEP. DATE TO		ENG. RECORD DATE		 NATURAL GAS COMPANY	
		3DE-1-M13 MISC SECTIONS & DETAILS								DRAFTING DESIGN CBI 11/1/88		DEMING COMPRESSOR STATION WASTE WATER DISPOSAL POND PLAN AND DETAILS	
		3DE-1-F1 FLOT PLAN								COMPUTER GRAPHICS PD 10/31/88		DWS. NO. 3DE-1-M12	
		DWG. 1-2								CHECKED JTC 11/1/88		SCALE: SHOWN	
										PROJECT APPROVAL JTC 11/1/88		DWS. NO. 3DE-1-M12	
										DESIGN APPROVAL JTC 11/1/88		REV	
										DRAWN BY DEMG08		DATE 11/1/88	
										SAVE NAME		NO.	



NO.	DATE	BY	DESCRIPTION	W.G.	APP	PRT	SEP	DATE	TO	W.O.
3DE-1-P12			SITE PLAN							
3DE-1-P1			PLOT PLAN							
3DE-2-M73			"A" & "B" PLANT ESD VENT STACK FDN. PLAN							
3DE-2-P81			"A" & "B" PLANTS ESD VENT STACK PIPING							
			FLA ID ELEV							
3DE-2-P80			"A" & "B" PLANTS ESD VENT PIPING SECTIONS							
3DE-2-P30	2/20/93	DPH	"B" PLANT COMP. BLDG. AREA PIPING PLAN	L-4955	12		9/18/92	BIDS	L-4955	
3DE-2-P2	1/8/26/92	CBT	"A" PLANT COMP. BLDG. AREA PIPING PLAN	L-4955	12		9/18/92	BIDS	L-4955	
			ADDED STATION E.S.D. VENTS & CONTROL BLDG.							
DWG. NO.			TITLE							

ENG. RECORD	DATE
DRAFTING DESIGN	CBT 4/13/92
CAD DRAFTING	EG 4/14/92
CHECKED	
PROJECT APPROVAL	
SURVEY DATE	

El Paso
NATURAL GAS COMPANY

DEMING COMPRESSOR STATION
"A" & "B" PLANTS
GENERAL PIPING PLAN

SCALE: 1" = 40'	DWG. NO. DE-2-P79	REV. 2
W.O. L-4955		

