

**GW - 151**

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**PERMITS,  
RENEWALS,  
& MODS  
Application**

RECEIVED

December 18, 2008

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New Mexico Energy, Minerals, and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
(505) 476-3487 office  
(505) 476-3462 fax

**Re: El Paso Natural Gas Company  
Eunice B Compressor Station GW-151  
Lea County, New Mexico**

Mr. Jim Griswold:

Per our conversation today, El Paso Natural Gas Company (EPNG) is forwarding you the signed "Attachment – Discharge Permit Approval Conditions". An additional copy has also been included for your records. EPNG received the approval letter and attachments from the New Mexico Oil Conservation Division on November 21, 2008. Please let me know if you have any additional questions or comments in regards to the attachments for Discharge Permit GW-151.

Respectfully,

**El Paso Natural Gas Company**



Glen Thompson  
Principal Environmental Representative

Enc

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

## 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 flat fee for a gas compressor station of greater than 1,000 Horsepower is \$1,700.00. The Oil Conservation Division (OCD) has received both the required filing and flat fees.
- 2. Permit Expiration, Renewal Conditions and Penalties:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this renewal permit is valid for a period of five years. **The renewed permit will expire on November 5, 2013** and an application for renewal should be submitted no later than 120 days before the 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 signed June 13, 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 potential 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 runoff. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

**18. Unauthorized Discharges:** The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. **An unauthorized discharge is a violation of this permit.**

**19. Vadose Zone and Water Pollution:** The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

**20. Additional Site Specific Conditions:** None.

**21. Transfer of Discharge Permit:** Pursuant to WQCC 20.6.2.3111 NMAC, prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

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

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

**23. Certification: (Owner/Operator),** by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

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

El Paso Natural Gas  
Company Name - print name above

Kenneth L. Morrow  
Company Representative - print name

Kenneth L Morrow  
Company Representative - Signature

Title: Area Manager

Date: 12-4-08



New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor  
**Joanna Prukop**  
Cabinet Secretary  
**Reese Fullerton**  
Deputy Cabinet Secretary

**Mark Fesmire**  
Director  
Oil Conservation Division



November 7, 2008

Mr. Glen Thompson  
El Paso Natural Gas Company  
3300 North A Street  
Building 2, Suite 200  
Midland, Texas 79705

**Re: Approval of Discharge Permit GW-151**  
**El Paso Natural Gas Company**  
**Eunice B Compressor Station (Section 5 of T21S, R36E)**  
**Lea County, New Mexico**

Mr. Thompson:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for 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 days of receipt of this letter.**

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 feel free to contact Jim Griswold at (505) 476-3465 or by email at [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us). On behalf of the staff at the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Price".

Wayne Price  
Environmental Bureau Chief

Attachment

LWP/jg  
xc: OCD District 1 Office, Hobbs



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**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:** None.

**21. Transfer of Discharge Permit:** Pursuant to WQCC 20.6.2.3111 NMAC, 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: \_\_\_\_\_

Public Notice

Application for a Discharge Permit Renewal for the Eunice B Compressor Station (GW-151), Lea County, New Mexico

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit 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), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 has submitted a renewal application for the Eunice B compressor station which is located at the SE/4 of the NW/4, Section 5, Township 21 south, Range 36 east, in Lea County, New Mexico. The facility is located approximately 11 miles northwest of Eunice, NM, one mile west of State Highway eight, and approximately 7-mile north of the Eunice A Compressor Station. The mailing address for the Eunice B compressor station is El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

The Eunice B compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG Number 1102 (suction) and 30125 (discharge) pipeline systems. No intentional or inadvertent discharges that could affect surface or groundwater are known or anticipated at the facility. Potential discharges at the station are limited to approximately 1,550 gallons of used oil from an above-ground storage tank. This tank is equipped with secondary containment and liquid level indicators to prevent spills. Process fluids such as water and used oil associated with daily operations are contained by a facility drain system, transferred to the used oil storage tank, then recycled by a NMOCD approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of approximately 160 feet below the ground surface. Aquifers below the station have a total dissolved solids concentration of between 707 and 4230 mg/L or greater.

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

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

Jim Griswold, Hydrologist  
New Mexico Energy, Minerals and Natural  
Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe NM 87505  
Phone: (505) 476-3465

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 proposed Eunice C compressor facility upon request.

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

PUBLISHER

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published in the regular and entire issue of said paper, and not a supplement thereof for a period

of 1 issue(s).

Beginning with the issue dated AUGUST 27, 2008

and ending with the issue dated AUGUST 27, 2008

*Kathi Bearden*  
PUBLISHER

Sworn and subscribed to before me this 27TH day of AUGUST, 2008

*Dora Montz*  
Notary Public.

My Commission expires  
February 07, 2009  
(Seal)



OFFICIAL SEAL  
DORA MONTZ  
NOTARY PUBLIC  
STATE OF NEW MEXICO

My Commission Expires \_\_\_\_\_

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

49102027 00015805  
KLEINFELDER  
8300 JEFFERSON NE  
SUITE B  
ALBUQUERQUE, NM 87113

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

PUBLISHER

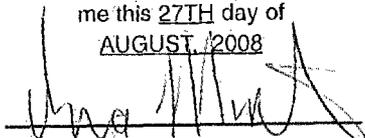
of the Hobbs News-Sun, a news-  
paper published at Hobbs, New  
Mexico, do solemnly swear that  
the clipping attached hereto was  
published in the regular and  
entire issue of said paper, and not  
a supplement thereof for a period

of 1 issue(s).

Beginning with the issue dated  
AUGUST 27, 2008  
and ending with the issue dated  
AUGUST 27, 2008

  
PUBLISHER

Sworn and subscribed to before  
me this 27TH day of  
AUGUST, 2008

  
Notary Public.

My Commission expires  
February 07, 2009  
(Seal)



OFFICIAL SEAL  
DORA MONTZ  
NOTARY PUBLIC  
STATE OF NEW MEXICO

My Commission Expires: \_\_\_\_\_

This newspaper is duly qualified to  
publish legal notices or advertise-  
ments within the meaning of  
Section 3, Chapter 167, Laws of  
1937, and payment of fees for said  
publication has been made.

49102027 00015804  
KLEINFELDER  
8300 JEFFERSON NE  
SUITE B  
ALBUQUERQUE, NM 87113

Aviso público

Uso para una renovación del permiso de la descarga para la estación del  
compresor de Eunice B (GW-151), condado del pasto, New Mexico

El Paso Natural Gas (EPNG) da por este medio el aviso que el uso sig-  
uiente del permiso de la descarga se ha sometido de acuerdo con la subdi-  
visión B, C, y E del código administrativo de 20.6.2.31.08 New Mexico.

El Paso Natural Gas (EPNG), 3300 North A Street, Building 2, Suite 200,  
Midland, TX 79705 ha presentado una solicitud de la renovación para  
Eunice que se extiende la estación del compresor de B que está situada en  
el SE/4 del NW/4, sección 5, el municipio 21 del sur, 36 del este, en conda-  
do de Lea, New Mexico. La facilidad está situada aproximadamente 11 mil-  
las de noroeste de Eunice, New Mexico, de una milla al oeste de la car-  
retera de estado ocho; y aproximadamente del 7 - norte de la milla de  
Eunice una estación del compresor. La dirección del correo para la estación  
del compresor de Eunice B es El Paso Natural Gas, 2316 West Bender  
Blvd., Hobbs, NM 88240.

La estación del compresor de Eunice B se utiliza para la compresión del gas  
natural de la calidad de la tubería, y es parte del EPNG número 1102 (suc-  
ción), y 30125 sistemas de tubería (de la descarga). No se sabe ni se antic-  
ipa ningunas descargas intencionales o inadvertidas que podrían afectar a  
la superficie o al agua subterránea en la facilidad. Las descargas poten-  
ciales en la estación se limitan a aproximadamente 1.550 galones de aceite  
usado de un tanque de almacenaje sobre el suelo. Este tanque se equipa  
de la contención secundaria y de indicadores llanos líquidos para prevenir  
derramamientos. Los líquidos de proceso tales como agua y aceite usado  
asociados a operaciones diarias son contenidos por un sistema del dren de  
la facilidad, transferidos al tanque de almacenaje usado de aceite, después  
reciclados 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 pro-  
fundidad de 160 pies debajo de la superficie de tierra. Este sistema del  
acuifero tiene una concentración total de los sólidos en suspensión entre de  
707 y 4230 mg/l o mayor.

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

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

Jim Griswold, Hydrologist  
New Mexico Energy, Minerals and Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Teléfono: (505) 476-3465

La energía de New Mexico, los minerales y el departamento de los recur-  
sos naturales aceptarán comentarios y declaraciones del interés con  
respecto a este uso y proporcionarán los avisos futuros para la facilidad  
propuesta del compresor de Eunice C a petición

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. \_\_\_\_\_ dated 8/20/08

or cash received on \_\_\_\_\_ in the amount of \$ 1700<sup>00</sup>

from El Paso Natural Gas

for GW-151

Submitted by: Lawrence Rocco Date: 9/8/08

Submitted to ASD by: Lawrence Rocco Date: 9/8/08

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 \_\_\_\_\_

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

**REMITTANCE ADVICE**

CHECK DATE 08/20/2008  
CHECK NUMBER 07567153  
VENDOR NUM 0000002667

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

**RETAIN FOR YOUR RECORDS**

Refer Payment Inquires to EPGTR - 713-420-4200

<b>Voucher ID</b>	<b>Invoice Number</b>	<b>Invoice Date</b>	<b>Discount</b>	<b>Paid Amount</b>
00347265	CKREQ080813A RENEWAL OF DISCHARGE PERMIT GW-151	08/13/2008	0.00	1,700.00
<b>TOTAL</b>			\$0.00	\$1,700.00

August 26, 2008

via UP Tracking# 1Z 6R4 V49 02 5137 2817

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
(505) 476-3440 office  
(505) 476-3462 facsimile

**RE: Discharge Permit GW-151 Flat Fee  
El Paso Natural Gas  
Eunice B Compressor Station  
Lea County, New Mexico**

Dear Mr. Griswold:

Per Condition 1 of the "DRAFT Renewal of Discharge Permit GW-151" submitted by the New Mexico Oil Conservation Division (NMOCD) to El Paso Natural Gas (EPNG) dated July 21, 2008, EPNG has enclosed the \$1,700.00 Flat Fee for the renewal of Discharge Permit# GW-151 for the Eunice B Compressor Station. A check for the filing fee was already submitted by Kleinfelder prior to the NMOCD confirming the application administratively complete. I also wanted to thank you for your assistance throughout the permit approval process. If you have any questions prior to issuing the final discharge permit, please contact me at (432) 686-3268.

Sincerely,

El Paso Natural Gas Company



Glen Thompson  
Principal Environmental Representative

Enc

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

# Advertising Receipt

IVED  
2008 JUL 28 PM 3 21

Hobbs Daily News-Sun  
201 N Thorp  
P O Box 936  
Hobbs, NM 88241-0850  
Phone: (575) 393-2123  
Fax: (575) 397-0610

JIM GRISWOLD  
NM OIL CONSERVATION DIVISION, EMNRD  
1220 S. SAINT FRANCIS DR.  
SANTA FE, NM 87505

**Cust#:** 01101546-000  
**Ad#:** 02601824  
**Phone:** (505)476-3492  
**Date:** 07/21/08

**Ad taker:** C2      **Salesperson:** 08      **Classification:** 673

Description	Start	Stop	Ins.	Cost/Day	Surcharges	Total
07 07 Daily News-Sun	07/23/08	07/23/08	1	129.10		129.11
Bold						1.00
Affidavit for legals						3.00
<b>Payment Reference:</b>					<b>Total:</b>	□ 133.11
LEGAL					<b>Tax:</b>	0.00
JULY 23,2008					<b>Net:</b>	133.11
NOTICE OF PUBLICATION					<b>Prepaid:</b>	0.00
STATE OF NEW MEXICO					<b>Total Due</b>	133.11
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 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-151) El Paso Natural Gas Company, 3300 North A Street, Building 2 Suite 200, Midland, Texas 79705 has submitted an application for renewal of discharge plan for their Eunice B

AFFIDAVIT OF PUBLICATION

State of New Mexico,  
County of Lea.

I, KATHI BEARDEN

PUBLISHER

of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period.

of 1 weeks.

Beginning with the issue dated July 23 2008

and ending with the issue dated July 23 2008

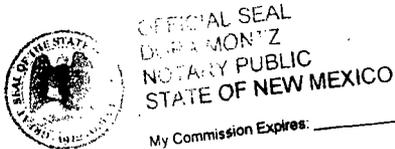
*Kathi Bearden*  
PUBLISHER

Sworn and subscribed to before me this 23rd day of

July 2008  
*[Signature]*

Notary Public.

My Commission expires February 07, 2009 (Seal)



This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL  
JULY 23, 2008

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 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-151) El Paso Natural Gas Company, 3300 North A Street, Building 2 Suite 200, Midland, Texas 79705 has submitted an application for renewal of discharge plan for their Eunice B Compressor Station, near Oil Center, NM, located in the SE of the NW of Section 5, Township 21 South, Range 36 East, NMPM (Lea County). The facility is used for the compression of pipeline quality natural gas. Materials generated and/or stored at the facility include but may not be limited to: new and used lubricating oils, coolant water, filters, paints, detergents, and cleaning supplies. The aquifer beneath this facility lies at a depth of 160 feet below ground surface with a concentration of total dissolved solids ranging between 707 to 4,230 milligrams per liter. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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

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

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

GIVEN Under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 27th day of June 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL  
#24259

Mark Fesmire, Director

01101546000      02601824  
NM OIL CONSERVATION DIVISION,  
1220 S. SAINT FRANCIS DR.  
SANTA FE, NM 87505

THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

RECEIVED  
2008 JUL 30 PM 3:55

NM EMNRD Oil  
Jim Griswold  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

ALTERNATE ACCOUNT: 56689  
AD NUMBER: 00262337 ACCOUNT: 00002212  
LEGAL NO: 85702 P.O. #: 52100-00000137  
195 LINES 1 TIME(S) 169.68  
AFFIDAVIT: 7.00  
TAX: 14.02  
TOTAL: 190.70

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO  
COUNTY OF SANTA FE

I, L. Paquin, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 85702 a copy of which is hereto attached was published in said newspaper 1 day(s) between 07/24/2008 and 07/24/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 24th day of July, 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

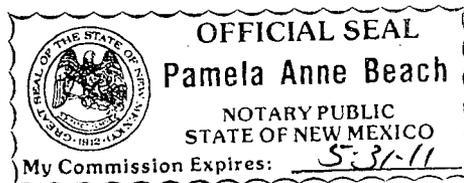
**NOTICE OF PUBLICATION**  
**STATE OF NEW MEXICO**  
**ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT**  
**OIL CONSERVATION DIVISION**  
Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20:6:2-3106 NMAC), the following discharge permit application 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.

/s/ L. Paquin  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 24th day of July, 2008

Notary Pamela Anne Beach

Commission Expires: May 31, 2011



(GW 151) E Paso Natural Gas Company, 3300 North A Street, Building 2, Suite 200, Midland, Texas 79705, has submitted an application for renewal of discharge plan for their Eunice Compressor Station (near Oil Center, NM, located in the SE 1/4 of the NW 1/4 of Section 5, Township 25 South, Range 26 East, NMMPM (Lea County)). The facility is used for the compression of pipeline quality natural gas. Materials generated and/or stored at the facility include, but may not be limited to, new and used lubricating oils, coolant water, filters, paints, detergents, and cleaning supplies. The aquifer beneath this facility lies at a depth of 160 feet below ground surface with a concentration of total dissolved solids ranging between 707 to 4230 milligrams per liter. 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.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 27th day of June 2008.

STATE OF NEW MEXICO  
OIL CONSERVATION  
DIVISION

SEAL  
Mark Fesmire,  
Director  
Legal No. 85702  
Pub. July 24, 2008



8300 Jefferson NE, Suite B  
Albuquerque, NM  
87113

p| 505.344.7373  
f| 505.344.1711

[kleinfelder.com](http://kleinfelder.com)

July 17, 2008  
File No. 93018.1 – ALB08LT001

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

**SUBJECT: Discharge Plan Application for a Discharge Permit Renewal Fee  
El Paso Natural Gas Company Eunice "B" Compressor Station  
(GW-151)  
Lea County, New Mexico**

Dear Mr. Griswold:

Attached is payment for the discharge plan application renewal for El Paso Natural Gas Company Eunice "B" Compressor Station (GW-151).

Should you have any questions concerning this payment, please feel free to contact John Dietrich at (505) 344-7373.

Respectfully submitted,  
**KLEINFELDER WEST, INC.**

**Reviewed by:**

John Dietrich  
Staff Geologist

Roy McKinney, PG  
Senior Program Manager

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. \_\_\_\_\_ dated 7/17/08

or cash received on \_\_\_\_\_ in the amount of \$ 100<sup>00</sup>

from EL PASO NATURAL GAS CO.

for GW-151

Submitted by: Lawrence Roman Date: 7/22/08

Submitted to ASD by: Lawrence Roman Date: 7/22/08

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 \_\_\_\_\_



New Mexico Energy, Minerals and Natural Resources Department

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

**Mark Fesmire**  
Director  
Oil Conservation Division



July 21, 2008

Mr. Glen Thompson  
El Paso Natural Gas Company  
3300 North A Street, Building 2, Suite 200  
Midland, Texas 79705

**Re: Application for Renewal of Discharge Permit GW-151**

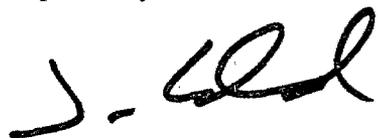
Mr. Thompson:

The Oil Conservation Division (OCD) received El Paso Natural Gas Company's (EPNG) application dated June 13, 2008 for renewal of discharge permit GW-151 for your Eunice B Compressor Station located within Section 5 of Township 21 South, Range 36 East, NMPM, in Lea County near Oil Center, New Mexico. With the receipt last week of the required filing fee, the application is now deemed "administratively complete".

Therefore, the New Mexico Water Quality Control Commission (WQCC) regulations public notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The public notice example provided with the application needs to be modified to include my name and phone number (505-476-3465). The OCD 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 by phone or email at [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us). Please refer to permit GW-151 in all future communication. On behalf of the OCD, I wish to thank you and your staff for your continued cooperation during the review process.

Respectfully,



Jim Griswold  
Hydrologist

JG/jg

cc: OCD District I Office, Hobbs



## Griswold, Jim, EMNRD

---

**From:** Griswold, Jim, EMNRD  
**Sent:** Monday, July 21, 2008 12:02 PM  
**To:** 'glen.thompson@elpaso.com'  
**Subject:** GW-151, Eunice B Compressor Station

**Attachments:** GW-151 Admin Complete Letter.pdf; GW-151 DRAFT approval.pdf

Glen,

Attached you will find .pdf files containing a letter of administrative completeness and a DRAFT permit approval for EPNG's Eunice B CS. Please proceed with the public notice requirements using my name and phone number. Be sure to have the Hobbs newspaper provide you with proof of publication and forward same to me. Also, provide me ASAP with the signage locations. If you need hardcopy of the letter and/or draft permit, please let me know. I will not be in the office for the rest of the week starting noon tomorrow. Thanks.

Jim Griswold  
Hydrologist  
*Environmental Bureau  
ENMRD/Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
direct: 505.476.3465  
email: [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)*



GW-151 Admin  
Complete Letter.p...



GW-151 DRAFT  
approval.pdf (98 ...

## Griswold, Jim, EMNRD

---

**From:** Griswold, Jim, EMNRD  
**Sent:** Monday, July 21, 2008 12:06 PM  
**To:** Hansen, Edward J., EMNRD  
**Cc:** Thompson, Bruce C., DGF; Warren, Alvin, DIA; Kiger, Stephanie P, DIA; 'ddapr@nmda.nmsu.edu'; 'Linda\_Rundell@nm.blm.gov'; 'psisneros@nmag.gov'; 'lsouthard@nmag.gov'; 'r@rthicksconsult.com'; 'sricdon@earthlink.net'; 'nmparks@state.nm.us'; Dantonio, John, OSE; 'sreid@nmoga.org'; Martinez, Elysia, NMENV; 'lazarus@glorietageo.com'; Stone, Marissa, NMENV; 'ron.dutton@xcelenergy.com'; 'cgarcia@fs.fed.us'; 'jbarnett@barnettwater.com'; Kieling, John, NMENV; 'bsg@garbhall.com'; Olson, Bill, NMENV; 'claudette.horn@pnm.com'; 'ekendrick@montand.com'; 'staff@ipanm.org'; Williams, Chris, EMNRD; Johnson, Larry, EMNRD  
**Subject:** Renewal of Discharge Permit GW-151  
**Attachments:** GW-151 Admin Complete Letter.pdf; GW-151 DRAFT approval.pdf; GW-151 OCD Public Notice.pdf

Attached you will find .pdf files containing a letter of administrative completeness, draft permit, and public notice from the OCD regarding renewal of Discharge Permit GW-151

Jim Griswold  
Hydrologist  
*Environmental Bureau*  
*ENMRD/Oil Conservation Division*  
*1220 South St. Francis Drive*  
*Santa Fe, New Mexico 87505*  
*direct: 505.476.3465*  
*email: [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)*



GW-151 Admin  
Complete Letter.p...



GW-151 DRAFT  
approval.pdf (98 ...



GW-151 OCD Public  
Notice.pdf (...

**Griswold, Jim, EMNRD**

---

**From:** Griswold, Jim, EMNRD  
**Sent:** Tuesday, July 15, 2008 2:59 PM  
**To:** 'glen.thompson@elpaso.com'  
**Subject:** Filing and Permit Fees for EPNG Discharge Plan Renewal GW-151

Glen,

I am reviewing EPNG's renewal application for the Eunice B Compressor Station (Discharge Plan GW-151). The \$100 filing fee and \$1,700 permit fee did not accompany the application. I cannot issue a determination regarding administrative completeness until after the filing fee is received by OCD. The permit fee is not required at this time but will be necessary before the permit is formalized. Thanks.

Jim Griswold  
Hydrologist  
*Environmental Bureau*  
*ENMRD/Oil Conservation Division*  
*1220 South St. Francis Drive*  
*Santa Fe, New Mexico 87505*  
*direct: 505.476.3465*  
*email: [jim.griswold@state.nm.us](mailto:jim.griswold@state.nm.us)*



# DOCUMENT TRANSMITTAL FORM

RECEIVED

TO:	Mr. Brad Jones NMOCD 1220 S. St. Francis Drive Santa Fe, NM 87505	PAGE	1	OF	1
		TRANSMITTAL DATE:	2008 JUN 18 PM 06:14 08		
		TRANSMITTAL DCN:	93018.1-ALB08TS001		
RETURN RESPONSES/COMMENTS TO:	Marco Wikstrom/David Janney				
RETURN RESPONSES/COMMENTS BY:	July 1, 2008				

PROJECT NO.:	93018	PROJECT NAME:	Eunice "B"
ACTIVITY/DESCRIPTION:	Discharge Plan		

DOCUMENTS BEING TRANSMITTED				
ITEM	REV.	PAGES	DATE	DESIGNATOR
Discharge Plan Application and Permit Renewal	0	26	06/16/08	93018.1-ALB08RP001

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8300 Jefferson NE, Suite B  
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87113

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f | 505.344.1711

[kleinfelder.com](http://kleinfelder.com)

June 16, 2008  
File No. 93018.1 – ALB08RP001

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

**SUBJECT: Discharge Plan Application for a Discharge Permit Renewal  
El Paso Natural Gas Company Eunice "B" Compressor Station  
(GW-151)  
Lea County, New Mexico**

Dear Mr. Jones:

Kleinfelder West, Inc. (Kleinfelder) on behalf of the El Paso Natural Gas Company (EPNG) is pleased to submit for your review the attached discharge plan for a discharge permit renewal for the Eunice "B" Compressor Station, GW-151.

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".

Public Notice will be published in the Hobbs News Sun newspaper in accordance with NMAC 206.2.3108.

The following are attached:

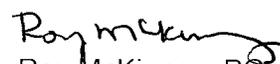
- Discharge Plan Application;
- Public Notice text in both Spanish and English;
- Discharge Plan.

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

Sincerely,  
**KLEINFELDER WEST, INC.**

  
Marco Wikstrom  
Staff Geologist

**Reviewed by:**

  
Roy McKinney, PG  
Senior 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

Revised June 10, 2003

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

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

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

New  Renewal  Modification

1. Type: Compressor Station (Eunice B, GW-151)

2. Operator: El Paso Natural Gas Company

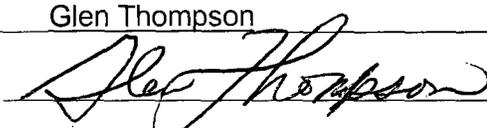
Address: 3300 North A Street, Building 2, Suite 200, Midland, TX 79705

Contact Person: Glen Thompson Phone: (432) 686-3268

3. Location: SE/4 of the NW/4 Section 5 Township 21 South Range 36 East  
Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.  
Attached
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.  
Attached
6. Attach a description of all materials stored or used at the facility.  
Attached
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.  
Attached
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.  
Attached
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.  
Attached
10. Attach a routine inspection and maintenance plan to ensure permit compliance.  
Attached
11. Attach a contingency plan for reporting and clean-up of spills or releases.  
Attached
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.  
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.  
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: Glen Thompson Title: Principal Environmental Representative

Signature:  Date: 06/13/2008

E-mail Address: Glen.Thompson@EIPaso.com

## Public Notice

### Application for a Discharge Permit Renewal for the Eunice B Compressor Station (GW-151), Lea County, New Mexico

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit 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), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 has submitted a renewal application for the Eunice B compressor station which is located at the SE/4 of the NW/4, Section 5, Township 21 south, Range 36 east, in Lea County, New Mexico. The facility is located approximately 11 miles northwest of Eunice, NM, one mile west of State Highway eight, and approximately ¼-mile north of the Eunice A Compressor Station. The mailing address for the Eunice B compressor station is El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

The Eunice B compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG Number 1102 (suction) and 30125 (discharge) pipeline systems. No intentional or inadvertent discharges that could affect surface or groundwater are known or anticipated at the facility. Potential discharges at the station are limited to approximately 1,550 gallons of used oil from an aboveground storage tank. This tank is equipped with secondary containment and liquid level indicators to prevent spills. Process fluids such as water and used oil associated with daily operations are contained by a facility drain system, transferred to the used oil storage tank, then recycled by a NMOCD approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of 160 feet below the ground surface. This aquifer system has a total dissolved solids concentration of between 707 and 4230 mg/L or greater.

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

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

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

Phone: (505) 476-3487

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 proposed Eunice C compressor facility upon request.

## Aviso público

### Uso para una renovación del permiso de la descarga para la estación del compresor de Eunice B (GW-151), condado del pasto, New México

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

El Paso Natural Gas (EPNG), 3300 North A Street, Building 2, Suite 200, Midland, TX 79705 ha presentado una solicitud de la renovación para Eunice que se extiende la estación del compresor de B que está situada en el SE/4 del NW/4, sección 5, el municipio 21 del sur, 36 del este, en condado de Lea, New México. La facilidad está situada aproximadamente 11 millas de noroeste de Eunice, New México, de una milla al oeste de la carretera de estado ocho, y aproximadamente del ¼ - norte de la milla de Eunice una estación del compresor. La dirección del correo para la estación del compresor de Eunice B es El Paso Natural Gas, 2316 West Bender Blvd., Hobbs, NM 88240.

La estación del compresor de Eunice B se utiliza para la compresión del gas natural de la calidad de la tubería, y es parte del EPNG número 1102 (succión), y 30125 sistemas de tubería (de la descarga). No se sabe ni se anticipa ningunas descargas intencionales o inadvertidas que podrían afectar a la superficie o al agua subterránea en la facilidad. Las descargas potenciales en la estación se limitan a aproximadamente 1.550 galones de aceite usado de un tanque de almacenaje sobre el suelo. Este tanque se equipa de la contención secundaria y de indicadores llanos líquidos para prevenir derramamientos. Los líquidos de proceso tales como agua y aceite usado asociados a operaciones diarias son contenidos por un sistema del dren de la facilidad, transferidos al tanque de almacenaje usado de aceite, después reciclados 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 160 pies debajo de la superficie de tierra. Este sistema del acuífero tiene una concentración total de los sólidos en suspensión entre de 707 y 4230 mg/l o mayor.

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

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

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

Teléfono: (505) 476-3487

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 propuesta del compresor de Eunice C a petición

**EUNICE "B" COMPRESSOR STATION DISCHARGE PLAN  
EL PASO NATURAL GAS  
Prepared by Kleinfelder West, Inc., Albuquerque, NM**

---

**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) Eunice "B" Compressor Station (Eunice B) is utilized for the compression of pipeline quality natural gas, and is part of the EPNG Number 1102 (suction) and 30125 (discharge) pipelines. Eunice B is part of a network that transports an amount of natural gas that varies according to customer demand. Compression is required to move natural gas through the pipelines for delivery to EPNG customers. This is an automated station which is inspected by EPNG personnel a minimum of once per week while in operation. A plot plan of Eunice B is included as Figure 1.

Eunice B consists of one natural gas-fueled Solar Taurus 60-7802S gas-turbine compressor engine rated at 7,137 International Standards Organization (ISO) horsepower (hp), and associated equipment.

Total site compressor rated horsepower is 7,137 ISO hp.

**Item 2**

*Name of operator or legally responsible party and local representative.*

**Legally Responsible Party**

Mike Catt, Vice President  
El Paso Natural Gas Company  
2 North Nevada Ave.  
Colorado Springs, CO 80903

**Local Representative**

Kenneth Morrow, Area Manager  
El Paso Natural Gas Company  
Plain Operating Area  
2316 W. Bender Blvd.  
Hobbs, NM 88240  
Office: (505) 492-2380,  
Cell: (505) 390-3716  
1-800-334-8047 (24 hour emergency notification)

Or

**Local Representative (Alt.)**

Tim Howell  
El Paso Natural Gas Company  
2316 W. Bender Blvd.  
Hobbs, NM 88240  
(505) 492-3128

**Operator**

El Paso Natural Gas Company  
Plains Operating Area (Eunice B)

**Physical Address**

El Paso Natural Gas Company  
Plains Operating Area (Eunice B)  
Approximately 11 miles northwest of Eunice, NM  
1 mile west of State Hwy. 8, and approximately ¼-mile north of  
the Eunice A Station (GW-46)

**Mailing Address**

El Paso Natural Gas Company  
Plains Operating Area  
2316 W. Bender Blvd.  
Hobbs, NM 88240

**Item 3:**

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

Lea County, New Mexico  
SE/4 of the NW/4, Section 5, Township 21 South, Range 36 East

Latitude: 32 Degrees, 31 Minutes, and 1 Second North  
Longitude: 103 Degrees, 17 Minutes, and 16 Seconds West

Large-scale topographic site maps and aerial photograph are attached in Appendix A (Figures 2, 2a, & 3).

**Item 4:**

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

El Paso Natural Gas Company  
2 North Nevada Ave.  
Colorado Springs, CO 80903  
(432) 686-3268 G. Thompson or alternate contact (719) 520-4350 S. D. Miller

**Item 5:**

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

To accomplish natural gas compression Eunice B Station utilizes the following:

- One (1) natural gas-fueled Solar Taurus 60-7802S gas-turbine compressor engine site rated at 7,137 ISO hp, with a centrifugal compressor;
- One (1) inlet filter for the natural gas stream (scrubber);
- One (1) fuel gas filter;
- One (1) fin-fan to cool the natural gas stream;
- One (1) 1,550-gallon welded steel used oil AST equipped with secondary containment;
- One (1) 30-gallon lube oil AST day tank for the reciprocating compressor; and
- One (1) 70-gallon building sump equipped with secondary containment.

**Gas Compressors**

The compressor building housing the compressor engine and compressor is constructed 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 1,550-gallon used oil AST via the building sump.

Natural gas compressed by centrifugal compressors does not produce wastewater. The compressor engine and ancillary equipment is washed on an as-needed basis. The wash down water is discharged into the 1,550-gallon used oil AST mentioned above, and non-toxic, biodegradable detergents such as Tide® or dish soap are used to clean the equipment.

The rate of used oil and wash-down water generated from the compressor engine, compressor, and scrubber blow-down is 500 gallons or less per year of operation (1.37 gallons per day). This used oil is drained into the 1,550-gallon used oil AST and removed as needed by an oil recycler. EPNG currently has an oil recycling contract with Thermo Fluids (Midland Service Office) which is called upon to recycle the wash down water/used oil mixtures.

**Natural Gas Scrubbers (inlet and fuel)**

All inlet gas is passed through one (1) suction scrubber on the upstream side of the main compressor. Also, one (1) fuel gas filter removes minimal liquids and other foreign matter from the natural gas stream before entering the compressor engine. Any used oil, scrubber blow-down, or other liquids generated by the suction scrubber and fuel gas filter is discharged into the 1,550-gallon used oil AST.

Filters from this operation are replaced as needed. The filters are characterized as prescribed by 20 New Mexico Administrative Code (NMAC) 3.1, Subpart 14, Regulated Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas industry. Regulated NORM is defined as NORM at a concentration of greater than 30 picocuries per gram of radium 226 above background, or NORM with a maximum radiation exposure reading at any accessible point that is greater than 50 microrentgens per hour, including background levels.

If any filter is characterized as NORM-regulated they 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 Eunice B Station.

Gas inlet scrubber filters that are not characterized as NORM-regulated are drained for 24 hours into the 1,550-gallon used oil AST. After the scrubber filters are drained, non-recyclable components are bagged and disposed of in a separate dumpster that is be emptied as needed by Lea Land Inc. for transport to their industrial solid waste landfill, and recyclable components will be reused. This dumpster is placed inside concrete-lined and curbed secondary containment.

### **1,550-Gallon Used Oil AST**

The 1,550-gallon used oil AST receives wash down water, used oil, and biodegradable detergents from the compressor building drains and sump, auxiliary building drains (which uses the same sump as the compressor building), suction scrubber blow-down, and the fuel gas filter. While tank emptying is in progress, drip pans are placed under all connection points between the tank truck and used oil tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. The 1,550-gallon AST is installed within a concrete-lined secondary containment that is designed to contain at least one and one-third times (133%) the volume of the tank. This containment holds only one tank. The tank is located to the east of the compressor building (Figure 1).

### **70-Gallon Building Sump**

One below-grade 70-gallon building sump is used to collect used oil/water/detergent mixtures from the building drain system. This sump is housed inside secondary containment that is inspected for process fluids by site personnel at least weekly while the station is in operation. The sump is located to the east of the compressor building, and north of the 1,550-gallon used oil tank.

### **30-Gallon Day Tank**

One 30-gallon lube oil AST is used to automatically replenish the gas turbine compressor as it consumes oil with use. Lube oil drums are used to replenish this tank via a lube oil transfer pump. The day tank and drums are located within the compressor building which contains floor drains that drain into the 70-gallon building sump where it is transferred into the 1,550-gallon used oil AST. Secondary containment is provided by this building drain and sump system.

### **Underground Drain Lines**

All underground piping and drain lines are hydrostatically tested every five years during the annual station shutdown. Duration of hydrostatic testing is at least 30 minutes and piping is subjected to at least three pounds per square inch (PSI) above operating pressure during the test. Upon request, EPNG will provide the New Mexico Oil Conservation Division (NMOCD) with results of the test findings.

### **Storm Water and Other Precipitation**

The Eunice B site has good natural drainage to the north. Station facilities are constructed and site grading is accomplished in such a way to, as much as practical, prevent ingress or pooling of storm water around buildings, process vessels, piping, secondary containment, and other equipment. Storm water is collected via gravel-lined ditches that drain onto adjacent EPNG-owned land. Process fluids do not intermingle with storm water drained onto adjacent rangeland.

**Uncontained Wash Down Water**

As necessary for general housekeeping of outdoor areas, Eunice B personnel utilize high-pressure water-jets or high-pressure steam to remove solid particulate matter (dust, dirt, weeds, etc.) from fin fans or piping that are not contained within the buildings or secondary containment structures. No detergents or cleaning solutions are used for this procedure, and no process fluids intermingle with this water. This wash water is not contained.

**Contained Wash Down Water**

As necessary for maintenance, repair, and general housekeeping, Eunice B personnel utilize high-pressure water jets or high-pressure steam to clean process vessels inside secondary containment, and engines and equipment inside the compressor and auxiliary buildings. This wash down water may contain biodegradable detergents such as Tide® or dish soap. This wash down water drains via the station drain and sump system to the 1,550-gallon used oil AST.

**Additional Information**

The Eunice B plot plan (Figure 1) shows the location of fences, property boundaries, buildings, pipelines, and tanks.

**Item 6**

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

Container	ID	Material	Form	Volume	Location	Containment
Steel AST	Used oil tank	Used oil, water, and detergents	Liquid	1,550 gallons	East of compressor building	Concrete containment
Steel AST	Day tank	New Lube Oil	Liquid	30 gallons	Inside compressor building	Building drains and sump that is drained to the used oil tank
55-gallon drums	None	New Lube Oil	Liquid	Two drums onsite at any given time	Inside compressor building	Compressor building drains and sump that is drained to the used oil tank
Steel paint locker if more than five gallons	None	Very small quantities of paints, lubricants, detergents, and cleaning supplies	Liquids	Likely less than five gallons	Inside auxiliary building.	If over five gallons, paint locker and building sump that is drained to the used oil tank

**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 and auxiliary building sump, scrubber blow-downs, and engine drains	Used engine oil, wash down water, detergents, and other non-hazardous liquids	12 barrels per year (approximately 500 gallons per year or 1.37 gallons per day)	Used lube oil, water, and water with detergents
Oil and scrubber filters, fuel gas filters	Regulated solid waste	2 cubic feet per day	Metal, paper, cloth, and non-hazardous waste
Domestic trash, empty containers and drums*	Trash	0.5 cubic feet per day	Paper, metal, plastic, food waste
Station Restroom	Sewage	Less than 50 gallons per day	Liquid and sewage sludge

\*EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

**Item 8:**

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

Type of Effluent	Collection	Storage	Hauler	Disposition
Used oil	Drained to the building sump and immediately to the 1,550 gallon used oil AST	1,550 gallon AST	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Scrubber blow-down	Drained to the 1,550 gallon used oil AST	1,550 gallon AST	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Wash down water	Drained to the building sump, and/or immediately to the 1,550 gallon used oil AST	1,550 gallon AST	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Wash down water with detergents	Drained to the building sump, and/or immediately to the 1,550 gallon used oil AST	1,550 gallon AST	Removed as needed by an approved hauler	Hydrocarbon Recovery Facility (currently Thermo Fluids, Odessa, TX)
Oil and scrubber filters, fuel gas filters	Scrubber filters hot-drained for 24 hours and bagged, inlet filters bagged	Dumpster within a concrete-lined and curbed secondary containment	Removed as needed by an approved hauler	Approved recycling facility (currently the Quell Petroleum recycling facility)
Empty containers and drums*, domestic trash	Trash collected in waste can	Dumpster	Removed once a week by an approved hauler	Approved landfill (currently the Lea County Landfill)
Domestic Sewage	Restroom drain system	1,000-gallon septic tank	Not applicable	Leach field which was constructed in accordance with NMED guidelines for onsite disposal systems
Batteries	Moved to the interior of the auxiliary building	Used batteries stored onsite no longer than one year	Removed as needed by EPNG personnel; batteries will not be stored for more than one year	Approved battery recycler (currently Hobbs Iron & Metal)

\*EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

**Non-Exempt, Non-Hazardous Waste**

Used oil is collected as needed from the used oil AST and removed from the site by an NMOCD-approved contractor. While tank emptying is in progress, drip pans are placed under all connection points between the tank truck and tank. EPNG 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 Plains Operating Area Office (see address under Item 2).

**Hazardous Waste**

No RCRA-listed hazardous wastes are generated at Eunice B other than lead-acid wet cell batteries. Used batteries are stored in the auxiliary building, but no batteries are stored for more than one year.

**Domestic Sewage**

A restroom facility containing one wash basin and a toilet is installed in the auxiliary building. Sewage treatment consists of a 1,000-gallon septic tank and a leach field which was constructed in accordance with NMED guidelines for onsite disposal systems.

**Other Solid Waste**

Solid waste is placed into a portable disposal dumpster that is emptied by a solid waste contractor once per week. Used oil filters are hot-drained to the 1,550-gallon used oil tank for 24 hours and non-recyclable components are 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 by a permitted solid waste contractor.

**Names, addresses, and phone numbers of currently used NMED and NMOCD-approved transporters/disposal facilities. EPNG will also use other NMED and NMOCD-approved transporters and/or disposal facilities as needed after a minor modification is approved by NMOCD.**

Thermo Fluids (used oil recycling)  
1501 Walther Road  
Odessa, TX 79763  
Phone Number: (432) 580-3098

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

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

Hobbs Iron & Metal (battery recycling)  
920 S. Grimes Street  
Hobbs, NM 88240  
Phone Number: (505) 393-1726

**Item 9**

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

EPNG will notify NMOCD of any significant changes from this plan, process modification, or production increase that could result in a significant modification in discharges from this facility.

**Item 10**

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

Eunice B has fully automated equipment and controls and is designed to minimize on-site chemicals. Liquids stored on-site in excess of five gallons are placed within secondary containment that prevents or mitigates any releases to the environment. When in operation, Eunice B is visually inspected by EPNG personnel a minimum of once per week and underground piping is hydrostatically tested every five years

during the annual station shutdown. If the station is not in operation the visual inspection is accomplished as necessary.

Verbal and written notifications of leaks or spills will be made to the NMOCD according to NMOCD Rule 116. Any release of a chemical with a reportable quantity regulated by Title 40 Code of Federal Regulations (CFR) Part 300 and 372 will be reported to the National Response Center, and when applicable, to the New Mexico Environment Department (NMED).

**Item 11**

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

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

The "Spill and Release Control, Cleanup and Reporting" section of the El Paso Corporation Environmental Handbook, which is available to site personnel, provides guidance in the management of leaks or spills, and outlines procedures to be used in case of a leak or spill (a copy of the 2008 version is presented in Appendix B). Visual monitoring is conducted on a regular basis (at least weekly when operating) of aboveground components, including all containment structures, and ASTs. As stated, hydrostatic testing of buried components is accomplished every five years.

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

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

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

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

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

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

**Item 12**

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

**Geologic Description**

The Eunice B Station is located in an area with little topographic relief. Rocks below the Station consists of clastic, carbonate, and evaporate sedimentary rocks ranging from Ordovician through Triassic in age. The Permian-age formations are an important local source of oil and natural gas. These rocks are draped by alluvial sediments of Quaternary age ranging from 30 to 60 feet in thickness consisting of sand, gravel, silt, and clay.

**Site Hydrology**

The Eunice B Station is located in the Pecos River Basin in southern Lea County, New Mexico. The basin has no perennial streams, but there are a few ephemeral streams and broad drainages. Runoff from the site flows north, which is away from the Monument Draw located to the south of the site. There are no surface water bodies or groundwater discharges within one mile of Eunice B.

**Site Hydrogeology**

The Ogallala Formation, containing the Ogallala aquifer, is the principal source of domestic and industrial water in the area. The Ogallala Formation overlies the relatively impermeable Chinle Formation and dips to the southeast, generally parallel to the underlying Chinle Formation and present-day subsurface. The Ogallala aquifer is unconfined in some areas where it comes in contact with Pleistocene alluvium. Groundwater is encountered at a depth of approximately 160 feet below the ground surface. The general hydraulic gradient of 10 to 12 feet per mile (approximately 0.002 ft/ft) generally flows to the southeast (Cronin, 1969). The lateral movement of groundwater in this aquifer has been estimated to range from two inches per day (Cronin, 1969) to more than a foot per day (Minton, n.d.).

**Water Quality**

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

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

**Flooding Potential**

Eunice B is located in the Pecos River Basin in an area of low precipitation and high evaporation. In southern Lea County, New Mexico, the basin has no perennial streams, but there are a few ephemeral streams and broad shallow drainages. Most precipitation quickly soaks into the soil or evaporates. The land surface at the site has little relief, but topography suggests that site runoff is generally to the north. Site topographic slope is approximately 0.3 degrees or 0.006 ft/ft, dipping north (Figure 2 and 2a). Federal Emergency Management Agency (FEMA) flood maps do not exist for this site. Site grading is designed to ensure that offsite drainage is diverted from the station and that pooling of water is minimized. No significant flooding has been recorded at Eunice B.

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

**Wells**

According to the New Mexico Office of the State Engineer, Water Administration Technical Engineering Resource System (WATERS) database there are no domestic, or stock water wells within ¼-mile of the Eunice B site. The nearest well is a secondary oil recovery well located approximately one mile southeast of the site.

**Additional Information**

Eunice B does not contain any unlined surface impoundments, pits, leach fields (other than domestic sewage), injection wells, drying beds, solids disposal, or land farms.

**Item 13**

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

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

## References

- Boyer, D. G., D. McQuillan, and M.S. Goad, *New Mexico Surface Impoundment Assessment*, Water Pollution Control Bureau, New Mexico Environmental Improvement Division, Santa Fe, NM, 1980.
- Cronin, J. G., *Ground Water in the Ogallala Formation in the Southern High Plains of Texas and New Mexico*, Hydrologic Investigations, Atlas HA-330, USGS, Washington, DC, 1969.
- Hem, J. D., *Study and Interpretation of the Chemical Characteristics of Natural Water*, Geological Survey Water-Supply Paper 1473, Reprinted from the 1970 edition, University Press of the Pacific, 2005.
- Howells, L., *Base of Moderately Saline Ground Water in San Juan County, Utah*, Utah Department of Natural Resources Technical Publication no. 94,35 p. 1990.
- Minton, E. G., *General Ground Water Supply on the High Plains of New Mexico*, Lea County Ground Water Conservation, Lovington, NM, no date.
- Nicholson, A. and A Clebsch, *Geology and Ground Water Conditions in Southern Lea County, New Mexico*, Ground Water Report No. 6, State Bureau of mines and Mineral Resources, New Mexico Institute of Mining and Technology, Socorro, NM, 1961.
- Saylor, L. A., *Eunice "B" Compressor Station Discharge Plan*, El Paso Natural Gas, 1993.
- U.S. Bureau of Reclamation, *Eastern New Mexico Water Supply Project, New Mexico*, Final Environmental Statement, Department of the Interior, Washington, DC, 1976.

**Table 1**  
**Groundwater Quality and Analytical Results**

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Table 1, Groundwater Quality and Analytical Results, (El Paso Natural Gas 1981)

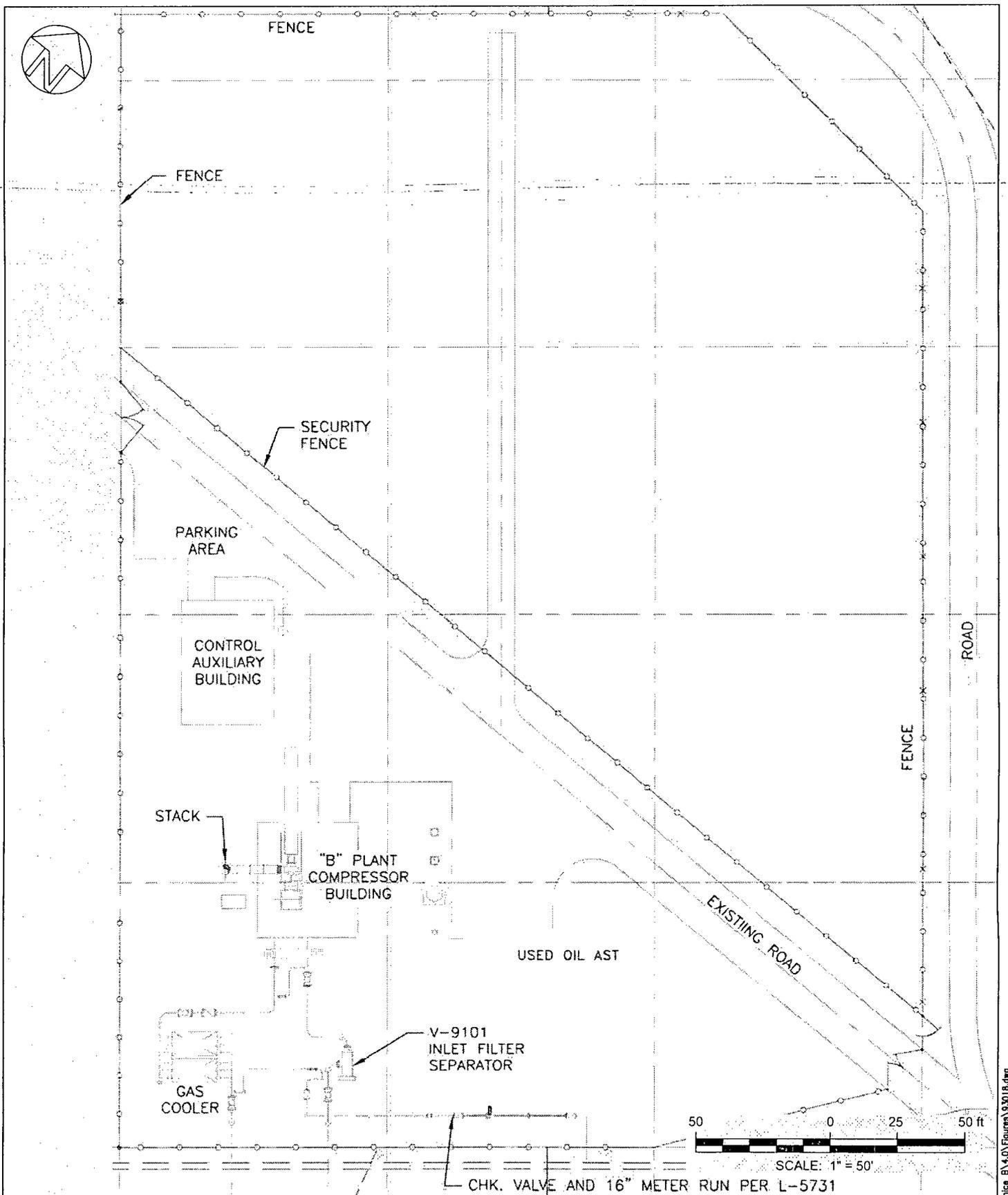
Analyses of Well Water from the Ogallala Formation  
 Located near El Paso Natural Gas Company's Eunice and Monument Plants

Constituent	Well Designation <sup>1/</sup>							
	L <sup>1/</sup>	M <sup>2/</sup>	N <sup>3/</sup>	P <sup>4/</sup>	Q <sup>5/</sup>	R <sup>6/</sup>	S <sup>7/</sup>	T <sup>8/</sup>
Sulfate (SO <sub>4</sub> ), mg/L	124	1780	145	72	480	140	380	1480
Chloride (Cl), mg/L	1383	1078	220	35	407	89	145	624
Nitrate (NO <sub>3</sub> as N), mg/L	0	0	4.5	3	5	9.5	0	0
Specific Conductance, mmhos/cm	4100	4800	1100	495	2010	850	1560	4000
pH	7.2	7.15	7.8	7.75	7.85	8.1	8.7	8.05
Total Dissolved Solids, mg/L	3801	4230	874	396	1664	707	1172	3162
Chromium (Cr), mg/L	.01	.01	0	0	.01	0	0	.01
Copper (Cu), mg/L	.05	.05	.05	0	.05	0	0	0
Iron (FE), mg/L	.03	.01	0	0	.01	.01	0	.01
Manganese (Mn), mg/L	.17	.10	0	0	.03	.02	0	.03
Zinc (Zn), mg/L	.10	.75	.10	.70	1.25	.10	0	.05

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

**APPENDIX A, FIGURES**  
**Site Drawing, Maps, and Aerial Photograph**





SOURCE: Based on map provided by El Paso Natural Gas, entitled PLOT PLAN EUNICE C COMPRESSOR STATION, dated March 10, 2008.

<b>KLEINFELDER</b>	<b>EUNICE B SITE PLOT PLAN</b>		<b>FIGURE</b> <b>1</b>
	El Paso Natural Gas		
	Eunice, New Mexico		
	Originator: M. Wikstrom	Drawn By: PDan	
Approved By: D. Janney	Project No.: 93018	Drawing No.: 93018 Figures	
	Scale: 1" = 50'	Drawing Category: A	



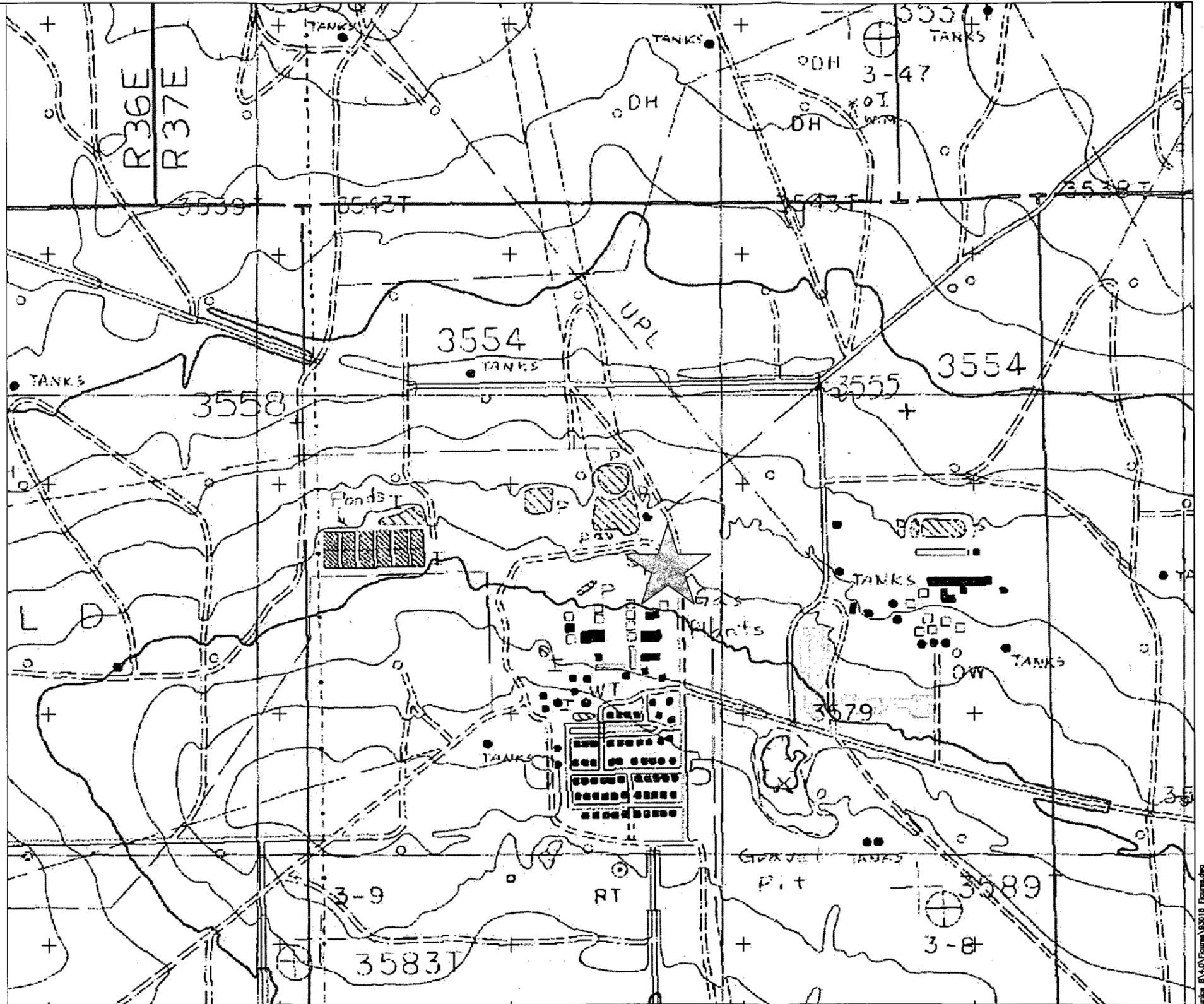
SOURCE: Map provided by nationalatlas.com.

Not to Scale

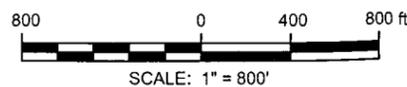
AREA MAP



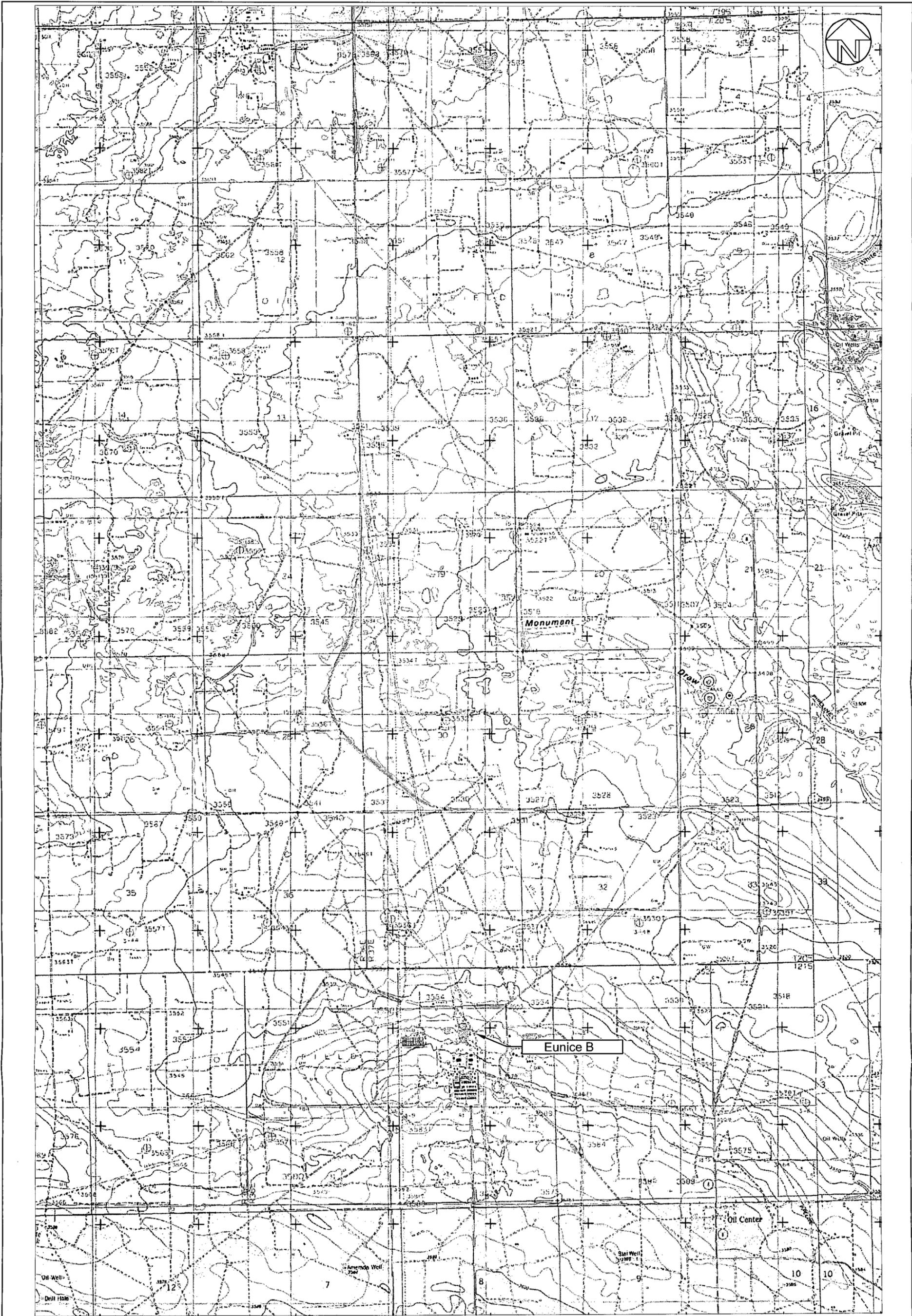
LEGEND



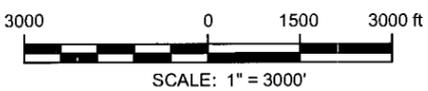
SOURCE: Map created from mapcard.com.



<b>KLEINFELDER</b>	<b>EUNICE B SITE TOPOGRAPHIC MAP</b> El Paso Natural Gas Eunice, New Mexico		<b>FIGURE</b> <b>2</b>
	Originator: M. Wikstrom	Drawn By: PDan	
Approved By: D. Janney	Project No.: 93018	Drawing No.: 93018 Figures	
	Scale: As referenced	Drawing Category: A	



SOURCE: Map created from mapcard.com.



<h1 style="margin: 0;">KLEINFELDER</h1>		<b>EUNICE B COMPRESSOR STATION</b> Eunice, New Mexico		<b>2a</b>	FIGURE
		Originator: M. Wikstrom	Drawn By: PDan		
Approved By: D. Janney	Project No.: 93014	Drawing No.: 93014_02_0			
	Scale: 1" = 3000'	Drawing Category: A			



EUNICE B COMPRESSOR  
STATION SITE

SOURCE: Aerial photo from mapband.com.



**KLEINFELDER**

EUNICE B SITE AERIAL PHOTOGRAPH  
El Paso Natural Gas  
Eunice, New Mexico

FIGURE

**3**

Originator: M. Wikstrom

Drawn By: P.Dan

Date: April 2008

Approved By: D. Janney

Project No.: 93018

Drawing No.: 93018 Figures

Scale: 1" = 200'

Drawing Category: A

**APPENDIX B**  
**Excerpts from the 2008 EPNG Environmental Handbook**





## 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
6. The Environmental Department is responsible for making initial notifications of RQ releases to applicable regulatory agencies and for handling any follow-up reporting requirements. Facility Management is responsible for verbal reports to agencies if the Environmental Department cannot be reached.
  7. Reportable Quantity spill events will be entered into the Company's Comprehensive Incident Report Tracking System (CIRTS) and updated as needed for ongoing cleanups.

### Initial Spill or Release Response

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

### Spill or Release Control and Cleanup

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

## 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 of the facility-designated waste storage area.
  - Arrange with the Environmental Department for help in sampling spill wastes and their proper disposal.
  - Replace used spill kit response equipment with new equipment.
3. Keep a copy of any required report and all other documents associated with a spill or release including Federal, State and local forms in the facility SPCC or Spills & Releases files.

### For Further Information:

Refer to the following procedures in this Handbook:

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

Notes:

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# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**

Governor

**Joanna Prukop**  
Cabinet Secretary

February 14, 2004

**Lori Wrotenbery**

Director

**Oil Conservation Division**

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 7001-1940-0004-7923-4375**

**Mr. Robert H. St. John**  
**El Paso Natural Gas Co.**  
**3300 North "A" Building 2, Suite 200**  
**Midland, Texas 79705**

**RE: Discharge Plan Renewal GW-151**  
**El Paso Natural Gas Co.**  
**Eunice B Compressor Station**  
**Lea County, New Mexico**

Dear Mr. St. John:

The ground water discharge plan renewal application GW-151 for the El Paso Natural Gas Co. Eunice B Compressor Station located in the NW/4 NW/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within 10 working days of receipt of this letter.**

The original discharge plan application was submitted on September 13, 1993 and approved November 5, 1993. The discharge plan renewal application letter, dated October 1, 2003, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications 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 liability should operations result in pollution of surface water, ground water or the environment.

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

U.S. Postal Service  
CERTIFIED MAIL RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)

7001 1940 0004 7923 4375

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

2-16-04

Postmark  
Here

GW-151

Sent To  
ROBERT H. ST. JOHN - EPNG  
Street, Apt. No.,  
or PO Box No. 3300 NORTH 'A' BLDG 2, #200  
City, State, ZIP  
MIDLAND, TX 79705

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 **November 5, 2008**, 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. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan renewal application for the El Paso Natural Gas Co. Eunice B Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 3000 horsepower of \$1,700. The OCD has received both the filing fee and the renewal fee.

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

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/eem  
Attachment

Xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-151  
El Paso Natural Gas Co.  
EUNICE B COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
February 14, 2004

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

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity no later than June 30, 2004 and every year from tested date thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June 30, 2004 and every five (5) years thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities, which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously

approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: The facility will have an approved storm water run-off plan.
16. Closure: The OCD will be notified when operations of the Eunice B Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Eunice B Compressor Station, the Director 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 these conditions and requirements of this permit administratively.

**El Paso Natural Gas Co.**

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 10/14/03,  
or cash received on 10/27/03 in the amount of \$ 1700.00  
from EPNG

for \_\_\_\_\_ GW-151

Submitted by: \_\_\_\_\_ (Facility Name) Date: \_\_\_\_\_ (DP No.)

Submitted to ASD by: Ed Martine Date: 10/27/03

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal   
Modification \_\_\_\_\_ Other \_\_\_\_\_ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment  or Annual Increment \_\_\_\_\_

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 10/14/2003	CHECK NUMBER [REDACTED]
Pay ***ONE THOUSAND SEVEN HUNDRED AND XX / 100 US DOLLAR***		62-20 311	Amount ***\$1,700.00
To The Order Of	STATE OF NEW MEXICO ENVIRONMENTAL DEPARTMENT WATER QUALITY MANAGEMENT 1220 SOUTH ST. FRANCIS DRIVE SANTA FE, NM 87505	[Signature] Authorized Signature	



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

RECEIVED

OCT 20 2003

OIL CONSERVATION  
DIVISION

REMITTANCE ADVICE

CHECK DATE 10/14/2003  
CHECK NUMBER [REDACTED]  
VENDOR NUM 0000002667

STATE OF NEW MEXICO  
ENVIRONMENTAL DEPARTMENT  
WATER QUALITY MANAGEMENT  
1220 SOUTH ST FRANCIS DRIVE  
SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00174418	CKREQ031002	10/02/2003	0.00	1,700.00
FOR DISCHARGE PERMIT GW-151 - QUESTIONS ROBERT ST JOHN PH 432-686-3268				
TOTAL			\$0.00	\$1,700.00

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9/25/03,  
or cash received on 10/27/03 in the amount of \$ 100.00  
from EPNG

for GW-151

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Facility Name) (DP No.)

Submitted to ASD by: Ed Martin Date: 10/27/03

Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(Specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.  
Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

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 09/25/2003 CHECK NUMBER [REDACTED]  
62-20 Amount  
311

\*\*\*\$100.00\*\*\*  
VOID AFTER ONE YEAR

Pay \*\*\*ONE HUNDRED AND XX/100 US DOLLAR\*\*\*

To The Order Of STATE OF NEW MEXICO  
ENVIRONMENTAL DEPARTMENT  
WATER QUALITY MANAGEMENT  
1220 SOUTH ST. FRANCIS DRIVE  
SANTA FE, NM 87505

DL SA  
Authorized Signature



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

REMITTANCE ADVICE

CHECK DATE 09/25/2003  
CHECK NUMBER [REDACTED]  
VENDOR NUM 0000002667

STATE OF NEW MEXICO  
ENVIRONMENTAL DEPARTMENT  
WATER QUALITY MANAGEMENT  
1220 SOUTH ST FRANCIS DRIVE  
SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00172657	CKREQ030917	09/17/2003	0.00	100.00
TOTAL			\$0.00	\$100.00



**NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT**

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

May 3, 2000

**CERTIFIED MAIL  
RETURN RECEIPT NO. 5051-6007**

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

**RE: Discharge Plan Renewal GW-151  
El Paso Natural Gas Company  
Eunice B Compressor Station  
Lea County, New Mexico**

Dear Mr. Martinez

The ground water discharge plan renewal application GW-151 for the El Paso Natural Gas Company Eunice B Compressor Station located in the NW/4 NW/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within 10 working days of receipt of this letter.

The original discharge plan application was submitted on September 13, 1993 and approved November 5, 1993. The discharge plan renewal application letter, dated February 29, 2000, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications 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 Company of liability should operations result in pollution of surface water, ground water or the environment.

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

U.S. Postal Service <b>CERTIFIED MAIL RECEIPT</b> (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent Via:	
Postage	
Certified	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Name (Please Print Clearly) (To be completed by mailer) Tom J. MARTINEZ, EL PASO NAT. GAS. Co. Street, Apt. No.; or PO Box No. 3300 NORTH A STREET, STR 200 City, State, ZIP+4 MIDLAND, TX 79705	
PS Form 3800, July 1999 See Reverse for Instructions	

7099 3220 0000 5051 6007

Postmark Here  
EPNG  
EUNICE B  
GW-151 EM

Tom J. Martinez  
GW-151  
May 3, 2000  
Page 2

Please note that Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, El Paso Natural Gas Company is required to notify the Director of any facility expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on **November 5, 2003**, and El Paso Natural Gas Company should submit an application in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan renewal application for the El Paso Natural Gas Company Eunice B Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan application will be assessed a fee equal to the filing fee of \$50.00. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 3000 horsepower equal to one-half of the original flat fee or \$690.00. The OCD has received the filing fee.

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

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/eem  
Attachment

Xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-151  
EL PASO NATURAL GAS COMPANY  
EUNICE B COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
May 3, 2000

1. Payment of Discharge Plan Fees: The \$50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor stations with horsepower rating greater than 3000 horsepower. The renewal flat fee required for this facility is \$690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.
2. Commitments: El Paso Natural Gas Company will abide by all commitments submitted in the discharge plan renewal application letter dated February 29, 2000 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.
4. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity no later than June 30, 2000 and every year from tested date thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure 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. The test results will be submitted to OCD by July 31, 2000.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June 30, 2000 and every five (5) years thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by July 31, 2000.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: The facility will have an approved storm water run-off plan.
16. Closure: The OCD will be notified when operations of the Eunice B Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Eunice B Compressor Station, the Director 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 Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas Company further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

**El Paso Natural Gas Company**

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/24/2000,  
or cash received on \_\_\_\_\_ in the amount of \$ 50<sup>00</sup>  
from EL PASO NATURAL CO.  
for EUNICE CAMP B ST. GW-151

Submitted by: WAYNE PRICE (Family Name) Date: 3/1/2000 (DP No.)  
Submitted to ASD by: [Signature] Date: "  
Received in ASD by: \_\_\_\_\_ Date: \_\_\_\_\_

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(optional)

Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.  
Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_

**THE FACE OF THIS DOCUMENT HAS A BLUE BACKGROUND AND MICROPRINTING. THERE IS AN ARTIFICIAL WATERMARK ON THE REVERSE SIDE.**

<b>EL PASO NATURAL GAS COMPANY</b> P.O. Box 1492 El Paso, TX 79978	<b>CITIBANK DELAWARE</b> A Subsidiary of Citicorp One Penn's Way New Castle, DE 19720 62-20/311
--	---

Date 02/24/2000 Pay Amount \$50.00\*\*\*  
Pay \*\*\*\*FIFTY AND XX / 100 US DOLLAR\*\*\*\* Void After One Year

To The Order Of **NMED WATER QUALITY MANAGEMENT**  
2040 S Pacheco  
Santa Fe, NM 87505

GW-151 H. Brent Austin  
Authorized Signature

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 11/18/93,  
or cash received on 12/6/93 in the amount of \$ 1380.00  
from El Paso Natural Gas Company  
for Eunice 'B' Compressor Station Qx-151

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
(Facility Name) (DP No.)

Submitted to ASD by: Kathy Brown Date: 12/6/93

Received in ASD by: Angie Moore Date: 12-6-93

Filing Fee \_\_\_\_\_ New Facility X Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_  
(specify)

Organization Code 521.07 Applicable FY 94

To be deposited in the Water Quality Management Fund.

Full Payment X 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. [redacted]  
232 CBD  
62-20  
311  
11/18/93  
Date

PAY TO THE ORDER OF

NMED WATER QUALITY MANAGEMENT  
P O BOX 2088  
SANTA FE  
NM 87504

PAY AMOUNT  
\$1,380.00  
Void After 1 Year

Authorized Signatory





OIL CONSERVATION DIVISION  
RECEIVED

'93 DEC 6 AM 9 44

ONE PETROLEUM CENTER/BUILDING TWO  
3300 NORTH 'A' STREET  
MIDLAND, TEXAS 79705

December 3, 1993

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

Subject: Discharge Plan GW-151  
Eunice "B" Compressor Station  
Lea County, New Mexico

Dear Mr. Anderson:

El Paso Natural Gas Company (EPNG) is submitting a check in the amount of \$1,380.00, payable to the NMED Water Quality Management, as required by the NMWQCC as the flat fee for the referenced Discharge Plan.

If there are any questions or comments regarding this subject or if additional information is found necessary, please feel free to contact me at 915/686-3226.

Sincerely,

A handwritten signature in cursive script that reads 'Lori A. Saylor'.

Lori A. Saylor, Engineer  
Environmental Compliance Engineering



P.O. BOX 1492  
EL PASO, TX 79978

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

C CONTROL NO.

232 CBD

62-20  
311

11/18/93  
Date

PAY TO THE ORDER OF

NMED WATER QUALITY MANAGEMENT  
P O BOX 2088  
SANTA FE NM 87504

PAY AMOUNT

\$1,380.00

Void After 1 Year

PIPELINE  
OF CHOICE

Authorized Signatory



ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-151  
El Paso Natural Gas Co.  
EUNICE B COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
February 14, 2004

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

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity no later than June 30, 2004 and every year from tested date thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than June 30, 2004 and every five (5) years thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities, which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.
13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously

approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

15. Storm Water Plan: The facility will have an approved storm water run-off plan.
16. Closure: The OCD will be notified when operations of the Eunice B Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Eunice B Compressor Station, the Director 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 these conditions and requirements of this permit administratively.

**El Paso Natural Gas Co.**

Print Name: Kenneth L. Morrow

Signature: Kenneth L. Morrow

Title: Plains Area Manager

Date: 3-1-04



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING  
GOVERNOR

ANITA LOCKWOOD  
CABINET SECRETARY

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

November 5, 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. P-111-334-278**

Ms. Lori Saylor  
El Paso Natural Gas Co.  
One Petroleum Center/Bldg 2  
3300 North "A" Street  
Midland, Texas 79705

**Re: Discharge Plan (GW-151)  
Eunice "B" Compressor Station  
Lea County, New Mexico**

Dear Ms. Saylor:

The groundwater discharge plan GW-151 for the El Paso Natural Gas Co. Eunice "B" Compressor Station located in the NW/4 NW/4 Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated September 21, 1993.

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

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

Please note that section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Ms. Lori Saylor  
November 5, 1993  
Page 2

Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire November 5, 1998 and you should submit an application for renewal in ample time before that date.

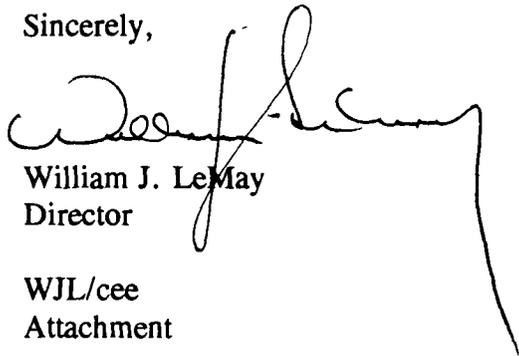
The discharge plan application for the El Paso Natural Gas Co. Eunice "B" Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen-hundred eighty (1380) dollars for compressor stations in excess of 3000 horsepower.

The OCD has received your \$50 filing fee. The flat rate for a discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

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

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

Sincerely,



William J. LeMay  
Director

WJL/cee  
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-151 APPROVAL  
EL PASO NATURAL GAS COMPANY  
EUNICE "B" COMPRESSOR STATION  
DISCHARGE PLAN REQUIREMENTS  
(November 5, 1993)

1. Payment of Discharge Fees: The \$1380 flat fee (either total payment or installments) will be paid upon receipt of this approval letter.
2. Drum Storage: All drums will be stored on pad and curb type containment.
3. Sump Inspection: All pre-existing sumps will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.
4. Berms: All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
5. Pressure testing: All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
6. Spills: All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 9-13-93,  
or cash received on 10/7/93 in the amount of \$ 50.00  
from El Paso Natural Gas  
for Eunice "B" Compressor Station GW-151

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_  
Submitted to ASD by: Kathy Brown Date: 10/7/93  
Received in ASD by: A. Alure Date: 10-7-93

Filing Fee  New Facility \_\_\_\_\_ Renewal \_\_\_\_\_  
Modification \_\_\_\_\_ Other \_\_\_\_\_

Organization Code 521.07 Applicable FY 94

To be deposited in the Water Quality Management Fund.  
Full Payment \_\_\_\_\_ or Annual Increment \_\_\_\_\_



EL PASO NATURAL GAS COMPANY  
EL PASO, TEXAS

CONTROL NO.

CHECK NO

62-20  
311

09-13-93  
Date

PAYABLE AT  
CITIBANK — DELAWARE  
WILMINGTON, DEL

PAY TO THE ORDER OF

NEW MEXICO WATER QUALITY  
CONTROL COMMISSION  
P.O. BOX 2088  
SANTA FE NM 87504

PAY AMOUNT

\$50.00\*\*\*\*\*

John M. Green, Jr.

Authorized Signatory

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico  
Energy Minerals and Natural Resources

Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

New                       Renewal                       Modification  
(No Changes)

1. Type: Eunice B Compressor Station

2. Operator: El Paso Natural Gas Company

Address: 3506 West County Road, Hobbs, New Mexico 88240

Contact Person: Robert H. St. John Phone: (432) 686-3268

3. Location: NW/4 NW/4 Section 5 Township 21S Range 36E  
Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

14. CERTIFICATION: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Kenneth L. Morrow

Title: Area Manager, Plain Operating Area

Signature: *Kenneth L. Morrow*

Date: October 2, 2003