

March 8 2016

7014 1200 0002 0906 3810 Return Receipt Requested

State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Re: Enterprise Field Services LLC
Below Grade Tank Registrations

To Whom It May Concern:

Enterprise Field Services LLC is submitting Below Grade Tank Registrations for the following facilities:

- Poker Lake Compressor Station
- Nash Compressor Station
- Lost Tank Compressor Station
- Sand Dunes Compressor Station
- Corazon Compressor Station
- Trunk C Compressor Station
- Turkey Track Compressor Station
- Cedar Canyon Compressor Station

If you have questions or require additional information, please contact our area environmental representative, Alena Polk at (575) 706-4926, or me directly at (713) 381-6684.

Sincerely,

Jon E. Fields

cc:

Director, Field Environmental

Oil Conservation Division, District II, 811 S. First Street, Artesia, NM 88210



AMARILLO 921 North Bivins Amarillo, Texas 79107 Phone 806.467.0607 Fax 806.467.0622

ARTESIA 408 W. Texas Ave Artesia, New Mexico 88210 Phone 575.746.8768 Fax 575.746.8905

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan

HOBBS 318 East Taylor Street Hobbs, New Mexico 88240 Phone 575.393.4261 Fax 575.393.4658

MIDLAND 2901 State Highway 349 Midland, Texas 79706 Phone 432.522.2133 Fax 432.522.2180

OKLAHOMA CITY 430 West Wilshire Blvd, Suite 10 Oklahoma City, Oklahoma 73116 Phone 405.486.7033

> SAN ANTONIO 13111 Lookout Way San Antonio, Texas 78223 Phone 210.265.8025 Fax 210.568.2191

ENVIRONMENTAL CONSULTING ENGINEERING DRILLING CONSTRUCTION EMERGENCY RESPONSE

> Toll Free: 866.742.0742 www.talonipe.com

Sand Dunes Compressor Station

Owned/Operated: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210-4324

Prepared by: Talon/LPE
December 2015

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1. INTRODUCTION

Enterprise Field Services, LLC is pleased to submit this application for a below-grade tank with secondary containment and leak detection. The proposed tank will be owned and operated by Enterprise Field Services, LLC and is proposed to be installed on federally owned land. The existing facility, Sand Dunes Compressor Station, is located at 32.277222, -103.798056 (NAD 1983), on the southwest ¼ of the northeast ¼ of section 29, township 23 south, range 31 east, in Eddy county. The metal tank will have the capacity to hold 100 bbl of water and condensate. The existing six foot, chain link fence with barbed wire surrounds the existing facility and will include the proposed tank.

Form C-144, Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application is included in Appendix 1.

2. HYDROGEOLOGIC REPORT

Fifteen (15) wells were located within a five-mile radius of the facility. Wells measured in depth from 135 feet to 4,291 feet. Of the fifteen wells, only four (4) had water. C 02492 (New Mexico Office of the State Engineer, 2015) located 3.51 miles to the northwest had water at 85 feet. C 02492 POD2 (New Mexico Office of the State Engineer, 2015) located 3.35 miles to the northwest had water at 125 feet. C 02348 (New Mexico Office of the State Engineer, 2015) located 2.8 miles to the southeast of the facility had water at 430 feet. Finally, C 02664 (New Mexico Office of the State Engineer, 2015) located 3.94 miles north of the facility had water at 354 feet. The closest well is C 02954 EXPL (New Mexico Office of the State Engineer, 2015) located 0.69 miles to the north was drilled to 905 feet with no water located.

A 1962 report entitled "Ground-water investigations of the project Gnome area, Eddy and Lea Counties, New Mexico" prepared on the behalf of the U.S. Atomic Energy Commission (now the Department of Energy) (Cooper, 1962) encompasses the area where the facility is situated and appears to be the best available data. In 1962, approximately 70 wells in the area showed water depth with a minimum of 6.5 feet and a maximum of 445 feet.

In 2005, the EPA Waste Isolation Pilot Plant (WIPP) Recertification Fact Sheet No. 5 (Environmental Protection Agency, 2005) showed that 15 monitoring wells were drilled in the area of the Plant. Water was encountered at 50-60 feet below ground surface (bgs) in 14 of the 15 wells. The 15th well was dry.

Sand Dune Compressor Station is located outside the five mile radius of the Gnome area but within the fifteen mile radius of the Gnome area. Based on the best available data, using the well location with the highest water level, the groundwater level used for this report is 85 feet bgs.

3. SITING CRITERIA COMPLIANCE DEMONSTRATIONS

Based on topographic maps and aerial views of the site, there are no flowing or significant watercourses, lakebeds, sinkholes, wetlands, playa lakes, springs, public-use fresh water wells, or fresh water wells used for livestock consumption within a 200 foot radius of the proposed site. These maps can be found in **Appendix 4** of this report.

The bottom of the tank's outer wall will rest five feet below grade. Since data shows that groundwater levels are at approximately 50 feet, the bottom of the tank will be greater than 25 feet above groundwater.

4. DESIGN PLAN

A sign of at least 12 inches by 24 inches is currently posted upright in a conspicuous place on the surrounding fence, with lettering at least two inches in height. The sign includes the operator's name, the specific location of the site, and all necessary emergency telephone numbers. A photograph of the sign on site is included in **Appendix 3**.

A surrounding chain link perimeter fence is currently in place around the facility that will include the below-grade tank. This fence is six feet in height with two strands of barbed wire at the top. A photograph of the fence on site is included in **Appendix 3**.

The 100 bbl tank will be constructed of metal and will be resistant to sunlight damage, and to its contents of water and condensate. It will have a cone-shaped top to prevent damage from snow or water puddling, and it will be double-walled with leak detection capabilities. The foundation will have a level base free of anything that could damage the liner or tank bottom. Drawings of the tank design are included in **Appendix** 2.

5. OPERATION AND MAINTENANCE PLAN

The operation and maintenance plan will follow what is required by NMAC 19.15.17.12, and can be found in **Appendix 5** of this report.

6. CLOSURE PLAN

The closure plan will follow what is required by Subsection C of NMAC 19.15.17.9, and can be found in **Appendix 6**.

Cooper. (1962). Ground-water investigations of the project Gnome area, Eddy and Lea Counties, New Mexico. U.S. Atomic Energy Commission.

Environmental Protection Agency. (2005, June). EPA Waste Isolation Pilot Plant (WIPP) Recertification Fact Sheet No. 5. New Mexico, USA.

New Mexico Office of the State Engineer. (2015, December 3). New Mexico.

New Mexico Office of the State Engineer. (2015, December 3). Point of Diversion Summary - C 02348. New Mexico.

New Mexico Office of the State Engineer. (2015, December 3). Point of Diversion Summary - C 02492 POD2. New Mexico.

New Mexico Office of the State Engineer. (2015, December 3). Point of Diversion Summary - C 02664. New Mexico.

New Mexico Office of the State Engineer. (2015, December 3). Point of Diversion Summary - C02492. New Mexico.

Appendix 1

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Form C-144

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 811 S. First St., 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** Department Oil Conservation Division 1220 South St. Francis Dr.

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Form C-144

Revised June 6, 2013

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Santa Fe, NM 87505

☐ Modification to an existing per	ank, or proposed alternative method
or proposed alternative method	
Instructions: Please submit one application (Form C-14-	f) per individual pit, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liabi	lity should operations result in pollution of surface water, ground water or the with any other applicable governmental authority's rules, regulations or ordinances.
1.	with any other appreadic governmental authority's rules, regulations or ordinances.
Operator: Enterprise Field Services, LLC	OGRID #:
Address: P O Box 4324, Houston, TX 77210-4324	
Facility or well name: Sand Dunes Compressor Station	
API Number:N/A	OCD Permit Number; N/A
U/L or Qtr/Qtr SW 1/4 of NE 1/4 Section 29 Township	<u>23S</u> Range <u>31E</u> County: <u>Eddy</u>
Center of Proposed Design: Latitude 32,277222	Longitude <u>-103.798056</u> NAD: □1927 ☑ 1983
Surface Owner: ☑ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian All	otment
☐ Pit: Subsection F, G or J of 19.15.17.11 NMAC Temporary: ☐ Drilling ☐ Workover ☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid ☐ Lined ☐ Unlined Liner type: Thickness	HDPE PVC Other Volume:bbl Dimensions: L x W x D il. water, antifreeze 6-inch lift and automatic overflow shut-off
□ Alternative Method: Submittal of an exception request is required. Exceptions must be submitted S. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, tell in the permanent pits, tell in the permanent pits, tell institution or church) □ Four foot height, four strands of barbed wire evenly spaced between one at laternate. Please specify	mporary pits, and below-grade tanks) if located within 1000 feet of a permanent residence, school, hospital,

Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks) Screen Netting Other		
☐ Monthly inspections (If netting or screening is not physically feasible)		
Signs: Subsection C of 19.15.17.11 NMAC ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers ☐ Signed in compliance with 19.15.16.8 NMAC – N/A		
Variances and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. Please check a box if one or more of the following is requested, if not leave blank: Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.		
5. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accematerial are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source	
General siting		
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells	☐ Yes ☒ No ☐ NA	
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks) - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No	
Within the area overlying a subsurface mine. (Does not apply to below grade tanks) - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No	
Within an unstable area. (Does not apply to below grade tanks) - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	Yes No	
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	Yes No	
Below Grade Tanks		
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ⊠ No	
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site		
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)		
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	Yes No	
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ☐ No	
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image		
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No	

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Temporary Pit Non-low chloride drilling fluid			
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site			
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image			
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Permanent Pit or Multi-Well Fluid Management Pit			
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No		
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No		
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.			
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No		
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No		
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached. Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC - Appendix 4 Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC - Appendix 2 Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC - Appendix 5 Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC - Appendix 6			
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC			
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC A List of wells with approved application for permit to drill associated with the pit. Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	15.17.9 NMAC		

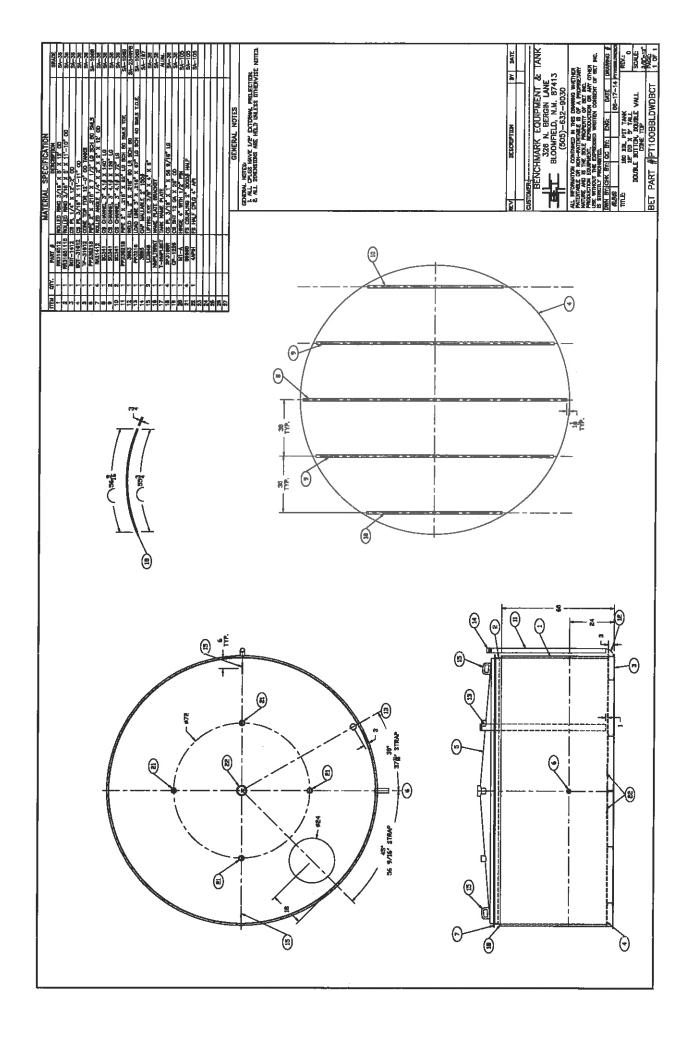
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC	documents are	
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan. Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Falternative Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	luid Management Pit	
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be closure plan. Please indicate, by a check mark in the box, that the documents are attached. ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings) ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC		
15. Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable soul provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 19.15.17.10 NMAC for guidance.	rce material are Please refer to	
Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA	
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes NA NA NA NA NA NA NA N		
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes Yes NA NA NA NA NA NA NA N		
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa ake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site		
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No	
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No	
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No	
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No	
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance		

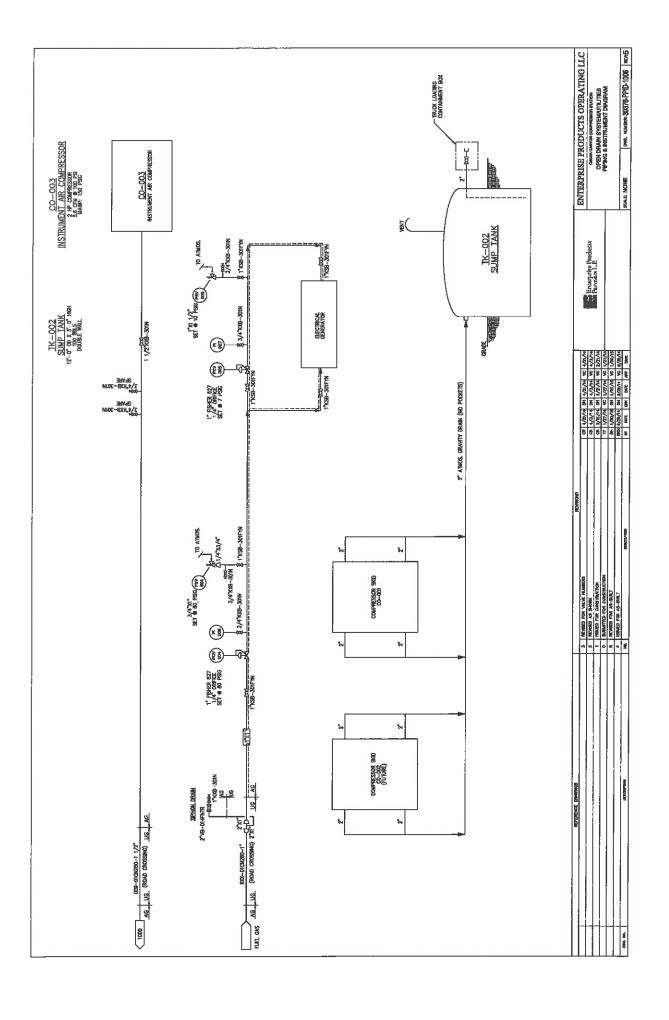
adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological	
Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain FEMA map	☐ Yes ☐ No
16. On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan by a check mark in the box, that the documents are attached. Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17. Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19. Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
17. Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beli	ef.
Name (Print):	
Signature: Date: 03/01/2016	
e-mail address: snolan@eprod.com Telephone: 713-381-6595	
18. OCD Approval: Permit Application (including closure plan) Closure Plan (only) COCD Conditions (see attachment)	
OCD Representative Signature: Approval Date:	
Title: OCD Permit Number:	
19. Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date:	the closure report. complete this
20.	
Closure Method: ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-log ☐ If different from approved plan, please explain.	
	oop systems only)
21. Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in mark in the box, that the documents are attached.	
21. Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in	
21. Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in mark in the box, that the documents are attached. Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure for private land only) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable)	
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in mark in the box, that the documents are attached. Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure for private land only) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable) Waste Material Sampling Analytical Results (required for on-site closure)	
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in mark in the box, that the documents are attached. Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure for private land only) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable) Waste Material Sampling Analytical Results (required for on-site closure) Disposal Facility Name and Permit Number Soil Backfilling and Cover Installation	
Closure Report Attachment Checklist: Instructions: Each of the following items must be attached to the closure report. Please in mark in the box, that the documents are attached. Proof of Closure Notice (surface owner and division) Proof of Deed Notice (required for on-site closure for private land only) Plot Plan (for on-site closures and temporary pits) Confirmation Sampling Analytical Results (if applicable) Waste Material Sampling Analytical Results (required for on-site closure) Disposal Facility Name and Permit Number	dicate, by a check

Operator Closure Certification: I hereby certify that the information and attachmbelief. I also certify that the closure complies wi	ents submitted with this closure report is true, accurate and complete to the best of my knowledge and ith all applicable closure requirements and conditions specified in the approved closure plan.
Name (Print):	Title:
Signature:	Date:
e-mail address:	Telephone:

Appendix 2

Tank Design Drawing





Appendix 3

Photographs



Fencing - 6 foot, 3-strand barbed wire

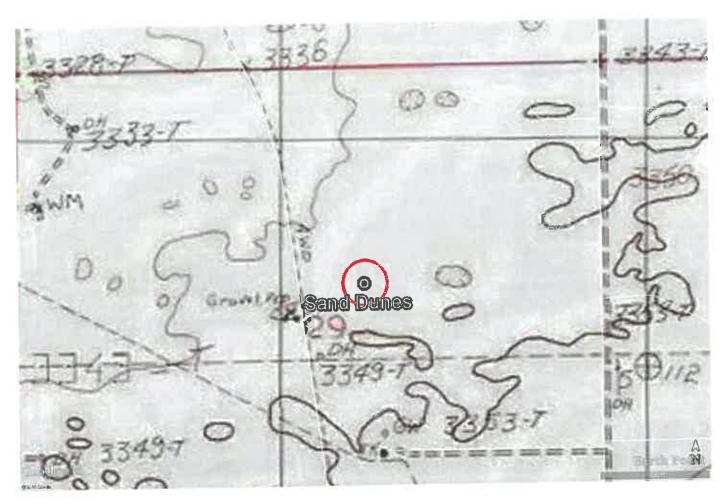


Sand Dunes Compressor Station Signage

Appendix 4

Maps





Sand Dunes Compressor Station Topographic Map within 200 feet



Sand Dunes Compressor Station - 100 feet



Sand Dunes Compressor Station 200 feet



Sand Dunes Compressor Station = 1000-foot radius

Appendix 5

Operating and Maintenance Plan

Operational Plan

NMAC 19.15.17.12

OPERATIONAL REQUIREMENTS

Enterprise will operate and maintain the below-grade tank to contain liquids and solids and maintain the secondary containment system to prevent contamination of fresh water and protect public health and the environment.

Enterprise shall not discharge into or store any hazardous waste in the below-grade tank.

If the below-grade tank develops a leak, Enterprise shall remove all liquid above the damage or leak within 48 hours of discovery, notify the appropriate division office and repair the damage or replace the below-grade tank as applicable.

Enterprise shall operate and install the below-grade tank to prevent the collection of surface water run-on.

Enterprise shall maintain on site an oil absorbent boom or other device to contain an unanticipated release.

Enterprise shall not allow a below-grade tank to overflow or allow surface water run-on to enter the below-grade tank.

Enterprise shall remove any measurable layer of oil from the fluid surface of a below-grade tank.

Enterprise shall inspect the below-grade tank for leakage and damage at least monthly.

Enterprise shall document the integrity of each tank at least annually and maintain a written record of the integrity for five years.

Enterprise shall maintain adequate freeboard to prevent overtopping of the below-grade tank.

Operator of a below-grade tank who discovers that the below-grade tank does not demonstrate integrity or that the below-grade tanks develops any of the conditions identified in Paragraph (5) of Subsection A of th19.15.17.12 NMAC (para 3 above) shall repair the damage or close the existing below-grade tank pursuant to the closure requirements of 19.15.17.13 NMAC.

No longer a controlled document once printed. April 9, 2015 (4:25PM)



System/Location:

Carlsbad - Compressor Stations

Procedure No.

CARLS-COMPSTA-350

Revision No: Revision Date:

4/06/15 1 o

Page: 1 of 2

Inspection of Sump Tank Interstitial Space

<u>Procedure Description:</u> Provide clear instructions to safely inspect sump tank interstitial space to ensure tank integrity.

<u>Procedure Requirements:</u> Personal Protective Equipment (P PE) must be worn including but not limited to the following: Company approved Fire Retardant Clothing (FRC) and the following ANSI / ASTM approved equipment; safety glasses, hard hat, safety shoes and hearing protection (high noise areas or activities). For additional PPE requirements, refer to the workplace Hazard Assessment (SF19).

Procedure Preparation: BEFORE performing this procedure, read and understand all steps.

Warning: NATURAL GAS CONDENSATE is an OSHA/NFPA Class-1A Extremely Flammable liquid. Releases flammable vapors at well below ambient temperatures and readily forms flammable mixtures with air. Exposed to an ignition source, it will burn in the open or be explosive in confined spaces. Keep away from heat, sparks and open flame. May cause irritation to eyes, skin, and respiratory system. May be harmful if inhaled or absorbed through skin and harmful or fatal if swallowed. Avoid liquid, mist, and vapor contact. Refer to SDS for proper PPE and additional information.

COMPLETION STEPS:

- 1. REMOVE cap on Nozzle 13.
- 2. Visually INSPECT interstitial space for liquids.

If liquids ARE OBSERVED then,

Replace cap on Nozzle 13.

Contact management immediately.

If liquids ARE NOT OBSERVED then,

Replace cap on Nozzle 13.

Nozzle 13



*** End of Procedure ***

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Revision Log

Revision Approval Log			
Rev. No. Date Action		Ву	
4/06/15	Initial Issue	T. Green	
		Date Action	

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System/Location:

Carlsbad - Compressor Stations

Procedure No.

CARLS-COMPSTA-351

Revision No: Revision Date: 0 4/06/15

Page: 1 of 3

Procedure Title:

Emptying Station Sump Tank

<u>Procedure Description:</u> Provide clear instructions to safely remove liquid level from station sumptank.

<u>Procedure Requirements:</u> Personal Protective Equipment (PPE) must be worn including but not limited to the following: Company approved Fire Retardant Clothing (FRC) and the following ANSI / ASTM approved equipment; safety glasses, hard hat, safety shoes and hearing protection (high noise areas or activities). For additional PPE requirements, refer to the workplace Hazard Assessment (SF19).

Procedure Preparation: BEFORE performing this procedure, read and understand all steps.

SYSTEM BACKGROUND INFORMATION:

Warning: NATURAL GAS CONDENSATE is an OSHA/NFPA Class-1A Extremely Flammable liquid. Releases flammable vapors at well below ambient temperatures and readily forms flammable mixtures with air. Exposed to an ignition source, it will burn in the open or be explosive in confined spaces. Keep away from heat, sparks and open flame. May cause irritation to eyes, skin, and respiratory system. May be harmful if inhaled or absorbed through skin and harmful or fatal if swallowed. Avoid liquid, mist, and vapor contact. Refer to SDS for proper PPE and additional information...

COMPLETION STEPS:

- 1. REMOVE cap on Nozzle 13.
- 2. Visually INSPECT interstitial space for liquids.

If liquids ARE OBSERVED then,

Replace cap on Nozzle 13.

Contact management immediately.

If liquids ARE NOT OBSERVED then,

Replace cap on Nozzle 13.

Continue to next step.

- 3. OPEN access hatch and visually verify liquid level in sump tank.
- 4. SPOT truck near sump tank.
- 5. ATTACH ground cable to truck fame.

Nozzle 13





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- 6. CONNECT truck hose to N14.
- 7. OPEN loading line valve.
- 8. START truck pump.
- 9. VERIFY liquid level via access hatch.
- 10. STOP truck pump when sump empty.
- 11. CLOSE loading line valve.
- 12. CLOSE truck hose valve
- 13. OPEN Loading Line Drain Valve to drain any residual liquids from the hose into the catch basin.
- 14. DISCONNET truck hose from N14.
- 15. REMOVE any liquids from catch basin and dispose of properly.

Loading Line Drain Valve N 14

Loading Line Valve



*** End of Procedure ***

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Revision Log

Revision Approval Log			
Rev. No. Date Action		Ву	
0	4/06/15	Initial Issue	T. Green
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Appendix 6

Closure Plan

CLOSURE REQUIREMENTS

Site Rankings

Although Site Rankings are no longer required, Enterprise has chosen to include them in this report.

Criteria:

Depth to ground water	Less than 50 feet	(20 points)	
(vertical distance from bottom of pit to seasonal high water	100 feet	(10 points)	10
elevation of ground water.)	100 feet or more	(0 points)	
Wellhead protection area: (Less than 200 feet from a	Yes	(20 points)	
private domestic water source, or less than 1000 feet from all other water sources.)	No	(0 points)	0
Distance to surface water:	Less than 200 feet	(20 points)	j
(Horizontal distance to all	200 feet to 1,000 feet	(10 points)	
wetlands, playas, irrigation canals, ditches, and perennial and ephemeral watercourses.)	Great than 1,000 feet	(0 points)	0
	Ranking Score (TOTAL POINTS):	1	0

Enterprise shall not commence closure without first obtaining approval of the closure plan submitted with the permit application or registration pursuant to 19.15.17.13 NMAC.

Enterprise shall close the below-grade tank by first removing all contents and transferring the materials to a division approved facility.

Enterprise shall test the soils beneath the below-grade tank as follows:

A minimum of five point composite sample to include any obvious stained or wet soils, or other evidence of contamination shall be taken under the below-grade tank and that sample shall be analyzed for the constituents listed in Table I of 19.15.17.13 NMAC below.

Table I Closure Criteria for Soils Beneath Below-Grade Tanks where contents are Removed				
Depth below bottom of pit to groundwater less than	Constituent	Method*	Limit**	
10,000 mg/l TDS				
≤50 feet	Chloride	EPA 300.0	600 mg/kg	
	TPH	EPA SW-846	100 mg/kg	
		Method 418.1***		

	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet -100 feet	Chloride	EPA 300.0	10,000 mg/kg
	ТРН	EPA SW-846 Method 418.1 ***	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8021B or 8260B***	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8015M	50 mg/kg
	Benzene	EPA 300.0	10 mg/kg
> 100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1 ***	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8021B or 8260B***	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8015M	50 mg/kg
***	Benzene	EPA 300.0	10 mg/kg

^{*}Or other test methods approved by the division

If any contaminant concentration is higher than the above parameters, the division may require additional delineation upon review of the results and Enterprise must receive approval before proceeding with closure.

If all contaminant concentrations are less than or equal to the parameters listed above, Enterprise can proceed to backfill the excavation with non-waste containing, uncontaminated, earthen material.

CLOSURE NOTICE

Enterprise shall notify the appropriate division district office verbally, and in writing, at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Enterprise name and the location to be closed, including the unit letter, section, township, and range.

Enterprise shall notify the surface owner by certified mail (return receipt requested) that Enterprise plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement.

^{**}Numerical limits or natural background level, whichever is greater

^{***} Or Method 8015 with GRO, DRO, & MRO

CLOSURE REPORT AND BURIAL IDENTIFICATION

Within 60 days of closure completion, Enterprise shall submit a closure report on form C-144, with necessary attachments to document all closure activities including sampling results, information required by 19.15.17 NMAC, and details on back-filling, capping and covering, where applicable. In the closure report, Enterprise shall certify that all information in the report and attachments is correct and that Enterprise has complied with all applicable closure requirements and conditions specified in the approved closure plan.

TIMING REQUIREMENTS FOR CLOSURE

Within 60 days of cessation of operations, Enterprise shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility.

Within six months of cessation of operations, Enterprise shall remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves. If there is any equipment associated with a below-grade tank, Enterprise shall remove the equipment, unless the equipment is required for some other purpose.

SOIL COVER DESIGNS FOR BELOW-GRADE TANKS

The soil cover for closures after site contouring (where Enterprise has removed the below-grade tank and, if necessary, remediated the soil beneath the below-grade tank to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0) shall consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.

Enterprise shall construct the soil cover to the site's existing grave and prevent ponding of water and erosion of the cover material.

RECLAMATION AND RE-VEGETATION

RECLAMATION OF AREAS NO LONGER IN USE

All areas disturbed by the closure of the below-grade tanks, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.

Topsoils and subsoils shall be replaced to their original relative positions and contoured to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of a below-grade tank.

Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

OTHER REGULATORY REQUIREMENTS

The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of any operations subject to those provisions, if the other requirements provide equal or better protection of fresh water, human health and the environment.

Enterprise shall notify the division when reclamation and re-vegetation are complete.

BUREAU OF LAND MANAGEMENT (BLM) REQUIREMENTS

The long-term objective of final reclamation is to establish the course for eventual ecosystem restoration, including the restoration of the natural vegetation community, hydrology, and wildlife habitats. This means returning the land to a condition approximating or equal to that which existed prior to the disturbance. It also involves salvaging and reusing all available topsoil in a timely manner, revegetation disturbed areas to native species, controlling erosion, controlling invasive non-native plants and noxious weeds, and monitoring results. With proper reclamation measures, over time, local native species will become re-established on the site and the area will regain its original productive and scenic potential.

Reclamation generally can be judged successful when a self-sustaining, vigorous, diverse, native (or otherwise approved) plant community is established on the site, with a density sufficient to control erosion and non-native plant invasion and to re-establish wildlife habitat or forage production. Native perennial species or other plant materials specified by the surface management agency or private surface owner will be used. Seeding should be accomplished by drilling on the contour whenever practical or by other approved methods such as dozer track walking followed by broadcast seeding. Seeding or planting may need to be repeated until revegetation is successful, as determined by the surface management agency/ Erosion control is generally sufficient when adequate groundcover is reestablished, water naturally infiltrates into the soil, and gullying, headcutting, slumping, and deep or excessive rilling is not observed.

The site must be free of State or county listed noxious weeds, oil field debris, contaminated soil, and equipment.

Enterprise should inform the surface management agency that reclamation has been completed and that the site is ready for final inspection when these requirements have been met. Enterprise must file a Final Abandonment Notice (FAN) upon completion of reclamation operations, which indicates that the site meets reclamation objectives and is ready for inspection. Upon receipt of the Final Abandonment Notice, the surface management agency will inspect the site to ensure reclamation is fully successful. The BLM must approve the Final Abandonment Notice, even

when the surface is managed by another surface management agency. Final abandonment will not be approved by the BLM until the surface reclamation work has been completed and the required reclamation is acceptable to the surface management agency. Enterprise is responsible for monitoring reclamation progress and taking the necessary actions to ensure success.