



ENTERPRISE PRODUCTS PARTNERS L.P.  
ENTERPRISE PRODUCTS HOLDINGS LLC  
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

May 25, 2023

OCD E-Permitting System Submittal

Oil Conservation Division  
New Mexico OMNRD  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**RE: Response to Notice of an Administratively Incomplete  
Discharge Permit Application for the South Eddy Gas Plant  
Enterprise Field Services, LLC  
South Eddy Gas Plant**

Dear Ms. Wells,

Enterprise Field Services, LLC (Enterprise) is submitting this revised ground water discharge permit application for the South Eddy Gas Plant (Facility) in response to a Notice of an Administratively Incomplete letter (NOD) received on May 1, 2023. This revised application is submitted within 30 days of receipt of the NOD and includes the requested additional information and modification.

If you have any questions regarding this application, please do not hesitate to contact me at 713-381-5766 or by email at [jli@eprod.com](mailto:jli@eprod.com), or Pranav Kulkarni at 713-381-5830.

Sincerely,

A handwritten signature in blue ink that reads "Jing Li".

Jing Li  
Staff Environmental Engineer  
/bjm

A handwritten signature in blue ink that reads "Pranav Kulkarni".

Pranav Kulkarni, Ph.D.  
Manager, Environmental

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Sarah Cottrell Propst**  
Cabinet Secretary

**Todd E. Leahy, JD, PhD**  
Deputy Cabinet Secretary

**Dylan Fuge**, Division Director (Acting)  
Oil Conservation Division



**BY ELECTRONIC MAIL ONLY**

May 1, 2023

Jing Li  
Enterprise Field Services, LLC  
1100 Louisiana Street  
Houston, TX 77002  
jli@eprod.com

**RE: Enterprise Field Services, LLC - Notice of an Administratively Incomplete Discharge Permit Application for South Eddy Gas Plant**

Dear Ms. Li:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed the Discharge Permit Application resubmitted to the OCD on April 3, 2023 for Enterprise Field Services, LLC's (Enterprise) South Eddy Gas Plant.

As per 20.6.2.3108.A NMAC, OCD is required to notify Enterprise within 30 days of receipt of the discharge permit application of any deficiencies that make the application deemed administratively incomplete. OCD is requesting the below additional information, modifications, and/or clarification for administrative completeness of the submitted discharge permit application:

1. In the letter dated March 2, 2023, OCD requested the contingency plan be updated to include both major and minor releases. The application that Enterprise resubmitted on April 3, 2023 included major but not minor releases. Update.

**Updated Section 8.0 Spill/Leak Prevention and Reporting Procedures (Contingency Plan) in its entirety to the following:**

***Enterprise has implemented an Emergency Response Plan. The Emergency Response Plan describes processes necessary to respond to discharges of petroleum products. A general response will include ensuring all personnel are notified, isolating the source, establishing an appropriate perimeter and control points, assessing the hazard, then implementing appropriate control measures. In the event of a major release, Enterprise will work closely with NMOCD to***

**develop a plan for remediation according to 19.15.29 NMAC. In the event of a major or minor release, Enterprise will enact an initial response that will include but is not limited to source elimination and site security, containment, site stabilization and remediation. For minor releases (>5 barrels<25 barrels), the response will generally involve stopping the release (if applicable), use of absorbent materials, collection and containerization of the spill and any contaminated media, and notification of additional response personnel if needed. Following the initial response activities for both a major or minor release, Enterprise will also comply with 19.15.29.9, 19.15.29.10, 19.15.29.11, 19.15.29.12 and 19.15.29.13 NMAC.**

**Chemicals stored on-site that are not oil-based are minimal in volume and unlikely to result in a discharge to groundwater based on the extent, underlying lithology, and short-term identification and response associated with a manned facility.**

2. Date and sign the certification statement at the end of the application.

**Section 13 Certification has been signed and dated.**

A “complete” amended discharge permit application is due to OCD no later than May 31, 2023 (i.e., 30 days from email receipt); please submit the revised discharge permit application through the existing E-permitting application page and email an updated discharge permit application to [Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov). If you have any questions regarding this letter, contact me at (505) 469-7520 or via email.

Respectfully,

*Shelly Wells*

Shelly Wells  
Environmental Specialist-Advanced





# ENSOLUM

## SUPPLEMENT TO THE DISCHARGE PERMIT APPLICATION REVISION 2

**Property:**  
**South Eddy Cryo Gas Plant**  
810 Buck Jackson Road  
Malaga, Eddy County, New Mexico 88262

**May 20, 2023**

**ENTERPRISE FIELD SERVICES, LLC**  
1100 Louisiana Street  
Houston, Texas 77002

Ensolum, LLC | Environmental, Engineering & Hydrogeologic Consultants  
10333 Harwin Drive, Suite 470 | Houston, TX 77036 | [ensolum.com](http://ensolum.com)

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## 1.0 INTRODUCTION

This document provides supplemental information to a discharge permit application for the South Eddy Gas Plant (Facility) operated by Enterprise Field Services, LLC (Enterprise) in response to a notice from the New Mexico Oil Conservation Division (NMOCD) stating Enterprise's natural gas plants are subject to the permitting requirements of Title 20, Chapter 6, Part 2 of the New Mexico Administrative Code (NMAC). There are no intentional discharges to groundwater at the Facility. Instead, this discharge permit application describes the measures that prevent potential discharges to groundwater of any water contaminant listed in 20.6.2.3103 NMAC or any toxic pollutant. Existing regulatory and operational programs are discussed in the context of site-specific environmental and operational conditions to verify that inadvertent releases of liquids stored and used at the Facility are minimized and contained, waste is managed appropriately, and groundwater resources are protected.

This supplement to the discharge permit relies heavily on the following existing document, which can be made available at the request of NMOCD:

- *Enterprise Products Company 2022 Emergency Response Plan Revision No. 12 for the Carlsbad Operation-North TX Permian and the Permian Operations-Western Operations.*
- Material Safety Data Sheets for any non-oil-based chemicals stored at the Facility.

Specific components of the existing plans and policies are referenced in subsequent sections of this document.

## 2.0 FACILITY DESCRIPTION

The Facility is located approximately 30 miles southeast of Carlsbad, New Mexico, being described as the Southeast  $\frac{1}{4}$  of the Northeast  $\frac{1}{4}$  of Section 1, Township 25 South, Range 30 East, NMPM, Eddy County, State of New Mexico (32.16028N, -103.827811W) as depicted on **Figure 1** and documented in **Appendix C**.

The Facility is designed to process a maximum flow capacity of 240 MMSCFD of the design inlet gas composition at the design inlet conditions through the cryogenic portion of the process. The Facility will have inlet gas treating utilizing proprietary solvent to remove carbon dioxide, TEG and Mole Sieve dehydration units for water removal, and a Gas Sub-Cooled (GSP) cryogenic process to achieve ethane recovery while meeting the liquid specifications.

### 2.1 Property, Operator, and Facility Ownership and Contacts

The following list outlines key entities associated with the Facility, OGRID 241602

#### Facility Name:

South Eddy Cryo Gas Plant  
810 Buck Jackson Road  
Malaga, New Mexico 88262

#### Landowner:

Enterprise Field Services, LLC  
1100 Louisiana Street  
Houston, Texas 77002

**Facility Owner and Operator:**

Enterprise Field Services, LLC  
1100 Louisiana Street  
Houston, Texas 77002

**Key Facility Contact:**

Robert Dunaway  
Sr. Environmental Engineer  
PO Box 4324/ENV  
Houston, Texas 77210  
(575) 628-6802  
[rhodunaway@eprod.com](mailto:rhodunaway@eprod.com)

**2.2 Facility Diagrams**

Facility maps and diagrams are described below and referenced as attachments.

- A topographic map depicting topography and the location of the Facility relative to nearby environmental receptors (waterways and water wells) is included in **Figure 1**.
- A Site Layout depicting an aerial image of the Facility is included in **Figure 2**.
- A diagram depicting detailed components of the Facility, including locations, and contents of storage containers and process flow-through vessels; storage areas; and connection pipelines are included in **Figure 3**.

**2.3 Fencing**

The Facility includes an outer chain-link perimeter fence. The location of the Facility boundaries is depicted in **Figure 2 and 3**.

**2.4 Processing Units**

The cryogenic processing conducted at the Facility consists of the following process areas:

- Harp-type Slug Catcher
- Stabilizer System
- Inlet Separation and Filtration
- Inlet Compression
- Amine treating for CO<sub>2</sub> Removal
- TEG dehydration for H<sub>2</sub>O Removal
- Thermal Oxidizer
- Molecular Sieve Dehydration
- GSP Cryogenic Gas Plant w/ Propane Refrigeration
- Residue Recompression
- Heat Medium System with Heater
- Flare System
- Water supply, drain systems, wastewater
- Utilities (fuel, air, reverse osmosis water)

**2.5 Tanks**

The Facility utilizes aboveground storage tanks (ASTs), totes, and underground sumps for storage. The locations of these ASTs are included in the Facility Diagram in **Figure 3**. Details about tank content, size, and construction are included in **Table 1**. Chemicals, such as biocide

and corrosion inhibitor, are stored in small totes and 5-gallon buckets temporarily for maintenance on equipment.

## **2.6 Process Vessels**

This Facility utilizes oil-filled manufacturing equipment (i.e., flow-through process vessels) for continuous recovery and/or intermediate storage of liquids entrained in natural gas.

## **2.7 Secondary Containment**

Containment walls constructed of concrete are used as secondary containment for large liquid ASTs. For drums and totes, portable containment constructed of plastic/HDPE is used for secondary containment. Bulk storage container installations are constructed so that a means of secondary containment is provided for the entire capacity of the largest container and sufficient freeboard to contain precipitation. Secondary containment areas are sufficiently impervious to contain oil and other liquid discharges.

## **2.8 Loading Areas**

The majority of the liquids arrive and exit the Facility through pipelines. Trucks may occasionally receive wastewater from tanks or sumps, and these activities occur at tank load-outs. Spill control equipment, including dedicated catch pans, spill pans, sorbent materials, and/or spill control boom, are present to provide spill control truck loading. To prevent premature vehicular departure, the Facility has warning signs in the loading areas. The Facility also requires that truck drivers chock their wheels before loading. Drains and outlets on tank trucks and cars are checked for leakage before loading/unloading or departure and, if necessary, are tightened, adjusted, or replaced.

## **2.9 Storage Areas**

The Facility utilizes indoor storage areas, outdoor storage areas, and roll-off boxes to store materials and equipment within the Facility. A storage yard includes equipment that has not been in service, including valves, piping, fittings, gaskets, and bolts/tools. Any liquids stored in storage areas are stored in plastic or stainless-steel totes/containers and fitted on individual containment structures.

## **2.10 Pits, Ponds, and Impoundments**

There are no pits, ponds, or surface impoundments for liquids storage or waste accumulation at this Facility. There are no ponds, lagoons, or catchment basins for stormwater accumulation.

## **2.11 Disposal Facilities**

There is no on-site disposal at the Facility.

### 3.0 SITE CHARACTERISTICS

The following sections describe the hydrologic/geologic characteristics in the Facility's vicinity.

#### 3.1 General Description of Topography, Elevations, and Vegetation Types

The Facility is located within a portion of the Lower Pecos River Surface Water Basin and the Carlsbad Declared Groundwater Basin<sup>1</sup>. This area is relatively flat and largely covered by sand dunes underlain by a hard caliche surface. The dune sands are locally stabilized with shin oak, mesquite, and burr grass. The vegetation on these soils ranges from open grass stands, grasses, shrubs, desert succulent mixtures, and some piñon-juniper woodlands. Mixed stands of trees and riparian vegetation can be found along the Black, Delaware, and Pecos Rivers and around springs and playas in the basin. These areas are used for forage production, farming, wildlife habitat, and recreation, while they also provide aesthetics and watershed benefits<sup>2</sup>.

#### 3.2 Soil Type

Based on the available site-specific and regional subsurface information, the Facility is underlain by the Berino complex on 0 to 3 percent (%) slopes – eroded and Simona gravelly fine sandy loam. These surficial soils are classified as well-drained, moderately permeable soils formed by sandy eolian deposits derived from sedimentary rock and mixed alluvium. Further classification of these soils indicates that the capacity of the most limiting layer to transmit water is moderately high to high (0.60 to 2.00 inches per hour), and runoff potential is low.<sup>3</sup> Additionally, geotechnical investigations at the Facility prior to construction indicated that, in general, the soil stratigraphy at the Facility from 0 to 50 feet below ground surface (bgs) was classified as silty sand, loose to very dense, gray, light gray, brown to light brown, reddish brown, with root fibers to 2 ft bgs, clay pockets, and moist<sup>4</sup>.

#### 3.3 Surface Water Features

**Figure 1** is a topographic map depicting water bodies, streams, watercourses, and potential groundwater discharges within a 1-mile radius of the Facility boundary. There are no natural surface bodies of water or groundwater discharge sites within ¼-mile of the Facility, and where drainages exist in interdunal areas, they are ephemeral, discontinuous, dry washes. Man-made surface water features are depicted in **Figure 1** and are named. Various man-made irrigation ditches are present within a 1-mile radius of the Facility. Joe Bar Tank is located on the southeast corner of the Facility. **Figure 1** applies the following databases for surface water features: National Wetlands Inventory, National Hydrography Dataset, and United States Geological Survey. One freshwater emergent wetland is identified within the datasets and depicted within 0.25 miles of the Facility, and a second is just over 0.25 miles from the Facility. These appear as surface depressions, and visual inspection has identified no wetland features such as wetland vegetation or standing water. It appears they are topographic depressions that receive surface runoff and temporarily store precipitation for short periods until evaporation occurs. They are mostly dry except during large storm events. The Facility is approximately 2.5-miles east of Wood Draw, the nearest significant watercourse.

<sup>1</sup> New Mexico Office of the State Engineer (NMOSE) – online query November 2022

<sup>2</sup> Lower Pecos Valley Regional Water Plan. Volume II Regional Water Plan. Prepared for New Mexico Interstate Stream Commission Regional Water Planning Program. Prepared July 2001. Prepared by Pecos Valley Water Users Organization.

<sup>3</sup> Natural Resources Conservation Services. Web Soil Survey. National Cooperative Soil Survey. Eddy County, New Mexico. Online query accessed November 22, 2022. <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

<sup>4</sup> Geotechnical Exploration, New Enterprise – South Eddy Project, Eddy County, New Mexico. Prepared March 2015 by Geotechnical Engineering and Testing

### 3.4 Water Wells

Using information from the New Mexico Water Rights Database from the New Mexico Office of the State Engineer (NMOSE), groundwater monitoring wells exist within and/or within a one-mile radius outside the facility boundary. A Site Receptor Map (**Figure 1**) depicts groundwater wells within a 1-mile radius of the Facility boundary: Point of diversion (POD) File Number C-3891-POD1, and C-3891-POD2. C-3891-POD1 the depth to the first water-bearing strata was recorded on the boring log at 420 feet below ground surface (bgs), and the static water level is recorded at 429 ft bgs. C-3891-POD2 permit is recorded as not active. The static water level in C03716-POD1 is recorded at 425 ft bgs. The static water level in C-04520-POD1 is recorded at 455 ft bgs.

### 3.5 Shallowest Aquifer

In this area of the Delaware Basin, groundwater occurs in the Cenozoic alluvium, Permian Dewey Lake Red Beds, and Rustler Formations. Alluvial groundwater occurs closest to the Pecos River and is not present at the Facility. The Permian Dewey Lake Red Beds are the chief groundwater source in the eastern part of Eddy County. The depth to water is generally less than 500 feet, but deeper than 350 ft<sup>5</sup>. Drilling logs for water wells within a 1-mile radius of the Facility indicate depths ranging from approximately 425 to 460 ft bgs.

### 3.6 Geological Characteristics

The Facility is constructed on Cenozoic alluvium overlying Permian Ochoa Series - Dewey Lake (Pierce Canyon) Red Bed Formation and Rustler formation<sup>6</sup>. The average thickness of the Dewey Lake Formation is about 560 feet. Generally, the upper 50 ft of the formation consists of alternating layers of clays and sands. The middle interval from 50 to 280 ft is mudstone underlain by sandstone and fractured sandstone. Individual sandstone units are light- to dark- or greenish-gray, buff, and red. The basal 50 ft are fine-grained sandstone and thin- to medium-bedded siltstone interbedded with gypsum and carbonate. The gypsum and carbonate are interbedded with anhydrite<sup>7</sup>.

The Rustler Formation is approximately 560 ft deep. The Rustler Formation is characterized by anhydrite, gypsum, two dolomite marker beds, and interbedded red and green sandy clays, with a basal zone of sandstone, siltstone, and shale<sup>8</sup>. The Rustler conformably overlies the thick sequences of Permian through Ordovician rocks consisting of evaporites, limestone, and siltstone, beginning with the Salado Formation<sup>9</sup>.

### 3.7 Site Flooding Potential

The annual precipitation of the region in Eddy County is 14 inches. The most likely flood events occur from heavy storms during the summer months of June through September, resulting from prolonged heavy rainfall over dry areas and are characterized by peak flows of moderate duration. These summer rain showers and thunderstorms account for more than half of the annual precipitation<sup>10</sup>. Most of this rainfall collects and runs through dry arroyos, none near the Facility.

5 S. F. Richey, J.G. Wells, and K.T. Stephens., 1985, Geohydrology of the Delaware Basin and vicinity, Texas and New Mexico. Water-Resources Investigations Report USGS Numbered Series - 84-4077. vi, 99 p. :ill., maps ;28 cm.

6 D. N. Miller; Petrology of Pierce Canyon Redbeds, Delaware Basin, Texas and New Mexico. AAPG Bulletin 1966; 50 (2): 283-307. doi: <https://doi.org/10.1306/5D25B487-16C1-11D7-8645000102C1865D>

7 S. F. Richey, J.G. Wells, and K.T. Stephens., 1985, Geohydrology of the Delaware Basin and vicinity, Texas and New Mexico. Water-Resources Investigations Report USGS Numbered Series - 84-4077. vi, 99 p. :ill., maps ;28 cm.

<sup>8</sup>Hendrickson, G.E., and Jones, R.S., 1952, Geology and Ground-Water Resources of Eddy County, New Mexico: New Mexico Bureau of Mines and Mineral Resources, New Mexico Institute of Mining & Technology Groundwater Report 3

9 S. F. Richey, J.G. Wells, and K.T. Stephens., 1985, Geohydrology of the Delaware Basin and vicinity, Texas and New Mexico. Water-Resources Investigations Report USGS Numbered Series - 84-4077. vi, 99 p. :ill., maps ;28 cm.

<sup>10</sup> Flood Insurance Study Eddy County New Mexico and Incorporated areas. Prepared by Federal Emergency Management Agency (FEMA) Flood Insurance Study Number 35015CV000A. Effective June 4 2010. Online query accessed November 22, 2022. <https://msc.fema.gov/portal/advanceSearch>

Based on Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL), the nearest mapped floodplain is associated with the Pecos River, some 5.6-miles to the west.

### 3.8 Groundwater Characteristics

Groundwater in this region is sourced from the Permian Dewey Lake Red beds for stock and domestic supply at depths near 450 ft bgs. The groundwater is generally poor quality and classified as moderately saline with total dissolved solids (TDS) content ranging from 3,000 to 10,000 milligrams per liter (mg/l) and generally closer to 4,000 mg/l; however, it is satisfactory for irrigation<sup>11</sup>. It contains greater than 2,000 mg/l sulfate and 400 to 900 mg/l of chloride<sup>12</sup>.

## 4.0 POTENTIAL DISCHARGES

There are no intentional discharges at the Facility; however, the NMOCD has determined that inadvertent discharges of liquids or improper disposal of waste solids stored at the Facility have the potential to impact groundwater. The information provided below discusses Facility operations and the use or storage of any materials, as requested by NMOCD. Similar procedures for storage and handling are applied to chemicals that are not oil-based.

The ASTs, volume of containers, and associated containments, and the predicted direction of a release should containment fail, are included in **Table 1**.

Miscellaneous chemicals that are not always on-site but are included in the Safety Data Sheet (SDS) inventory because they are sometimes used for the maintenance of equipment. These materials are maintained temporarily at minimal volumes and stored in a shed or closet when present. The SDS for these materials can be provided at the request of the NMOCD.

### 4.1 Onsite Disposal

This Facility does not have an on-site disposal system. There are no injection wells onsite. All condensate, produced water, RO reject water, slop tanks, and rainwater is collected in sumps or is stored in fixed roof ASTs and then sent off-site via pipeline or trucked by an Enterprise approved subcontractor to an approved disposal facility.

#### 4.1.1 Sanitary Sewage

Sanitary sewage is a separate system and does not commingle with any process waste generated by gas processing at the Facility. Sanitary sewage is treated and released into a septic leach field within the Facility property line. The septic system leach fields are located on the Facility Layout in **Figure 3**.

### 4.2 Off-site Disposal

Liquid and solid waste are collected at the Facility, properly characterized, and transported off-site for disposal. Enterprise has established methods of disposal for recovered materials in accordance with applicable legal requirements. The Enterprise Field Environmental Engineer coordinates the disposal of any transported materials.

<sup>11</sup> S. F. Richey, J.G. Wells, and K.T. Stephens., 1985, Geohydrology of the Delaware Basin and vicinity, Texas and New Mexico. Water-Resources Investigations Report USGS Numbered Series - 84-4077. vi, 99 p. :ill., maps ;28 cm.

<sup>12</sup> Hendrickson, G.E., and Jones, R.S., 1952, Geology and Ground-Water Resources of Eddy County, New Mexico: New Mexico Bureau of Mines and Mineral Resources, New Mexico Institute of Mining & Technology Groundwater Report 3

Liquid Waste	Disposal Volume (estimated)	Disposed of Via	Final Disposal Disposition
Condensate	30,000 bbls/mth	Third Party Trucking Vendor	Permitted and Approved SWD Facility
Mixed Produced Water/Reject RO	7,500 bbl/mth	Third Party Trucking Vendor	Permitted and Approved SWD Facility
Solid Waste (Office Trash)	Collected Weekly	Third Party Municipal Trash Hauler	Local permitted landfill

### 4.3 Wastewater

Process wastewater from dehydration and separation consists of produced water with minor hydrocarbon constituents and is stored in ASTs in secondary containment. In general, process wastewater is stored in ASTs and then transported off-site via pipeline or tanker truck for disposal.

#### 4.3.1 Closed Drain System

The Facility operates a closed drain system between process vessels and is also available for use to collect and separate wash water for equipment maintenance on an as-needed basis as well as stormwater before being directed to the ASTs and then transported off-site via pipeline or tanker truck for disposal.

### 4.4 Stormwater Management

Stormwater surface flow is depicted on the Facility Diagram and is generally directed through the Facility to avoid contact with equipment and storage containers/tanks. The facility is located on flat ground with little to no slope. In general, stormwater surface flow travels south/southeast. An earthen berm is in place on the western, eastern and southern boundary of the facility. Stormwater that is not collected in secondary containments is directed away from equipment and storage containers/tanks via site grading to avoid contact and then allowed to evaporate or infiltrate into the ground. Stormwater that is collected in secondary containments is directed to sumps associated with each containment and recovered by a third-party vacuum truck for off-site disposal. Stormwater that may collect in tank cellars is also connected to the sump system. The Facility has implemented procedures for drainage from undiked areas, including visual inspections. If a situation requires the discharge of accumulated stormwater to ground surface, qualified Facility personnel will visually evaluate the water quality to ensure the release of uncontaminated stormwater only. Facility personnel will record the date, area(s) inspected, and results of the evaluation(s). The evaluated stormwater must be clear and free of color; odor; floating, settled, suspended solids; foam; and/or oil sheen to be authorized for any discharge. Currently, no stormwater is discharged.

#### 4.4.1 Storage Tank Bottom Sludge/Sludge

Oil and sludge can accumulate in the bottom of compressor skids, containments, or tanks. Tanks may be periodically taken out of service for integrity inspections and/or service changes. This material is collected as E&P waste with a vacuum truck and disposed of offsite at a nearby disposal facility.

#### 4.4.2 Maintenance Materials

During equipment maintenance, used oils are collected and stored in containers with general secondary containment. Periodically, this material is shipped off-site for recycling or disposal. Various quantities of lubricants, oils, and unused chemicals for operations are stored outside on pallets.

#### 4.4.3 Petroleum Hydrocarbon Impacted Soil

Non-hazardous soils that may be impacted with petroleum products are promptly removed and disposed of in accordance with local, state or federal disposal requirements. Secondary containment systems are provided to prevent releases.

#### 4.4.4 Miscellaneous Solid Waste

Non-hazardous solid waste is segregated on-site and containerized in roll-off boxes that are inventoried and labeled for removal from the facility according to the waste stream. These include but are not limited to waste from the office, E&P waste from operations, process filters, and scrap metal.

#### 4.4.5 Ponds, Lagoons, Catchments

There are no ponds, lagoons, or catchment basins on-site.

#### 4.4.6 Groundwater Contamination

There is currently no known groundwater contamination associated with the Facility.

#### 4.4.7 Commingled Waste Streams

There are no commingled waste streams at the Facility.

## 5.0 COLLECTION AND STORAGE SYSTEMS

ASTs and sumps are used throughout the Facility to hold and store condensate, process water, and stormwater, which is then trucked off-site for disposal. The ASTs are equipped with high-level alarms, and the sumps have visual gauges. Pumps, valves, and piping systems are used throughout the Facility to transfer various liquids among tankage and process vessels.

Lube oil and casing oil are stored in aboveground fixed containers. Current contents and total capacity are listed in **Table 1**. The Facility also receives, stores, and uses a variety of additives and chemicals that are stored in small volumes in totes and other containers. Oil-filled operational equipment and storage containers are used to manage the process flow. The condition of secondary containment and containment pad/liners is inspected and maintained as needed.

### 5.1 Buried Storage Tanks

The Facility does not have buried storage tanks installed at the site.

### 5.2 Sumps

Sumps are utilized to collect stormwater. These are connected by drains and energized on an as-needed basis to be disposed of off-site.

### 5.3 Buried Piping

Currently, the Facility does not have any buried piping. In the event this changes, Enterprise will employ the following best management practices for buried piping installation and maintenance:

- New or replaced buried piping is cathodically protected and is installed with a protective wrapping or coating.
- If a section of buried line is exposed, it is inspected for signs of deterioration and corrective actions are taken as indicated by the magnitude of the damage.
- Integrity and leak testing of buried piping is performed at the time of installation, modification, construction, relocation, and/or replacement

### 5.4 Effluent Treatment Facilities

This facility does not have an effluent treatment system.

### 5.5 Aboveground Valves and Piping

This facility has aboveground piping installed or replaced that is regularly examined during normal facility walk-throughs for general condition and necessary for corrective action. Facility walk-throughs are generally conducted daily for flange joints, expansion joints, piping supports, metal surfaces, catch pans, and valve locks and/or seals.

## 6.0 INSPECTION, MAINTENANCE, AND REPORTING

Enterprise personnel and contractors routinely conduct weekly, monthly and visual inspections, maintenance, and repair of tanks, equipment, instrumentation, valves, piping, and other items necessary for the continued safe operation of the Facility. These activities involve recordkeeping and reporting.

The Facility is staffed 24 hours a day, 7 days a week by field operations personnel. The daily visual examinations consist of a walk-through of the facility, including tank areas, oil-filled flow through vessels, and transformers. Field operations personnel check the equipment for leaks and proper operation. They examine all aboveground valves and flowline piping. Personnel inspect pumps to verify proper function and check for damage and leakage. They look for accumulation of liquids within the secondary containment and verify the condition and position of valves. The storage tanks are gauged/monitored on a continual basis. All malfunctions, improper operation of equipment, evidence of leakage, stained or discolored soil, etc. are logged and communicated to the Plant Manager.

Aboveground piping was designed and installed according to 40 CFR 112.8(d). Facility personnel conduct visual surveillance of pipe sagging, corrosion, abrasion, expansion joints, valve locking mechanisms, catch pans, pipeline supports, and metal surfaces. Problems with containment systems and potential signs of leaks, puddles, corrosion of the liner, holes in the berm, buildup of precipitation or deterioration to the structure are reported to the Plant Supervisor for scheduled immediate repairs.

Oil-filled equipment is designed and constructed according to good engineering practices and industry standards. The compatibility of the oil and container's construction material has been evaluated prior to use. Preventive maintenance based on regular scheduled visual inspections, tests, or evidence of the oil spills and/or problems that may occur can be quickly identified and resolved. Drums, totes, or any additional portable containers on-site, are typically elevated on separate containment pallets without direct contact to the ground which poses a minimal risk of corrosion and allows for all sides of the containers to be inspected. Drums, totes, or portable tanks are inspected routinely (non-documented) and handled on an as needed basis.

The waste stream profiles are recorded and documented for regulatory compliance. Annual waste management trainings are conducted by Enterprise's personnel that includes a review of operation and maintenance of equipment to prevent discharges; applicable pollution control laws, rules and regulations; general Facility operations; persons accountable for discharge prevention. Moreover, a review of Enterprise's policies and procedures related to spill prevention, cleanup, disposal, reporting, inspections, and routine handling of products will be covered during the training.

## 7.0 PROPOSED MODIFICATIONS

No modifications of the existing collection, treatment, and/or disposal systems are proposed at this time. However, in the case of a Facility expansion or process modification, the Facility will notify NMOCD in writing for modification of this discharge permit. An application and a description of the requested modifications will be included in the written notice.

## 8.0 SPILL/LEAK PREVENTION AND REPORTING PROCEDURES (CONTINGENCY PLAN FOR RELEASES)

Enterprise has implemented an Emergency Response Plan. The Emergency Response Plan describes processes necessary to respond to discharges of petroleum products. A general response will include ensuring all personnel are notified, isolating the source, establishing an appropriate perimeter and control points, assessing the hazard, then implementing appropriate control measures. In the event of a major release, Enterprise will work closely with NMOCD to develop a plan for remediation according to 19.15.29 NMAC. In the event of a major or minor release, Enterprise will enact an initial response that will include but is not limited to source elimination and site security, containment, site stabilization and remediation. For minor releases (>5 barrels<25 barrels), the response will generally involve stopping the release (if applicable), use of absorbent materials, collection and containerization of the spill and any contaminated media, and notification of additional response personnel if needed. Following the initial response activities for both a major or minor release, Enterprise will also comply with 19.15.29.9, 19.15.29.10, 19.15.29.11, 19.15.29.12 and 19.15.29.13 NMAC.

Chemicals stored on-site that are not oil-based are minimal in volume and unlikely to result in a discharge to groundwater based on the extent, underlying lithology, and short-term identification and response associated with a manned facility.

### 8.1 Notifications Procedures

Any employee observing a spill of any quantity, in accordance with company's safety procedures, should take steps to try to close off the source of the spill. For all releases, regardless of volume. Enterprise will comply with 19.15.29 NMAC guidance.

Enterprise's notification procedure consists of two parts:

Part 1 - Notify the responsible company personnel to initiate internal procedures.

Part 2 - Notify the proper government agencies to ensure that operational procedures comply with all existing laws and regulations.

### 8.2 Internal Notification Procedures

1. When an oil spill has been discovered, attempt to shut off the spill source.
2. If possible, contain oil spills to prevent oil from discharging into navigable waters.

3. Notify one of the following company personnel:
4. Fill out the company Notification Data Sheet, and if necessary, fill out the New Mexico Oil Conservation Division NMOCD Form C-141 Release Notification and Correction Action, found at <http://www.emnrd.state.nm.us/index.html>
5. Initiate action to cleanup spill.
6. If outside company assistance is needed, contact the local area spill response contractors as per Enterprise's approved vendors list.

## 9.0 PUBLIC NOTICE

Enterprise will provide written notice of the Discharge Permit Application by the following methods per Subsection B of 20.6.2.3108 NMAC.

- One sign measuring at least 2 feet by 3 feet will be displayed at the main entrance to the Facility. The sign will display the public notice in English and Spanish languages and be displayed for 30 days.
- One additional notice will be posted at the Carlsbad, New Mexico Post Office. The sign will display the public notice in English and Spanish languages and be displayed for 30 days.
- Written notice will be given by mail or electronic mail in English and Spanish to owners of all properties within a 1/3-mile distance from the property boundary of the Site.
- A summary of the notice will be given in English and Spanish languages in a display ad at least 3 inches by 4 inches in a newspaper of general circulation (not in a classified or legal advertisement section) in the *Carlsbad Argus*, a newspaper of general circulation in southeastern New Mexico.

### 9.1 Schedule

Enterprise will issue a public notice within 30 days after the NMOCD determines the Discharge Permit application is administratively complete. This includes public notice to the newspapers and mailings to the appropriate surface owners identified for distribution. The newspaper publication will run for one business day.

Within 15 days of completion of the public notice requirements, Enterprise will submit proof of notice to the NMOCD that includes an affidavit of mailings and a list of property owners, proof of publication in a newspaper, and an affidavit of posting.

### 9.2 Proposed Public Notice

The proposed public notice is presented below and includes the items specified in Subsection F of 20.6.2.3108.

## NOTICE OF PUBLICATION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 of the New Mexico Administrative Code), 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) 476-3441:

NMOCD Discharge Permit Number GW-XXX  
Enterprise Field Services, LLC  
South Eddy Gas Plant  
810 Buck Jackson Road, Malaga, NM 88263  
32.16028N, -103.827811W  
Section 1, SE1/4/NE1/4, Township 25S, Range 30  
Mr. Robert Dunaway, (575) 628-6802, rhdunaway@eprod.com

Enterprise announces the submittal of an application for potential unintended discharges at the South Eddy Gas Plant located approximately 30 miles southeast of Carlsbad, New Mexico (32.16028N, -103.827811W). The Facility is a compression facility through which natural gas and condensate from nearby oil and gas production facilities are transported by pipeline for treatment and processing. The design throughput for the South Eddy Gas Plant is 240 MMscf/day of natural gas. Once gathered at the Facility, the gas is compressed through cryogenic processing, dehydrated to remove the water content, and processed to remove and recover natural gas liquids. The discharge permit includes a description of materials stored and used at the Facility and any waste generated for off-site disposal. Groundwater at the facility is estimated to be less than 500 feet, but deeper than 350 feet and contains total dissolved concentrations (TDS) of approximately 4,000 milligrams per liter (mg/l). The discharge permit addresses how liquids and solid waste will be handled, stored, and disposed of, including procedures to prevent an unintended discharge. Response actions and abatement requirements for spills and leaks are addressed.

The NMOCD has determined the application is administratively complete and is in the process of preparing a draft permit. The NMOCD shall post a notice on its website and distribute notice of the submittal application to affected local, state, federal, tribal, or pueblo government agency, political subdivisions, ditch associations, and land grants as identified by the department and persons on a general and facility-specific list maintained by the department who have requested notice of discharge permit applications. Interested persons may obtain information, submit comments, and request to be placed on a facility-specific mailing list for future notices. The NMOCD will also accept comments and statements of interest regarding the application and will create a facility-specific mailing list for persons who wish to receive future notices. Prior to ruling on any proposed permit, the Director shall allow at least 30 days after the draft permit is posted, during which time interested persons may submit comments.

Persons interested in obtaining further information, submitting comments, or requesting to be on a facility-specific mailing list for future notices may contact the Oil Conservation Division contact listed below:

Ms. Shelly Wells  
New Mexico Oil Conservation Division  
Energy Minerals and Natural Resources Division  
1220 South St. Francis Drive Santa Fe, NM 87505  
(505) 469-7520, Shelly.Wells@emnrd.nm.gov

## 10.0 FACILITY CLOSURE/POST CLOSURE PLAN

Since this discharge permit is for unintended discharges, a closure and post-closure plan must include the entire Facility. The following general procedures will apply to prevent impacts on groundwater upon cessation of Facility operations:

- Enterprise will remove all fluids from ASTs. Then the liquid and sludge containers will be disposed of off-site as described above in **Section 4.2**.
- Liquids that are not oil-based will be segregated. Any unused chemicals will be identified and profiled, then handled and disposed of using a third-party waste handler licensed and certified to handle the hazardous and non-hazardous waste.
- All ASTs, storage vessels, process equipment, and piping will be dismantled and removed from the Facility. Sumps will be excavated. Disposal of scrap material and equipment will be through recycling or offsite disposal based on appropriate waste profiling.
- If applicable, below-ground piping will be cut at least 3 ft bgs, capped on both ends, and buried in place.
- Any solid waste, such as building materials, concrete, containment metal, liner, and miscellaneous metal or lumber will be recycled or disposed of off-site as solid waste.
- Any releases that were deferred under 19.15.29 NMAC will be addressed under the requirements of Part 29.
- Once all equipment has been removed, Enterprise will collect soil samples from each plant process area. Sample locations will be based on operations and designed to identify any residual impacted soil prior to reclamation.
  - Soil samples will be collected from the ground surface and field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride using Hach® chloride QuanTab® test strips. If field screening indicates the samples exceed 100 milligrams/kilogram total petroleum hydrocarbons (TPH) or 600 mg/kg chloride, a hand auger will be used to advance a borehole in that location. Samples will be collected every foot until field screening indicates residual impacts are absent. If the boreholes are advanced deeper than 4 feet, field screening results will be compared to 2,500 mg/kg TPH and 20,000 mg/kg chloride.
  - All soil samples will be placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported at or below 4 degrees Celsius (°C) under strict chain-of-custody procedures to a certified laboratory for analysis of the following chemicals of concern (COCs): BTEX following the United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-motor oil range organics (MRO) following EPA Method 8015M/D; and chloride following EPA Method 300.0.
  - Laboratory analytical results will be compared to the requirements of 19.15.29 NMAC and reported, addressed, and closed according to those regulations.

## 11.0 FINANCIAL ASSURANCE

The estimated costs for closure/post-closure activities are located in **Appendix F**. Once NMOCD approves this plan, Enterprise will submit financial assurance to the NMOCD in the amount of the facility's estimated closure and post-closure costs within 30 days of NMOCD's approval. The financial assurance will be provided on NMOCD-prescribed forms or forms otherwise acceptable to the NMOCD, payable to the NMOCD.

## 12.0 GROUND WATER DISCHARGE PERMIT APPLICATION AND PERMIT FEES

Pursuant to 20.6.2.3114 NMAC, a filing fee of \$100.00 is being submitted with this application. The permit fee of \$4,000.00 for a gas processing plant will be submitted within 30 days of receipt of the approved Discharge Permit.

## 13.0 CERTIFICATION

I hereby certify that the information submitted with this application is true, accurate, and complete to the best of my knowledge and belief.

Printed Name: Rodney M. Sartor

Signature: 

Title: Senior Director

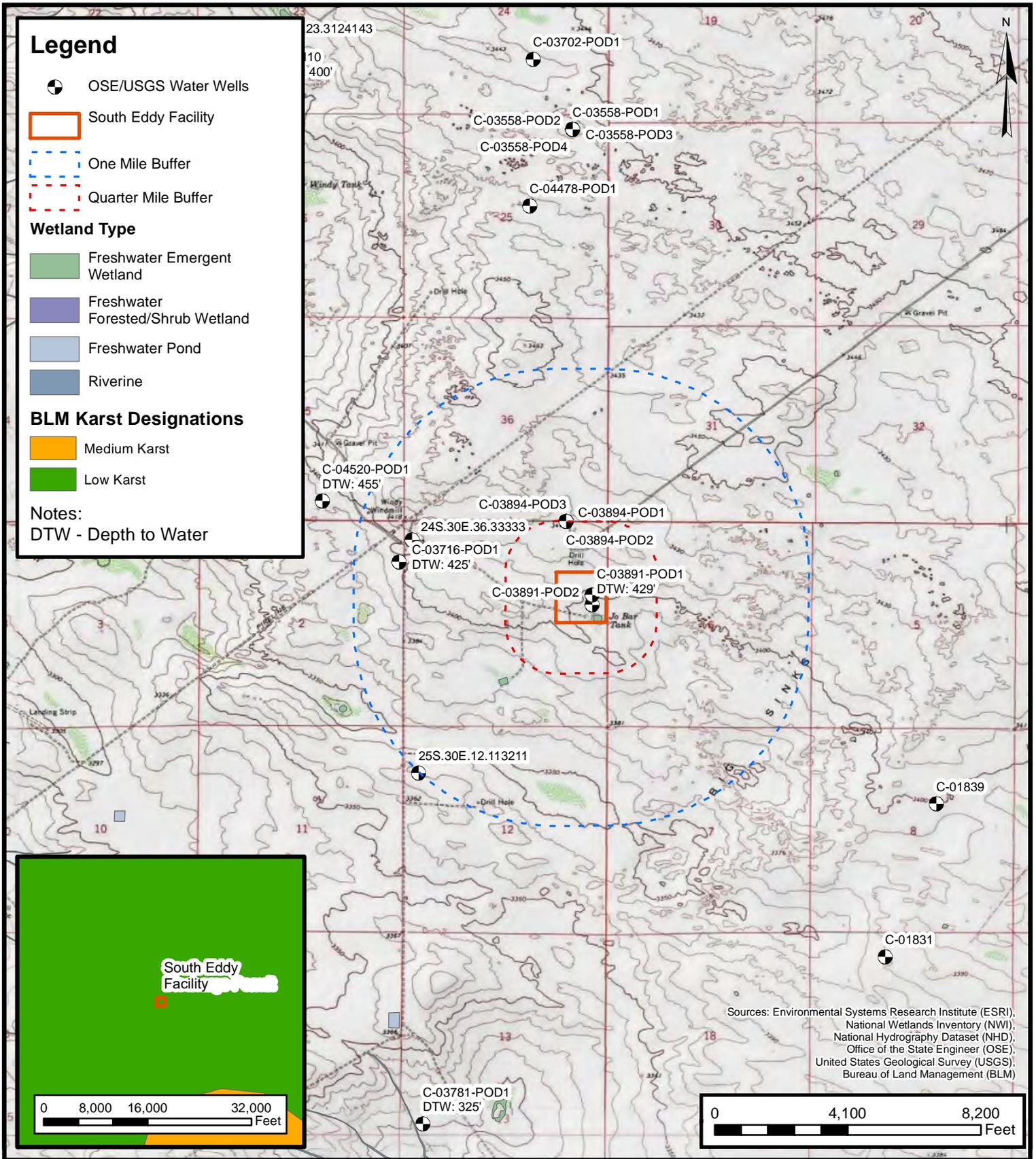
Enterprise Field Services, LLC  
1100 Louisiana Street  
Houston, Texas 77002



# APPENDIX A

## Figures

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Document Path: C:\Users\Justin\_Valdez\GIS\Enterprise Products Operating LLC\04B1226260 - South Eddy Discharge Permit\1 - MXDs\Figure 1 - Site Receptor Map.mxd

Sources: Environmental Systems Research Institute (ESRI), National Wetlands Inventory (NWI), National Hydrography Dataset (NHD), Office of the State Engineer (OSE), United States Geological Survey (USGS), Bureau of Land Management (BLM)



**Site Receptor Map**

South Eddy Discharge Permit  
 Enterprise Products Operating LLC  
 Sec 1 T25S R30E  
 Eddy County, New Mexico  
 Project Number: 04B1226260

**FIGURE**  
**1**



Document Path: C:\Users\juelm\Videos\GIS\Ensolium GIS9 - Carlsbad\Enterprise Products Operating LLC\04B1226260 - South Eddy Discharge Permit\1 - MXD\Figure 2 - Site Layout.mxd

Sources: Environmental Systems Research Institute (ESRI)



### Site Map

South Eddy Discharge Permit  
 Enterprise Products Operating LLC  
 Sec 1 T25S R30E  
 Eddy County, New Mexico  
 Project Number: 04B1226260

**FIGURE**  
**2**

# Legend

- Structure
- Location Area
- Structure



Sources: Environmental Systems Research Institute (ESRI)



## Facility Layout Map

South Eddy Discharge Permit  
 Enterprise Products Operating LLC  
 Sec 1 T25S R30E  
 Eddy County, New Mexico  
 Project Number: 04B1226260

FIGURE  
**3**



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## APPENDIX B

### Tables

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**TABLE 1  
STORAGE TANKS AND CHEMICAL TOTES LOCATED AT THE FACILITY  
South Eddy Cryo Gas Plant  
Enterprise Field Services, LLC  
Eddy County, New Mexico**

Aboveground Storage Tanks	Quantity	Maximum Capacity (bbbls)	Predicted Direction of Flow	Primary Containment Material	Storage/Containment
RO Treated Water	1	400	Southeast	Fiberglass	Concrete unlined containment
RO Reject Water	1	400	Southeast	Fiberglass	Visual Inspection (no containment)
Condensate	2	300	Southeast	Steel	Concrete unlined containment
TEG Storage Tank	1	100	Southeast	Steel	Concrete unlined containment
Amine	1	400	Southeast	Steel	Concrete unlined containment
Slop Tank	2	400	Southeast	Steel	Concrete unlined containment
Glycol	1	100	Southeast	Steel	Concrete unlined containment
Lube Oil Makeup	2	100	Southeast	Steel	Concrete unlined containment
Totes and Drums	Quantity	Maximum Capacity (gallons)	Predicted Direction of Flow		Storage/Containment
Methanol (liquid)	11	300	Southeast	Plastic Tote	Portable Plastic Containment
Methanol (liquid)	5	275	Southeast	Plastic Tote	Portable Plastic Containment
Methanol (liquid)	2	520	Southeast	Plastic Tote	Portable Plastic Containment
Methanol (liquid)	3	330	Southeast	Plastic Tote	Portable Plastic Containment
Kleanatol (cleaning detergent, liquid)	1	300	Southeast	Plastic Tote	Visual Inspection
Ucarsol GT900 (antifoam agent, liquid)	8	50	Southeast	Steel Drum	Visual Inspection
Ucarsol GT900 (antifoam agent, liquid)	2	300	Southeast	Plastic Tote	Concrete unlined containment
Lulube 300 (mineral oil, liquid)	6	300	Southeast	Plastic Tote	Visual Inspection
Mobile DTE Oil	15	50	Southeast	Steel Drum	Concrete unlined containment
Diesel Exhaust Fluid	5	50	Southeast	Plastic Drum	Drum Containment Pallet
Kleanflo (cleaning agent, liquid)	3	300	Southeast	Plastic Tote	Concrete unlined containment
Diesel Fuel	1	520	Southeast	Steel	Concrete unlined containment
F24 + Degreaser (cleaning solution, liquid)	1	300	Southeast	Plastic Tote	Concrete unlined containment



APPENDIX C  
Survey Documentation

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South Eddy Plant Site  
Eddy County, New Mexico

Page 1 of 2

**EXHIBIT "A"**

**DESCRIPTION FOR PROPOSED SOUTH EDDY PLANT SITE**

**A PARCEL OF LAND BEING THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 1, TOWNSHIP 25 SOUTH, RANGE 30 EAST, NMPM, EDDY COUNTY, STATE OF NEW MEXICO, SAID PARCEL BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:**

**BEGINNING** at the southeast corner of the northeast 1/4 of said Section 1, monumented with a 5/8-inch rebar set, with an aluminum cap stamped "SAM LLC", from which a found GLO 3" brass cap monument at the southeast corner of Section 1 bears South 00°00'05" East, along the east line of the southeast 1/4 of Section 1, a distance of 2,659.16 feet;

**THENCE** South 89°36'10" West, along the south line of said northeast 1/4 of Section 1, a distance of 1,331.35 feet to the southwest corner of said parcel, monumented with a 5/8-inch rebar set, with an aluminum cap stamped "SAM LLC";

**THENCE** North 00°03'01" East, leaving said south line of the northeast 1/4 of said Section 1, along the west line of the parcel, a distance of 1,329.88 feet to the northwest corner of the parcel, monumented with a 5/8-inch rebar set, with an aluminum cap stamped "SAM LLC";

**THENCE** North 89°36'56" East, along the north boundary of the parcel, a distance of 1,330.15 feet to the east line of Section 1, monumented with a 5/8-inch rebar set, with an aluminum cap stamped "SAM LLC" for the northeast corner of the parcel;

**THENCE** South 00°00'05" East, a distance of 1,329.58 feet along the east line of Section 1, to the **POINT OF BEGINNING**.

Said parcel contains 40.622 acres, more or less.

Notes

- 1) Bearings are based upon New Mexico State Plane Coordinates, East Zone, NAD83(2007), as established by GPS observations tied to the NGS CORS network and are used to denote angles only. Distances stated herein are grid measurements, U.S. Survey Feet.
- 2) Description is based upon observable field evidence, prior surveys, and documents of record.
- 3) For additional information, see attached plat (Exhibit "B") in conjunction with and considered an integral part of this description.
- 4) Date of Survey: 01/28/2015

Surveying And Mapping, LLC  
2003 Northrup Drive  
Midland, Texas 79705

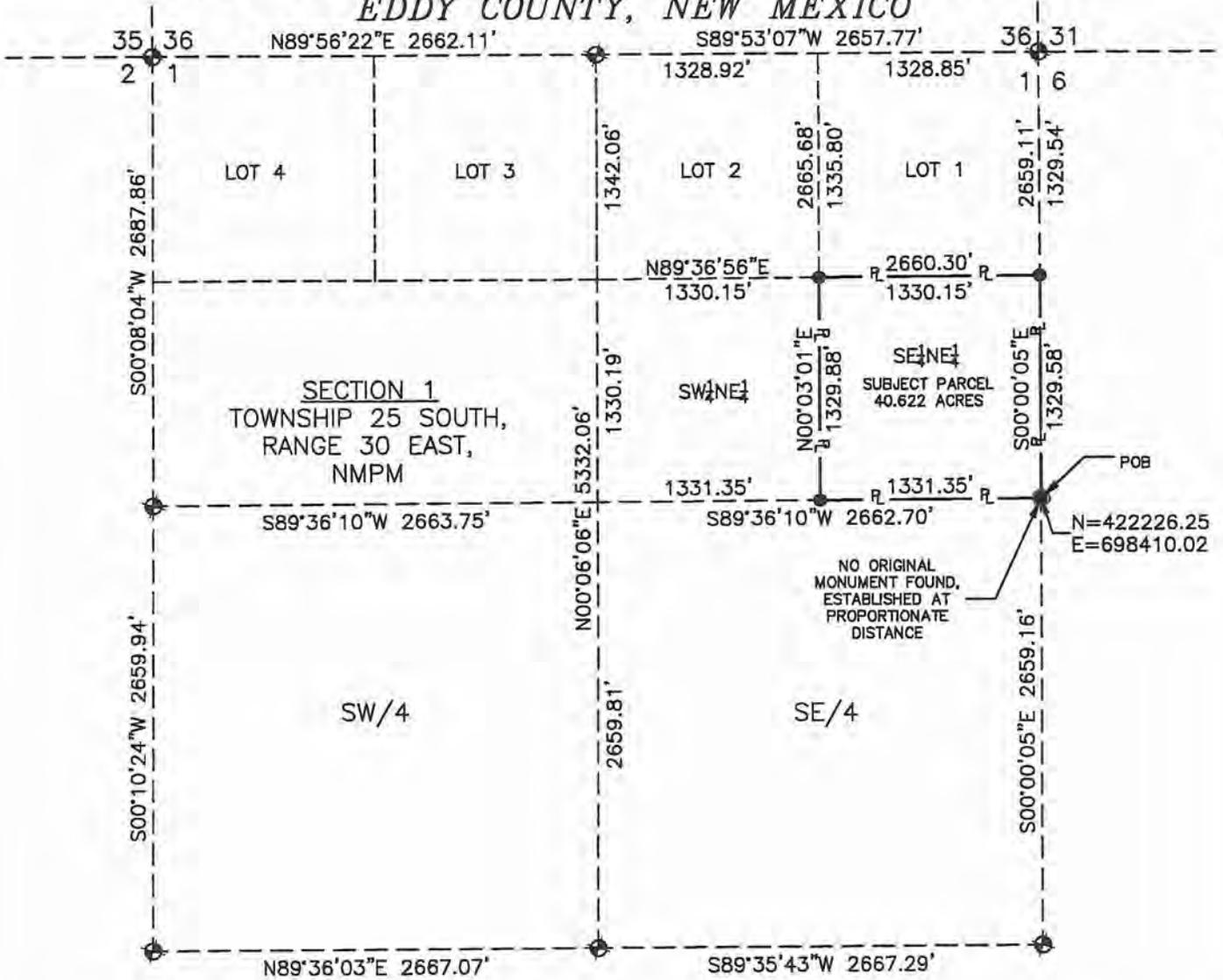


*Clinton Kyle Gregg*      2/3/2015  
 Clinton Kyle Gregg      Date  
 Professional Surveyor  
 NM PS #21205

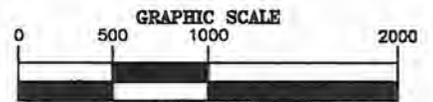
FN18072(MEF)

34773

**EXHIBIT "B"**  
**PLAT OF THE SE<sup>1</sup>/<sub>4</sub>/NE<sup>1</sup>/<sub>4</sub>, SECTION 1,**  
**TOWNSHIP 25 SOUTH, RANGE 30 EAST, NMPM**  
**EDDY COUNTY, NEW MEXICO**



PLANT SITE ACREAGE: 40.622



(IN FEET)  
 1 INCH = 1000 FT  
 EDDY COUNTY, NEW MEXICO

NOTE: DISTANCES SHOWN ARE GRID.  
 BEARING BASIS: NEW MEXICO STATE PLANE COORDINATE SYSTEM, EAST ZONE  
 (3001), NAD 83 (2007).

THIS SURVEY WAS COMPLETED WITHOUT THE BENEFIT OF AN ABSTRACT OF TITLE.  
 THERE MAY BE EASEMENTS OR OTHER MATTERS OF RECORD NOT SHOWN.



**LEGEND**

- SECTION LINE
- R — PROPERTY LINE
- CHAINLINK FENCE
- ⊙ SECTION CORNER FOUND GLO BRASS CAP
- REBAR SET 5/8-INCH W/ ALUMINUM CAP STAMPED "SAM LLC"

*Clinton Kyle Gregg* 2/3/2015  
 CLINTON KYLE GREGG DATE  
 PROFESSIONAL SURVEYOR  
 NM PS #21205

PROJECT: SOUTH EDDY PLANT SITE
JOB NUMBER: 34773
SURVEY DATE: 1/28/2015
SCALE: 1"=1000'
SURVEYOR: C.GREGG
TECHNICIAN: MRA
DRAWING: 34773-PLANT SITE-NEW LOCATION
TRACT ID: SOUTH EDDY PLANT SITE
PARTYCHIEF: TIM CULVER
FIELDBOOKS:



2003 NORTHROP DRIVE  
 MIDLAND, TEXAS 79705  
 OFC. (432) 699-0601  
 EMAIL: SAM@SAM.BIZ

SE<sup>1</sup>/<sub>4</sub>/NE<sup>1</sup>/<sub>4</sub>, SECTION 1,  
 TOWNSHIP 25 SOUTH,  
 RANGE 30 EAST, NMPM  
 EDDY COUNTY, NEW MEXICO





## APPENDIX D

# SPCC Non-Applicability Determination

---



Ms. Alena Miro  
Enterprise Products  
P.O. Box 4324  
Houston, TX 77210-4324

ARCADIS U.S., Inc.  
711 North Carancahua  
Suite 1080  
Corpus Christi  
Texas 78401  
Tel 361 883 1353  
Fax 361 883 7565

Subject:  
SPCC Non-Applicability Determination  
South Eddy Plant, Eddy County, New Mexico  
(Lat. 32° 9' 40"; Long. -103° 49' 42")

ENVIRONMENTAL SERVICES  
Texas Engineer License #F-533

Dear Ms. Miro:

ARCADIS U.S., Inc. (ARCADIS) conducted a Spill Prevention, Control, and Countermeasure (SPCC) Plan non-applicability determination for the Enterprise South Eddy Plant located approximately 18 miles southeast of Loving in Eddy County, New Mexico. The non-applicability determination was conducted by reviewing U.S. Geological Survey (USGS) 7.5-minute series topographic maps.

Date  
May 17, 2016

Contact:  
Ken Brandner

As shown on the USGS Big Sinks Quadrangle topographic map (Figure 1), ground surface elevation at the South Eddy Plant is approximately 3,410 feet above mean sea level (MSL). The site area slopes southeasterly toward a playa lake (Big Sinks) located approximately one mile southeast of the facility. This playa lake (elevation 3,350 feet MSL) is a naturally closed depression with no outlet to navigable waters.

Extension:  
361-883-1353, ext. 16

In summary, surface water drainage from the South Eddy Plant is to a natural closed depression with no outlet to navigable waters. Discharges of oil, if any, from the South Eddy Plant could not reasonably be expected to discharge into or upon the navigable waters of the United States or adjoining shorelines. Therefore an SPCC plan is not required for this facility as specified in Title 40, Code of Federal Regulations (CFR) Part 112.1(d)(1)(i).

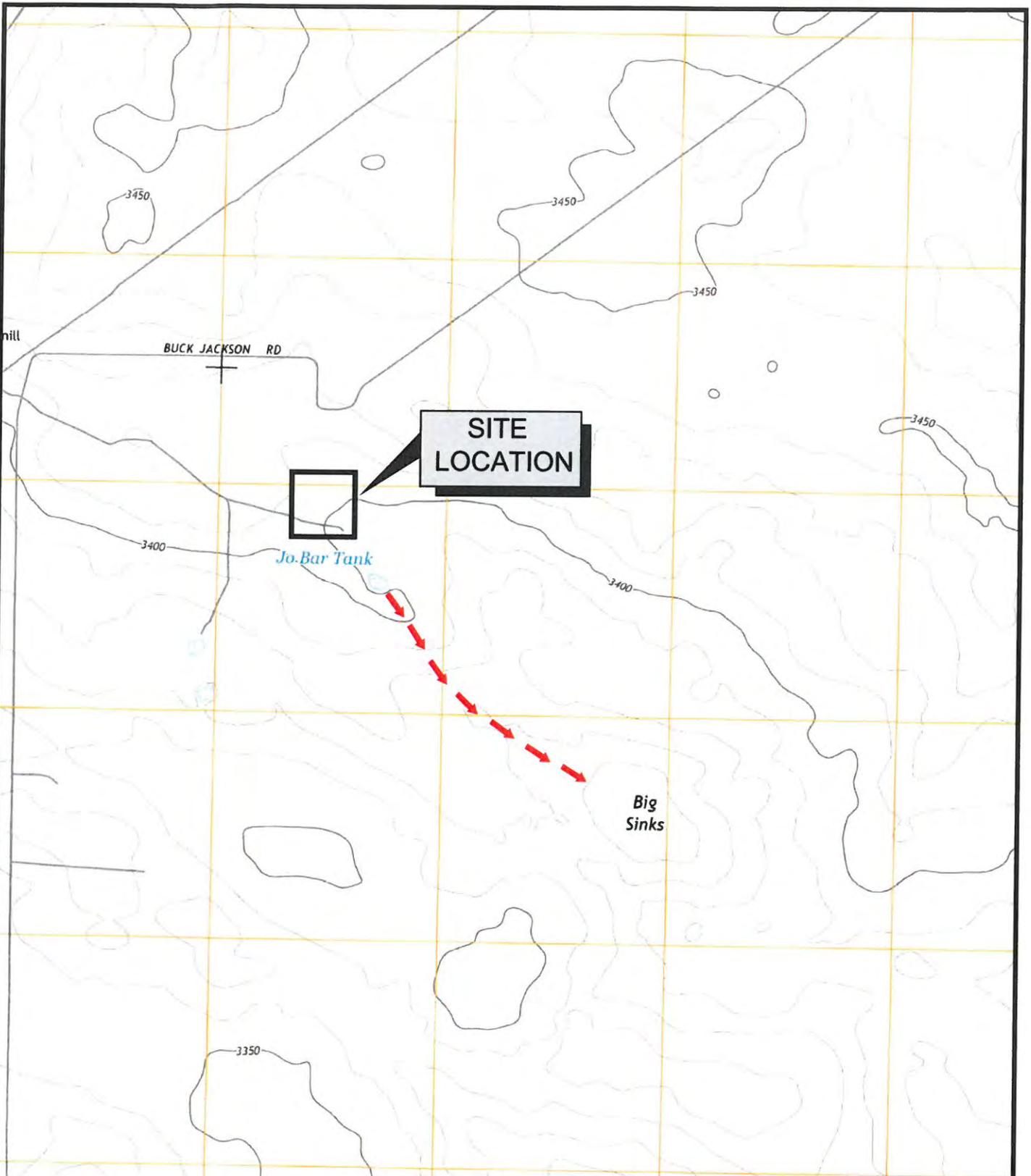
Sincerely,

ARCADIS

Kenneth J. Brandner  
Geological Engineer, P.E., P.G.



CITY: DIV/GROUP: DB: LD: AM: PD: TM: TR: LYRON\*OFF\*REF\*  
G:\Active Projects\Enterprise\1603.0001 - South Eddy NM SPCC Applicability\Figure-Maps\Figure 1 Topo Map.dwg LAYOUT: MODEL SAVED: 4/15/2016 10:27 AM ACADVER: 19.1S (LMS TECH) PAGESETUP: — PLOTSTYLETABLE: — PLOTTED: 4/15/2016 10:43 AM BY: LEASE, DIANA



0 2,000'

**LEGEND**

 DRAINAGE DIRECTION

ENTERPRISE  
SOUTH EDDY PLANT  
EDDY COUNTY, NEW MEXICO

**TOPOGRAPHIC MAP**



FIGURE  
**1**



## APPENDIX E

# Typical Inspection Form

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**MONTHLY INSPECTION FORM**

<input checked="" type="checkbox"/> if Yes and insert Word Order Number	Condensate Tank	Condensate Tank	Piping	Valves	Stop Oil Tank	Produced Water Tank	Loading Areas	Lube Oil Tank	Used Oil Tank	Drum Storage	Stop Water Tank	Sumps
Leakage is detected at seam connections, corrosion or gaskets.												
Leakage is detected at ancillary equipment, gauges and instrumentation.												
Leakage is detected from pumps, piping and fittings.												
Leakage or settlement is detected at container foundation.												
Drain valves on containers are not closed and capped.												
Vents and/or psig release devices on containers are obstructed.												
Overflow protection system is not operating properly.												
Containment berm/dike discharge valves are not closed.												
Containment berm/dike is eroded.												
Leakage is accumulating in area drains or ditches.												
Leakage is accumulating in dike, if applicable.												
Storm water is present within containment area.												
Spill response equipment (pads, sorbents, etc.) is not readily accessible.												
ALL OK												

**COMMENTS**

---

Inspector \_\_\_\_\_

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

Supervisor \_\_\_\_\_

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



## APPENDIX F Estimated Cost of Closure

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**COST-TO-CLOSURE (CTC) ESTIMATE  
SOUTH EDDY GAS PLANT OPERATIONAL CLOSURE  
MALAGA, EDDY COUNTY, NEW MEXICO**

**Date Prepared:** 03/28/23  
Previous Estimate dated: Original

*Form Revised 03-2023 from ENV Remediation Group Template*

**This Cost to Closure (CTC) estimate is to accrue for probable and estimable expenditures related to:**

Closure of the gas plant as required in the discharge permit application prepared in response to a notice from the New Mexico Oil Conservation Division (NMOCD) stating Enterprise’s natural gas plants are subject to the permitting requirements of Title 20, Chapter 6, Part 2 of the New Mexico Administrative Code (NMAC). There are no immediate or pending plans for the closure of the gas plant and, therefore, expenditures have been categorically tasked reasonably as listed in Section 10 of Enterprise’s permit application package prepared in March 2023. Prior to the start of any closure activities, Enterprise will need to re-evaluate all costs, contracts, subcontractors and gas plant inventory to appropriately estimate expenditures in an internal addendum to this document. This document has been prepared for internal use only and estimates non-Enterprise effort as understood by Ensolum.

**CHANGES to Scope (from previously accrued estimate):**

Original Estimate

**This cost estimate includes costs for (DESCRIPTION of proposed activities):** *(try to match DESCRIPTION line numbers below to the TASK line numbers on page 2 - below)*

- |    |   |
|----|---|
| 1  | Pre-Closure Planning - including administration/project management costs associated with closure strategy development, pre-bid conference calls, bid-walk, gas plant inventory and assessment   |
| 2  | Pre-Job Planning - following award to all contractors, site walk/pre-job meeting, job plan, health and safety planning, One Call notifications  |
| 3  | Site decommissioning: Remove all fluids from aboveground storage tanks (ASTs) and sumps   |
| 4  | Site decommissioning: Off-site disposal or recycling of liquids/sludges   |
| 5  | Site decommissioning: Waste profiling - any unused chemicals will be identified and profiled, then handled and disposed of or recycled using a third-party waste handler licensed and certified to handle hazardous and non-hazardous waste |
| 6  | Site decommissioning: Dismantle ASTs, storage vessels, process equipment, and piping and removed from the facility  |
| 7  | Site decommissioning: Excavate BGSTs and sumps  |
| 8  | Site decommissioning: Dispose scrap material and equipment off-site through recycling or based on appropriate waste profiling   |
| 9  | Site decommissioning: Dispose of solid waste material off-site (building materials, concrete, containment metal, line and miscellaneous metal or lumber   |
| 10 | Collect soil samples from each plant process area to identify any residual impacted soil prior to reclamation   |
| 11 | Regrade, restore and contour site   |
| 12 | Provide closure documentation to NMOCD for review   |

**The attached CTC estimate is based on the following ASSUMPTIONS:** *(try to match ASSUMPTION line numbers below to the TASK line numbers on page 2 - below)*

- |    |   |
|----|---|
| 1  | There are no releases, residual contamination, or impacts to soil, groundwater or surface water at the facility   |
| 2  | All tankage, piping, instrumentation, and process equipment will be in a condition consistent with recent operations and standard shut-down procedures. |
| 3  | Costs for investigation, monitoring or supplemental corrective action related to historic releases are not included herein.                             |
| 4  | Costs do not include asset retirement obligations, legal filing or transfer of deed costs   |
| 5  | Costs do not include land access agreement fees, lease/right of way agreements, foreclosure fees, or similar  |
| 6  | Costs do not include electrical feed equipment and disconnects  |
| 7  | Costs do not include daily decommissioning oversight by Ensolum   |
| 8  | The decommissioning subcontractor will direct bill to Enterprise but be managed and overseen by Ensolum   |
| 9  | NORM, asbestos containing material, or other hazardous materials are not present at the site to managed for transportation/disposal off-site            |
| 10 | Cost assumes there will be no equipment sales and all equipment and tankage will be scrapped.   |
| 11 | Ensolum costs and subcontractor costs include a 10% and 25% contingency, respectively, due to the open nature bid of this CTC in 2023                   |

*(insert/delete rows above as needed)*

COST-TO-CLOSURE (CTC) ESTIMATE		03/28/23		SOUTH EDDY GAS PLANT OPERATIONAL CLOSURE				Page 2	
This cost estimate includes:		Ensolum:	Demo Sub:	Misc Subs:	Misc Subs:	Misc Subs:	LAB:	SubTOT:	Year(s):
TASK:		(MSA)	(MSA)	(MSA)	(MSA)	(no MSA)	(no MSA)		(1-4+)
1	Pre-closure planning	\$3,000	\$1,500					\$4,500	1
2	Pre-job planning	\$4,000	\$2,000					\$6,000	1
3	Site decommissioning (ranged average with assumptions)	\$11,000	\$3,500,000					\$3,511,000	1
4	Soil sample collection	\$9,000					\$6,000	\$15,000	1
6	Site closure and regulatory/stakeholder correspondence	\$17,000						\$17,000	1
7								\$0	
<i>(insert/delete rows above as needed)</i>									
SubTotals>>>		\$44,000	\$3,503,500	\$0			\$6,000	\$3,553,500	
								Invoiced to date for above SOW >>>	\$0
Contractors w/ MSA (direct-bill to Enterprise):		Ensolum, Demo subcontractors (TexMex, Envirotech, Lighthouse options)							
SUB = Subcontracted to Consultant (has no MSA with Enterprise):		drilling, surveying, other subs & fees;							
LAB = laboratory (Subcontracted to Consultant)									

\$3,553,500	<b>SUBTOTAL CONTRACTED</b> (from above) - amount already invoiced for above SOW			
	+ Other Expenditures (list):	NA		
	+ Annual Land/Lease Payments	*see attached tab "Landowners" for line-item estimates	Unknown agreements	
\$150,000	+ COR Expenses (est. \$2,000/day)	No. of field days requiring a COR=	75	1
\$3,703,500	<b>TOTAL CONTRACTED</b>			
\$555,525	+ 15% Enterprise Contingency			1
\$0	+ 5% Task Cost Tracking (for tasks >\$500K, e.g. excavation)			
\$4,259,025	<b>TOTAL PROJECT COST</b>			
\$0	- AFE Budget remaining*	*Totals as of:	NA	0
	(for a positive balance, use a positive number)			
\$0	+ Work in Progress* (WIP, includes unpaid & unprocessed invoices not included in Remaining AFE Budget)			1
\$4,259,025	<b>TOTAL ESTIMATED COST</b>			

**REFERENCE ONLY**

**NOT SUBMITTED TO AGENCY**

## STATEMENT OF BASIS

INTERNAL DOCUMENTATION

<b>Project Sign-off (Date: )</b>		<b>ePermit Number: n/a</b>	
<b>Other: Response to NOD (Date: 5/15/2023 )</b>			
<b>PROJECT INFORMATION</b>			
<b>Facility Name:</b>	South Eddy Cryo Plant	<b>Project No.:</b>	22SEGP01W
<b>Facility Location:</b>	18 m SE Loving, New Mexico, Eddy,		
<b>Project Name:</b>	Ground water discharge permit		
<b>Permitting Lead:</b>	Jing Li		
<b>Project Originator:</b>	Dunaway, Robert H		
<b>Project Stakeholders:</b>	Dunaway, Robert H; Kulkarni, Pranav ; Quesada, Daniel Elfego; Reinermann, Paul S		
<b>Agency:</b>	Other		
<b>Permit Type:</b>	Other	<b>Base Permit</b>	Water
<b>For Air Permitting Project is a Water Permit Needed:</b>	NO		
<b>Permit Action</b>	Initial		
<b>Title V Facility</b>	NO	<b>OPN Needed:</b>	NO
<b>Public Notice</b>	NO		
<b>Title V Significant Revision Triggered?</b>	NO		
<b>Project Folder:</b>	Y:\Permits\Permitting by State\NM\South Eddy Cryo Plant\S Eddy GW discharge permit Oct 2022		
<b>Date Action Required By:</b>	05/31/2023		
<b>SCOPE OF WORK/PERMITTING STRATEGY</b>			
Enterprise is submitting this revised ground water discharge permit application in response to the Notice of Deficiency (NOD) received from NMOCD on 5/1. This revised application addressed questions and comments in the NOD and provided the requested information. This NOD only includes one question (regarding the contingency plan for minor releases) and we have contacted OCD reviewer to confirm the response, see attached email.			
<b>SUMMARY OF POTENTIAL ISSUES</b>			
No potential issue.			
<b>FACILITY/PROCESS DESCRIPTION</b>			
South Eddy Cryo Plant is a 240 MMscf/day cryogenic gas processing plant designed to treat and process natural gas for Enterprise's gathering systems located throughout southeastern New Mexico. The facility consists of one train.			
<b>GENERAL INFORMATION</b>			
<b>Process/Operating Data Verification</b>			
Engineering Design, Operating Data, Vendor Specs/Name Plate			
<b>Additional Information:</b>			
<b>Does Permit Action Trigger New Regulation:</b>	NO		
<b>Additional Information:</b>			
<b>Does Action Trigger New Compliance Requirement:</b>	NO		
<b>Additional Information:</b>			
<b>Circulated for Stakeholder Review:</b>	YES		
<b>Stakeholder Call/meeting:</b>	NO		
<b>Received Stakeholder Comments:</b>	YES		
<b>Attachments:</b>			

# STATEMENT OF BASIS

<b>Public Notice Information</b>		
<b>Miscellaneous Comments:</b>		
<b>EMISSION FACTORS</b>		
N/A		
<b>Additional Information:</b>		
<b>MODELING</b>		
N/A		
<b>Additional Information:</b>		
<b>PERMITTING HISTORY</b>		
2/1/23: Initial discharge application. 4/3/23: Response to first NOD		
<b>APPROVER</b>	<b>TITLE</b>	<b>APPROVAL DATE</b>
Sartor, Rodney Michael	Senior Director, Environmental	5/23/2023 10:12:23 AM
Cooley, Brad	Director, Environmental	5/18/2023 1:31:44 PM
Kulkarni, Pranav	Manager, Environmental Permitting	5/18/2023 11:05:47 AM
Mendez, Brenda J	Analyst, Senior Environmental	5/16/2023 6:50:06 AM
Downs, Sara Elisabeth	Specialist, Associate Environmental	5/15/2023 2:10:49 PM
Li, Jing	Engineer, Staff Environmental	5/15/2023 8:56:55 AM

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Sarah Cottrell Propst**  
Cabinet Secretary

**Todd E. Leahy, JD, PhD**  
Deputy Cabinet Secretary

**Dylan Fuge**, Division Director (Acting)  
Oil Conservation Division



**BY ELECTRONIC MAIL ONLY**

May 1, 2023

Jing Li  
Enterprise Field Services, LLC  
1100 Louisiana Street  
Houston, TX 77002  
jli@eprod.com

**RE: Enterprise Field Services, LLC - Notice of an Administratively Incomplete  
Discharge Permit Application for South Eddy Gas Plant**

Dear Ms. Li:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed the Discharge Permit Application resubmitted to the OCD on April 3, 2023 for Enterprise Field Services, LLC's (Enterprise) South Eddy Gas Plant.

As per 20.6.2.3108.A NMAC, OCD is required to notify Enterprise within 30 days of receipt of the discharge permit application of any deficiencies that make the application deemed administratively incomplete. OCD is requesting the below additional information, modifications, and/or clarification for administrative completeness of the submitted discharge permit application:

1. In the letter dated March 2, 2023, OCD requested the contingency plan be updated to include both major and minor releases. The application that Enterprise resubmitted on April 3, 2023 included major but not minor releases. Update.

**Updated Section 8.0 Spill/Leak Prevention and Reporting Procedures (Contingency Plan) in its entirety to the following:**

***Enterprise has implemented an Emergency Response Plan. The Emergency Response Plan describes processes necessary to respond to discharges of petroleum products. A general response will include ensuring all personnel are notified, isolating the source, establishing an appropriate perimeter and control points, assessing the hazard, then implementing appropriate control measures. In the event of a major release, Enterprise will work closely with NMOCD to***

**develop a plan for remediation according to 19.15.29 NMAC. In the event of a major or minor release, Enterprise will enact an initial response that will include but is not limited to source elimination and site security, containment, site stabilization and remediation. For minor releases (>5 barrels<25 barrels), the response will generally involve stopping the release (if applicable), use of absorbent materials, collection and containerization of the spill and any contaminated media, and notification of additional response personnel if needed. Following the initial response activities for both a major or minor release, Enterprise will also comply with 19.15.29.9, 19.15.29.10, 19.15.29.11, 19.15.29.12 and 19.15.29.13 NMAC.**

**Chemicals stored on-site that are not oil-based are minimal in volume and unlikely to result in a discharge to groundwater based on the extent, underlying lithology, and short-term identification and response associated with a manned facility.**

2. Date and sign the certification statement at the end of the application.

**Section 13 Certification has been signed and dated.**

A “complete” amended discharge permit application is due to OCD no later than May 31, 2023 (i.e., 30 days from email receipt); please submit the revised discharge permit application through the existing E-permitting application page and email an updated discharge permit application to [Shelly.Wells@emnrd.nm.gov](mailto:Shelly.Wells@emnrd.nm.gov). If you have any questions regarding this letter, contact me at (505) 469-7520 or via email.

Respectfully,

*Shelly Wells*

Shelly Wells  
Environmental Specialist-Advanced



State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan Grisham**  
Governor

**Sarah Cottrell Propst**  
Cabinet Secretary

**Todd E. Leahy, JD, PhD**  
Deputy Secretary

**Dylan Fuge**, Division Director  
Oil Conservation Division



**BY ELECTRONIC MAIL ONLY**

June 15, 2023

Jing Li  
Enterprise Field Services, LLC  
1100 Louisiana Street  
Houston, TX 77002  
[jli@eprod.com](mailto:jli@eprod.com)

**RE: Enterprise Field Services, LLC - Notice of an Administratively Complete Discharge Permit Application for South Eddy Gas Plant**

Dear Jing Li:

The New Mexico Energy, Minerals and Natural Resource Department's Oil Conservation Division (OCD) has reviewed your amended discharge permit application, dated May 25, 2023, for Enterprise Field Services, LLC's (Enterprise), South Eddy Gas Plant. OCD has determined that the amended discharge permit application is administratively complete.

Given OCD's determination, Enterprise must provide public notice within 30 days of receipt of this letter (i.e., July 15, 2023) in accordance with the requirements of 20.6.2.3108(B) NMAC to the general public in the locale of the Gas Plant by each of the methods listed below:

1. Prominently posting a synopsis of the public notice at least 2 feet by 3 feet in size, in English and in Spanish, at the South Eddy Gas Plant's main entrance and at the Carlsbad Post Office located at 301 N Canyon Street, Carlsbad, New Mexico, 88220 for 30 days;
2. Providing written notice of the discharge by mail or electronic mail, to owners of record of all properties within a 1/3 mile distance from the boundary of the property where the discharge site is located; if there are no properties other than properties owned by the discharger within a 1/3 mile distance from the boundary of property where the discharge site is located, Enterprise shall provide notice to owners of record of the next nearest adjacent properties not owned by the discharger;
3. Providing notice by certified mail, return receipt requested, to the owner of the discharge site if Enterprise is not the owner; and

4. Publishing a synopsis of the notice in English and in Spanish, in a display ad at least three inches by four inches **not** in the classified or legal advertisements section, in the Carlsbad Current-Argus. Note, the public notice in the application appears to contain an error. The provided notice had the following: "Range 30," which is missing the cardinal direction. The actual published public notice should correct this error.

As per 20.6.2.3108(F) NMAC, the notice must also include the address and phone number within OCD by which interested persons may obtain information, submit comments, and request to be placed on a facility-specific mailing list for future notices and that OCD will accept comments and statements of interest regarding the application and will create a facility-specific mailing list for persons who wish to receive future notices. The following OCD contact information must be included in the notice:

Leigh Barr – Administrative Permitting Supervisor  
New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
(505) 476-3441  
[LeighP.Barr@emnrd.nm.gov](mailto:LeighP.Barr@emnrd.nm.gov)

Within 15-days of completion of the public notice requirements in 20.6.2.3108(B) NMAC, Enterprise must submit to the OCD proof of the notice, including affidavit of mailing(s) and the list of property owner(s), proof of publication, and an affidavit of posting, as appropriate.

Also, as part of the discharge permit application, Enterprise was required to submit a Closure/Post Closure Plan for OCD approval. OCD has reviewed this plan and hereby approves the Closure/Post Closure Plan. The financial assurance (FA) associated with this plan is \$4,259,025. The FA must be on OCD-prescribed forms, or forms otherwise acceptable to the OCD, payable to the OCD. Bond forms can be found at the bottom of OCD's Forms Page located at <https://www.emnrd.nm.gov/ocd/ocd-forms/>. The FA is due to the OCD within 30-days of email receipt of this letter (i.e., July 15, 2023).

If you have any questions, please do not hesitate to contact me by email at [LeighP.Barr@emnrd.nm.gov](mailto:LeighP.Barr@emnrd.nm.gov). On behalf of the OCD, I wish to thank you and your staff for your cooperation during this process.

Regards,

*Leigh Barr*

Leigh Barr  
Administrative Permitting Supervisor

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 220524

**CONDITIONS**

Operator: Enterprise Field Services, LLC PO Box 4324 Houston, TX 77210	OGRID: 241602
	Action Number: 220524
	Action Type: [UF-DP] Discharge Permit (DISCHARGE PERMIT)

**CONDITIONS**

Created By	Condition	Condition Date
lbarr	None	6/15/2023