HITP - \_20\_

# GENERAL CORRESPONDENCE

YEAR(S): 2011\_



March 8, 2012

File No.: 114431.2-ALB12LT001

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

Subject:

Submittal of Replacement Check for

**Application Fee and Temporary Permit Fee** 

Permit No. HITP-020

Line 696 - MAPL 3-inch SJ River Plant to Chaco Plant

San Juan County, New Mexico

Dear Mr. Jones:

As discussed yesterday, Kleinfelder West, Inc. (Kleinfelder), on behalf of the Enterprise Products Operating Company, Inc. (Enterprise), is submitting the enclosed check no. 2253 in the amount of \$250.00. The check is made out to the Water Quality Management Fund.

The enclosed check is a replacement check for check no. 2238 (\$100) and check no. 2250 (\$150) that were submitted to the Oil Conservation District in August 2011, but were never cashed. The previously submitted checks were for the Application Fee (\$100) and the Temporary Permit Fee (\$150) for permit no. HITP-020 at the above referenced site.

Should you have any questions, please feel free to contact Eileen Shannon (Kleinfelder) at (505) 344-7373 or Runell Seale (Enterprise) at (505) 599-2124.

Respectfully submitted,

KLEINFELDER WEST, INC.

Eileen L. Shannon, P.G

Project Manager

cc: Runell Seale, Enterprise, 614 Reilly Ave., Farmington, NM 87401



### **DOCUMENT TRANSMITTAL FORM**

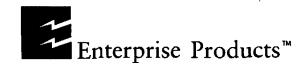
TO:	TO: Mr. Brad Jones			9 dim = 1-				PAGE	1	OF	1 .	
·	Oil Conservation Division NM Energy Minerals and Natural Resources Dept 1220 South Francis Dr Santa Fe, NM 87505				TRANSMITTAL DATE:			: 3/8/201	3/8/2012			
					TRANSMITTAL DCN: 114431.2-ALB12TS001							
· · · · · · · · · · · · · · · · · · ·					Eileen Sl	Shannon						
RETU	RN RESPO	NSES/COM	MENTS I	BY:	3/20/12							
PROJECT NO.: 114431/2 PROJI				ECT NAME: Enterprise Permits - SJ River to Chaco Hydrostatic					atic			
ACTIVITY/DESCRIPTION: Replacement				Check for Temporary Permit Fee								
DOCUMENTS BEING TRANSMITTED												
ITEM							REV.	PAGES	DATE	DESIGNA	TOR	
Check Tempo	# 2253 to Wate rary Permit HIT	r Quality Mana P-020	gement Fu	nd for li	ndividual				3/8/2012	<del></del>		
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INSTRUCTIONS/REMARKS  Copy to Runell Seale    Mark previous issues "obsolete", "superceded", or "uncontrolled"   Destroy previous affected material with this record   Return old material with this record   New issue (no previous copies received)   Replace with revised/new material   Maintain as controlled copy   Not Applicable    RECEIPT AND READ ACKNOWLEDGEMENT   Please Sign and Return To:    ADMINISTRATIVE SUPERVISOR   9019 WASHINGTON NE, BUILDING A   ALBUQUERQUE, NM 87113												
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KLEINFELDER RECEIPT PRINT NAME					· · · · ·	SIGNATUI	RE			DATE		
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# ACKNOWLEDGEMENT OF RECEIPT | OF CHECK/CASH

Thereby acknowledge receipt of check No	5963	adated _ <u>3/6/12</u>
or cash received on in the amou	(	00
from Klientelder Ixic.		
for HITP-20		
Submitted by: LAWSTNIA ROME!	<u>0</u> Date: _	3/13/12
Submitted to ASD by: / Lan - Fe		
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Organization Code <u>521.07</u> A	pplicable FY <u>20</u>	16
To be deposited in the Water Quality Managen	nent Fund.	
Full Payment or Annual Incren	nent	

# ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

Thereby actinowledge receipt of	check No <b>3</b>	253	_ dated _ 3/6/12
or cash received on			
from Klientelder	INC		
for HITP-20			· •
Submitted by: LAWIENCE	Romero	Date:	3/13/12
Submitted to ASD by:	•		1
Received in ASD by:	<b>,</b>		
Filing Fee New	Facility	Renewal	
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Full Payment or Ar.	nual Increment		



ENTERPRISE PRODUCTS PARTNERS LP ENTERPRISE PRODUCTS OPERATING LLC ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

July 29, 2011

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

Re: Notice if Intent-Hydrostatic Test
MAPL Line 696 – 3" SJ River Plant to Chaco Metering
San Juan County, New Mexico

Dear Mr. Jones,

The attached request for Hydrostatic Test Special Permission is being submitted by Kleinfelder West, Inc. on behalf of Enterprise Products Operating, LLC. Please contact either myself or Eileen Shannon at Kleinfelder should you have any questions.

Thank you,

Runell Seale

**Environmental Scientist** 

505-599-2124

RECEIVED OCD



August 2, 2011

File No.: 114431.2-ALB11LT001

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

Subject: Submittal of a Notice of Intent to Perform a Hydrostatic Test

Line 696 - MAPL 3-inch SJ River Plant to Chaco Plant

San Juan County, New Mexico

Dear Mr. Jones:

On behalf of the Enterprise Products Operating Company, Inc. (Enterprise), Kleinfelder West, Inc. (Kleinfelder) is pleased to submit this Notice of Intent (NOI) for a hydrostatic test of the pipeline. Enterprise intends to dispose of the used hydrostatic test water into a Class I injection well; therefore, no surface discharge of hydrostatic test water is planned.

Enterprise planning to conduct hydrostatic testing on its 3-inch Line 696 located between San Juan River Plant and Chaco Plant in San Juan County. Actually placement of water into the pipeline is scheduled to start on approximately August 8, 2011. Approximately 26.11 miles of piping will be tested.

Kleinfelder has included the required information for the NOI as stated in the "Guidelines for Hydrostatic Test Dewatering" dated January 11, 2007. Attached to this NOI are the following:

- Background Information;
- Notice of Intent;
- Figure 1, Pipeline Undergoing Hydrostatic Test;
- Figure 2, Temporary Frac tank Staging Location for Hydrostatic Test Water

A check totaling \$100.00 made out to the New Mexico Water Quality Management Fund will be submitted on behalf of Enterprise for the \$100 filing fee. A separate \$150 special permission fee will be paid upon NMOCD approval.

Kleinfelder prepared this NOI in a manner consistent with the level of care and skill ordinarily exercised by other members of Kleinfelder's profession practicing in the same locality, under similar conditions and at the date the services are provided. The information provided in this document is based on our understanding of the information provided by Enterprise.

Should you have any questions, please feel free to contact Eileen Shannon or Bernie Bockisch (Kleinfelder) at (505) 344-7373 or Runell Seale (Enterprise) at (505) 599-2124.

Respectfully submitted,

KLEINFELDER WEST, INC.

Reviewed by:

Eileen L. Shannon, P.G

Eileen of She

**Project Manager** 

Bernard Bockisch, P.M.P. Senior Professional

cc: Runell Seale, Enterprise, 614 Reilly Ave., Farmington, NM 87401

#### **Background Information**

- The Enterprise MAPL Pipeline number 696 is an existing 3-inch natural gas pipeline;
- This transportation pipeline is part of a network that transports natural gas liquids.
- The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) requires periodic pressurized tests on all DOT-regulated pipelines and all newly installed pipelines to verify the integrity and safety of pipeline systems. Because the pipeline is used for the transportation of natural gas, waste water generated during hydrostatic testing is classified as non-exempt RCRA waste and is subject to the Water Quality Control Commission (WQCC) Regulations.

#### **Notice of Intent Plan**

On behalf of Enterprise, Kleinfelder is submitting this NOI plan as outlined in NMOCD Guidance document, "Guidelines for Hydrostatic Test Dewatering," (revised January 11, 2007). The NOI plan includes the following items:

#### Item a. Name and address of the proposed discharger;

Legally Responsible Party Mr. Don Anderson

**Enterprise Products Operating Company** 

614 Reilly Ave.

Farmington, NM 87401

(505) 599-2124

Local Representative Ms. Runell Seale

**Enterprise Products Operating Company** 

614 Reilly Ave.

Farmington, NM 87401

(505) 599-2124

Operator

Physical Address Chaco Gas Plant

Approximately 15.5 miles South of Bloomfield, NM

Mailing Address Ms. Runell Seale

**Enterprise Products Operating Company** 

614 Reilly Ave.

Farmington, NM 87401

(505) 599-2124

### Item b. Location of the discharge, including a street address, if available, and sufficient information to locate the facility with respect to surrounding landmarks;

The section of the 696 Pipeline to be tested is located in San Juan County. Water from the hydrostatic testing will not be discharged. Water will be transferred from the pipeline to frac tanks for temporary storage. The water will be tested and then hauled to a class 1 injection well. The location 696 Pipeline to be hydrostatically tested is shown on Figure 1.

The source of water used for the hydrostatic test will be fresh drinking water from the City of Bloomfield municipal water supply.

114431.2-ALB11LT001 Page 3 of 6 August 2, 2011 Copyright 2011, Kleinfelder Rev. 0 Three frac tanks, placed within secondary containment, will be located on Enterprise property located at the Chaco Plant near MP 1065+22. Directions to the Chaco Plant from Bloomfield, New Mexico are:

- Follow US-550 south for approximately 11.8 miles
- Turn right (west) onto Creek/Co Road 7100 for approximately 9.6 miles
- Turn left (south) at unnamed road and site will be approximately 0.5 miles down the road.

The tanks will be oriented in a manner that provides at least a 10-foot buffer between the tanks and the boundary of the property. The approximate coordinates for the proposed frac tank staging area are Latitude 36° 28' 53.08" North, Longitude 108° 7' 4.77" West. Approximately 52,920 gallons of water will be used for the hydrostatic test.

#### Item c. Legal description of the discharge location;

Storage of hydrostatic test water will occur in the frac tank staging area near MP 1065+22 at the following location:

SE ¼ of the SW ¼ of Section 16, Township 26 North, Range 12 West, San Juan County, New Mexico (See Figure 1).

### Item d. Maps (site-specific and regional) indicating the location of the pipelines to be tested:

Figure 1 is a regional map showing topography, the pipeline section undergoing testing, and the hydrostatic test water staging area. Figure 2 is a site-specific map showing details of the hydrostatic test water staging area.

### Item e. A demonstration of compliance to the following siting criteria or justification for any exceptions:

- i. Within 200 feet of a watercourse, lakebed, sinkhole, or playa lake;
- ii. Within 1,000 feet of an existing wellhead protection area or 100-year floodplain;
- iii. Within, or within 500 feet of, a wetland:
- iv. Within the area overlying a subsurface mine; or
- v. Within 500 feet from the nearest permanent residence, school, hospital, institution or church.

Because the hydrostatic test water will not be discharged to the surface, siting information is not required. The test water will be disposed of in a Class 1 injection well.

#### Item f. A brief description of the activities that produce the discharge;

Pressure testing with water, known as hydrostatic testing, is one of the tools pipeline operators use to verify pipeline integrity. The test involves clearing the pipeline of debris, purging the natural gas from the pipeline with nitrogen, filling the pipeline with water, then pressurizing the pipeline to a pressure higher than the standard operating pressure for approximately twelve hours. The purpose of hydrostatic testing in a pipeline is to determine the extent to which potential defects might threaten the pipeline's ability to sustain maximum allowable operation pressure. If leaks or breaks occur, the pipeline is repaired or the affected areas is replaced, and then re-tested. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety 114431.2-ALB11LT001

Page 4 of 6

August 2, 2011

Administration (PHMSA) requires periodic pressurized tests on all DOT-regulated pipelines and all newly installed pipelines to verify the integrity and safety of pipeline systems. Approximately 53,000 gallons of fresh water will be used for the hydrostatic test.

#### Item g. The method and location for collection and retention of fluids and solids;

Fresh water from the City of Bloomfield or other local municipal water supplies will be transported by Sunland Construction to the temporary frac tank staging area located at the San Juan River Plant. The water will be placed into the three 20,000 gallon frac tanks via hoses between the tanker trucks and the frac tanks. The fresh water will also be transferred from the frac tanks to the pipeline via hoses. After use, the hydrostatic test water will be removed from the pipeline via hoses and/or flexible pipe using drip pans under the connection points and stored in approximately three 21,000 gallon frac tanks with secondary containment at the hydrostatic test water staging area at Chaco Plant (Figure 2). The secondary containment under the frac tanks will consist of straw-bailed berm overlain by plastic sheeting that will placed under each individual frac tank. The bermed area will hold a minimum of 1 and 1/3 the volume of the frac tanks. The frac tanks will be located within 50 feet of the point of connection on the 696 pipeline. All individual tank valves will be closed and locked when not in use. Solids are not anticipated to be produced from the hydrostatic testing.

### Item h. A brief description of best management practices to be implemented to contain the discharge onsite and to control erosion;

Enterprise intends to discharge the hydrostatic test water into frac tanks for temporary storage. The frac tanks will be located within a lined bermed area as described above in Item g. Once analytical results are obtained for the hydrostatic test water, the water will be transported from the project site in DOT-approved tanker trucks to Key Energy in Farmington, New Mexico. The water will be transported by Dawn Trucking Corporation, an approved OCD C-133 hauler. A copy of their approval is included in Appendix A. The water will be disposed of in a Class I injection well operated by Key Energy. No upland discharges are planned.

### Item i. A request for approval of an alternative treatment, use, and/or discharge location (other than the original discharge site), if necessary;

In the event that the hydrostatic test water is found to be unsuitable for down-hole injection, Enterprise will acquire a temporary identification number from the US Environmental Protection Agency for the waste, and it will be properly transported and disposed of at a RCRA-permitted Treatment, Storage, and Disposal facility. Enterprise will provide the name and address of the facility and the appropriate disposal documentation to the NMOCD.

#### Item j. A proposed hydrostatic test wastewater sampling plan:

Enterprise will not collect nor analyze a pre-test sample of the water obtained from a local municipal water supply. Water quality analytical data supplied by the municipal water entity will be used as a baseline to determine if the water is suitable for use.

The post-hydrostatic test water samples will be analyzed for corrosivity, ignitability, reactivity, toxicity, and/or other characterization as required by Key Energy. Analytical results of the post-hydrostatic test water analysis will be submitted to the NMOCD with a recommendation for disposal of the hydrostatic test water into a Class 1 injection well.

# Item k. A proposed method of disposal of fluids and solids after test completion, including closure of any pits, in case the water generated from test exceeds the standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);

All fluids will be containerized, tested, and transported for disposal as described under item i and f. No solid waste is anticipated. In the event that the hydrostatic test water is found to be unsuitable for down-hole injection well disposal, a temporary identification number will be acquired from the US Environmental Protection Agency for the waste, and it will be properly transported and disposed of at a RCRA-permitted Treatment, Storage, and Disposal facility. Enterprise will provide the name and address of the facility and the appropriate disposal documentation to the NMOCD.

#### Item I. A brief description of the expected quality and volume of the discharge;

The hydrostatic test water will be analyzed to assess if the constituent concentrations meet Key Energy's disposal requirements for their Class 1 injection well. Based on historical data collected from previous hydrostatic test events using similar methods and solutions, the water quality is expected to be in compliance with regulatory limits. The volume of the hydrostatic test water is expected to be approximately 52,920 gallons.

#### Item m. Geological characteristics of the subsurface at the proposed discharge site;

The site is located within the west-central part of the San Juan Basin, a large, asymmetric structural depression that contains Paleozoic and Mesozoic sediments up to 15,000 feet thick. The area is characterized by bedrock hillsides and mesas and Pleistocene gravel terraces of the San Juan and Animas Rivers. Average annual precipitation in the area is 8.5 inches per year.

Based on three wells installed at the site in 1992, the subsurface geology beneath the site consists of approximately 50 feet or less of sandy deposits above the lower shale unit of the Nacimento Formation. The shale unit extends to approximately 105 feet below ground surface (bgs), where sandstone was encounter between 105 and 135 feet bgs. The remainder of the driller's log indicated sandstone and shale to a total borehole depth of 505 feet bgs (July 14, 1992 letter from El Paso Natural Gas to NMOCD).

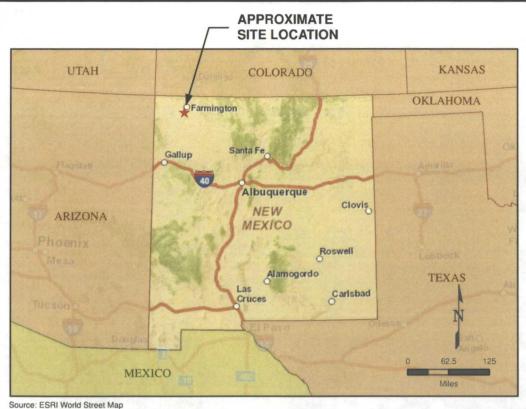
### Item n. The depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge;

Based on three wells drilled in 1992, to depths of 505 feet below grade, depth to groundwater at the site is estimated to be at a depth of approximately 120 feet below the plant site in the sandstone of the Ojo Alamo Formation. Total dissolved solids (TDS) measured in these wells in 1992 ranged from 1,616 to 3,150 parts per million (July 14, 1992 letter from El Paso Natural Gas to NMOCD).

Item o. Identification of landowners at, and adjacent to, the discharge collection/retention site. Landowners within 1/3-mile of the boundary of the temporary frac tank storage area within the Enterprise pipeline easement:

Because the hydrostatic test water will not be discharged to the surface, this information is not required.

#### **FIGURES**



- APPROXIMATE ENTERPRISE 696 PIPELINE

**LEGEND** 

- APPROXIMATE HYDROSTATIC TEST LOCATION
- ♦ APPROXIMATE MILE POST MARKERS
- \* APPROXIMATE SITE LOCATION

#### NOTE:

Enterprise 696 Pipeline recreated from ROCKYMNTN-696-PAL\_001.pdf through ROCKYMNTN-696-PAL\_007.pdf from Enterprise Products Company.

696 PIPELINE MP 19 MP 22 MP 25 MP 26 TEMPORARY FRAC TANK STAGING AREA FOR HYDROSTATIC TEST WATER **FIGURE** PROJECT NO.: 114431.2 **ENTERPRISE UNDERGOING HYDROSTATIC TEST** DRAWN: JUL 2011 Line 696 - MAPC 3-inch DRAWN BY: KFH KLEINFELDER San Juan River Plant to Chaco Plant CHECKED BY: BB San Juan County, New Mexico Bright People. Right Solutions. NAD 1983 StatePlane FILE NAME: ORIGINATOR: E. SHANNON DRAWING CATEGORY: New Mexico West, US Feet www.kleinfelder.com 114431\Figure1.mxd APPROVED BY: US 8/2/11

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Source: ESRI World Imagery

#### NOTE:

Enterprise 696 Pipeline recreated from ROCKYMNTN-696-PAL\_001.pdf through ROCKYMNTN-696-PAL\_007.pdf from Enterprise Products Company.

#### **LEGEND**

APPROXIMATE ENTERPRISE 696 PIPELINE APPROXIMATE HYDROSTATIC TEST LOCATION END OF LINE PIPELINE STATIONING

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KLEINFELDER
Bright People. Right Solutions.

FILE NAME: 114431\Figure2.mxd

PROJECT NO. 1114431.2	TEMPORARY FRAC TANK STAGING AREA		
DRAWN: JUL 2011	FOR HYDROSTATIC TEST WATER		
DRAWN BY: KFH	Line 696 - MAPC 3-inch San Juan River Plant to Chaco Plant		
CHECKED BY: BB	San Juan County, New Mexico		

San Juan County, New Mexico

ORIGINATOR: E. SHANNON APPROVED BY: ELS 8-2-11 **FIGURE** 

## APPENDIX A Dawn Trucking Corporation OCD-Approval Letter

Submit in triplicate to Santa Fe Office

Transporter Name\_

## State of New Mexico Energy Minerals and Natural Resources

Form C-133 Revised 1-1-89

#### Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

#### AUTHORIZATION TO MOVE PRODUCED WATER

DAWN TRUCKING CORPORATION

Address	Office Location (If different)
P O BOX 1498	#16 CR 5860
FARMINGTON, NM 87499-1498	FARMINGTON, NM 87401
Phone Numbers(s) 505-327-6314	· · · · · · · · · · · · · · · · · · ·
State Corporation Commission Permit No. 1432657	
NOTE: It is the responsibility of each holder of an appersonnel with the content of Division Rules compliance therewith. Failure to move and d Division Rules 709 and 710 are cause for can move produced water.	709 and 710 and to assure operations in ispose of produced water in accordance with
	, .
I hereby certify that the information above is true and complet	te to the best of my knowledge and belief.
Signature Sol a Men	DateFEBRUARY 14, 2003
Printer Name ACK A. NELSON	Title VICE PRESIDENT
(This space for State Use)  Approved by Ap	Title Engen Dan Chif