

HITP - 023

**TEMPORARY
PERMISSION
2011**



ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

RECEIVED OCD
2011 NOV 22 P 1:49

November 7, 2011

UPS Tracking No. 1Z 875 525 03 5080 6051

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87504

Re: Transwestern Pipeline Company, Hydrostatic Test Water Disposal, Submittal of
Temporary Permission Fee, Thoreau Compressor Station, GW-080,

Dear Mr. Jones:

Included with this letter, find check no. 541018109 in the amount of \$150.00 to cover the temporary permission fee for the disposal of the 2650 gallons of hydrostatic test water generated at the above referenced facility.

Should you require additional information concerning this NOI, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell
Sr. Environmental Specialist
File

Xc: Thoreau Compressor Station

Transwestern
DAILY SHIPMENT DETAIL REPORT
18-Nov-2011 - 3:05:36 PM

Pickup Date: 18-Nov-2011
Pickup Record No.: 2904 5180 13

UPS Account No.: 875525
Sorted By: Order of Shipment

All charges are in USD; fuel surcharge included where applicable.

Name / Address	Shipment Detail	Options	Published Rate Charges
Ship To: Jeff Whippo Transwestern Pipeline Company Ste 250 4001 Indain School Rd NE Albuquerque NM 87110 United States	Service Type: 2ND DAY AIR Total Packages: 1 Billable Wt.: 1.0 lb Transportation: Shipper	Shipment Service Charge:	12.60
Ship From: Larry Campbell Transwestern Pipeline Company 6381 N. Main St ROSWELL NM 88201	Tracking No.: 1Z8755250250131620 Package Type: UPS Letter Weight: 1.0 lb	Package Service Charge: UPS Total Charge:	12.60 12.60
Ship To: Manager of Comp and Enforcement New Mexico Environment Department Bldg B 1301 Siler Air Quality Bureau Santa Fe NM 87507 United States	Service Type: GROUND Total Packages: 1 Billable Wt.: 1.0 lb Transportation: Shipper	Shipment Service Charge:	5.86
	Tracking No.: 1Z8755250351476835 Package Type: Package Weight: 1.0 lb	Package Service Charge: UPS Total Charge:	5.86 5.86
Ship To: Emissions Fees Section TCEQ MC-170 12100 Park 35 Circle Austin TX 78711-3087 United States	Service Type: GROUND Total Packages: 1 Billable Wt.: 1.0 lb Transportation: Shipper	Shipment Service Charge:	5.98
Ship From: Larry Campbell Transwestern Pipeline Company 6381 N. Main St ROSWELL NM 88201	Tracking No.: 1Z8755250351349642 Package Type: Package Weight: 1.0 lb	Package Service Charge: UPS Total Charge:	5.98 5.98
Ship To: Brad Jones New Mexico Oil Conservation Div 1220 South St. Francis Dr. Santa Fe NM 87504 United States	Service Type: GROUND Total Packages: 1 Billable Wt.: 1.0 lb Transportation: Shipper	Shipment Service Charge:	5.86
Ship From: Larry Campbell Transwestern Pipeline Company 6381 N. Main St ROSWELL NM 88201	Tracking No.: 1Z8755250350806051 Package Type: Package Weight: 1.0 lb	Package Service Charge: UPS Total Charge:	5.86 5.86

Summary Totals:

Shipment Option	Shpts	Pkgs	Pub Charges	Billing Option	Shpts	Pkgs	Pub Charges
Package Option		Pkgs	Pub Charges	Prepaid	4	4	30.30
				TOTAL CHARGES			30.30
				4 Shipment(s)			
				4 Package(s)			

All charges are in USD; fuel surcharge included where applicable.

Your invoice may vary from the displayed rates.

* Indicates Shipper-Paid Declared Value

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 541018109 dated 11/16/11

or cash received on _____ in the amount of \$ 150.00

from TRANSWESTERN Pipeline Co

for HITP-23

Submitted by: LAWRENCE Romero Date: 11/23/11

Submitted to ASD by: [Signature] Date: 11/23/11

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Temp Permitted

Organization Code 521.07 Applicable FY 2011

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



November 7, 2011

Mr. Larry Campbell
Transwestern Pipeline Company
6381 N. Main Street
Roswell, New Mexico 88201

Re: Hydrostatic Test Individual Temporary Permission HITP-023
Transwestern Pipeline Company
Thoreau Compressor Station
Collection Location: SE/4 of Section 20, Township 14 North, Range 13 West,
NMPM, McKinley County, New Mexico

Dear Mr. Campbell:

The Oil Conservation Division (OCD) has received Transwestern Pipeline Company's (Transwestern) notice of intent, dated November 7, 2011, for authorization to withdraw and collect approximately 2,650 gallons of wastewater generated from a hydrostatic test of the new scrubber system and associated piping at the Thoreau Compressor Station (GW-080), located at 174 Castlerock Road, Thoreau, New Mexico or approximately 1.5 miles northwest of Thoreau, New Mexico. The proposed collection location is within Thoreau Compressor Station facility boundary in SE/4 of Section 20, Township 14 North, Range 13 West, NMPM, McKinley County, New Mexico. No surface discharge is proposed by Transwestern. The hydrostatic test wastewater will be discharged into a frac tank for temporary storage, transferred from the frac tanks to an OCD approved water hauler, and delivered to Key Energy Services for injection and disposal into a Class I well. OCD acknowledges the receipt of the filing fee (\$100.00) with the November 7, 2011 notice of intent. The OCD acknowledges the urgency of this situation and will allow the approved activities to commence while awaiting the receipt of the temporary permission fee (\$150.00) pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund** and submit to OCD.

Based on the information provided in the request, temporary permission is hereby granted for the collection, retention, and disposal of the hydrostatic test wastewater generated from the proposed hydrostatic test event with the following understandings and conditions:

1. Transwestern will be testing the additional scrubber system and associated piping (elbows, flanges, and piping) for the Thoreau Compressor Station located at 174 Castlerock Road, Thoreau, New Mexico 87323;
2. Transwestern shall ensure no discharge will occur at the hydrostatic test wastewater collection location: Located at 174 Castlerock Road, Thoreau, New Mexico 87323 or approximately 1.5 miles northwest of Thoreau, New Mexico;
3. Transwestern will acquire the hydrostatic test water from one of the three domestic wells at the Thoreau Compressor Station facility boundary: Within the SE/4 of Section 20, Township 14 North, Range 13 West, NMPM, McKinley County, New Mexico;
4. Transwestern will generate approximately 2,650 gallons of hydrostatic test wastewater generated from the test that will be slowly discharged into one (1) 21,000 gallon frac tank for temporary storage, while awaiting testing, transfer and disposal into a Class I well at Key Energy Services;
5. Transwestern will temporary store the hydrostatic test wastewater in a temporary frac tank with impermeable secondary containment (e.g., liners - geomembrane and berms - hay bales), which will contain a volume of at least one-third greater than the total volume of the largest tank or one-third greater than the total volume of all tanks that are inter-connected, whichever is greater;
6. Transwestern will not discharge any hydrostatic test wastewater generated from the test event to the ground surface within the Thoreau Compressor Station facility boundary or directly or indirectly to groundwater;
7. Transwestern will analyze the hydrostatic test wastewater to determine if it is a RCRA non-hazardous/non-exempt waste that Key Energy Services may accept for disposal. If the hydrostatic test wastewater does not meet the criteria for Key Energy Services waste acceptance, the test water shall be sent to a RCRA permitted TSDF for disposal;
8. Transwestern will ensure the transfer the hydrostatic test wastewater via an OCD approved C-133 water hauler to Key Energy Services Class I well for injection and disposal;
9. Transwestern shall remove all hydrostatic test wastewater from the collection/retention location within ten (10) calendar days of the completion of the hydrostatic test;
10. Transwestern shall restore any surface area impacted or disturb from the approved activities;
11. Transwestern shall implement best management practices to prevent unauthorized releases during the transfer/collection activities;
12. Transwestern shall ensure that the transfer/collection activities do not cause any fresh water supplies to be degraded or to exceed 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);

Mr. Campbell
Transwestern Pipeline Company
Permit HTP-023
November 7, 2011
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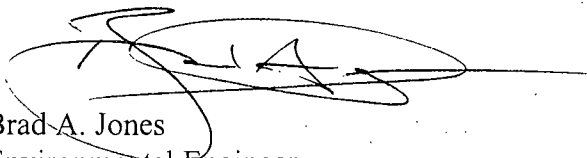
13. Transwestern must properly notify the landowner(s) of the proposed collection/retention of the approved activities prior to the hydrostatic test event; and
14. Transwestern shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to OCD Rule 29 (19.15.29 NMAC).

It is understood that the hydrostatic test has already begun. This temporary permission will expire within 120 calendar days of its issue date. Temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions.

Please be advised that approval of this request does not relieve Transwestern of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve Transwestern of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

Cc: OCD District III Office, Aztec

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 541017974 dated 12/27/11

or cash received on _____ in the amount of \$ 100⁰⁰

from Transwestern Pipeline

for HITP-23

Submitted by: Lawrence Portnoy Date: 11/8/11

Submitted to ASD by: John Tom Date: 11/8/11

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____