

**HBP - \_26\_**

**PERMITS,  
RENEWALS, &  
MODS**



P.O. Box 217  
Bloomfield, NM 87413

April 10, 2012

Mr. Brad Jones  
New Mexico Oil Conservation Division  
1120 South St. Francis Dr.  
Santa Fe, New Mexico 87505

**RE: Delivery of the temporary permission fee**

Dear Mr. Jones

Please find the attached check for \$150.00 submitted due to the acceptance of ConocoPhillips San Juan Gas Plant request for annual temporary permission. In accordance with 20.6.2.3114 NMAC this check will complete the fee portion of this agreement.

Thank You,

Todd Kinard  
ConocoPhillips SJGP  
Compliance Coordinator

APR 13 9 05 AM '12

ACKNOWLEDGEMENT OF RECEIPT  
OF CHECK/CASH

I hereby acknowledge receipt of check No. 1008 dated 4/10/12  
or cash received on \_\_\_\_\_ in the amount of \$ 150<sup>00</sup>

from Cortoco-Phillips

for HBP-26

Submitted by: Lawrence Roa Date: 4/17/12

Submitted to ASD by: Juan Torres Date: 4/17/12

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

Filing Fee \_\_\_\_\_ New Facility \_\_\_\_\_ Renewal \_\_\_\_\_

Modification \_\_\_\_\_ Other TEMP PERMISSION

Organization Code 521.07 Applicable FY 2012

To be deposited in the Water Quality Management Fund.

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

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

**John Bemis**  
Cabinet Secretary

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

**Jami Bailey**  
Division Director  
Oil Conservation Division



April 4, 2012

Mr. Todd Kinard  
ConocoPhillips Company  
San Juan Basin Gas Plant  
P.O. Box 217  
Bloomfield, New Mexico 87413

**Re: Request for Annual Temporary Permission To Discharge Hydrostatic Test Water**  
**Permit: HBP-026**  
**ConocoPhillips San Juan Basin Gas Plant**  
**Bloomfield, New Mexico**

Dear Mr. Kinard:

The Oil Conservation Division (OCD) has received the ConocoPhillips San Juan Basin Gas Plant (SJGP) revised request, dated April 2, 2012, for an annual temporary permission to discharge small quantities (25,000 gallons or less) of hydrostatic test wastewater generated from the testing of new natural gas pipelines at the SJGP. OCD acknowledges receipt of \$100.00 filing fee with the initial March 20, 2012 request. This approval will not become effective until OCD receives the temporary permission fee (\$150.00) pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

Based on the information provided in the request, the OCD hereby grants annual temporary permission. Hydrostatic test wastewater generated from all hydrostatic tests of the new gathering natural gas inlet flow lines to the ConocoPhillips SJGP and new natural gas outlet pipelines from the ConocoPhillips SJGP may be performed during the approved one-year period with the following conditions:

1. the volume does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources is used for each test;
3. oral or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event;
4. the discharge does not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
5. no discharge shall occur:
  - a. where ground water is less than 10 feet below ground surface.
  - b. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
  - c. within an existing wellhead protection area;

- d. within, or within 500 feet of a wetland; or
  - e. within 500 feet from the nearest permanent residence, school, hospital, institution, or church;
6. best management practices must be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
  7. the discharge does 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);
  8. ConocoPhillips SJGP shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 19.15.29 NMAC.
  9. the landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event; and
  10. an annual report, summarizing all tests of new pipeline with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:
    - a. the location of hydrostatic test (Section/Township/Range or GPS coordinates);
    - b. the date of each test;
    - c. the volume of each discharge; and
    - d. the source and quality of test water (laboratory analysis, if necessary).

Annual temporary permissions shall expire one (1) year after issuance. **This temporary permission will expire April 3, 2013.** *Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date.* An annual temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of this approval.

This approval will not become effective until OCD receives the temporary permission fee (\$150.00) pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

Please be advised that approval of this request does not relieve ConocoPhillips SJGP of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve ConocoPhillips SJGP 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](mailto:brad.a.jones@state.nm.us).

Sincerely,



Brad A. Jones  
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec

## Jones, Brad A., EMNRD

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**From:** Kinard, Todd A. [Todd.A.Kinard@conocophillips.com]  
**Sent:** Monday, April 02, 2012 10:42 AM  
**To:** Jones, Brad A., EMNRD  
**Subject:** COP Hydro ATP request\_Rev-3\_3-23-2012.doc  
**Attachments:** COP Hydro ATP request\_Rev-3\_3-23-2012.doc

Brad,  
I have attached the revised ATP request. If you have any further questions or concerns please give me a call.

Thanks,

Todd Kinard  
Compliance Coordinator  
San Juan Gas Plant  
P:505-632-4954  
C:505-330-8309



P.O. Box 217  
Bloomfield, NM 87413

April 2, 2012

Mr. Brad Jones  
New Mexico Oil Conservation Division  
1120 South St. Francis Dr.  
Santa Fe, New Mexico 87505

**RE: Revised request for Annual Temporary Permission to Discharge  
Hydrostatic Test Water.  
ConocoPhillips San Juan Basin Gas Plant  
Bloomfield, NM**

Dear Mr. Jones

Pursuant to 20.6.2 NMAC, ConocoPhillips San Juan Gas Plant (SJGP) requests the New Mexico Oil Conservation Division (OCD) to grant SJGP Annual Temporary Permission (ATP) to discharge hydrostatic test water from new piping at the SJGP. This ATP will cover water used for hydrostatic testing of the Gathering Natural Gas flow lines (Inlet) to the SJGP and the Natural Gas Outlet Pipelines (Residue).

**Response to OCD Guidelines ATP Conditions**

In support of this request for Annual Temporary Permission to discharge hydrostatic test water, ConocoPhillips SJGP provides the following information as specified by OCD's Guidelines for Hydrostatic Test Dewatering (Rev. January 11, 2007):

- a. Each hydrostatic test dewatering event performed under a granted ATP will NOT exceed a volume of 25,000 gallons.
- b. Only municipal-sourced water obtained from the City of Bloomfield, New Mexico, or other OCD-approve sources, will be utilized to test the new Inlet or Residue flow line(s) anticipated to be tested under a granted ATP.
- c. At least 72 hours prior to any dewatering event, the OCD will be provided oral or written notification.
- d. No test water from any dewatering event will be allowed to enter any lake, perennial stream, river or their respective tributaries that may be seasonal.

- e. No dewater event will occur:
  - 1. Where groundwater is less than ten feet (10') below ground surface.
  - 2. Within 200 feet of a watercourse, lakebed, sinkhole or playa lake.
  - 3. Within an existing wellhead protection area.
  - 4. Within, or within 500 feet of, a wetland
  - 5. Within 500 feet of the nearest permanent residence, school, hospital, institution or church.
  
- f. Best management practices will be implemented to ensure that all test water and from any dewatering event will remain onsite, no impact to adjacent property will occur, and erosion will be controlled.
  
- g. No dewatering event will be allowed to cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsection A, B, or C of 20.6.2.3103 NMAC.
  
- h. The hydrostatic test events will happen on the ConocoPhillips SJGP facility, therefore no other landowners will need to be informed.
  
- i. ConocoPhillips SJGP will submit an annual report to the OCD summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event within 45 days after the permit expiration date. The report will contain the following information:
  - 1. The location of the tests.
  - 2. The date of each test.
  - 3. The volume of each test dewatering.
  - 4. The source of the water used during the test.

The filing fee in the amount of \$100.00, payable to the Water Quality Management Fund, was attached to the original ATP request. The remaining \$150.00 will be submitted upon acceptance of this request by the OCD.

If there are any questions concerning this request or additional information is required, please contact me at (505) 632-4954.

Sincerely,



Todd Kinard  
Compliance Coordinator SJGP

cc: Beverly J. Cox