

GW-270

**General
Correspondence**

YEAR(S): 2010 - 2014

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, October 21, 2010 2:16 PM
To: 'Slade, Rose'
Subject: RE: Proposed discharge plan modifications

Rose Slade,

OCD approves your updated information for these facilities. For GW-243 (House CS), GW-367 (Trestle CS) and GW-270 (W. Eunice CS)

Reflect any changes to your facility schematic upon your next renewal application submittal (if any), annotate any waste or fluid quantity change as well. For each facility.

If a waste stream, not known within any previous application, is noted, annotate that within the next renewal application. OCD shall be notified if a new waste stream is generated prior to the applicant disposing of the material.

llowe

Leonard Lowe

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From: Slade, Rose [mailto:Rose.Slade@SUG.com]
Sent: Tuesday, October 19, 2010 7:34 AM
To: Lowe, Leonard, EMNRD
Cc: Krautsch, Jacob; Elliott, Phillip A.
Subject: Proposed discharge plan modifications

Thank you,

Rose L. Slade
EHS Compliance Specialist
SOUTHERN UNION GAS SERVICES
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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.



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432.943.1100 Fax: 432.943.1101

October 19, 2010

Mr. Leonard Lowe
Oil Conservation Division / EMNRD
1220 South St. Francis
Santa Fe, New Mexico 87505

Re: Proposed Discharge Plan Modifications

Mr. Lowe,

Southern Union Gas Services (SUGS) requests New Mexico Energy, Minerals and Natural Resources Department (EMNRD) approval for proposed modifications to the following Discharge Plans and Permits:

House Compressor Station (GW-243)
Unit "O", Section 11, Township 20 South, Range 38 East, NMPM
Lea County, New Mexico

Trestle Compressor Station (GW-367)
Unit "P", Section 3, Township 21 South, Range 37 East, NMPM
Lea County, New Mexico

West Eunice Compressor Station (GW-270)
Unit "P", Section 36, Township 21 South, Range 36 East, NMPM
Lea County, New Mexico

SUGS approval request was prepared pursuant to WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC.

SUGS proposes to install a three (3) phase separator at each the above listed facilities. The proposed three (3) phase separator will operate at 50-60 PSI and will collect fluids (hydrocarbons and produced water) from the existing two (2) phase Inlet Field Scrubber and the two (2) phase Suction Scrubber and the 2nd/3rd inter stage scrubbers located on each of the compressor units.

Within the proposed three (3) phase separator, hydrocarbon vapors from the fluids will be recycled back to the existing Inlet Field Scrubber for compression in the gas stream.

The produced water will be piped to the existing atmospheric condensate storage tanks. The produced water will be transported, by a New Mexico licensed transporter to a New Mexico Oil Conservation Division (NMOCD) approved disposal.

The hydrocarbons will be injected downstream of the discharge piping of the compressors. The injection of the hydrocarbon stream will employ a positive displacement (PD) pump driven by a five (5) horsepower (hp) electric motor for efficient pressurization and transportation of the fluid.

The proposed process modifications will employ an appropriate number of valves, check valves, pressure safety valves or other safety precautions to safeguard the system. The system will be flexible enough to allow the diversion of the process stream in case of repair or failure within the system. The existing condensate storage tanks will serve as contingency tanks, if required.

South Union Gas Services anticipates the proposed modifications to the listed facilities may:

- Substantially reduce hydrocarbon emissions at the facility by employing a virtually closed system, hydrocarbon vapors will be captured in the three (3) phase separator and reintroduced to the gas stream. Hydrocarbon emissions emanating from the existing storage tanks should be minimal.
- Substantially reduce the potential for liquid hydrocarbon releases at the Compressor Station storage tanks, by transporting the hydrocarbons via pipeline to centralized processing and treating plants. SUGS "pigging" program will ensure hydrocarbon fluids are effectively transported to the plants.

Southern Union Gas Services would like to begin these proposed modifications as soon as possible. SUGS requests approval to operate the above listed facilities under the existing Discharge Plan(s). If approved, the proposed modifications will be documented in the appropriate Compressor Station renewal application and Discharge Plan.

If you have any questions, comments or are in need of additional information, please contact:

Rose L. Slade
rose.slade@sug.com
EHS Compliance Specialist
Southern Union Gas Services
432-940-5147 (cell)
432-943-1116 (office)