

HBP - _____33_____

RENEWAL REQUEST AND APPROVAL

DATE:

____Sept. 18, 2020_____

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Friday, September 18, 2020 9:59 AM
To: 'Campbell, Lawrence (Larry)'
Cc: Egan, Kerry L
Subject: RE: Submittal, Transwestern Pipeline Company Annual Permission to Conduct Hydrostatic Discharges
Attachments: 2020 0918 HBP-033 renewal approval signed.pdf

Larry,

Please see the attached renewal approval for Transwestern's annual temporary permission HBP-033. If you have any questions regarding the approval, please do not hesitate to contact me.

Brad

Brad A. Jones
Environmental Engineer
EMNRD Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505
E-mail: brad.a.jones@state.nm.us
Office/Mobile: (505) 469-7486

From: Campbell, Lawrence (Larry) <Larry.Campbell@energytransfer.com>
Sent: Thursday, September 3, 2020 11:24 AM
To: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>
Cc: Egan, Kerry L <kerry.egan@energytransfer.com>
Subject: [EXT] RE: Submittal, Transwestern Pipeline Company Annual Permission to Conduct Hydrostatic Discharges

[Brad, see attached.](#) Have a great holiday weekend also.....

From: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>
Sent: Thursday, September 3, 2020 11:21 AM
To: Campbell, Lawrence (Larry) <Larry.Campbell@energytransfer.com>
Subject: RE: Submittal, Transwestern Pipeline Company Annual Permission to Conduct Hydrostatic Discharges

Larry,

Is there a way you can email me an electronic copy of what was mailed to the office? If so, please email. Have a great holiday weekend.

Brad

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Environmental Engineer
EMNRD Oil Conservation Division
1220 S. Saint Francis Drive

Santa Fe, New Mexico 87505

E-mail: brad.a.jones@state.nm.us

From: Campbell, Lawrence (Larry) <Larry.Campbell@energytransfer.com>

Sent: Thursday, September 3, 2020 11:17 AM

To: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>

Subject: [EXT] Submittal, Transwestern Pipeline Company Annual Permission to Conduct Hydrostatic Discharges

Brad, FYI, I have submitted to your office today via UPS, Transwestern's application request and fees to conduct hydrostatic test water discharges in NM.....

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

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 Secretary

Adrienne Sandoval, Division Director
Oil Conservation Division



September 18, 2020

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

**Re: Renewal Request for Approval of Annual Temporary Permission to Discharge
Hydrostatic Test Water
Transwestern Pipeline Company, LLC
Permit: HBP-033**

Dear Mr. Campbell:

The Oil Conservation Division (OCD) has received the Transwestern Pipeline Company LLC (Transwestern) email renewal request, dated September 3, 2020, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new natural gas pipelines throughout the State of New Mexico, which expired on June 21, 2020. Also, OCD acknowledges receipt of the filing fee (\$100.00) and temporary permission fee (\$50.00) with the September 3, 2020 submittal.

Based on the information provided in the request, annual temporary permission is hereby granted to Transwestern for the discharge of the hydrostatic test wastewater generated from all new pipeline hydrostatic tests an operator may perform during an approved one-year period with the following understandings and conditions:

1. the volume of the discharge does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources (upon a written request to OCD) is used for each test;
3. email or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event. The notice shall contain the following information:
 - a. the proposed location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
 - b. the date of the proposed discharge;
 - c. the volume of the proposed discharge; and
 - d. the source of hydrostatic test water;

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 (19.15.7.W(4) NMAC), lakebed, sinkhole, or playa lake (19.15.7.P(4) NMAC);
 - c. within an existing wellhead protection area (19.15.7.W(8) NMAC);
 - d. within 500 feet of a wetland (19.15.7.W(9) NMAC); or
 - e. within 500 feet from the nearest permanent residence, school, hospital, institution, or church;
6. no discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED, and OCD prior to the discharge;
7. 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;
8. 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 Water Quality Regulations);
9. Transwestern shall report all unauthorized discharges, spills, leaks, and releases of hydrostatic test wastewater and conduct corrective action pursuant to the Water Quality Regulations of 20.6.2.1203 NMAC and release notification pursuant to OCD Rule 29 (19.15.29 NMAC);
10. 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
11. an annual report, summarizing each test of new pipeline with less than 25,000 gallons per hydrostatic test per discharge event, will be submitted to OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a. the location of hydrostatic test discharge (Section/Township/Range or GPS coordinates);
 - b. the date of each discharge;
 - 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 September 18, 2021.** 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.

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) 469-7486 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad A. Jones", with a large, stylized flourish at the end.

Brad A. Jones
Environmental Engineer

BAJ/baj

Jones, Brad A., EMNRD

From: Campbell, Lawrence (Larry) <Larry.Campbell@energytransfer.com>
Sent: Thursday, September 3, 2020 11:24 AM
To: Jones, Brad A., EMNRD
Cc: Egan, Kerry L
Subject: [EXT] RE: Submittal, Transwestern Pipeline Company Annual Permission to Conduct Hydrostatic Discharges
Attachments: NM_Regional_ hydrostatic discharge application to OCD_200903.pdf

Brad, see attached. Have a great holiday weekend also.....

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Brad

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To: Jones, Brad A., EMNRD <brad.a.jones@state.nm.us>
Subject: [EXT] Submittal, Transwestern Pipeline Company Annual Permission to Conduct Hydrostatic Discharges

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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

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ENERGY TRANSFER PARTNERS

September 3, 2020

Transwestern Pipeline Company

UPS Tracking No. 1Z 875 525 03 9481 2524

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South Francis Drive
Santa Fe, New Mexico 87505

RE: Transwestern Pipeline Company, LLC, 2020 Renewal Request of HBP-033, Annual-Temporary Permission to Discharge Hydrostatic Test Water

Dear Mr. Jones;

Transwestern Pipeline Company LLC, (Transwestern) is requesting renewal of Permit No. HBP-033 for Annual-Temporary Permission to discharge hydrostatic test water from new natural gas pipelines owned and operated by Transwestern Pipeline Company in the State of New Mexico. Discharge will occur within Transwestern's easements and right-of-ways and on private parcels that contain our facilities. Our easements and right-of-ways occur on federal, state, and private land. Discharge will be performed in a manner that controls runoff, soil erosion and discharging sediment from the sites. Methods of controlling runoff include: detention basins and trenches that provide soil percolation and evaporation, water truck spraying for dust suppression, and application to excavated soils and backfill to aid in compaction.

Transwestern understands that the annual-temporary permission authorizes the discharge of hydrostatic test water throughout the State of New Mexico under the following conditions:

1. The volume does not exceed 25,000 gallons per hydrostatic test and pipe cleaning event;
2. Only water from public/municipal water supply or other approved sources will be used for each test;
3. Transwestern will provide oral or written notification to the Oil Conservation Division (OCD) 72 hours prior to each hydrostatic discharge event;
4. Test water will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;

6381 N. Main
Roswell, NM 88201

Additionally, 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 500 feet of a wetland, or
 - e. Within 500 feet from the nearest residence, school, hospital, institution, or church.
5. The discharge will not cause any fresh water supplies to be degraded and shall adhere to the standards as set forth in Subsections A, B, and C of New Mexico Administrative Code (NMAC) 20.6.2.3103 for maximum allowable concentration of contaminants in groundwater unless existing conditions exceed the standard (New Mexico Water Quality Control Commission Regulation);
 6. Best management practices will be implemented to contain the discharge onsite, ensure it does not impact adjacent property, and to control erosion;
 7. The discharge will be in accordance with our easement/right-of-way agreements and the landowner(s) of each proposed discharge site and/or collection/retention location will be properly notified of the activities prior to each proposed event; and
 8. Transwestern will submit an annual report, summarizing all tests and cleaning actions using less than 25,000 gallons per event, to the OCD within 45 days following expiration of the Annual-Temporary Permission to discharge. This report shall contain the following information:
 - a. Location of the hydrostatic test (Section, Township, Range or GPS coordinates);
 - b. Date of each test;
 - c. Volume of each discharge; and
 - d. Source and quality of test water (with laboratory analysis, if necessary).

Enclosed find check no. 260501172 in the amount of \$150.00 to cover the filing fee and permission fee made payable to the Water Quality Management Fund.

Should you have any questions, please feel free to contact undersigned at (505-625-8022); or by email at larry.campbell@energytransfer.com.

Respectfully submitted,



Larry Campbell
Sr. Environmental Specialist
6381 North Main
Roswell, NM 88201

TRANSWESTERN PIPELINE CO LLC
8111 Westchester Dr., Ste 600
Dallas, TX 75225

Page: 1 of 1

Payment Date: 08/31/2020

Check No.: 260501172

Check Date: 08/31/2020

Vendor: WATER QUALITY MGMT FUND

Vendor ID: 1000002788

Invoice Number	Invoice Date	Document Number	Reference	Gross Amount	Discount	Net Amount
ST_17254	08/26/2020	5800005248	PERMIT # HBP-033	150.00	0.00	150.00
Check Total.....						\$ 150.00

PLEASE DETACH BEFORE DEPOSITING CHECK. For inquiries call:214-840-5422 or email accountspayable@energytransfer.com

THIS CHECK IS VOID WITHOUT A BLUE & GREEN BACKGROUND - THIS IS WATERMARKED PAPER - HOLD TO LIGHT TO VERIFY WATERMARK

TRANSWESTERN PIPELINE CO LLC
8020 Park Lane, Suite 200
Dallas, TX 75231
Vendor ID: 1000002788

Payable Through
WELLS FARGO BANK, N.A.

88-158
531

Check No.:
260501172

Check Date:
08/31/2020

VOID AFTER 90 DAYS

PAY:
***ONE HUNDRED FIFTY -----

\$150.00

To The
Order of:

WATER QUALITY MGMT FUND
OIL CONSERVATION DIVISION
1220 S ST FRANCE DR
SANTA FE, NM 87505-4225

Thomas E. Long

Authorized Signature

SIGNATURE HAS A COLORED BACKGROUND - BORDER CONTAINS MICROPRINTING