

**GW - 113**

**PERMITS,  
RENEWALS,  
& MODS  
Application**



Northern Natural Gas Company  
700 South Fillmore, Suite 330  
Amarillo, TX 79101  
806-342-2035

February 7, 2005

New Mexico Environmental Department  
Air Quality Bureau  
2048 Galisteo St.  
Santa Fe, NM. 87505

RE: Voidance of Title V Permit Number P-152  
Eunice Compressor Station, Northern Natural Gas Company  
Lea County, New Mexico

Northern Natural Gas Company request that the Title V Permit Number P152 at the Eunice Compressor Station be voided. The station has not run since June 2000; and there are no plans for the station to ever run again.

Thank you for your time and consideration in this matter. Should you have questions or comments concerning this request, please contact me at 806-345-3502.

Respectfully submitted,

Larry "Rick" Loveless  
Division Environmental Specialist  
Amarillo Regional Office

This letter IS Regarding the GW-113  
Permit Number.

**Lowe, Leonard, EMNRD**

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**From:** Felts, Richard [Richard.Felts@nngco.com]  
**Sent:** Friday, February 01, 2008 12:57 PM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** Closure letter  
**Attachments:** Amarillo\_0201132412\_001.pdf

Leonard,

Here is a closure letter that we sent to New Mexico Environmental

Thanks  
Richard

<<Amarillo\_0201132412\_001.pdf>>

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**Lowe, Leonard, EMNRD**

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**From:** Felts, Richard [Richard.Felts@nngco.com]  
**Sent:** Friday, February 01, 2008 6:20 AM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** RE: GW-113, Northern Natural Gas Company

Mr.. Lowe

Northern Natural Gas still owns the Eunice compressor station. We shut the station down about 5 to 10 years ago. I will try to find out exactly when we shut the station down. If you have any questions please give me a call.

Thanks  
Richard  
Office: 806-345-3502  
Cell: 806-282-8311

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**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Thursday, 01 31, 2008 15:24  
**To:** Felts, Richard  
**Subject:** GW-113, Northern Natural Gas Company

Mr. Felts,

Do you know if SUG bought the Eunice Compressor Station located in NW/4 of Section 27, 22 South, 37 East, Lea County, N.M.? This facility was formally owned by Northern Natural Gas Company.

Let me know.

Thank you,

llowe

**Leonard Lowe**  
Environmental Engineer  
Oil Conservation Division, EMNRD  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505  
Phone: (505) 476-3492  
Fax: (505) 476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)

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2/1/2008



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Betty Rivera**  
Cabinet Secretary

September 3, 2002

**Lori Wrotenbery**  
Director  
Oil Conservation Division

CERTIFIED MAIL  
RETURN RECEIPT NO. 3929-9604

Mr. Larry Campbell  
Transwestern Pipeline Co.  
6381 North Main  
Roswell, NM 88201

RE: Discharge Plan Renewal GW-113  
Transwestern Pipeline Co.  
Eunice Compressor Station  
Lea County, New Mexico

Dear Mr. Campbell:

The ground water discharge plan renewal GW-113 for the Transwestern Pipeline Co. Eunice Compressor Station located in the NW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within thirty (30) days of receipt of this letter.** New mailing address appears below.

The discharge plan renewal application letter, dated December 2, 2001, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations includes all earlier applications and approvals and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Note Section 3109.G, which provides for possible future amendment of the plan. Be advised that approval of this plan does not relieve Transwestern Pipeline Co. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Transwestern Pipeline Co. of its responsibility to comply with any other governmental authority's rules and regulations.

Also be advised that all exposed pits, including lined pits and open tanks (exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

Section 3104 of the regulations provides: "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C, Transwestern Pipeline Co. is required to notify the Director of any facility

Mr. Larry Campbell  
GW- 113  
September 3, 2002  
Page 2

expansion, production increase or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on June 19, 2007, and Transwestern Pipeline Co. should submit an application in ample time before this date. Section 3106.F of the regulations states that if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan renewal application for the Transwestern Pipeline Co. Eunice Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application is assessed a filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor station facilities with a rating of greater than 1,000 horsepower of \$1,700.00.

On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson  
Chief, Environmental Bureau  
Oil Conservation Division

RCA/eem  
Attachment

Xc: OCD Hobbs Office

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

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87503  
SEP 09 2002

Sent To  
LARRY CAMPBELL / TRANSWESTERN  
Street, Apt. No.,  
or PO Box No. 6381  
City, State, ZIP  
ROSWELL, NM 88201

4096 9604  
6296 3929  
4000 4000  
0457 1002

GN113 ED

PS Form 3800, January 2001  
See Reverse for Instructions

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-113  
TRANSWESTERN PIPELINE CO.  
EUNICE COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
September 3, 2002

1. **Payment of Discharge Plan Fees: The \$100.00 filing fee and the \$1,700.00 flat fee are due upon receipt of this approval; total due upon receipt, \$1,800.00.** All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.
2. **Commitments:** Transwestern Pipeline Co. will abide by all commitments submitted in the discharge plan renewal application letter dated December 2, 2001 and these conditions for approval.
3. **Waste Disposal:** All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis. **Rule 712 Waste:** Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
  1. the waste stream is identified, and authorized, as such in the discharge plan, and;
  2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.
4. **Drum Storage:** All drums containing material other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
5. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
6. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing

tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.
9. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All below grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.
10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
14. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
15. Storm Water Plan: Transwestern Pipeline Co. shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then Transwestern Pipeline Co. shall: take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.
16. Closure: The OCD will be notified when operations of the Eunice Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
17. Conditions accepted by: Transwestern Pipeline Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern Pipeline Co. further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

Transwestern Pipeline Co.

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

ATTACHMENT TO THE DISCHARGE PLAN GW-113 RENEWAL  
TRANSWESTERN PIPELINE COMPANY  
EUNICE COMPRESSOR STATION  
DISCHARGE PLAN APPROVAL CONDITIONS  
(November 10, 1997)

1. Transwestern Commitments: Transwestern will abide by all commitments submitted in the discharge plan application dated June 23, 1997.
2. Waste Disposal: All wastes shall be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.
4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.
8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.
10. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.
11. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.
12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.
13. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
14. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
15. Certification: Transwestern, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted: 

TRANSWESTERN PIPELINE COMPANY

by Regional Director  
Title