GW - 147

PERMITS, RENEWALS, & MODS Application



WO APPROVAL REQ WO APPROVAL REQ HATTE IS CEAVING N.M.

March 29, 2012

UPS No. 1ZR173A30297355290

Mr. Leonard Lowe Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505

Subject : El Paso Natural Gas Company's Deming Station Discharge Permit GW-147 Deming Compressor Station (SW/4 of SE/4 of Sec 32, T23S, R11 W) Luna County, New Mexico

Dear Mr. Lowe:

El Paso Natural Gas Company (EPNG) is notifying NMOCD that Deming Compressor Station is shutdown. The Deming Discharge Plan will expire on August 19, 2013. An application for renewal will not be submitted since the station will not operate.

Deming Compressor Station is old, obsolete and underutilized and can be abandoned without adversely affecting system operations or services and the abandonment will save El Paso's customers the costs associated with operating and maintaining the station facilities. The Federal Energy Regulatory Commission has given approval for station abandonment in place.

The Deming Station has been completely isolated from the mainline system. There is no longer any piping connections between the plant and the mainlines. The boundary fence will remain, as EPNG owns the property and will continue to use offices at the station as our Deming Area Office.

EPNG plans to decommission the facility and abandon in place. Our plan is to remove liquids from the site. With removal of all known liquids at the site, there will be reduced chance of spills and impact to the environment.

"A" Plant Tanks

- Four 1000 gal Jacket water recovery tanks (below grade). EMPTY.
- One 1000 gal Oil water recovery tank (below grade). EMPTY.
- One 4,250 gallon below-grade fiberglass reinforced plastic (FRP) receives oil/water from "A" Plant basement and "B" Plant basement(Tank V-9126). EMPTY.
- One 4,250 gallon below-grade fiberglass reinforced plastic (FRP) receives oil fraction from oil/water separator (Tank V-9127). EMPTY.
- One 4,250 gallon below-grade fiberglass reinforced plastic (FRP) natural gas stream scrubber liquids (Tank V-9128). EMPTY.
- One 872 gal used oil tank within containment. EMPTY.
- One 220 gal Acid tank (1/3 full) within containment. Will be EMPTY within 6 months.

"B" Plant Tanks

- Three 1000 gal Jacket water recovery tanks (below grade). EMPTY
- Four 8820 gal Engine Lube oil tanks with containment. Will be EMPTY within 6 months.
- One 600 gal Acid tank with containment. EMPTY.
- One 220 gal Acid tank with containment. EMPTY.
- One 872 gal portable used oil tank with containment. EMPTY

Compressor Engines - Remove all liquids within 6 months. Recycle the oil and dispose any cooling water at an offsite facility that will accept the liquids.

Drum Storage Area North of Shop – No drums with liquids are stored at the site.

Double Lined Pond – There has not been any wastewater blowdown into the pond for many years. If there is water in the pond, it is only rain water.

The new oil and used oil will be sent to :

Solvent Recy-Clean 1850 West Broadway Rd. Suite 110 Phoenix, AZ 85041 602-268-2600

The oil cooling water and jacket cooling water will be sent to either:

Solvent Recy-Clean 1850 West Broadway Rd. Suite 110 Phoenix, AZ 85041 602-268-2600

Waste Management Butterfield 40404 S. 99th Avenue Mobile, AZ 85239 602-256-0630

The sulfuric acid will be sent to :

Clean Harbors Arizona, LLC EPA ID: AZD049318009

1340 West Lincoln Street Phoenix, AZ 85007 Phone: 602.462.2300 Fax: 602.462.2391

After removal of liquids, the plan is to abandon in place. Please let us know if you have any concerns or questions regarding abandonment in place of this facility. I will be taking vacation during the first week of April and returning to the office on April 10th. My telephone number is (520) 663-4222 and my email address is <u>anu.pundari@elpaso.com</u>.

Sincerely,

ann Pundan

Anu Pundari Principal Environmental Engineer

| Proof of Delivery | Close Window |
|--------------------------------------|------------------------------------|
| Dear Customer, | |
| This notice serves as proof of deliv | ery for the shipment listed below. |
| Tracking Number: | 17R173A30297355290 |
| Service: | UPS 2nd Day Air® |
| Shipped/Billed On: | 03/29/2012 |
| Delivered On: | 04/03/2012 9:31 A.M. |
| Delivered To: | 1220 S SAINT FRANCIS DR |
| | SANTA FE, NM, US 87505 |
| Signed By: | ORTEGA |
| Left At: | Front Desk |
| Thank you for giving us this opport | unity to serve you. |
| Sincerely, | |
| LIPS | |
| | |
| Tracking results provided by UPS: | 04/03/2012 1:55 P.M. ET |
| Print This Page | Close Window |

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Bc: Deming Station – Wastewater Dave Campbell/Deming Station /File 290

Electronic: Sandra Miller



2009 OCT 23 PM 1 02

October 20, 2009

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UPS No. 1ZR173A30294158875

Mr. Leonard Lowe Environmental Engineer Oil Conservation Division/EMNRD 1220 S. St. Francis Drive Santa Fe, N.M. 87505

Subject : El Paso Natural Gas Company's Deming Station Discharge Permit GW-147 Deming Compressor Station (SW/4 of SE/4 of Sec 32, T23S, R11 W) Luna County, New Mexico

Dear Mr. Lowe:

Attached is the signed Discharge Permit for your files. If you have any questions, please contact me at (520) 663-4222.

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Sincerely,

ann Pundan

Anu Pundari Principal Engineer

ATTACHMENT DISCHARGE PERMIT APPROVAL CONDITIONS

1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for a compressor station with horsepower greater than 1001 HP is \$1700.00 and was processed Please submit this amount with a signed copy of the permit and return to the OCD within 30 days. Checks should be made out to the New Mexico Water Quality Management Fund.

2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. The permit will expire on August 19, 2013 and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*

3. Permit Terms and Conditions: Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its July, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. Modifications: WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. Waste Disposal and Storage: The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class

II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCDapproved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Part 35 Waste: Pursuant to OCD Part 35 (19.15.35.8 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in

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secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not 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 (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days. The OCD does not consider covering contaminated areas a remediation of the spill/release.

16. OCD Inspections: The OCD performed an inspection of this facility on December 2, 2008. As a result of this inspection OCD noted:

Liquids in the secondary containment leak detection system for the pond. The Owner/Operator shall verify the integrity of the overall pond and shall submit a work plan for this investigation by October 15, 2009.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An</u> <u>unauthorized discharge is a violation of this permit.</u>

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: The owner/operator shall ensure that all employees understand all permit conditions.

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. **Certification:** (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information. I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

<u>El Pass Matoral Gas G.</u> Company Name-print name above

David W. Campbell Company Representative- print name

Company Representative- Signature

Title Operations Manager Date: 10/12/29



September 25, 2009

UPS No. 1ZR173A30294217953

2009

- CIFINED OCD

Mr. Leonard Lowe **Environmental Engineer Oil Conservation Division/EMNRD** 1220 S. St. Francis Drive Santa Fe, N.M. 87505

El Paso Natural Gas Company's Deming Station Discharge Permit GW-147, Deming Compressor Station (SW/4 of SE/4 of Sec 32, T23S, R11 W) Luna County, New Mexico Subject :

Dear Mr. Lowe:

Attached are revisions and clarifications to the Discharge Plan Renewal Application sent July 28, 2008 that Richard Duarte and myself discussed during our telephone conference on September 16, 2009. Please include this letter with the permit documents.

If you have any questions, please contact me at (520) 663-4222.

Sincerely,

ann Pundan

Anu Pundari **Principal Engineer**

El Paso Natural Gas Company Deming Compressor Station DISCHARGE PLAN RENEWAL APPLICATION REVISIONS

Revise Item 2: New

Local Representative:

Anu Pundari El Paso Natural Gas Company 5151 E. Broadway Suite 1680 Tucson, AZ 85711 (520) 663-4222

Mailing Address:

David W. Campbell, Area Manager

Revise Item 5: Addition to bullets

To accomplish natural gas compression, Deming Station utilizes the following:

- (1) 4,250 gallon below-grade fiberglass reinforced plastic (FRP) natural gas stream scrubber liquids (Tank V-9128)
- (4) 1,000 gallon below-grade "A" Plant FRP jacket water tanks (liquids in tank 72 hours or less)
- (1) 1,000 gallon below-grade "A" Plant FRP oil water tank (liquids in tank 72 hours or less)
- (1) 220 gallon aboveground "A" Plant acid tank with concrete containment
- (3) 1,000 gallon below-grade "B" Plant FRP jacket water tanks (liquids in tank 72 hours or less)
- (1) 600 gallon aboveground "B" Plant acid tank with concrete containment
- (1) 220 gallon aboveground "B" Plant acid tank with concrete containment

Revise Item 5: Cooling Towers

Current Language : The site contains acid tanks that will be removed once the acid is used up. These tanks are housed inside a concrete curbed secondary containment structure and will likely be removed in late 2008 or early 2009.

New Language: The site contains acid tanks. There are two acid tanks located on the west side of "B" Plant cooling tower. One tank is 600 gallons and one tank is 220 gallons but is currently empty. In the future, the contents of the 600 gallon tank (which is 1/3 full) will be transferred to the 220 gallon tank. One 220 gallon FRP acid tank is located on the west side of "A" plant cooling tower.

Revised Item 5: 872 gallon Used Oil ASTs

Current language: 872- Gallon Portable Used Oil ASTs

Two 872 –gallon portable used oil steel ASTS are utilized intermittently to store used oil from the compressor engines and compressors undergoing maintenance. When in use, they are placed inside secondary containment composed of hay bales with a plastic tarp liner. When tank emptying is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tanks. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. These tanks are stored at the east end of the compressor buildings.

New Language:

872- Gallon Portable Used Oil ASTs

Two 872 –gallon used oil steel ASTS are utilized to store used oil from the compressor engines and compressors undergoing maintenance. There are within concrete secondary containment. When tank emptying is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tanks. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. These tanks are stored at the east end of the compressor buildings.

Revised Item 5: Drum Storage

Current language: This drum storage area is located north of the shop.

New language: The drum storage rack is on the north side of A Plant spray pump builing.

<u>Revised Item 5: Natural Gas Scrubbers (Inlet and Fuel)</u>

Current Language: Any liquids generated by the suction scrubbers (blowdown) and fuel gas filters are discharged into the oil/water separator system.

New Language : Any liquids generated by the suction scrubber (blowdown) are discharged to a below-grade 4,250 gallon FRP tank (tank V-9128). Any liquids generated by the fuel gas filters are discharged into the oil/water separator system.

Revised Item 5:

Current Language: 4,250 Gallon Natural Gas Liquids/Used Oil Below Grade Storage Tanks (V-9126 and V-9127)

Current Language: These tanks utilize polyethylene liners as secondary containment that, through 6-inch PVC piping, allows for leak detection. While in operation secondary containment is inspected at least once a week. The last hydrostatic test for these tanks was accomplished on October 21, 2002, a new hydrostatic test is being scheduled for late 2008.

New Language : These tanks utilize polyethylene liners with a 6-inch PVC piping which allows for leak detection. While in operation, the leak detection will be inspected monthly. A visual inspection of the tanks was conducted in 2009.

<u>Revised Item 5 : Underground Drain Lines and Compressor Building Basement</u></u>

Current Language: Underground drain lines are hydrostatically tested every five years during the annual station shutdown.

New Language : Underground drain lines are hydrostatically tested on a periodic basis. The process was begun in late 2008. Repairs were made to the underground drain line system as needed. A drain line integrity test is scheduled for September 29, 2009.

Revised Item 5: Drum Storage

Current Language: This drum storage area is located north of the shop.

New Language: There are two drum storage areas. One is on the north side of "A" Plant with a drum storage rack. One is within the Bulk new compressor oil storage tank concrete containment area located west of "B" Plant.

Item 6: Additional Tanks

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| Container | ID | Material | Form | Volume | Location | Containment |
|--------------|--------|----------|--------|---------------|--------------|--------------|
| Closed FRP | V-9128 | Scrubber | Liquid | 4,250 gallons | East Side of | Polyethylene |
| Below grade | | liquids | | | Plant | liner |
| with | | | | | | |
| polyethylene | | | | | | |
| secondary | | | | | | |
| containment | | | | | | |
| Closed FRP | Acid | Acid | Liquid | 220 gallons | Near cooling | Concrete |
| | | | | | towers | Containment |
| Closed FRP | Acid | Acid | Liquid | 600 gallons | Near cooling | Concrete |
| | | | | | towers | Containment |
| Closed FRP | Acid | Acid | Liquid | 220 gallons | Near cooling | Concrete |
| | | | _ | | towers | Containment |

** There are (5) below grade 1000 gallon FRP "A" Plant tanks and (3) below grade 1000 gallon FRP "B" Plant tanks associated with the jacket water/oil water cooling system. These tanks are used to temporarily store liquids during engine maintenance activities. Typically, the contents of the tanks are pumped out within 72 hours.

Item 6: Revision to Tank Description

| Current | | | | | | |
|---------------------------------|---------------|---|--------|-------------|---------------------------------------|--|
| Container | ID | Material | Form | Volume | Location | Containment |
| Portable closed Steel AST | Used oil tank | Used oil from the compressor engines | Liquid | 872 gallons | East of compressor building #1 | When in use, hay bales and plastic tarp. |
| Portable Steel AST | Used oil tank | Used oil from the compressor engines | Liquid | 872 gallons | East of compressor building # 2 | When in use, hay bales and plastic tarp. |

New:

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| 1 | | | | | | |
|---------------------------------|---------------|---|--------|-------------|--------------------------|-------------|
| Container | ID | Material | Form | Volume | Location | Containment |
| Portable closed Steel AST | Used oil tank | Used oil from the compressor engines | Liquid | 872 gallons | East end of "A" Plant | Concrete |
| Portable Steel AST | Used oil tank | Used oil from the compressor engines | Liquid | 872 gallons | East end of "B" Plant | Concrete |

Item 8 : Liquid/Solid Waste Collection/Treatment/Disposal Procedures - Additional wastes

| Type of Effluent | Collection | Storage | Hauler | Disposition |
|----------------------|--------------------|-------------------|---------------------|----------------------|
| Scrubber Liquids | Drained via the | Below Grade | Thermo-Fluids | Recycled by a |
| | facility drain | storage tank – V- | | hydrocarbon |
| | system to the tank | 9128 | | recycling facility |
| | | - | | (Mesa Oil or Safety |
| | | | | Kleen or Thermo- |
| | | | | Fluids) |
| Pipe Coating, Non- | Specific | Drums, Rolloff | Chemical | Non Hazardous |
| Hazardous Spent | Maintenance | Container | Transportation Inc. | Facility permitted |
| Abrasive Blast | Projects | | - | to accept waste |
| Media, Asbestos | | | | stream |
| Containing | | | | |
| Materials, Non | | | | |
| hazardous | | | | |
| equipment cleanout | | | As needed, | |
| waste, spent glycol, | | | Operations | |
| NORM waste, oily | | | Personnel for | |
| absorbents, oily | | , | certain waste | |
| soil, non-hazardous | | | streams | |
| spill residues, or | | | | |
| certain other non- | | | | |
| hazardous wastes | | | | |
| Profiled Hazardous | Specific | Drums, Rolloff | Chemical | Hazardous Waste |
| Waste such as | Maintenance | Container, Tanks | Transportation, Inc | Disposal Facility |
| Spent Solvents or | Projects | | | that approves |
| Certain Spill | | | | waste profile and is |
| Residues or Certain | | | | permitted to accept |
| Equipment | | | | hazardous waste |
| Cleanout wastes or | | | | |
| Wastos | | | | |
| TSCA Waste | Specific | Drums Polloff | Chomical | TSCA Disposal |
| I SCA Waste | Maintenance | Container | Transportation Inc | Facility that |
| | Projects | Container | | annroves waste |
| | | | | nrofile and is |
| | | | | prome and is |
| | | | | TSCA waste |
| NORM regulated | Specific | Drums, Rolloff | Chemical | NORM Disposal |
| Waste | Maintenance | Container | Transportation, Inc | Facility that |
| | Projects | | 1 | approves waste |
| | , | | | profile and is |
| | | | | permitted to accept |
| | | | | NORM waste |
| General Trash | Onsite Dumpster | Dumpster | As needed by | City of Deming |
| includes but not | | | Hamill Disposal | Landfill |
| limited to empty | | | Service | |
| aerosol cans, empty | | | | |
| drums or other | | | | |
| empty containers, | | | | |

| | | a second s | |
|-----------------------|---|---|--|
| fluorescent light | | | |
| bulbs, oily materials | | | |
| such as cardboard, | · | | |
| pallets, dry rags, | | | |
| empty paint cans, | | | |
| dry paint brushes, | | | |
| paper, cardboard, | | | |
| pigs with no oily | | | |
| sludge, etc | | | |

Item 10 : Routine inspection and maintenance plan to ensure permit compliance

Current Language: When in operation, this site is visually inspected by EPNG personnel a minimum of once per day during the week while in operation and underground piping is hydrostatically tested every five years. If the station is not in operation, a visual inspection is accomplished as necessary.

New Language : When in operation, this site is visually inspected by EPNG personnel a minimum of once per day during the week while in operation. Underground drain lines are hydrostatically tested on a periodic basis. If the station is not in operation, a visual inspection is accomplished as necessary.

Item 11 : Contingency Plan for reporting and clean up of spills or releases

Current Language: As stated, hydrostatic testing of buried components will be accomplished every five years.

New Language : Underground drain lines are hydrostatically tested on a periodic basis.

Current Language : Commercial absorbent pads or rags will be used to absorb small spills. Any oil-bearing soil will be disposed of in New Mexico at an NMOCD- approved facility that approves the waste profile. Spill containment kits will be located at the facility.

New Language: Commercial absorbent pads or rags will be used to absorb small spills. If disposed in the State of New Mexico, any oil-bearing soil will be disposed at an NMOCD- approved facility that approves the waste profile. Spill containment kits will be located at the facility.

Other Information:

<u>Waste Disposal and Storage</u>: All wastes will be disposed at an approved facility that accepts the wastes. RCRA, TSCA, NORM, non- hazardous, and non-exempt waste will be disposed upon proper waste determination.

Below-Grade Tanks/Sumps and Pits/Ponds: All existing below-grade tanks and sumps without secondary containment and leak detection will be inspected annually via a visual inspection.

Process, Maintenance and Yard Areas – The entire station yard area is not paved or curbed since it is impractical. Precautions are taken to prevent spills onto the ground and any spills are addressed promptly. There is a spill kit readily available at the site.

Labeling: The emergency notification information is on a sign when first entering the facility. The sign includes information regarding a 24 hour phone number to call in case of any emergency. In addition, Material Safety Data Sheets on any products/chemicals include an emergency phone number.

UPDATED DRAWING DEMING STATION DISCHARGE PLAN





Bill Richardson Governor Joanna Prukop Cabinet Secretary

Mark Fesmire Division Director Oil Conservation Division



September 9, 2009

Mr. Richard Duarte El Paso Natural Gas 3801 Atrisco Blvd. NW Albuquerque, N.M. 87120

 Re: Renewal Discharge Permit, GW-147
 EPNG Deming Compressor Station
 SW/4 SE/4 in Section 32, Township 23 South, Range 11 West, NMPM, Luna County, New Mexico

Dear Mr. Duarte:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the **El Paso Natural Gas Company's** discharge permit for the above referenced site contingent upon the conditions specified in the enclosed **Attachment to the Discharge Permit**. 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 30 days of receipt of this letter including permit** fees.

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

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Glenn von Gonten Acting Environmental Bureau Chief

Attachments-1 xc: OCD District Office

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ATTACHMENT DISCHARGE PERMIT APPROVAL CONDITIONS

1. Payment of Discharge Plan Fees: All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of \$100.00, plus a flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required \$100.00 filing fee. The flat fee for a compressor station with horsepower greater than 1001 HP is \$1700.00 and was processed Please submit this amount with a signed copy of the permit and return to the OCD within 30 days. Checks should be made out to the New Mexico Water Quality Management Fund.

2. Permit Expiration, Renewal Conditions and Penalties: Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. The permit will expire on August 19, 2013 and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved. *Expired permits are a violation of the Water Quality Act {Chapter 74, Article 6, NMSA 1978} and civil penalties may be assessed accordingly.*

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3. Permit Terms and Conditions: Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its July, 2008 discharge plan application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. Modifications: WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. Waste Disposal and Storage: The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class

II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCDapproved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. OCD Part 35 Waste: Pursuant to OCD Part 35 (19.15.35.8 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. Waste Storage: The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. Process, Maintenance and Yard Areas: The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in

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secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not 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 (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Part 29 (19.15.29 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days. The OCD does not consider covering contaminated areas a remediation of the spill/release.

16. OCD Inspections: The OCD performed an inspection of this facility on December 2, 2008. As a result of this inspection OCD noted:

Liquids in the secondary containment leak detection system for the pond. The Owner/Operator shall verify the integrity of the overall pond and shall submit a work plan for this investigation by October 15, 2009.

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. <u>An</u> <u>unauthorized discharge is a violation of this permit.</u>

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions: The owner/operator shall ensure that all employees understand all permit conditions.

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21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferor shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.

Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure Plan and Financial Assurance: Pursuant to 20.6.2.3107 NMAC an owner/operator shall notify the OCD when any operations of the facility are to be discontinued for a period in excess of six months. Prior to closure, or as a condition of this permit, or request from the OCD, the operator will submit an approved closure plan, modified plan, and/or provide adequate financial assurance.

23. Certification: (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. Owner/Operator further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively

<u>Conditions accepted by</u>: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

Company Name-print name above

Company Representative- print name

Company Representative- Signature

Title_____

Date:_____

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THE SANTA FE NEW - MEXICAN

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2008 SEP 29 PM 2 48

Tim Griswold NM EMNRD OIL CONSERV 1220 S ST FRANCIS DR **SANTA FE NM 87505**

NOTICEOF

PUBLICATION

STATE OF NEW

MEXICO

ENERGY, MINERALS

AND NATURAL RESOURCES

DEPARTMENT OIL CONSERVATION

Notice is hereby given that pursuant to New Mexico Water Quality Control. Commission Regulations (20623106 NMAC), the following dis-charge permit appli-cation(s) has been submitted to the Di-rector of the New Mexico Oli Conserva-tion Division ("NMOCD") 1220 S. Saint Francis Drive, Santa Fe New Mexico 87505 Telephone (505) 476:3440:

(GW-147) El Paso Natural Gas Com-pany, 3801 Atrisco Bivd NW, Albuquer-que, New Mexico 87120 has submitted an application for re-newal of the dis

newal of the dis-charge plan for their

charge plan for their Deming Compressor Station located in the SW/4 of the SE/4 of Section 32, Township 23 South, Range 11 West, NMPM (Luna County) approxi-mately 14 miles west of Deming, New Mex-ico. The facility will be used for the com-pression of pipeline quality natural gas

quality natural gas. Materials generated

Materials generated and/or stored at the facility include but may not be limited to: new and used lubri-cating oils, coolant water, filters, paints, detergents and

water, mers, paints detergents, and cleaning supplies. The aquifer beneath this facility lies at an approximate depth of 200 feet below ground

Surface with a con-centration of total dissolved solids less than 400 milligrams

than 400 milligrams per liter. The dis-charge plan ad-dresses how process materials and waste will be properly han dled, stored, and dis-posed of, including how, spills, leaks, and other accidental dis-charges to the sur-

ALTERNATE ACCOUNT: 56689 AD NUMBER: 00268731 ACCOUNT: 00002212 LEGAL NO: 86017 P.O. #: 52100-00000137 283 LINES 1 TIME(S) 246.40 AFFIDAVIT: 7.00 OK to P26 TAX: 20.11TOTAL: 273.51

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO COUNTY OF SANTA FE

I, L. Paquin, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 86017 a copy of which is hereto attached was published in said newspaper 1 day(s) between 09/24/2008 and 09/24/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 24th day of September, 2008 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 24th day of September, 2008

Mul Notary

Commission Expires:



www.santafenewmexican.com

charges to the sur-face will be managed Santa Fe, NM 87501-2021 • 505-983-3303 • fax: 505-984-1785 • P.O. Box 2048, Santa Fe, NM 87504-2048

(HIP-110) Public Serv-ice Company of New dental discharges to the director will ap-Mexico (PNM), Al-the surface will be prove or disapprove varado Square, Albu-protect fresh water. 87158-2104, has sub-mitted an application The NMOCD has desition and information querque, New Mexico
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to 264 mg/l. The plan held the Director will consists of a descrip-approve or disap-disapprove the proposed and location for re-tention, and testing of water and solids, in-cluding how spills, ments received if a

ICO OIL CONSERVATION

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-147) El Paso Natural Gas Company, 3801 Atrisco Blvd NW, Albuquerque, New Mexico 87120 has submitted an application for renewal of the discharge plan for their Deming Compressor Station located in the SW/4 of the SE/4 of Section 32, Township 23 South, Range 11 West, NMPM (Luna County) approximately 14 miles west of Deming, New Mexico. The facility will be used for the compression of pipeline quality natural gas. Materials generated and/or stored at the facility include but may not be limited to: new and used lubricating oils, coolant water, filters, paints, detergents, and cleaning supplies. The aquifer beneath this facility lies at an approximate depth of 200 feet below ground surface with a concentration of total dissolved solids less than 400 milligrams per liter. The discharge plan addresses how process materials and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en español, sirvase comunicarse por favor:

New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio'n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 18th day of September 2008.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director



Bill Richardson Governor Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary

Mark Fesmire Director Oil Conservation Division



September 18, 2008

Mr. Richard Duarte El Paso Natural Gas Company 3801 Atrisco Blvd. NW Albuquerque, New Mexico 87120

Re: Application for Renewal of Discharge Permit GW-147

Mr. Duarte:

The Oil Conservation Division (OCD) has received El Paso Natural Gas Company's application dated July 23, 2008 for renewal discharge permit GW-147 for the compressor station located in the SW/4 of the SE/4 (Unit O) of Section 32 in Township 23 South, Range 11 West, NMPM, within Luna County west of Deming, New Mexico. With the receipt on September 2, 2008 by OCD of the filing fee and subsequent to preliminary review, the application can now be deemed "administratively complete".

Therefore, the New Mexico Water Quality Control Commission (WQCC) regulations notice requirements pursuant to 20.6.2.3108 NMAC must be satisfied and demonstrated to the OCD. The OCD will also provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3465 or by email at *jim.griswold@state.nm.us*. Please refer to permit GW-147 in all future communication. On behalf of the OCD, I wish to thank you and your staff for your continued cooperation during the review process.

Respectfully,

al

Jim Griswold Hydrologist

JG/jg cc: OCD District II Office, Artesia

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

| I hereby acknowledge receipt of check N | Jo dated 8/24/08 |
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| or cash received on in the a | mount of \$_1700 |
| from El Preso Mater. | al GAS Co. |
| for <u>GW-147</u> | |
| Submitted by: LAWICIE | Romero Date: 9/12/08 |
| Submitted to ASD by: | Romen Date: 9/13/08 |
| Received in ASD by: | Date: |
| Filing Fee New Facili | ty Renewal |
| Modification Other | |
| Organization Code <u>521.07</u> | Applicable FY2004 |
| To be deposited in the Water Quality Mar | nagement Fund. |
| Full Payment or Annual I. | ncrement |
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ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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RECEIVED

EL PASO NATURAL GAS COMPANY

P.O. BOX 4430 HOUSTON, TX 77210-4430 2008 SEP 2 PM 3 13

REMITTANCE ADVICE

 CHECK DATE
 08/29/2008

 CHECK NUMBER
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 VENDOR NUM
 0000002667

NM GROUND WATER FUND NM OIL CONSERVATION DIVISION ENVIRONMENTAL BUREA ATTN MR GRISWOLD ENGINEER 1220 S ST FRANCIS DR SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

| Voucher ID | · Invoice Number | Invoice Date | Discount | Paid Amount | |
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| 00348877 | CKREQ080826 | 08/26/2008 | 0.00 | 1,800.00 | |

| TOTAL | \$0.00 | \$1,800.00 |
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Griswold, Jim, EMNRD

From: Sent: To: Subject: Griswold, Jim, EMNRD Friday, August 01, 2008 8:32 AM 'ricardo.duarte@elpaso.com' Renewal of Discharge Plan GW-147

Hello Mr. Duarte,

The OCD has received EPNGs renewal application for your Deming compressor station (GW-147). However, the check (#07552523) for \$1,800.00 to cover the filing and permitting fees associated with the application is dated 5/3/07 and is clearly marked "VOID AFTER ONE YEAR". The check is also issued to OCD directly. Could you please have a current check issued as soon as possible with the payee listed as the "Water Quality Management Fund". Otherwise, I cannot make a determination of administrative completeness on your application. Thanks.

Jim Griswold Hydrologist Environmental Bureau ENMRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 direct: 505.476.3465 email: jim.griswold@state.nm.us

EL PASO NATURAL GAS COMPANY P.O. BOX 4430 HOUSTON; TX: 77210-4430

REMITTANCE ADVICE

CHECK DATE CHECK NUMBER VENDOR NUM 05/03/2007

NEW MEXICO OIL CONSERVATION DIVISION ENVIRONMENTAL BUREAU 1220 S ST FRANCIS DR SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

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| | NMOCD | | TRANSMITTAL DATE: | 07/28/08 | | | | |
| | 1220 South St. Francis Drive Santa Fe, NM 87505 | | TRANSMITTAL DCN: | 93560.2-ALB08TS001 | | | | |
| RETURN RESPONSES/COMMENTS TO: | | Marco W | /ikstrom | | | | | |
| RETURN RESPONSES/COMMENTS BY: | | August 1 | 1, 2008 | | | | | |

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| PROJECT NO.: | 93560 | PROJECT NAME | EPNG Deming DP | | |
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| DOCUMENTS BEING TRANSMITTED | | | | | |
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| INSTRUCTIONS/REMARKS | |
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| 3 COPIES FORWARDED TO RICHARD DUARTE, EPNG | Mark previous issues "obsolete", "superseded", or uncontrolled" Destroy previous affected material Return old material with this record New issue (no previous copies received) Replace with revised/new material Maintain as controlled copy Not Applicable |
| RECEIPT AND READ ACKNOWLEDGEMENT PLEASE COMPLETE AND RETURN WITHIN 15 WORKING DAYS TO: KLEINFELDER DOCUMENT CONTROL CENTER | |

| CLIENT RECEIPT | PRINT NAME | SIGNATURE | DATE |
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| Complete & Return this page via Fax/Mail/Email | JIM GRISWOLL | J-al | 7/31/08 |

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| upon receipt from client | | | |


8300 Jefferson NE, Suite B Albuquerque, NM 87113 **p**] 505.344.7373

f| 505.344.1711

kleinfelder.com

July 28, 2008 File No. 93560.2 – ALB08RP001

Mr. Jim Griswold Environmental Engineer New Mexico Energy, Minerals, and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

SUBJECT: Discharge Plan Application for a Discharge Permit Renewal El Paso Natural Gas Company Deming Compressor Station (GW-147) Luna County, New Mexico

Dear Mr. Griswold:

Kleinfelder West, Inc. (Kleinfelder) on behalf of the El Paso Natural Gas Company (EPNG) is pleased to submit for your review the attached discharge plan for a discharge permit renewal for the Deming Compressor Station (GW-147).

Kleinfelder has included the required information for the discharge plan as outlined in Title 20, Chapter 6, Part 2, NMAC, and "Guidelines for The Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and crude Oil Pump Stations".

Public notice, in Spanish and English, will be published in the <u>Deming Headlight</u> newspaper in accordance with New Mexico Administrative Code 20.6.2.3108.

The following are attached:

- Discharge Permit Application Form;
- Public Notice text in both Spanish and English;
- Discharge Plan;
- Check in the amount of \$1,800.00 to cover the filing fee and discharge permit fee.

Should you have any questions, please feel free to contact Marco Wikstrom or David Janney (Kleinfelder) at (505) 344-7373, or Richard Duarte (EPNG) at (505) 831-7763.

Sincerely, KLEINFELDER WEST, INC.

Marco Wikstrom Staff Geologist

Reviewed by:

Barbara Everett, P.G., R.G. Program Manager

93560.2-ALB08RP001 Copyright 2008, Kleinfelder 07/28/08 Rev. 0

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|---|--|--|--|
| <u>District 1</u> 1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> 1301 W. Grand Avenue, Artesia, NM 88210 | State of Ne Energy Minerals and | w Mexico Natural Resources | Revised June 10, 2003 Submit Original |
| District III 1000 Rio Brazos Road, Aztec, NM 87410 | Oil Conservat | ion Division | Plus 1 Čopy to Santa Fe |
| District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505 | 1220 South St | . Francis Dr. | 1 Copy to Appropriate District Office |
| | Santa Fe, N | IN 87505 | |
| DISCHARGE PLAN APP REFINERIES, AN (Refer to the O | LICATION FOR SE COMPRESSOR, G D CRUDE OIL PU CD Guidelines for assistan | ERVICE COMPA EOTHERMAL F. MP STATIONS ce in completing the app | NIES, GAS PLANTS, ACILITES |
| | New 🛛 Renewal | Modification | |
| 1. Type: <u>Compressor Station</u> | (Deming GW-147) | | |
| 2. Operator: <u>El Paso Natural Gas</u> | · | | |
| Address: <u>3801 Atrisco Blvd. NW, A</u> | <u>Albuquerque, NM 87120</u> | | |
| Contact Person: <u>Richard Duart</u> | 9 | Phone: | (505) 831-7763 |
| 3. Location: <u>SW/4</u> of the <u>SE/4</u> Subm | Section <u>32</u> To it large scale topographic r | ownship <u>23 South</u> nap showing exact locat | Range <u>11 West</u> ion. |
| 4. Attach the name, telephone numbe Attached | r and address of the landow | wher of the facility site. | |
| 5. Attach the description of the facili Attached | ty with a diagram indicatin | g location of fences, pits | s, dikes and tanks on the facility. |
| 6. Attach a description of all materia Attached | s stored or used at the facil | ity. | |
| Attach a description of present sou must be included. Attached | rces of effluent and waste | solids. Average quality | and daily volume of waste water |
| 8. Attach a description of current liqu Attached | id and solid waste collection | on/treatment/disposal pr | ocedures. |
| 9. Attach a description of proposed n Attached | nodifications to existing co | llection/treatment/dispos | sal systems. |
| 10. Attach a routine inspection and m Attached | aintenance plan to ensure p | ermit compliance. | |
| 11. Attach a contingency plan for repo Attached | orting and clean-up of spill | s or releases. | |
| 12. Attach geological/hydrological in Attached | formation for the facility. | Depth to and quality of g | ground water must be included. |
| Attach a facility closure plan, and rules, regulations and/or orders. Attached | other information as is nec | essary to demonstrate c | ompliance with any other OCD |
| 14. CERTIFICATIONI hereby certi best of my knowledge and belief. | ty that the information sub | mitted with this applicat | ion is true and correct to the |
| Name: <u>Richard Duarte</u> | | Title: <u>Environme</u> | ntal Representative |
| Signature: Rudund | Ann b | Date: 7-2 | 3-08 |
| E-mail Address: Ricardo.Dua | rte@ElPaso.com | | |

Aviso público

Uso para una renovación del permiso de la descarga para la estación del compresor de Deming (GW-147), condado de Luna, New México

El Paso Natural Gas Company (EPNG) da por este medio el aviso que el uso siguiente de la renovación del permiso de la descarga se ha sometido de acuerdo con la subdivisión B, C, y E del código administrativo de 20.6.2.31 08 New México.

Compañía de gas natural de El Paso (EPNG), 3801 Atrisco Blvd. NW, Albuquerque NM 87102 ha presentado una solicitud de la renovación para el plan previamente aprobado de la descarga para la estación del compresor de Deming (GW #147) situada en el SW/4, SE/4 de la sección 32, el municipio 23 del sur, se extiende 11 del oeste, en el condado de Luna, New México. La facilidad está norte localizado de 1 milla de los E.E.U.U. 10 de un estado a otro, 11 millas al oeste de Deming, nanómetro. La dirección del correo para la estación del compresor de Deming es El Paso Natural Gas, 1900 Station Road SW, Deming, NM 88030.

La estación del compresor de Deming se utiliza para la compresión del gas natural de la calidad de la tubería, y es parte de las tuberías de EPNG California "A" y "B". Estas tuberías transportan el gas natural a los Estados Unidos occidentales. No se sabe ningunas descargas intencionales o inadvertidas que podrían afectar a la superficie o al agua subterránea en la facilidad. Las descargas potenciales en la estación se limitan a aproximadamente 8.820 galones de nuevo aceite a partir de los cuatro tanques de almacenaje sobre el suelo y a 4.250 galones de líquidos usados de aceite y del gas a partir de los dos tanques de almacenaje abajo del grado. Los estos tanques se equipan de la contención secundaria y de indicadores llanos líquidos para prevenir derramamientos. Los líquidos de proceso tales como agua y aceite usado se asociaron a operaciones diarias son contenidos por un sistema del dren de la facilidad, transferidos a los tanques de almacenaje subterráneos, después reciclados o dispuestos por una facilidad aprobada NMOCD.

La primera agua subterránea probablemente que se afectará por un escape, una descarga accidental, o un derramamiento existe en una profundidad que excede 200 pies debajo de la superficie de tierra. Este sistema del acuífero tiene una concentración total de los sólidos en suspensión entre aproximadamente 366 y 395 mg/l.

El plan de la descarga sometió esquemas cómo el agua y la basura producidas serán manejadas correctamente, incluyendo la dirección, almacenaje, y la disposición final. El plan incluye los procedimientos para la gerencia apropiada de escapes, de descargas accidentales, y de derramamientos para proteger las aguas del estado de New México.

Para la información adicional, ser colocado en una lista de personas a quienes se mandan propaganda facilidad-específica para los avisos futuros, o someter los comentarios satisfacen entran en contacto con:

Jim Griswold, Environmental Engineer New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

Teléfono: (505) 476-3487 E-Mail: jim.griswold@state.nm.us

La energía de New México, los minerales y el departamento de los recursos naturales aceptarán comentarios y declaraciones del interés con respecto a este uso y proporcionarán los avisos futuros para la facilidad del compresor de Deming a petición.

Public Notice

Application for a Discharge Permit Renewal for the Deming Compressor Station (GW-147), Luna County, New Mexico

El Paso Natural Gas (EPNG) hereby gives notice that the following discharge permit renewal application has been submitted in accordance with Subsection B, C, and E of 20.6.2.3108 New Mexico Administrative Code.

El Paso Natural Gas Company (EPNG), 3801 Atrisco Blvd. NW, Albuquerque NM 87102 has submitted a renewal application for the previously approved discharge plan for the Deming compressor station (GW #147) located in the SW/4, SE/4 of Section 32, Township 23 South, Range 11 West, in Luna County, New Mexico. The facility is located 1 mile north of US Interstate 10, 11 miles west of Deming, NM. The mailing address for the Deming compressor station is El Paso Natural Gas, 1900 Station Road SW, Deming, NM 88030.

The Deming compressor station is utilized for the compression of pipeline quality natural gas, and is part of the EPNG California "A" and "B" pipelines. These pipelines transport natural gas to the western United States. No intentional or inadvertent discharges that could affect surface or groundwater are known at the facility. Potential discharges at the station are limited to approximately 8,820 gallons of new oil from four aboveground storage tanks and 4,250 gallons of used oil and gas liquids from two below grade storage tanks. These tanks are equipped with secondary containment and liquid level indicators to prevent spills. Process fluids such as water and used oil associated with daily operations are contained by a facility drain system, transferred to the below ground storage tanks, then recycled or disposed of by a NMOCD approved facility.

The first groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth exceeding 200 feet below the ground surface. This aquifer system has a total dissolved solids concentration between approximately 366 and 395 mg/L.

The discharge plan submitted outlines how produced water and waste will be properly managed, including handling, storage, and final disposition. The plan includes procedures for the proper management of leaks, accidental discharges, and spills to protect the waters of the State of New Mexico.

For additional information, to be placed on a facility-specific mailing list for future notices, or to submit comments please contact:

Jim Griswold, Environmental Engineer New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Drive Santa Fe NM 87505

Phone: (505) 476-3487 E-mail: jim.griswold@state.nm.us

The New Mexico Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this application and will provide future notices for the Deming compressor facility upon request.

Deming Compressor Station Discharge Plan

Prepared by Kleinfelder West, Inc. Albuquerque, NM

Attachments:

Appendix A:

- Figure 1, Deming Compressor Station Site Plan
- Figure 2, Topographic Map of the Deming Compressor Station Site
- Figure 3, Aerial Photograph of the Deming Compressor Station Site
- Figure 4, FEMA Flood Map

Appendix B:

 Spill and Release Control, Cleanup and Reporting Procedures – Excerpted from the 2008 EPNG Environmental Handbook

Item 1

Indicate the major operational purpose of the facility. If the facility is a compressor station include the total combined site rated horsepower.

The El Paso Natural Gas Company (EPNG) Deming "A" and "B" Compressor Station, GW-147, (hereafter referred to as "Deming") is utilized for compression of pipeline quality natural gas, and is part of the EPNG California "A" and "B" pipeline systems. Deming is part of a network that moves natural gas from New Mexico to end users in California and other parts of the Southwest. The amount of natural gas transported varies depending on customer demand. Compression is required to move natural gas through the pipeline for delivery to EPNG customers.

Deming is manned five days a week and is inspected a minimum of once per day during the week during operation, if in operation. However, the station is operated only on an intermittent basis throughout the year to test its engines and other equipment. The station has had almost no use since 2003 and is currently on standby status.

To accomplish natural gas compression Deming utilizes twenty-one (21) Cooper-Bessemer GMV-10TF natural gas fueled reciprocating engines, each site-rated at 1002 International Standards Organization (ISO) horsepower (hp), and their associated equipment. Fourteen (14) engines are housed in compressor building number one ("A" Plant), and seven (7) engines are housed in compressor building number two ("B" Plant).

Total site combined compressor rated horsepower for Deming is 21,042 ISO hp.

| item 2 | |
|---|---|
| Name of operator or legally responsible | party and local representative. |
| Legally Responsible Party | Mike Catt, Vice President El Paso Natural Gas Company 2 North Nevada Ave. Colorado Springs, Colorado 80903 |
| Local Representative | Richard Duarte El Paso Natural Gas Company 3801 Atrisco Blvd. NW Albuquerque, NM 87120 (505) 831-7763 |
| Or | |
| Local Representative (Alt.) | Sandra D. Miller 2 North Nevada Ave. Colorado Springs, Colorado 80903 |
| Operator Physical Address | El Paso Natural Gas Company 1900 Station Road SW Deming, NM 88030 |
| Mailing Address | El Paso Natural Gas Company 1900 Station Road SW Deming, NM 88030 |
| | (575) 544-5234, Gene D. Hill, Manager (800) 334-8047 (24 hour emergency notification) |

Item 3 have a state of the stat

Give a legal description of the location and county. Attach a large-scale topographic map.

Luna County, New Mexico SW/4 of the SE/4 of Section 32, Township 23 South, Range 11 West

Latitude:32 Degrees 15 Minutes 25 Seconds NorthLongitude:107 Degrees 59 Minutes 48 Seconds West

A topographic map and aerial photograph are attached in Appendix A (Figures 2 & 3).

Item 4

Attach the name, telephone number and address of the landowner of the facility site.

El Paso Natural Gas Company 2 North Nevada Ave. Colorado Springs, Colorado 80903

(505) 831-7763, R. Duarte or alternate contact (915) 759-2270 S. D. Miller

Attach a description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

To accomplish natural gas compression Deming utilizes the following:

- Twenty-one (21) Cooper-Bessemer GMV-10TF natural gas fueled reciprocating engines and compressors, each site-rated at 1002 ISO hp each;
- Six inlet filters for the natural gas stream (scrubbers);
- Two (2) fuel gas filters;
- Two (2) cooling towers, one for each gas stream (replaced with new cooling towers in 2007);
- Four (4) 8,820-gallon aboveground storage tanks (AST) for lube oil storage;
- Two (2) 872-gallon temporary use, used oil aboveground storage tanks;
- Two (2) 4,250-gallon below-grade fiberglass reinforced plastic (FRP) natural gas stream liquids/used oil storage tanks (V-9126 and V-9127);
- Two (2) compressor buildings equipped with basements designed to contain spills and wash-down water;
- One (1) natural gas fueled Capstone® 30 kilowatt "micro turbine" generator;
- One (1) Fram Industrial oil/water separator (V-9129); and
- One (1) double lined water disposal evaporation pond (receives water from the cooling towers, and water from the oil/water separator).

Gas Compressors

Natural gas that is compressed using reciprocating compressors does not produce wastewater. The buildings that house the compressors have been installed in such a manner to ensure containment of leaks, spills and wash down water. Any spills or wash down water from cleaning operations are contained by the building drain and basement systems and transferred to the oil/water separator.

Used oil is generated from the compressors at a rate of approximately 1.2 gallons per day of operation, or 10 BBL per year while in operation.

De-Commissioned Auxiliary Generators

Electrical power was supplied by four (4) Worthington CCG-8 natural gas fired engines driving auxiliary generators. These generators were de-commissioned in 2007 and are no longer functional. They are still housed inside the auxiliary building. A Capstone® "micro turbine" now supplies auxiliary electrical power.

Gas-Turbine Auxiliary Generator

One Portable natural gas fueled Capstone® 30 kilowatt auxiliary generator is used to supply electrical power to the station in the event of utility power failure. This is a small air-cooled gas turbine generator equipped with air-bearings that does not contain any oil or other liquids. It is located on the west side of the office building. No secondary containment is provided or needed.

Natural Gas Scrubbers (inlet and fuel)

All inlet gas is passed through suction scrubbers on the upstream side of the compressors. Also, fuel gas filters remove minimal liquids and other foreign matter from the natural gas stream before entering the compressor engines. Any liquids generated by the suction scrubbers (blowdown) and fuel gas filters are discharged into the oil/water separator system. Water from the separator is transferred to the double lined evaporation pond, and natural gas liquids and oils are transferred to one of the 4,250-gallon below-grade fiberglass reinforced plastic natural gas stream/used oil liquids storage tanks.

Filters from this operation are replaced as needed. The filters are characterized as prescribed by 20 New Mexico Administrative Code (NMAC) 3.1, Subpart 14, Regulated Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas industry. Regulated NORM is defined as NORM at a concentration of greater then 30 picocuries per gram of radium 226 above background, or NORM with a maximum radiation exposure reading at any accessible point that is greater than 50 microroentgens per hour, including background levels.

If any filter is characterized as NORM-regulated, it would be stored in properly labeled, UN/DOT-approved 55-gallon metal drums for disposal at an approved facility. To date, no filters have been characterized as NORM regulated at the Station.

Gas inlet scrubber filters that are not characterized as NORM-regulated are drained for 24 hours into the facility drain system. After the scrubber filters are drained, non-recyclable components are bagged and disposed of in the onsite dumpster that is emptied as needed by Hamill Disposal Service for transport to the City of Deming Landfill, and recyclable components are reused.

Cooling Towers

Two cooling towers, replaced in 2007, are used to cool the natural gas streams after exiting the compressors. Water used for these towers comes from two wells located at the Site. Once the existing acids are used up, swimming pool grade HTH (dry chlorine, powder form) will be the only chemical used in these towers (to prevent algae growth). When Total Dissolved Solids (TDS) concentrations exceed a threshold due to evaporation, used cooling tower water is transferred to the double lined evaporation pond. One cooling tower is located to the southwest of compressor building #2 and the other is located to the northwest of compressor building #1 (Figure 1). The site contains acid tanks that will be removed once the acid is used up. These tanks are housed inside a concrete-curbed secondary containment structure and will likely be removed in late 2008 or early 2009.

8,820-Gallon Lube Oil ASTs

Four 8,820-gallon steel ASTs are used to store lube-oil onsite for the 21 compressors. The tanks are filled by lube oil contractors using tank trucks. When tank filling is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tanks. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. Secondary containment is composed of a single concrete berm that is capable of holding 59,242 gallons. Subtracting the volume occupied by three of the four tanks makes this berm capable of holding 6.5 times the volume of the largest single tank (57,652 gallons). These tanks are located to the west of compressor building #2 (Figure 1).

872-Gallon Portable Used Oil ASTs

Two 872-gallon portable used oil steel ASTs are utilized intermittently to store used oil from the compressor engines and compressors undergoing maintenance. When in use, they are placed inside secondary containment composed of hay bales with a plastic tarp liner. When tank emptying is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tanks. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. These tanks are stored at the east end of the compressor buildings.

4,250-Gallon Natural Gas Liquids/Used Oil Below Grade Storage Tanks (V-9126 and V-9127)

Two 4,250-gallon fiberglass reinforced plastic natural gas liquids/used oil below grade tanks are utilized to store natural gas liquids and used oil from the natural gas stream and facility drain system. These tanks utilize polyethylene liners as secondary containment that, through 6-inch PVC piping, allows for leak detection. While in operation secondary containment is inspected at least once a week. The last hydrostatic test for these tanks was accomplished on October 21, 2002; a new hydrostatic test is being scheduled for late 2008. When tank emptying is accomplished, drip pans are placed under all connection points between the tank truck and lube oil tanks. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. These tanks are located to the south of compressor building #1 (Figure 1).

Underground Drain Lines and Compressor Building Basement

Underground drain lines are part of the facility drain system that routes process fluids from normal operations, spills, and leaks to the oil/water separator. Each of the two compressor buildings contains a basement that runs the length of the building which serves to capture spills, leaks, or wash down water. Underground drain lines are hydrostatically tested every five years during the annual station shutdown. Duration of hydrostatic testing is at least 30 minutes and piping is subjected to at least three pounds per square inch (PSI) above operating pressure during the test. EPNG will provide the New Mexico Oil Conservation Division (NMOCD) with a notice and results of the test findings upon request.

Fram Industrial Oil/Water Separator (V-9129)

An oil/water separator receives water/oil/process fluid mixtures from the building drains and natural gas stream inlet filters (scrubbers). Oil and natural gas liquids from the separator are transferred to the 4,250-gallon below grade tanks (V-9126 and V-9127). Water from the separator is transferred to the evaporation pond. The oil/water separator is located between tanks V-9126 and V-9127, to the south of compressor building #1 (Figure 1).

Drum Storage

As necessary to store small quantities of oils, grease, and other consumables necessary to maintain the station, drums are stored on horizontal racks in a concrete lined and curbed storage area. Once drums are empty and EPA Clean*, they are crushed and disposed of via the onsite dumpster. This drum storage area is located north of the shop.

*EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Uncontained Wash-Down Water

As necessary for housekeeping, Deming personnel utilize high-pressure water-jets or high-pressure steam to remove solid particulate matter such as dust, dirt, weeds, etc. from fin-fans and piping (not contained within a building). No detergents or cleaning solutions are used for this procedure and no process fluids intermingle with this water. This wash water is not contained.

Contained Wash-Down Water

As necessary for maintenance and housekeeping, Deming personnel use wash-down water along with biodegradable detergents such as Tide® or dish soap to clean engines, floors, and other equipment within the compressor buildings. This mixture of water, detergent, and used oil is contained and drained by the facility drain system to the oil/water separator.

Domestic Sewage

Domestic Sewage that is generated at Deming is treated via three separate sewage systems, each equipped with septic tanks and leach fields; one system for each of the two compressor buildings, and one system for the Station office. All of these systems meet NMED guidelines for onsite disposal and are used only for disposal of domestic sewage.

Storm Water and Other Precipitation

Located in an alluvial region in an area of low precipitation and high evaporation, the Deming Station has natural drainage to the south, west, and east. Topographic relief is slight, dipping approximately 0.1 degrees, or 10 feet per mile. The station itself is built upon a slight natural ridge, thereby avoiding the pooling of storm water that tends to run south, west, and east (Figure 2). Precipitation in the region averages approximately 10 inches per year. A Federal Emergency Management Administration (FEMA) flood map is included as Figure 4. Figure 4 shows that a 100-year flood zone, "Zone A," exists to the west of the Station, and that the Station itself was not built upon the flood zone.

Additional Information

A diagram of the facility (Figure 1) shows the location of buildings, roads, tanks, pits, berms, and other pertinent information.

No significant changes have been made to the facility's effluent sources or process fluids since the last discharge plan was submitted. However, the cooling towers were replaced and the standby generators were de-commissioned in 2007.

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Item 6 Attach a description of all materials stored or used at the facility.

| Container | ID | Material | Form | Volume | Location | Containment |
|--|----------------------|--|--------|---------------------------|---------------------------------------|---|
| Portable closed Steel AST | Used oil tank | Used oil from the compressor engines | Liquid | 872 gallons | East of compressor building #1 | When in use, hay bales and plastic tarp |
| Portable closed Steel AST | Used oil tank | Used oil from the compressor engines | Liquid | 872 gallons | East of compressor building #2 | When in use, hay bales and plastic tarp |
| Closed FRP below grade tank with polyethylene secondary containment | V-9126 | Oil, wash down water with detergents, natural gas liquids | Liquid | 4,250 gallons | South of compressor building #1 | Polyethylene liner |
| Closed FRP below grade tank with polyethylene secondary containment | V-9127 | Oil, wash down water with detergents, natural gas liquids | Liquid | 4,250 gallons | South of compressor building #1 | Polyethylene liner |
| Closed steel AST | Lube oil | Engine lube oil | Liquid | 8,820 gallons | West of Compressor building #2 | Concrete containment |
| Closed steel AST | Lube oil | Engine lube oil | Liquid | 8,820 gallons | West of Compressor building #2 | Concrete containment |
| Closed steel AST | Lube oil | Engine lube oil | Liquid | 8,820 gallons | West of Compressor building #2 | Concrete containment |
| Closed steel AST | Lube oil | Engine lube oil | Liquid | 8,820 gallons | West of Compressor building #2 | Concrete containment |
| 55-gallon UN/DOT drums | Drum storage area | Small volume of lubricants and other consumables used for maintenance | Liquid | Approx. 150 gallons | North of the shop area | Concrete floored and curbed area |

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Item 7

Attach a description of present sources of effluent and waste solid. Average quality and daily volume of waste water must be included.

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| Source | Type of Waste | Volume | Quality |
|--|-----------------------|---|--|
| Compressor building | Used oil, natural gas | 10 barrels per year | Used lube oil, water, |
| basements and | liquids, wash down | (approximately 1.2 | and water with |
| scrubber blowdowns | water, detergents | gallons per day) | detergents |
| Oil and scrubber filter components, fuel gas filters | Solid waste | 10 cubic yards per year; less than one cubic yard a week and 3.3 cubic feet per day. | Used filter media |
| Domestic trash and empty drums* | Solid Waste | 5 cubic yards per year or approximately 0.4 cubic feet per day | Domestic trash such as paper, metal, plastic wrappers, food waste, etc. |

*EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Item 8 Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

| Type of Effluent | Collection | Storage | Hauler | Disposition |
|--|--|---|--|---|
| Used oil and natural gas stream liquids | Drained via the facility drain system to the oil/water separator | Below grade storage tanks, V- 9126 and V-9127 | Thermo-Fluids | Recycled by a hydrocarbon recovery facility (Mesa Oil or Thermo-Fluids) |
| Wash down water with detergents | Drained via the facility drain system to the oil/water separator | Double lined evaporation pond | As needed by Hamill Disposal Service | City of Deming landfill (NMOCD approved industrial landfill) |
| Oil and scrubber filters, fuel gas filters, domestic trash, empty containers and drums* | Oil and scrubber filters drained to facility drain system for 24 hours and bagged Domestic trash collected in waste can, large items placed directly into onsite dumpster | Dumpster | As needed by Hamill Disposal Service | City of Deming landfill |

*EPA Clean as prescribed in 40 C.F.R. Part 261, Section 261.7(b)

Non-Exempt, Non-Hazardous Waste

Used oil is collected as needed from the used oil storage tank and removed from the site by Mesa Oil or Thermo Fluids. When tank emptying is accomplished, drip pans are placed under all connection points between the tank truck and tank. EPNG also requires that the tank truck operator be in direct, radio, or telephone contact with the station operator. Disposal records are maintained at the EPNG Deming service office (see address under Item 2).

Any wash down water from the turbine or compressor inside the building is collected within the building sumps and discharged into facility drain system and into the oil/water separator.

Hazardous Waste

No RCRA-listed hazardous wastes are expected to be generated at Deming other than a lead-acid battery used for the generator, and Ni-Cad batteries used for the station control system backup power supply. The lead acid battery is an automobile-type starting battery that is exchanged at a local auto parts retailer, and the Ni-Cad batteries are serviced and replaced by NGH Power Systems.

Other Solid Waste

Solid waste is disposed of via a dumpster that is emptied as needed by Hamill Disposal Service. Used oil filters are hot-drained into facility drain system for 24 hours and are placed into plastic bags before disposal in the dumpster. Used scrubber filters are hot-drained for 24 hours into facility drain system and non-recyclable components are placed into plastic bags before disposal in the dumpster. Recyclable components are reused.

Names, Addresses, and Phone Numbers of Currently Used OCD Transporters/Disposal Facilities

Hamill Disposal Service (solid waste) Deming Municipal Landfill P.O. Box 706 Deming, NM 88031 (approximately three miles east of downtown Deming on East 4th Street)

NGH Power Systems (Ni-Cad batteries) 3500 Richmond Dr, NE, Suite B Albuquerque, NM 87107 Phone Number: (505) 345-0523

Thermo Fluids (used oil recycling) 1501 Walther Road Odessa, TX 79763 Phone Number: (432) 580-3098

Item 9 A Real State And A

Attach a description of proposed modifications to existing collection/treatment/disposal system.

No modifications to the Deming Station are necessary to meet NMOCD requirements. EPNG will notify NMOCD of any planned facility expansion, process modification, or production increase that could result in a significant modification in discharges from this facility.

Item 10

Attach a routine inspection and maintenance plan to ensure permit compliance.

Deming is designed to prevent spills and minimize on-site chemicals. Liquids stored on-site are placed within secondary containment that will prevent or mitigate any unplanned releases into the environment. When in operation, this site is visually inspected by EPNG personnel a minimum of once per day during the week while in operation and underground piping is hydrostatically tested every five years. If the station is not in operation a visual inspection is accomplished as necessary.

Verbal and written notifications of leaks or spills are made to the NMOCD according to NMOCD Rule 116. Any release of a chemicals with a reportable quantity regulated by Title 40 CFR Part 300 and 372 are reported to the National Response Center, and when applicable, to the NMED.

Attach a contingency plan for reporting and clean up of spills or releases.

EPNG will handle all spills and leaks immediately as required by the EPNG procedures outlined in the EPNG Environmental handbook (Appendix B), and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and Water Quality Control Commission (WQCC) regulations, WQCC section 1203.

The "Spill and Release Control, Cleanup and Reporting" section of the El Paso Corporation Environmental Handbook, which is available to site personnel, provides guidance in the management of leaks or spills, and outlines procedures to be used in case of a leak or spill (a copy of the 2008 version is presented in Appendix B). Visual monitoring will be conducted on a regular basis (at least weekly when operating) of aboveground components, including all containment structures, and ASTs. As stated, hydrostatic testing of buried components will be accomplished every five years.

Trained personnel using source removal techniques such as sorbents, excavation, collection, and proper disposal will address spills, if they occur. Spill response contractors are available if additional resources are needed.

Commercial absorbent pads or rags will be used to absorb small spills. Any oil-bearing soil will be disposed of in New Mexico at an NMOCD-approved facility that approves the waste profile. Spill containment kits will be located at the facility.

Large spills will be contained within the secondary containment system consisting of containment structures, sumps, and the used oil tank. Where applicable, liquids and solid waste will be segregated, characterized and managed accordingly.

In the event of a spill, personnel are trained to notify EPNG's Environmental Department. The EPNG Environmental Department in turn will make the necessary notifications to regulatory agencies.

Site personnel will also have access to the El Paso Corporation Environmental Compliance Manual, located on the EPNG Environmental web page. It contains spill reporting thresholds for fluids typically found at EPNG compressor stations. The manual contains a decision tree to aid in proper reporting procedures, including notification guidelines for reporting to the NMOCD District Field Office, and if appropriate, procedures for reporting to the NMOCD Director. If there is a conflict between the El Paso Corporation Compliance Manual and state regulations, state regulations will always take precedence.

EPNG contingency plans provide verbal and written notification of reportable leaks or spills to be made in accordance with OCD Rule 116 and New Mexico Water Quality Control Commission (NMWQCC) Section 1203 guidelines within the time limits set by NMOCD. Reportable releases regulated by the Code of Federal Regulations, Title 40, Parts 300 and 372 will be reported to the National Response Center, and where appropriate the NMED.

Item 12 - State State

Attach geological/hydrological information for the facility, Depth to and quality of groundwater must be included.

Regional Geologic Setting

Located within the basin and range province, Deming is approximately six miles southwest of the Mimbres River and lies atop thick deposits of Holocene and Pleistocene sand and gravel. The surrounding area consists largely of a desert or bolson underlain by thick deposits of sand and gravel. A large amount of groundwater is obtained from the water-bearing formations of the bolson deposits. This groundwater is derived largely from local precipitation and seepage from the runoff of tributary streams and arroyos that drain into the basin.

Site Geology

Logs from EPNG well installations indicate that sand, gravel, and small lenses of clay occur within 110 feet of the surface. A 13-foot thick shale unit was encountered at 124 feet with underlying unconsolidated material consisting of sand, gravel and a small amount of clay at 230 feet. Sandstone was encountered at approximately 338 feet, and bedrock (assumed to be plutonic/granitic) was encountered at 516 feet.

Hydrogeology and Water Quality

Groundwater is generally available everywhere in the basin and is encountered between five and 550 feet below the surface, depending on time of year and location within the basin. Two EPNG-owned wells within one mile of the Station are screened between 232 feet and 597 feet below ground surface (bgs), but there are no records of water level from these wells. Two wells located within three miles south and southwest of the site have recorded water levels ranging between 170 and 223 feet bgs (New Mexico Office of the State Engineer WATERS database, accessed 7-24-08). Water quality parameters collected from the EPNG-owned wells indicated that total dissolved solids (TDS) concentrations vary between 366 and 395 milligrams per liter (mg/l).

Hydrology

Average annual precipitation in the area is less than 10 inches. An ephemeral stream occurs to the north and west of the Station and contains a 100-year flood zone. Deming Station is situated to the east of this stream and outside the flood zone (Figure 4).

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Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

All reasonable and necessary measures will be taken to comply with 20 New Mexico Administrative Code (NMAC) 6.2.3103, Water Quality Standards. Should EPNG choose to permanently close the facility closure measures will include removal of all underground piping and equipment. All tanks will be emptied. All potential sources of toxic pollutants will be inspected and no potentially toxic materials or effluents will remain on site. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will occur and clean-up activities will commence. Post closure maintenance and monitoring plans would not be necessary unless a contamination is encountered.

Appendix A

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Figure 1 Site Plan, Figure 2 Topographic Map Figure 3 Aerial Photograph Figure 4 FEMA Flood Map

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DEMING COMPRESSOR STATION DEMING, NEW MEXICO







SOURCE: Aerial photo created from mapcard.com.

KLEINFELDER Originator: M. Wikstrom D Approved By: S



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Appendix B

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Spill and Release Control, Cleanup and Reporting Procedures – Excerpted from the 2008 EPNG Environmental Handbook



Spill and Release Control, Cleanup and Reporting

What is a Spill or Release?

A spill is an unauthorized release of product, raw materials, chemicals or waste-outside any secondary containment and into the environment. Spills can occur as a result of leaks, accidents or third party incidents. Spills that occur inside of secondary containment are not considered spills to the environment and are not subject to agency notification. Nonetheless, spills should still be reported to the Environmental Department and the procedures listed below should be followed.

Spill or Release Reporting Procedures

- Begin spill response and reporting activities upon finding a spill or release to 1. the environment. Notify Facility Management and the Environmental Department as soon as practicable.
- 2. Réport any spill or release of the following materials regardless of location (onproperty or off-property) to the Environmental Department:
 - Oil or petroleum products
 - Produced water/brine-
 - Hazardous substances or hazardous wastes
 - Chemicals
 - Unplanned natural gas (flaring or venting) if required by permit or State regulation
 - Asbestos-containing materials
 - Smoke or excessive opacity
- 3. Be prepared to give the following information to the Environmental Department:
 - The identity of the material released;
 - Estimate of the quantity released;
 - The location, time, and date the release occurred or was discovered;
 - Description of how the release occurred (e.g., equipment failure);
 - The extent of injuries, if any;
 - Possible hazards to human health or the environment outside the facility:
 - Immediate action taken in response to the release:
 - Names and numbers of the persons to be contacted for further information.
- 4. If applicable, follow any additional spill notification procedures in your facility Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure.
- 5. The following releases require immediate (within 1 hour of discovery) notification to the National Response Center (NRC):
 - Any petroleum product released into streams, rivers, lakes or dry washes

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Notes:

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Spill and Release Control, Cleanup and Reporting

cement, oil absorbent, pads, sand), and empty DOT- approved containers (e.g., drums).

- Contain the spill area using booms, soil berms, ditches, or similar means.
- Remove all absorbed material or liquid contained by diking and place in DOT- approved containers. Use pumps as needed.
- Use rags and cleansing agents as needed to clean spill response equipment.
- Decontaminate all reusable equipment and place decontamination wastes in containers:
- Label all containers properly.
- Transfer all containers to a temporary and secure storage area or the facility- designated waste storage area.
- Arrange with the Environmental Department for help in sampling spill wastes and their proper disposal.
- Replace used spill kit response equipment with new equipment.
- 3. Keep a copy of any required report and all other documents associated with a spill or release including Federal, State and local forms in the facility SPCC or Spills & Releases files.

For Further Information

Refer to the following procedures in this Handbook:

- Air Permits
- Asbestos
- Emergency Operations Procedure (EOP) (outside this handbook)
- Facility Spill Prevention, Control and Countermeasures (SPCC) plan (outside this handbook)
- Labeling
- Sampling and Analysis
- Waste Characterization

Notes:

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2. Eliminate or control the spill or release by closing valves; blowing down, or other means.

A release that exceeds the reportable quantity (RQ) of any CERCLA

A release of a hazardous substance or hazardous waste which occurs.

A release of hazardous waste which contains a reportable quantity of a

6. The Environmental Department is responsible for making initial notifications of

reports to agencies if the Environmental Department cannot be reached.

Comprehensive Incident Report Tracking System (CIRTS) and updated as

Be sure that Company personnel responding to a release have the

appropriate level of training and the proper Personal Protective

follow-up reporting requirements. Facility Management is responsible for verbal

RQ releases to applicable regulatory agencies and for handling any

7. Reportable Quantity spill events will be entered into the Company's

hazardous substances in any 24 hour period which is not fully contained

- 3. Initiate Emergency Operating Procedures (EOP) as appropriate.
- 4. Identify media (e.g., soil, water, etc.) affected by the spill and the exact location, e.g., legal description.
- 5. Identify the material spilled or released. The MSDS may provide information about the material spilled and the proper safety precautions to use.
- 6. Alert personnel of danger and evacuate personnel and/or public from the areas where there may be an immediate danger to life or health. Emergency responders may need to be used to evacuate public areas where conditions warrant.
- 7. Barricade or isolate the spill area as needed to keep unauthorized personnel out.

Spill or Release Control and Cleanup

during transportation

hazardous substance

heeded for ongoing cleanups.

Initial Spill or Release Response

Equipment (PPE).

- 1. To prevent pollutants from entering storm water runoff, routine housekeeping should include the removal or remediation of hydrocarbon impacted soil/gravel.
- Control and clean up the spill or release using procedures outlined in your facility's Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure, if applicable. The minimum response activities include:
 - Contact the Safety Department or refer to the MSDS for help in the selection and use of PPE.
 - Assemble the required response equipment including protective clothing and gear, heavy equipment (e.g., backhoe), absorbent material (e.g.,

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Griswold, Jim, EMNRD

From: Sent: To: Subject: Griswold, Jim, EMNRD Friday, August 01, 2008 8:32 AM 'ricardo.duarte@elpaso.com' Renewal of Discharge Plan GW-147

Hello Mr. Duarte,

The OCD has received EPNGs renewal application for your Deming compressor station (GW-147). However, the check (#07552523) for \$1,800.00 to cover the filing and permitting fees associated with the application is dated 5/3/07 and is clearly marked "VOID AFTER ONE YEAR". The check is also issued to OCD directly. Could you please have a current check issued as soon as possible with the payee listed as the "Water Quality Management Fund". Otherwise, I cannot make a determination of administrative completeness on your application. Thanks.

1

Jim Griswold Hydrologist Environmental Bureau ENMRD/Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 direct: 505.476.3465 email: jim.griswold@state.nm.us

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-147 EL PASO NATURAL GAS CO. DEMING COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS December 15, 2003

- 1. <u>Payment of Discharge Permit Fees:</u> Neither the \$100.00 filing fee nor the \$1,700.00 flat fee have been received by the OCD and are due upon receipt of this approval.
- 2. <u>Commitments:</u> El Paso Natural Gas Co. will abide by all commitments submitted in the discharge permit renewal application letter dated August 13, 2003 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only exempt oilfield 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 permit will be approved by OCD on a case-by-case basis. <u>Rule 712 Waste:</u> 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 permit, and;

2. existing process knowledge of such waste stream does not change without notification to the Oil Conservation Division.

- 4. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks</u>: 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.



GW-147

Page 4

December 15, 2003



- 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 must 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 permit 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 permit 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 Artesia District Office.



- 15. <u>Storm Water Plan:</u> El Paso Natural Gas 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 runoff, then El Paso Natural Gas Co. shall: take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge permit to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.
- 16. <u>Closure:</u> The OCD will be notified when operations of the Deming 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. <u>Conditions accepted by:</u> El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas 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.

El Paso Natural Gas Co.

| Print Name: GENE D. HILL | _ |
|--------------------------|---|
| Signature: Since 5, Till | _ |
| Title: MANAGER | |
| Date: 02 - 03 - 04 | |



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT



The ground water discharge permit renewal GW-147 for the El Paso Natural Gas Co. Deming Compressor Station located in the SE/4 SE/4 of Section 32, Township 23 South, Range 11 West, NMPM, Luna 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 permit renewal application letter, dated August 13, 2003, 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 permit is renewed pursuant to Section 3109.C. Note Section 3109.G, which provides for possible future amendment of the permit. Be advised that approval of this permit does not relieve El Paso Natural Gas Co. of responsibility should operations result in pollution of surface water, groundwater or the environment. Nor does it relieve El Paso Natural Gas 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, El Paso Natural Gas Co. is required to notify the Director of any facility

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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 permit is for a period of five years. This permit will expire on August 19, 2008, and El Paso Natural Gas 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 permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.

The discharge permit renewal application for the El Paso Natural Gas Co. Deming Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge permit application is assessed a filing fee of \$100.00. There is a renewal flat fee assessed for gas compressor stations in excess of 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 permit review.

Sincerely,

Roger C. Anderson Chief, Environmental Bureau Oil Conservation Division

RCA/eem Attachment

Xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-147 EL PASO NATURAL GAS CO. DEMING COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS December 15, 2003

- 1. <u>Payment of Discharge Permit Fees:</u> Neither the \$100.00 filing fee nor the \$1,700.00 flat fee have been received by the OCD and are due upon receipt of this approval.
- 2. <u>Commitments:</u> El Paso Natural Gas Co. will abide by all commitments submitted in the discharge permit renewal application letter dated August 13, 2003 and these conditions for approval.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only exempt oilfield wastes shall be disposed of down Class II injection wells. Nonexempt oilfield wastes that are non-hazardous may be disposed of at an OCDapproved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge permit will be approved by OCD on a case-by-case basis. <u>Rule 712 Waste</u>: 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 permit, and;

2. existing process knowledge of such waste stream does not change without notification to the Oil Conservation Division.

- 4. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks</u>: 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. <u>Above Ground Saddle Tanks</u>: 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. <u>Labeling:</u> All tanks, drums and containers must be clearly labeled to identify their contents and other emergency notification information.
- 9. <u>Below Grade Tanks/Sumps:</u> 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 permit 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. <u>Underground Process/Wastewater Lines:</u> 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 permit 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 <u>Class V Wells</u>: 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. <u>Housekeeping:</u> 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. <u>Spill Reporting:</u> All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.

- 14. <u>Transfer of Discharge Permit:</u> The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge permit. A written commitment to comply with the terms and conditions of the previously approved discharge permit must be submitted by the purchaser and approved by the OCD prior to transfer.
- 15. <u>Storm Water Plan:</u> El Paso Natural Gas 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 runoff, then El Paso Natural Gas Co. shall: take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge permit to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.
- 16. <u>Closure:</u> The OCD will be notified when operations of the Deming 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. <u>Conditions accepted by:</u> El Paso Natural Gas Co., by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Natural Gas 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.

El Paso Natural Gas Co.

Print Name:

Signature: _____

Title:

Date: _____

ATTACHMENT TO THE DISCHARGE PLAN GW-147 RENEWAL EL PASO NATURAL GAS COMPANY DEMING COMPRESSOR STATION DISCHARGE PLAN MODIFICATION APPROVAL CONDITIONS (June 17, 1998)

- 1. <u>EPNG Commitments:</u> EPNG will abide by all commitments submitted in the discharge plan application dated April 14, 1998.
- 2. <u>Waste Disposal</u>: 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 may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
- 3. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> 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.
- 6. <u>Above Ground Saddle Tanks</u>: 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. <u>Labeling:</u> All tanks, drums and containers should be clearly labeled to identify their contents and other emergency notification information.
- 8. <u>Below Grade Tanks/Sumps:</u> 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. <u>Underground Process/Wastewater Lines:</u> 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. <u>Class V Wells</u>: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 11. <u>Housekeeping:</u> 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.
- 12. <u>Spill Reporting:</u> All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.
- 13. <u>Transfer of Discharge Plan:</u> 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. <u>Closure:</u> 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. <u>Certification:</u> EPNG, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EPNG 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: EL PASO NATURAL GAS COMPANY

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by Robert G. McCubbin, Vice President, Transmission Ops. Title STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



POST OFFICE BOX 2088

STATE LAND OFFICE BUILDING

SANTA FE, NEW MEXICO 87504 (505) 827-5800

BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

August 19, 1993

CERTIFIED MAIL RETURN RECEIPT NO. P-111-334-257

Mr. Phil Baca El Paso Natura Gas Co. P.O. Box 1492 El Paso, Texas 79978

Re: Discharge Plan (GW-147) Deming Compressor Station Luna County, New Mexico

Dear Mr. Baca:

The groundwater discharge plan GW-148 for the El Paso Natural Gas Co. Deming Compressor Station located in the SE/4 SE/4 Section 32, Township 23 South, Range 11 West, NMPM, Luna County, New Mexico is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated June 14, 1993.

The discharge plan was submitted pursuant to section 3-106 of the Water Quality Control Commission Regulations. It is approved pursuant to section 3-109.A.. Please note Section 3-109.F., which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve you of your liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

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

Please note that section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C. you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.


Mr. Phil Baca August 19, 1993 Page 2

Pursuant to Section 3-109.G.4., this approval is for a period of five years. This approval will expire August 19, 1998 and you should submit an application for renewal in ample time before that date.

The discharge plan application for the El Paso Natural Gas Co. Deming Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of thirteen-hundred eighty (1380) dollars for compressor stations in excess of 3000 horsepower.

The OCD has received your \$50 filing fee. The flat rate for a discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

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

Sincerely. William J. LeMay Director

WJL/cee Attachment

xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-147 APPROVAL EL PASO NATURAL GAS COMPANY DEMING COMPRESSOR STATION DISCHARGE PLAN REQUIREMENTS (August 19, 1993)

- 1. <u>Payment of Discharge Fees:</u> The \$1380 flat fee (either total payment or installments) will be paid upon receipt of this approval letter.
- 2. <u>Drum Storage:</u> All drums will be stored on pad and curb type containment.
- 3. <u>Sump Inspection:</u> All pre-existing sumps will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade tanks will approved by the OCD prior to installation and will incorporate leak detection in their designs.
- 4. <u>Berms:</u> All tanks that contain materials other than freshwater will be bermed to contain one and one-third (1-1/3) the capacity of the largest tank within the berm or one and one-third (1-1/3) the total capacity of all interconnected tanks.
- 5. <u>Pressure testing:</u> All discharge plan facilities are required to pressure test all underground piping at the time of discharge plan renewal. All new underground piping shall be designed and installed to allow for isolation and pressure testing at 3 psi above normal operating pressure.
- 6. <u>Spills:</u> All spills and/or leaks will be reported to the OCD district office pursuant to WQCC Rule 1-203 and OCD Rule 116.

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

EDRUG FREE

POST OFFICE BOX 2088

STATE LAND DEFICE BUILDING

SANTA FE, NEW MEXICO 87504 (505) 827-5800

BRUCE KING GOVERNOR

ANITA LOCKWOOD CABINET SECRETARY

August 2, 1993

CERTIFIED MAIL RECEIPT NO. P-667-242-371

Environmental Compliance Manager El Paso Natural Gas Company P.O. Box 1492 El Paso, Texas 79978

RE: PIT CLOSURE EPNG DEMING COMPRESSOR STATION LUNA COUNTY, NEW MEXICO

Dear Mr. Baca:

The New Mexico Oil Conservation Division (OCD) has completed a review of the El Paso Natural Gas Company's (EPNG) June 22, 1993 "CLOSEOUT OF ABANDONED DISPOSAL POND IN LUNA COUNTY, NEW MEXICO", and July 9, 1993 "POND CLOSURE AT EL PASO NATURAL GAS COMPANY'S (EPNG) DEMING COMPRESSOR STATION, SECTION 32, T-23-S, R-11-W, LUNA COUNTY, NEW MEXICO". These documents contain information related to EPNG's proposed closure methods for an abandoned unlined cooling tower blowdown pit at the EPNG Deming Compressor Station in Luna County, New Mexico.

The above referenced closure plan is hereby approved.

Please be advised that OCD approval does not relieve EPNG of liability should remaining contaminants result in actual contamination of surface waters or ground waters which may be actionable under other laws and/or regulations. In addition, OCD approval does not relieve EPNG of responsibility for compliance with any other federal, state and local laws and/or regulations. Mr. Philip L. Baca August 2, 1993 Page 2

If you have any questions, please do not hesitate to contact me at (505) 827-5885.

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Sincerely,

am C. Olson logist Lental Bureau

xc: Mike Williams, OCD Artesia District Supervisor

STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 S. PACHECO SANTA FE, NEW MEXICO 87505 (505) 827-7131

June 17, 1998

CERTIFIED MAIL RETURN RECEIPT NO. P-288-259-083

Mr. Donald R. Payne Manager of Compliance Services El Paso Natural Gas Company P.O. Box 1492 El Paso, Texas 79978-1492

RE: Discharge Plan GW-147 Approval Deming Compressor Station Luna County, New Mexico

Dear Mr. Payne:

The groundwater discharge plan GW-147 for the El Paso Natural Gas Company (EPNG) Deming Compressor Station located in the SE/4 SW/4, SW/4 SE/4, and W/2 SE/4 SE/4 of Section 32, Township 23 South, Range 11 West, NMPM, Luna County, New Mexico is hereby approved under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan as approved August 19, 1993, and the discharge plan renewal application dated April 14, 1998. 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 10 working days of receipt of this letter.

The discharge plan application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109. Please note Sections 3109.E and 3109.G., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve EPNG of liability should operations result in pollution of surface water, ground water, or the environment.

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





Mr. Donald R. Payne June 17, 1998 Page 2

Please note that Section 3104 of the regulations provides: "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., EPNG is required to notify the Director of any facility 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 plan is for a period of five years. This approval will expire on August 19, 2003, and EPNG should submit an application in ample time before this date. Note that under Section 3106.F. of the regulations, 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. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal application for the El Paso Natural Gas Company Deming Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$690 for compressor stations. The OCD has received the filing and flat fees.

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,

otenberg Lori Wrotenbery

Director

LW/mwa Attachment

xc: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN GW-147 RENEWAL EL PASO NATURAL GAS COMPANY DEMING COMPRESSOR STATION DISCHARGE PLAN MODIFICATION APPROVAL CONDITIONS (June 17, 1998)

- 1. <u>EPNG Commitments:</u> EPNG will abide by all commitments submitted in the discharge plan application dated April 14, 1998.
- 2. <u>Waste Disposal</u>: 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 may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
- 3. <u>Drum Storage:</u> 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. <u>Process Areas:</u> 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. <u>Above Ground Tanks:</u> 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.
- 6. <u>Above Ground Saddle Tanks:</u> 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. <u>Labeling:</u> All tanks, drums and containers should be clearly labeled to identify their contents and other emergency notification information.
- 8. <u>Below Grade Tanks/Sumps:</u> 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. <u>Underground Process/Wastewater Lines:</u> 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 non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
- 11. <u>Housekeeping:</u> 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.
- 12. <u>Spill Reporting:</u> All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.
- 13. <u>Transfer of Discharge Plan:</u> 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. <u>Closure:</u> 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. <u>Certification:</u> EPNG, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. EPNG 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: EL PASO NATURAL GAS COMPANY

> > Title

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| DISCH | ARGE PLAN APPL REFINERIES, C AND (Refer to the OCI | ICATION FOR SE OMPRESSOR, GI CRUDE OIL PUN O Guidelines for assistance | CRVICE COMPANE EOTHERMAL FAC MP STATIONS the in completing the applica | ES,GAS PLANTS, ILITES tion) |
| | □ N | ew 🛛 Renewal | Modification | |
| 1. Type: | Natural Gas Compressor Sta | tion (Natural Gas Transn | nission)DEMING COMP | RESSOR STATION |
| 2. Operator | El Paso Natural C | Gas Company | | |
| Address: | <u>2 North Nevada Ave., C</u> | Colorado Springs, Colorad | lo 80903 | |
| Contact | Person: <u>Richard Duarte</u> | | Phone: (505) 83 | <u>31-7763</u> |
| 3. Location | : <u>SE</u> /4 <u>SE</u> /4 Submit | Section <u>32</u> T large scale topographic m | ownship <u>23-South</u> ap showing exact location. | Range <u>11-W</u> |
| 4. Attach t | he name, telephone number : | and address of the landow | mer of the facility site. | |
| 5. Attach t | he description of the facility | with a diagram indicating | location of fences, pits, dik | kes and tanks on the facility. |
| 6. Attach a | description of all materials | stored or used at the facili | ity. | · |
| 7. Attach a must be | description of present sourc included. | es of effluent and waste s | olids. Average quality and | daily volume of waste water |
| 8. Attach a | description of current liquid | l and solid waste collection | n/treatment/disposal proced | lures. |
| 9. Attach a | description of proposed mo | difications to existing col | lection/treatment/disposal s | ystems. |
| 10. Attach | a routine inspection and main | ntenance plan to ensure p | ermit compliance. | |
| 11. Attach | a contingency plan for repor | ting and clean-up of spills | s or releases. | |
| 12. Attach | geological/hydrological info | rmation for the facility. I | Depth to and quality of grou | nd water must be included. |
| 13. Attach rules, re | a facility closure plan, and o egulations and/or orders. | ther information as are ne | cessary to demonstrate com | pliance with any other OCD |
| 14. CERT best of my | TIFICATIONI hereby certify knowledge and belief. | that the information sub | nitted with this application | is true and correct to the |
| Name: | Richard Duarte | <u></u> | Title: <u>Principle Enviro</u> | nmental Engineer |
| Signature: | Endrand be | nat | Date: 6/26 | /03 |

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Item 1

Indicate the major operational purpose of the facility. If the facility is a compressor station include the total combined site rated horsepower.

EPNG Natural Gas Company ("EPNG") provides pipeline-quality natural gas transportation services for natural gas suppliers and end users throughout the Southwestern United States. EPNG owns and operates a large pipeline network for which Deming Compressor Station ("Deming") is one of many stations that provide natural gas compression. The amount of pipeline quality gas transported in the system varies depending on customer demand for natural gas. Compression is needed to maintain enough pressure in the pipeline to make required deliveries to customers.

The facility consists of the following combustion equipment:

"A" Plant:

14 – Cooper Bessemer GMV-10TF natural gas fired, 1100hp each, at ISO conditions. Or 1002 hp each at site altitude 4,456 ft above msl.

"B" Plant:

7 – Cooper Bessemer GMV -10 TF natural gas fired, 1100 hp each, at ISO conditions Or 1002 hp each at site altitude 4,456 ft above msl.

Auxiliary Power Generation:

4 Worthington CCG-8, natural gas-fired

Item 2

| Name of operator or legally response | ble party and local representative. | | | | |
|--------------------------------------|---------------------------------------|--|--|--|--|
| Legally Responsible Party | Thomas P. Morgan, Vice President | | | | |
| | El Paso Natural Gas Company | | | | |
| | 2 North Nevada | | | | |
| | Colorado Springs, Colorado 80903 | | | | |
| Local Representative | Richard Duarte (505) 831-7763 | | | | |
| | El Paso Natural Gas Company | | | | |
| | 3801 Atrisco Blvd. NW | | | | |
| | Albuquerque, NM 87120 | | | | |
| Operator | El Paso Natural Gas Company | | | | |
| Physical Address | 1900 Station Road SW | | | | |
| | Deming, NM 88030 | | | | |
| Mailing Address | El Paso Natural Gas Company | | | | |
| - | 1900 Station Road SW | | | | |
| | Bloomfield, NM 88030 | | | | |
| | (505) 544-5234, Gene D. Hill, Manager | | | | |
| | 1-800-334-8047 | | | | |
| | (24 hour emergency notification) | | | | |
| | | | | | |

Item 3

Give a legal description of the location and county. Attach a large-scale topographic map. Deming Compressor Station is located in the SE/4 SW/4, SW/4 SE/4 of Section 32 Township 23-South, Range 11 West, in Luna County, NM. Approximately 10 miles West of Deming, NM and 1 mile North of U. S. Interstate 10, right off of Exit 68 of I-10.

Item 4

Attach the name, telephone number and address of the landowner of the facility site.

El Paso Natural Gas Company 2 North Nevada Colorado Springs, Colorado 80903

Item 5

Attach a description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

The main operating process at Deming Compressor Station is natural gas compression. A diagram of the station is shown in attachment 1. The station facilities and mechanical processes are shown in the plan drawings within attachment 2. Additionally, detailed drawings of the double lined pond are shown in attachment 3.

Items 6 & 7

Attach a description of all materials stored or used at the facility.

a) Inlet and Fuel Gas Scrubbers

Any entrained liquids from the upstream compressor stations in the two pipelines that enter the station are trapped by the inlet gas scrubbers. These scrubbers are manually drained into a high pressure blow down vessel. The liquid (typically used oils used in compression upstream) is discharged into an underground tank equipped with a vent and secondary containment leak detection system. It is made of fiberglass-reinforced plastic ("FRP") tank has a capacity of 4,250 gallons. Any liquids are recycled by a used oil recycler.

b) Cooling Towers

The process of natural gas compression results in an increase of temperature of the compressed gas which requires cooling before it can leave the plant. This cooling is accomplished through the process of heat exchange via a cooling tower. This water is not in contact with the natural gas, and is itself cooled by partial evaporation in a cooling tower.

The blow-down from each of the two cooling towers is discharged in to the a double-lined evaporation pond with a leak detection system. The estimated quantity of cooling tower blow-down is 43, 200 gallons per day under design conditions. Cooling tower additives include sulfuric acid, CWT 6110 (corrosion inhibitor), chlorine, and Chemic 8056 (Biocide) as needed.

c) Compressor Building Basement drains

Any leaks or spills of lubricating oils, wash water or other fluids from the compressors drains to a sump located in the basements. The liquids are pumped into the feed tank to the oil water separator. This FRP tank has a maximum capacity of 4,250. The oil phase from the oil/water separator accumulates in a below grade FRP with leak detection and maximum capacity of 4,250 gallons. The water phase from the oil/water separator discharges to the double-lined pond. The contents of the oil storage tank are hauled by an oil recycler.

d) Solvent/degreaser use

Only non-hazardous degreasers such as Solvent 140 are currently used at the station. The degreasers are used until the container meets the definition of "empty" container. Once the container is empty, the container is crushed and placed in the location dumpster. Approximately one drum of degreaser per year when the station is operating normally.

e) Spent acids or caustics

EPNG has not had the occasion to generate any spent acids. If spent acids are generated, a determination (via sampling) will be made as to whether the waste meets the definition of hazardous waste and proper disposal is also established.

f) Used engine coolants

Any engine coolants that are drained from the engines are pump into storage tanks and reused. There is no generation of used engine coolants on a regular basis except those attributed to minor leaks which are collected in the basements. Coolant additives are Ambitrol (ethylene glycol). ABOVE - GRONNO TANK USED FOR STORAGE, FIBER CLASS - DOUBLE WALLED.

g) Used lubrication and motor oils

There is one 872 gallon aboveground metal storage tank on the east end of each compressor building of "A" Plant and "B" Plant, that is used to contain used lubricating oils from the compressor engines. The used oil is recycled by an oil recycler. No motor oils are disposed in the tanks.

h) Used lube oil and process filters

Used oil lubricating filters are completely drained of free liquids, dried and then placed in the location dumpster. The contents of the dumpster are hauled by a contractor to the City of Deming municipal landfill. Approximately 10 oil filters are generated each year. And approximately 150 air filters are generated every two years.

i) Sewage

The sewage system design allows for completely independent systems at each of the three septic tank installations. One system serves the Deming Area offices and the other two serve each "A" and "B" Plant. USED STRICTLY FOR DOMESTIC WASTR.

i) Other waste solids

Office trash, empty paint cans, empty and crushed drums, wood, paper, small pieces of metal are disposed in the location dumpster.

k) Used Oil.

It is difficult to estimate the amount of used oil generated from each source such as the inlet scrubbers, fuel scrubbers, compressor lubricating oils and oil fraction from the oil/water separator since there is no measurement device associated with each stream.

Item 8

Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

| Type of Waste | Collection | Storage | Hauler | Disposal |
|---------------------------|--|----------------------|---|--|
| Used oil. | Drained to an underground tank | ABT steel | Removed as necessary by Mesa Environmental | Recycled by Mesa Environmental Hydrocarbon Recovery Facility |
| Cooling Tower blowdown | Discharge into Double-lined pond | Double-lined pond | Pipe | Evaporation |
| General trash | Dumpster | Steel 5-yard | Waste Management | City Deming Municipal Landfill |

OCD Transporters/Disposal Facilities

Waste Management of Four Corners, 101 Spruce St., Farmington, NM (505) 327-6284

Hazardous Waste

With the exception of fluorescent light bulbs, Lead-acid or Ni-Cad batteries, no RCRA-listed hazardous was are generated at the facility. Safety-Kleen of Farmington, NM recycles all batteries.

Other Solid Waste

All solid waste will managed by disposal into the Waste Management dumpsters.

Item 9

Attach a description of proposed modifications to existing collection/treatment/disposal system.

No modifications to the facility are necessary to meet NMOCD requirements.

Item 10

Attach a routine inspection and maintenance plan to ensure permit compliance.

The facility is inspected periodically by an operator. The integrity of any buried piping installed at the facility was last tested in 2002 will be tested again during the year 2007 plant shutdown and then re-tested once every five years.

Item 11

Attach a contingency plan for reporting and clean up of spills or releases.

EPNG will handle all spills and leaks immediately as required by company procedures and will report all spills and leaks according to the requirements of the State of New Mexico as found in NMOCD Rule 116 and WQCC Section 1203.

Any waste generated will be characterized and profiled in accordance with NMOCD-Approved landfill requirements or solid-waste facility requirements (like Waste Management disposal facility).

Item 12

Attach geological/hydrological information for the facility, Depth to and quality of groundwater must be included.

Average annual precipitation in the area is 8.5 inches per year.

Site Geology. The Deming Compressor site is located approximately 6 miles Southwest of the Mimbres River. The surrounding area consists largely of a desert or bolson underlain by thick deposits of sand and gravel. A large amount of ground water is obtained from the water-bearing formations on the bolson deposits. The groundwater in these deposits is derived largely from local precipitation and seepage losses from the run-off of the tributary streams and arroyos which drain in to the county.

Local Geology: The Deming area is composed of alluvium and bolson deposits and other superficial deposits. The Station is located in the Basin and Range Province in Southwestern NM which consists largely of desert or bolson underlain by thick deposits of sand and gravel (Fiedler, 1927).

A generalized site subsurface description is presented based on the drill logs from EPNG wells. Sand and gravel with some clay can be expected with the first 110 feet. A thirteen foot shale unit was encountered at 124 feet. This was followed by another sand and gravel unity containing some clay at 230 feet. A 148 foot thick sandstone unit was encountered terminating at a depth of 486. This was followed by a 30 foot thick clay unit. Bedrock was encountered at 516 feet.

Regional Groundwater: The average annual rainfall in the area is less than 10 inches. Water bearing formations are composed of deposits of sand and gravel in the area vary greatly from place to place. The largest supplies of water are usually obtained from the coarser, loose sands and gravels and year appear to be larger from the lower horizons. The water wells were perforated at the following depths:

- Well No. 6 232-440 feet;
- Well No. 10 315-350 feet, 370 to 420 feet, 450 to 515 feet and 545 to 550 feet
- Well No. 12 397 to 597 feet

Item 13

Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

All reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC 6.2.3103 water quality standards should EPNG choose to permanently dose the facility. Closure measures will include removal or closure in place of all underground piping and equipment. All tanks will be emptied. No potentially toxic materials or effluents will remain on site. All potential sources of toxic pollutants will be inspected. Should contaminated soil be discovered, any necessary reporting under NMOCD Rule 116 and 20 NMAC 6.2.1203 will be made, and clean-up activities will commence. Post closure maintenance and monitoring plans would not be necessary unless contamination is encountered.

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