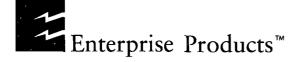


# PERMITS, RENEWALS, & MODS Application

#### ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

......

| I hereby acknowledge receipt of check No            |                   | dated 7/3/09 |
|---|-------------------|--------------|
| or cash received on in the amount of \$             |                   |              |
| from Euterprise Products                            |                   |              |
| for <u>Gw-278</u>                                   |                   |              |
| Submitted by: LAWRENCE Remerce                      |                   | 7/14/09      |
| Submitted to ASD by: Daloran Corner                 |                   |              |
| Received in ASD by:                                 | Date:             |              |
| Filing Fee New Facility                             | Renewal           |              |
| Modification Other                                  |                   |              |
| Organization Code521.07 Applicabl                   | e FY_ <u>2004</u> |              |
| To be deposited in the Water Quality Management Fun | d.                |              |
| Full Payment or Annual Increment                    |                   |              |



# RECEIVED

July 8, 2009

ENTERPRISE PRODUCTS PARTNERS LP DIENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER ENTERPRISE PRODUCTS OLD LENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

> Return Receipt Requested 7008 1830 0001 3448 3473

New Mexico Oil Conservation Division (OCD) Santa Fe Office 1220 South St. Francis Drive Santa Fe, NM 87505 Attn: Mr. Glenn von Gonten

RE: Enterprise Field Services LLC/ Enterprise Products Operating, LLC Discharge Permit Renewal Martinez Canyon Compressor Station (GW-298) Rio Arriba County, New Mexico

Dear Mr. Glenn von Goten:

Enterprise Products Operating, LLC submits the signed copy of the Discharge Permit Renewal for Martinez Canyon Compressor Station (GW-298) with check no. 3229782 in the amount of \$1,700.00 for permit fees per your request in a letter dated July 1, 2009.

If you have questions or need additional information, please contact our Environmental Scientist, Ms. Runell Seale at 505-599-214 or myself at 713-381-6595.

Sincerely,

J Them

Shiver J. Nolah Sr. Compliance Administrator

/bjm Enclosure

# 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 greater than 1001 horsepower is \$1700.00 and was processed with the application. Return a signed copy of the permit conditions with 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 July, 14, 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 October 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.

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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.

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**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

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.

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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 June 9, 2009. Mr. Clay Roesler and Runell Seale witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

- Photo 1 3: The facility has 4 below grade tanks. They are all designed with a secondary containment (tank within a tank) with a leak detection system. Verification of leak detection systems were all found to be dry. During the inspection, the leak detection system for all BGT ports were not easily accessible indicating that the leak detection system are not frequently inspected. <u>The owner/operator shall monitor and keep record of these leak detection systems on a monthly basis</u>. See Condition 11 for details.
- 2. Photo 4 6: Containers were not labeled. <u>The owner/operator shall properly label all</u> <u>containers</u>. See Condition 10 for details.
- Photo 7 10: All above ground storage tanks (AST) need to be properly lined. <u>The'</u> owner/operator shall submit to the OCD a work plan to line all above ground storage tanks. See Condition 9 for details. This was also noted in the 2003 permit, Condition 6. At the time of inspection tanks were still not lined. Enterprise is currently in violation of their discharge permit.

Enterprise shall resolve items 1 and 2 and submit a work plan for item 3 by August 3, 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

<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."

<u>Enterprise Field Services/Enterprise Products Operating LLC</u> Company Name-print name above

Terry L. Hurlburt

Company Representative orint mane

Title Sr. Vice President of Operations

Date: July-7, 2009

Company Representative- Signature

#### OCD Inspection: Enterprise Martinez Canyon CS, GW - 298 Inspector(s): Brandon Powell and Leonard Lowe Company Rep: Clay Roesler and Runell Seale Time: 12:54 - 13:30

Date: 06.09.09



<u>Photo 1</u>: 1 BGT, for pigging liquids. Leak detection verified dry.



<u>Photo 2</u>: 2 and 3 BGT for AST's. Lead detection verified dry.



<u>Photo 3</u>: 4 BGT, for skids. Leak detection verified dry.



Photo 4: Unlabeled barrel.



Photo 5: Unlabeled AST.



Photo 6: Unlabeled AST.

## OCD Inspection: Enterprise Martinez Canyon CS, GW - 298

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Clay Roesler and Runell Seale Time: 12:54 – 13:30

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Photo 7: Unlined AST.



Page 2

<u>Photo 10</u>: Discharge from AST on to unlined secondary containment area.



Photo 8: Unlined AST.



<u>Photo 9</u>: Overflow of AST on to unlined secondary containment.

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Enterprise Products Operating LLC P.O. Box 4735 Houston, Texas 77210

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00006 CKS 6A 07163 - 0003227762 NNNN 1635100005010 X14581 C STATE OF NEW MEXICO C/O OIL CONSERVATION DIVISION 1220 SOUTH ST FRANCIS DR SANTA FE NM 87505-4225 PAGE: 1 of 1

DATE: July 3, 2009 TRACE NUMBER: 6336816553229782 CHECK NUMBER: 3229782



| DATE     | INVOICE NO.  | DESCRIPTION   | INVOICE AMOUNT | DISCOUNT | NET AMOUNT |
|----------|--------------|---|----------------|----------|------------|
| 06/30/09 | 170000JUN09A | ENTERPRISE FIELD SERVICES MARTINEZ<br>CANYON GW298 NM | \$1,700.00     | \$0.00   | \$1,700.00 |
|          |              | TOTALS  | \$1,700.00     | \$0.00   | \$1,700.00 |

New Mexico Energy, Minerals and Natural Resources Department

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

Mark Fesmire Division Director Oil Conservation Division



June 18, 2009

Mr. Clay Roesler P.O. Box 2521 Houston, Texas 77252-2521

Re: Discharge Permit Renewal Martinez Canyon Compressor Station (GW-298) SE/4 SE/4 Section 16, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico

Dear Mr. Roesler:

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 discharge permit for the **Enterprise Products Operating LLC, Enterprise Field Services LLC.**, (owner/operator) 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

> Oil Conservation Division \* 1220 South St. Francis Drive \* Santa Fe, New Mexico 87505 \* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <u>http://www.emnrd.state.nm.us</u>



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کار اور افغان کار اور از این او در ایر کار معرف کار

Mr. Clayton Roesler Enterprise Products Operating, L.P. GW-298, Martinez Canyon CS June 18, 2009 Page 4

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**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

<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 Representative- print na | ame |
|----------------------------------|-----|
|                                  |     |
| Company Representative- Signatu  | ure |
| Title                            |     |
| Date:                            |     |

## OCD Inspection: Enterprise Martinez Canyon CS, GW - 298

Inspector(s): Brandon Powell and Leonard Lowe

<u>Company Rep</u>: Clay Roesler and Runell Seale Time: 12:54 – 13:30

Date: 06.09.09



<u>Photo 1</u>: 1 BGT, for pigging liquids. Leak detection verified dry.



<u>Photo 2</u>: 2 and 3 BGT for AST's. Lead detection verified dry.



<u>Photo 3</u>: 4 BGT, for skids. Leak detection verified dry.



Photo 4: Unlabeled barrel.



Photo 5: Unlabeled AST.



Photo 6: Unlabeled AST.

Page 1

#### OCD Inspection: Enterprise Martinez Canyon CS, GW - 298 Inspector(s): Brandon Powell and Leonard Lowe

<u>Company Rep</u>: Clay Roesler and Runell Seale Time: 12:54 – 13:30

Date: 06.09.09



Photo 7: Unlined AST.



Page 2

Photo 10: Discharge from AST on to unlined secondary containment area.



Photo 8: Unlined AST.



Photo 9: Overflow of AST on to unlined secondary containment.

#### Griswold, Jim, EMNRD

| From:        | Seale, Runell [RSeale@epco.com]   |
|--------------|---|
| Sent:        | Saturday, November 22, 2008 5:33 PM   |
| То:          | Griswold, Jim, EMNRD  |
| Subject:     | GW-298 Martinez Canyon CS Discharge Plan Renewal  |
| Attachments: | GW-298 Martinez Canyon Discharge Plan Renewal Final.pdf; Figure 1 Topo Map<br>Martinez.pdf; Figure 2 Site Facility Diagram Martinez.PDF; Figure 3 Martinez CS State<br>Engineer Reports.pdf |
|              |   |

Jim,

Attached please find the following in conjunction with our renewal of the Martinez Canyon Discharge Plan GW-298.

Plan Renewal Figure 1 Site Location Map Figure 2 Site Layout Diagram Figure 3 NM State Engineers database report

#### Runell A. Seale Environmental Specialist EHS&T-Environmental Permitting EPCO, Inc. Providing services to Enterprise Products and TEPPCO

614 Reilly Ave. Farmington, NM 87401 505 599-2124 office 505 599-2538 fax 505 320-2816 cell RSeale@epco.com

This inbound email has been scanned by the MessageLabs Email Security System.

#### Martinez Canyon Compressor Station

SE/4 of SE/4 of Section 16, Township 27N, Range 6W Rio Arriba, County, New Mexico

#### **GROUNDWATER DISCHARGE PLAN – GW 298**

This document constitutes a renewal for the Groundwater Discharge Plan (GW-298) for the Martinez Canyon Compressor Station in San Juan County, New Mexico. This Groundwater Discharge Plan has been prepared in accordance with the NMOCD "Guidelines for the Preparation of Discharge Plans at Natural Gas Plants, Refineries, Compressor and Crude Oil Pump Stations" (rev 12-95) and the New Mexico Water Quality Control Commission (WQCC) regulations, 20.6.2.3.104 and 3-106 NMAC.

#### 1. Type of Operation

This is a natural gas compression station consisting of one portable skid mounted Caterpillar 3612 natural gas engine with a site rated capacity of 3068 HP. This facility does not discharge and does not intend to discharge directly or indirectly into groundwater.

#### 2. Operator/Legally Responsible Party

Operator/Owner:

Enterprise Field Services LLC, Owner (EFS) Enterprise Products Operating LLC, Operator (EPO) P. O. Box 4324 Houston, TX 77210-4324

Local Representative:

Don Fernald, Field Environmental Scientist 614 Reilly Ave. Farmington, NM 87401 505.599.2141

#### 3. Facility Location

SE/4 of SE/4 (UL P), S16, T27N, R6W, Rio Arriba County, NM Latitude N 36.56480002 Longitude W -107.46537995 See Figure 1, Site Location Map (Topo Map)

#### 4. Landowner

New Mexico State Land Office Attn: Commercial Leasing P. O. Box 1148 Santa Fe, NM 87501 505.827.5724

#### 5. Facility Description

The facility provides natural gas compression for the gathering system. Natural gas will enter the site from EFS's Lateral C-25 line via underground and above ground pipelines. The gas will pass through a unit scrubber, a compressor which is driven by a Caterpillar 3612 natural gas fueled engine and then to a separator and a glycol dehydrator. The glycol dehydrator is not in service at this time. The gas will then be discharged into EFS's Lateral C-25 line. The facility will also have weekly pigging operations. Condensate and field liquids from the pigging operations, unit scrubber and separator will be piped underground to two condensate storage tanks. See Figure 2 Site Layout Map.

#### 6. Materials Stored or Used at the Facility

| Tank Contents   | Solid or Liquid | Tank Capacity-Max<br>Volume Stored  | Location                                |
|---|-----------------|-------------------------------------|---|
| Condensate & field<br>Liquids (T-101 & T-<br>102)                 | Liquid          | 500 barrels each,<br>interconnected | 200 feet away from facility components. |
| Engine Lube Oil<br>(T-103)  | Liquid          | 500 gallons                         | Adjacent to compressor skid             |
| Coolant/Ambritrol<br>(T-103A)                                     | Liquid          | 500 gallons                         | Adjacent to compressor skid             |
| Glycol<br>(T-104)   | Liquid          | 90 barrels                          | On glycol regen skid                    |
| Used lube oil and<br>washdown water<br>(T-106 BGT)                | Liquid          | 35 barrels                          | Near compressor                         |
| Produced Water<br>(T-107 BGT)                                     | Liquid          | 120 gallons                         | Near condensate tanks                   |
| Produced Water<br>(T-108 BGT)                                     | Liquid          | 120 gallons                         | Near condensate tanks                   |
| Methanol (T-109)  | Liquid          | 100 barrels                         | Adjacent to condensate tanks            |
| Diesel (T-110)  | Liquid          | 500 gallons                         | North of condensate tanks               |
| Condensate & field<br>liquids from pig<br>receiver (T-111<br>BGT) | Liquid          | 50 barrels                          | Adjacent to pig receiver cigar          |

# 7. Sources and Quantities of Effluent and Waste Solids Generated at the Facility

| Process<br>Fluid/Waste   | Source             | Quantity  | Additives                          |
|--|--------------------|---|------------------------------------|
| Glycol Filters   | Dehydration Units  | (Ranges)<br>None-Glycol<br>Dehydrator not in<br>service | None                               |
| Produced Water   | Condensate Tank    | 750 bbls/month  | None                               |
| Solid Waste (Trash)  | General trash      | < 1 yd/month  | None                               |
| Sorbent Material and rags  | Compressor Engines | 1-2 lb/month  | None                               |
| Used Oil   | Compressor Engine  | 40-50<br>gallons/biennially                             | None                               |
| Used Oil Filters   | Compressor Engines | 1filter/60 days   | None                               |
| Washdown water with<br>residual used oil with<br>solids and sludge | Compressor Engines | 75 gallons/6<br>months                                  | Water with detergents and lube oil |

#### 7A. Source & Quantity

#### 7B. Quality Characteristics

| Process<br>Fluid/Waste  | NM WASTE STATUS  | Analytical Process  | Toxic Pollutants |
|---|--|---|------------------|
| Glycol Filters  | Non-Exempt   | Profiled, recycled  | None             |
| Produced Water  | Exempt   | Profiled,<br>evaporated/injected                                    | None             |
| Solid Waste   | Exempt from NMED Solid<br>Waste regulations due to<br>small quantity generated | Not required  | None             |
| Sorbent materials<br>and rags   | Non-exempt   | Profilied, recycled   | None             |
| Used Oil  | Non-exempt   | Recycled, tested for halogen  | None             |
| Used Oil Filters  | Non-exempt   | Profiled, recycled  | None             |
| Washdown Water<br>with residual used<br>oil with solids and<br>sludge | Non-exempt   | Profiled at disposal facility<br>according to NMOCD<br>regulations. | None             |

### 7 (C). Commingled Waste Streams

There are no commingled waste streams at this facility.

# 8. Description of Current Liquid and Solid Waste Collection/Storage/Disposal Procedures

#### Transfer, Storage, and Disposal of Process Fluids, Effluents, and Waste Solids MARTINEZ CANYON COMPRESSOR STATION

| PROCESS<br>FLUID/WASTE                       | COLLECTION &<br>STORAGE SYSTEM  | CONTAINER<br>CAPACITY/<br>DESCRIPTION                                      | <u>NM Waste</u><br>STATUS | DESCRIPTION OF FINAL DISPOSITION  |
|--|---|--|---------------------------|---|
| Glycol Filters                               | Placed into covered bin on location to drain.   | 55 gallon steel drum   | Non-exempt                | Recycled: Transported by Safety Kleen Systems, Inc. to<br>facility Sec 10, T10N, R3E, NM. EPA ID #NMD 000 804<br>294, NM and/or Thermal Fluids, Inc. to recycling facility<br>located at 9010 Bates Road SW Albuquerque, NM EPA<br>#NMD986674141. None at this time, unit not in service. |
| Produced Water                               | Below grade steel pipes<br>drain to two 50 bbl. double<br>wall steel sumps.   | Two 50 barrel steel<br>double wall BG tank                                 | Exempt                    | Evap/Injection: Transported by Industrial Mechanical Inc.<br>to Basin Disposal Evap. Pond location: F 3-29-11.  |
| Solid Waste (Trash)                          | Placed into trash can inside<br>compressor building   | Trash cans with plastic liners   | Exempt                    | Buried: Transported by Waste Management, Inc. to San<br>Juan County Regional Landfill, #78 CR 3140, Aztec, NM<br>87410.   |
| Sorbent materials<br>and rags                | Placed into sealed bin for recycling  | Special waste bin, 6 yd<br>steel   | Non-exempt                | Recycled: Transported by Safety Kleen Systems, Inc. to<br>facility located at Sec 10, T10N, R3E, Albuquerque, NM.<br>EPA ID #NMD000804294, NM ID #2344 and/or Thermal<br>Fluids, Inc. to recycling facility located at 9010 Bates<br>Road SW Albuquerque, NM EPA #NMD986674141            |
| Used Oil                                     | Drained to trailer mounted<br>tank when oil is changed<br>once every other year.<br>Moved to Kutz Hydrocarbon<br>Recovery Facility-(GW-49-1)<br>for recycling | 500 gallon horizontal<br>skid mounted tank<br>located on mobile<br>trailer | Non-exempt                | Recycled: Transported by Safety Kleen Systems, Inc. to<br>facility, Sec 10, T10N, R3E, NM. EPA ID NMD<br>000.804.294, NM ID #2344 and/or Thermal Fluids, Inc. to<br>recycling facility located at 9010 Bates Road SW<br>Albuquerque, NM EPA #NMD986674141                                 |
| Used Oil Filters                             | Placed into sealed drum and<br>moved to EFS East Main St.<br>warehouse for recycling  | 55 gallon steel drum   | Non-exempt                | Recycled: Transported by Safety Kleen Systems, Inc. to<br>facility located at Sec 10, T10N, R3E, NM. EPA ID #NMD<br>000 804 294, NM ID #2344 and/or Thermal Fluids, Inc. to<br>recycling facility located at 9010 Bates Road SW<br>Albuquergue, NM EPA #NMD986674141                      |
| Washdown water<br>with traces of lube<br>oil | Collected via below ground<br>drain lines into BG tank.<br>Moved to Kutz Hydrocarbon<br>Recovery Facility (GW-49-1)<br>for recycling or disposal.             | 50 gallon double wall<br>BG tank   | Non-exempt                | Evap/Injection: Trucked by Key Energy Services to the<br>Key Four Corners Inc Disposal facility @ UL E, S2,<br>T29N,R12W  |

Bermed areas are designed and construction to ensure that they are sufficient to contain one and one-third capacity of the largest tank. Concrete curbed containments are provided beneath most of the process areas in the facility. A closed drain system from the compressor engine skids drain to the 35 barrel double walled BG tank. Produced water drains to the two 50 barrel produced water BG tanks within the large bermed area which has an impermeable liner.

Hydrostatic testing of the facility piping to the drain system is conducted every five (5) years to ensure the integrity of the passive drain line piping at this facility using appropriate methods to test integrity. This facility was last tested on 12-17-03 and is scheduled for testing before the five (5) year period expires.

#### 9. Proposed Modifications

There are no planned modifications to this facility.

#### 10. Inspection, Maintenance and Reporting

Routine inspections and maintenance are performed to ensure proper collection, storage, and off-site disposal at approved disposal and recycling facilities.

The BGT's at this facility are double lined steel vessels with leak detection. The AGT and BGT tanks will be inspected monthly. Leaks will be reported to the NMOCD in accordance with Rule 116 (19.15.C.116 NMAC) and WQCC regulation (20.6.2.1203 NMAC) regulations.

Precipitation and run-off do not come in contact with process waste streams. As a result, the facility has not installed any special storm water containment or collection systems. The facility pad is maintained to prevent surface accumulations.

#### 11. Spill/Leak Prevention and Reporting Procedures

A. Potential sources of spills or leaks at this facility include the following, tank overflow or rupture; overflow or cracking of fiberglass tanks; overflow or cracking on concrete sumps, rupture of process pipeline.

Prevention of accidental release from these sources is a high priority of operating personnel. Spill prevention will be achieved primarily through proper execution of operating procedures and secondly, by an active equipment inspection and maintenance program. Spill detection will be accomplished by daily visual inspection of facility equipment and continuous monitoring of process instrumentation. Tanks will be inspected monthly.

B. Spills occurring at this facility would be contained by the installed berms, or by berms erected on-site at the time of the incident. Heavy equipment to construct containment berms is readily available from private contractors in the area. Due to the lack of water bodies in the immediate area of the facility, containment equipment such as booms will not be stockpiled.

C. Operator will respond to and report spills as outlined in the SPCC plan of the Martinez Canyon Compressor Station and in accordance with the requirements of NMOCD Rule 116 (19-15.C.116 NMAC).

#### **12. Site Characteristics**

The Martinez Canyon Compressor Site (Lateral C-25) is located on Ensenada Mesa at an elevation of 6540 feel above sea level (asl). The northern boundary of Ensenada Mesa is defined by Carrizo Canyon, a large drainage about 1.5 miles north of the stations. The elevation in Carrizo Canyon due north of the compressor station is 6225 feet asl. Two smaller canyons flow northward into Carrizo Canyon east and west of the compressor stations. The elevation of Martinez Canyon, which lies about a half mile east of the compressor station, is about 6300 feet asl. Any precipitation runoff from the station drains to Martinez Canyon. The USGS Santo Peak 7.5 minute quadrangle shows all of these drainages as ephemeral streams.

The Eocene San Jose Formation underlies the compressor station and is the only exposed rock unit within miles of the site. The only other mapped unit, unconsolidated alluvium, is restricted to the major drainages. The San Jose Formation is a sequence of interbedded sandstones and mudstones and is subdivided into four members. In ascending order these are: Cuba Mesa, Regina, Llaves and Tapicitos. Our cursory examination of available geologic maps suggests that the compressor station lies the upper portion of the San Jose Formation, Perhaps on the Llaves Member. The Llaves is described as a course-grained arkose up to 1,300 feet thick in the center of the San Juan Basin. The topography surrounding the compressor station and our site observations demonstrate that the compressor station lies on a cliff-forming sandstone unit.

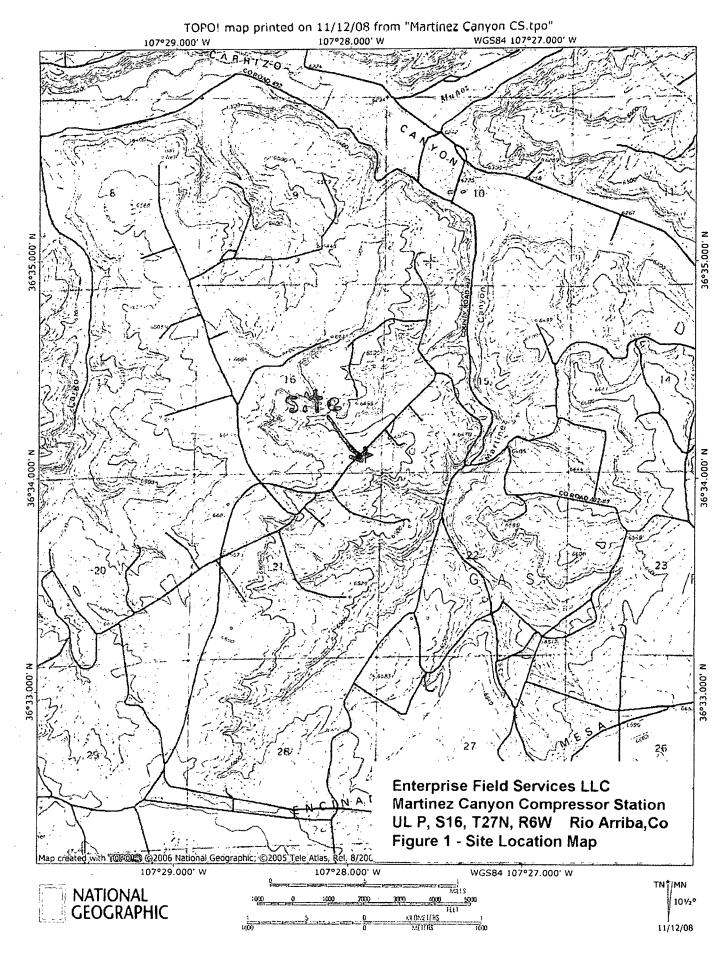
A review of the NM State Engineers Waters database indicate no water wells within 1 mile of the site as indicated by the attached reports. It is estimated that groundwater beneath the Martinez Canyon Compressor Site is over two hundred feet deep and is under artesian pressure. The pressure precludes the possibility of any leakage, spills or any other releases from entering groundwater within the San Jose Formation. It is estimated that only a release of catastrophic proportions could enter the alluvial aquifer. The Discharge Plan process is not designed to address such catastrophic releases. The alluvial aquifer is about one half mile east and more that 200 feet below the compressor station. Therefore, we conclude that effluent or leachate from the compressor station cannot move directly or indirectly into groundwater.

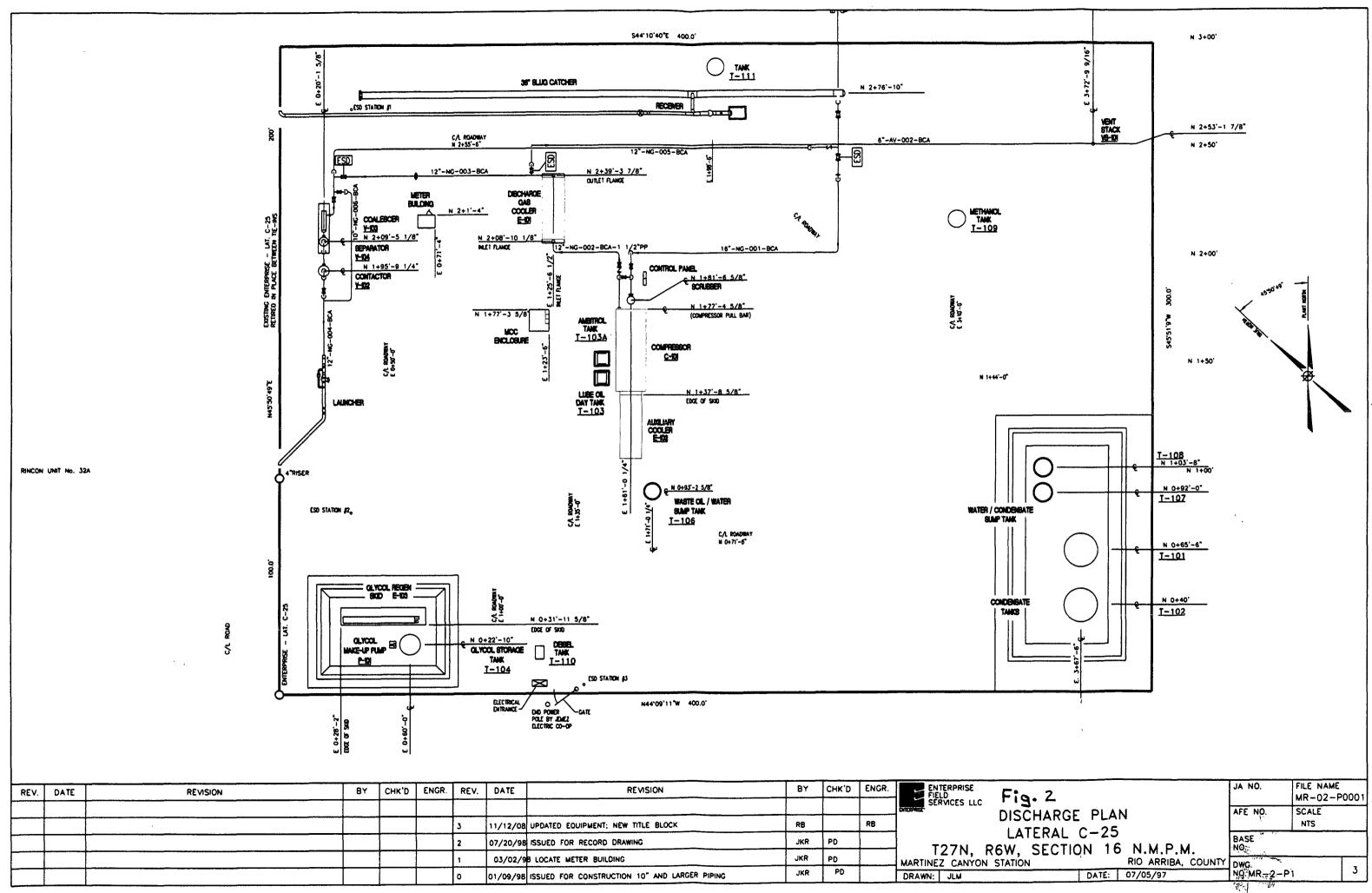
The flooding potential at this site is considered negligible. As a result, flood protection measures will not be installed at the facility.

#### **13. Additional Information**

Any unauthorized release or discharge will be reported to the NMOCD in accordance with NMOCD Rule 116, 19.15.C.116 NMAC.

Closure of facility when abandoned will meet current NMOCD guidelines and will conform to WQCC Section 3107.A.11 regulations. Reasonable and necessary measures will be taken to prevent the exceedance of 20 NMAC 6.2.3103 water quality standards should Enterprise choose to permanently close the facility. Closure measure will include removal or closure in place of the underground piping and equipment. The tanks will be emptied before removal. Potentially toxic materials or effluents will be removed from the site and properly disposed. Potential sources of toxic pollutants will be inspected. Contaminated soil if discovered will be reported under NMOCD Rule 116 and 20 NMAC 6.2.1203 procedures and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered.





| REV. | DATE | REVISION | BY | CHK'D | ENGR. | REV. | DATE     | REVISION                                      | BY  | CHK'D | ENGR. | FIELD FIELD FI                       |
|------|------|----------|----|-------|-------|------|----------|---|-----|-------|-------|--------------------------------------|
|      |      |          |    |       |       |      |          |   |     |       |       | DIS                                  |
|      |      |          |    |       |       | 3    | 11/12/08 | UPDATED EQUIPMENT; NEW TITLE BLOCK            | RB  |       | RB    |                                      |
|      |      |          |    |       | 1     | 2    | 07/20/98 | ISSUED FOR RECORD DRAWING                     | JKR | PD    |       |                                      |
|      |      |          |    |       |       | 1    | 03/02/9  | B LOCATE METER BUILDING                       | JKR | PD    |       | T27N, R6W,<br>MARTINEZ CANYON STATIC |
|      |      |          |    | 1     |       | 0    | 01/09/98 | ISSUED FOR CONSTRUCTION 10" AND LARGER PIPING | JKR | PD    |       | DRAWN: JLM                           |

| New Mexico Office of the State Eng<br>POD Reports and Downloads |                           |
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## AFFIDAVIT OF PUBLICATION

#### Ad No. 60829

## STATE OF NEW MEXICO **County of San Juan:**

BOB WALLER, being duly sworn says: That he is the CLASSIFIED MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Wednesday October 29, 2008

And the cost of the publication is \$262.15

ON 10/31/08 BOB WALLER appeared before me, whom I know personally to be the person who signed the above document.

Commission Expires - 1005/11

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

NOTICE OF PUBLICATION

Notice is hereby given pursuant to New Mexico Water Quality Control Commission Regulations (20.6/2/3106 NMAC); the following discharge permit applications have been submitted to the Director of the New Mexico Oll Conservation Division (NMOCD), 11220 S. Saint Francis Drive, Santa Fe. New Mexico 87505, Telephone (505) 476-3440

(GW-298). Enterprise Products Operating, LLC, PO Box 4324 in Houston, Texas 77210-4324 hos submitted an application for renewal of the discharge permit for their Martinez Canyon Compressor Station located in the SE/4 of the SE/4 of Sec (in 16, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexi co. The aquifer beneath this facility lies at a depth greater than 200 feet below surface with a total dissolved solids concentration of approximately 500 mg/l. The discharge permit addresses how oilfield products 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 project fresh water.

(GW 302) Enterprise Products Operating LLC: PO Box 4324 in Houston, Texas 77210-4324 has submitted an application for renewal of the discharge permit for their Potter Canyon Compressor Station located in the NW/4 of the NE/4 of Sec tion 19; Township 30 North, Range 10 Wes! NMPM. San Juan County, New Mexi co. Approximately 500 barrels per month of produced water with a dissolved so lids concentration of 10:000 mg/1 and 10 barrels per year of wash water is col-lected and transported off-site for disposal. The aquifer beneath this facility lies an approximate depth of 250 feet below surface with a total dissolved so lids concentration of 2000 mg/1. The discharge permit addresses how oilfield prod ucts 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.

(GW-303) Enterprise Products Operating, LLC, PO Box 4324 in Houston, Texas 772104324 has submitted an application for renewal of the discharge permit for their Navajo City Compressor Station located in the SW/4 of the NW/4 of Section 33. Township 30 North Range 7 West NMRM, Sin Juan County, New Mexico. Approximately 250 barrels per month of produced water with a dissolved solids concentration of up for 76000 mg/ and 10 barrels per year of wash water is col-lected and transported off site for disposal. The aguiter beneath this facility lies dt. an approximate depth of 200 feet below surface with a total dissolved solids concentration of 1000 mg/. The discharge permit addresses how oilfield prod ucts 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.

(GW-304) Enterprise Products Operating, LLC, PO Box 4324 in Houston, Texas, 772104324 has submitted an application for irrenewal of the discharge permit for their Turley Compressor Station (Trunk (O)) located in the SW/4 of the NW/4 of Section 30; Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico: Approximately 250 barrels per month of produced water with a dis solved solids concentration of up to 76,000 mg/4 and 10 barrels per year of wash water is collected and transported off site for disposal. The aquifer beneath this facility lies at an approximate depth of 100 feet below surface with a total dis solved solids concentration of sup properly handled, stored, and disposed of, in cluding how spills, leaks, and other accidental discharges to the surface will be managed in order to protect (resh water

managed in order to protect firesh water. The NMOCD hast determined that the applications are administratively complete and hast prepared draft permits "The NMOCD will accept comments and statements of inferest regarding these applications and will create facility-specific mailing lists for persons who wish to receive future motices. Persons interested in obtaining fur ther, information, Submitting comments or requesting to be on any facility-specific mailing list, for future inforces may contact the Environmental Bureau Chief of the OII Conservation Division at the address given above? The administrative complete ness determinations and draft permits may be viewed at the address between 6:00 arm and 4:00 ptm. Monday through Friday, or may also be viewed at the NMOCD web site http://www.emmrd.state.imm.us/acd/. "Persons interested in obtain ing copies of the applications, and adraft permits may be viewed of any proposed discharge permit or maior modification, the Director shall allow aperiod of any proposed discharge permit after the date of publication of this inotice, during which interested persons may, sub mit, comments on request that NMOCD with energies here a significant public hearings. Requests for public hearings shall set forth the reasons why any hearing should be held. Hearings will be held if the Director determines there is significant public interest.

be-held fifthe Director determines there is significant public interest. If no public hearingsfare held, the Director will approve or disapprove the proposed permits based on information available including all comments received. If public hearings are held, the director will approve or disapprove the proposed permits based on information in the permit application and information submitted at the hearings. Para obtener mas information sobre esta solicitud en español, sirvase comunicarse por favor. New Mexico Energy, Minerals and Natural Resources Department (De pto Def Energia Minerals v Recursos Naturales de Nuevo México), oil Conserva tion Division (Depto, Conservación 2016) fetroleo 1220 South St. Francis Drive Santa Fe New México (Contacto Dorothy Phillips, 505 476 3461)

GIVEN under the Seal of New /Mexico Oil Gonservation Commission at Santa Fe, New/Mexico on this 23rd day of October 2008 SITATE OF NEW MEXICO OLCONSERVATION DIVISION Mark Festmire, Director 和马克 SEAL 💱

Legal No., 60829 published in The Daily, Times' Farmington, New Mexico on Wednes' day October 29, 2008 신한사망 þ

# **NEW MEXICAN** Founded 1849

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

ALTERNATE ACCOUNT: 56689AD NUMBER: 00272354 ACCOUNT: 00002212LEGAL NO: 86210P.O. #: 52100-00000137317 LINES 1 TIME(S)276.08AFFIDAVIT:7.00TAX:22.47TOTAL:305.55

#### AFFIDAVIT OF PUBLICATION

#### STATE OF NEW MEXICO COUNTY OF SANTA FE

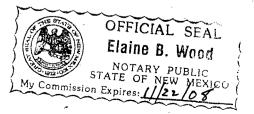
I, L. Paquin, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 86210 a copy of which is hereto attached was published in said newspaper 1 day(s) between 10/30/2008 and 10/30/2008 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 30th day of October, 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 30th day of October, 2008

Notar 22,2008 Commission Expires:



www.santafenewmexican.com

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

Notice is hereby given pursuant to New Mexico Water Quality Control Commission Control Commission Regulations Regulations (20.6.2:3106 NMAC), the following dis-charge permit appli-cations have been submitted to the Di-rector of the New Mexico Oil Conserva-tion Division (NMOCD) 1220 S Saint Francis Drive, Santa Fe New Mexico 87505, Telephone 87505, Telephone (505) 476-3440:

(GW-298) Enterprise Products Operating, LLC: PO Box 4324 in LLC, PO Box 4324 in Houston Texas 77210-4324 has sub-mitted an application for renewal of the dis-charge permit for their Martinez Canyon Compressor Station located in the SE/4 of the SE/4 of Section 16, Township 27 North, Range 6 West, NMPM, Range 6 West, NMPM, Rio Arriba County, New Mexico. The aq-ulfer beneath this fa-cillity lies at a depth greater than 200 feet below surface with a total dissolved solids concentration of approximately 500 mg/l. The discharge permit addresses how oil-field products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect fresh water.

Products Operating, LLC, PO Box 4324 in Houston, 77210-4324 has sub-mitted an application for renewal of the discharge permit for, their Potter Canyon Compressor, Station located in the NW/4 of the NE/4 of Section Township 19, Township 30 North, Range 10 West, NMPM, San Juan County, New Mexico. Approximately 500 barrels per month of produced water with a dissolved solids concentration of concentration of 10,000 mg/l and 10 barrels per year of wash water is col-lected and trans-ported off-site for disposal. The aquifer be-neath this facility lies at an approximate depth of 250 feet be-low surface with a total dissolved solids concentration of 2,000 concentration of 2,000 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental dis-charges to the surcharges to the sur-face will be managed in order to protect fresh water.

(GW-302) Enterprise

(GW-303) Enterprise Products Operating, LLC, PO Box 4324 in Houston, Texas 77210-4324 has sub-77210-4324 has sub-mitted an application for renewal of the disfor renewal or the dis-charge permit for their Navajo City Compressor Station located in the SW/4 of the NW/4 of Section 33, Township 30

North, Range 7 West, NMPM, San Juan County, New Mexico. Approximately 250 barrels per month of produced water with a dissolved solids concentration of up to 76,000 mg/l and 10 barrels per year of wash water is col-lected and trans-ported off-site for disposal. The aquifer be-neath this facility lies at an approximate depth of 200 feet below surface with a total dissolved solids concentration of 1,000 mg/l. "The discharge permit \_\_\_\_\_addresses permit addresses how oilfield products and waste will be properly handled, stored, and disposed including of, including now spills, leaks, and other accidental dishow charges to the sur-face will be managed in order to protect fresh water.

(GW-304) Enterprise Products Operating, LLC: PO Box 4324 in LLC, PO BOX 4324 in Houston, Texas 77210-4324 has sub-mitted an application for renewal of the dis-charge permit for their Turley Compres-sor Station (Trunk O) located in the SW/4 of the NW/4 of Section 30, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 250 barrels per month of produced water with produced water with a dissolved solids concentration of up to 76,000 mg/l and 10 barrels per year of wash water, is col-lected and trans-ported off-site for disposal. The aquifer be-neath this facility lies at an approximate depth of 100 feet be-low surface with a to-tal dissolved solids concentration of 300 concentration of 300 mg/l. The discharge permit addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental dis-charges to the sur-face will be managed in order to protect fresh water. fresh water.

The NMOCD has de-termined that the ap-plications are admin-istratively complete and has prepared draft permits. The NMOCD will accept comments and state-ments of interest re-garding these appli-cations and will cre-ate facility-specific mailing lists for per-sons who wish to re-ceive ruture notices. Persons interested in obtaining, further in-formation submitting comments or request-ing to be on any facil-ity specific mailing list for future notices may contact the Envi-ronmental Bureau Chief of the Oil Con-servation Division at the address given above. The adminis-trative completeness determinations and draft permits may be viewed at the above address between 8:00 a.m. and 4:00 p.m. a:m. and 4:00 p.m. Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.st ate:nm.us/ocd/.s. Per-Sons interested in obsons interested in ob-taining copies of the applications and draft permits may contact the NMOCD at the ad-dress given above. Prior to ruling on the renewal of any pro-posed discharge per-mit or major modifi-cation, the Director shall allow a period of at least thirty (30) days after the date of publication of this nopublication of this no-tice, during which in-terested persons may submit comments or request that NMOCD hold public nearings. Requests for public nearings shall set forth the reasons why any hearing should be held. Hearings will be held if the Director determines there is significant public in-terest. publication of this noterest. If no public hearings are held, the Director will approve or disapprove the proposed permits based on in-formation available, including all comments received. If public hearings are held; the director will approve or disap-prove the proposed permits based on in-formation in the permit application and information submit-ted at the hearings.

Para obtener más in-

formación sobre esta

solicitud en espan\_ol, sirvase comunicarse por favor: New Mex-ico Energy, Minerals and Natural Re-

and Natural Re-sources Department (Depto Del Energia Minerals y Recursos Naturales de Nuevo México), Oll Conser-vation División (Depto, Conserva-cio n Del Petróleo), 1220 South St. Feracio

cio n. Del Petronco, 1220 South St. Francis Drive: Santa Fe. New Mexico (Contacto, Dorothy Phillips 505-476-3461)

GIVEN under the Seal of New Mexico Oil

New Mexico, on this 23rd day of October

STATE OF NEW MEXICO OIL CONSERVATION

Director Legal No: 86210

Pub. Oct. 30, 2008

DIVISION

SEAL Mark Fesmire,

Com-

Fe:

Conservation

2008.

mission at Santa



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

Mark Fesmire Director Oil Conservation Division



October 23, 2008

Mr. Clayton Roesler Manager, Environmental Plans & Permitting Enterprise Products Operating, LLC PO Box 4324 Houston, Texas 77210-4324

TRANSMITTED VIA EMAIL: croesler@epco.com

#### Re: Discharge Plan Permit Renewal Application GW-298 Martinez Canyon Compressor Station (SE/4 of SE/4, Sec. 16, T27N, R6W) Rio Arriba County, New Mexico

Mr. Roesler:

The Oil Conservation Division (OCD) has received Enterprise Products' application along with the associated filing fee for renewal of discharge permit GW-298 for the Martinez Canyon Compressor Station. Upon preliminary review, your application has been deemed "administratively complete".

Therefore, the New Mexico Water Quality Control Commission public notice requirements under 20.6.2.3108 NMAC must now be satisfied and demonstrated to the OCD. Attached you will find a draft of the permit conditions pending a technical review by the OCD of the application. Final permit conditions may change as a result of that review and public comment.

If there are any questions regarding this matter, please do not hesitate to contact me by phone or email at *jim.griswold@state.nm.us*. Please refer to permit GW-298 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 III Office, Aztec

#### NOTICE OF PUBLICATION

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

Notice is hereby given pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application 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-298) Enterprise Products Operating, LLC, PO Box 4324 in Houston, Texas 77210-4324 has submitted an application for renewal of the discharge permit for their Martinez Canyon Compressor Station located in the SE/4 of the SE/4 of Section 16, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. The aquifer beneath this facility lies at a depth greater than 200 feet below surface with a total dissolved solids concentration of approximately 500 mg/l. The discharge permit addresses how oilfield products 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 <a href="http://www.emnrd.state.nm.us/ocd/">http://www.emnrd.state.nm.us/ocd/</a>. 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 23<sup>rd</sup> day of October 2008.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

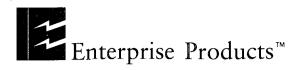
SEAL

Mark Fesmire, Director

## ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

| I hereby acknowledge receipt of check No: dated           | 10/20/08 |
|---|----------|
| or cash received on in the amount of $\frac{20}{20}$      |          |
| from Enterprise Products                                  |          |
| for <u>Gw-298</u>   |          |
| Submitted by: LAWSER FORE Date: 10/201                    | 08       |
| Submitted to ASD by: Journe Force Date: 10/20             | 0/08     |
| Received in ASD by: Date:                                 |          |
| Filing Fee New Facility Renewal                           | •<br>•   |
| Modification Other  |          |
| Organization Code <u>521.07</u> Applicable FY <u>2004</u> |          |
| To be deposited in the Water Quality Management Fund.     |          |
| Full Payment or Annual Increment                          |          |
|   |          |
|   | · .      |

\_\_\_\_\_



RECEIVED

ENTERPRISE PRODUCTS PARTNERS LP ENTERPRISE PRODUCTS OPERATING LLC ENTERPRISE PRODUCTS OLPOP, INC., SOLE MANAGER

October 20, 2008

Federal Express 8623 6321 2013

New Mexico Oil Conservation Division Environmental Bureau Attn: Jim Griswold/Wayne Price 1220 South St. Francis Drive Santa Fe, NM 87505

RE: Groundwater Discharge Renewal Applications Martinez Canyon Compressor Station – GW-298 Navajo City Compressor Station – GW-303 Potter Canyon Compressor Station – GW-302 Turley Compressor Station – GW-304

Dear Mr. Griswold and Mr.Price:

Enclosed for your review and handling are the referenced Discharge Plan Applications. Also enclosed is a check in the amount of \$400 which covers the application fee for the permit. There have been no significant changes to these facilities since our last renewal.

Should you have questions or need additional information, please contact me at (713) 803-5470 or Ms. Runell Seale of my staff at (505) 599-2124.

Sincerely.

Clay on Roesler Manager, Environmental Plans & Permitting

/ras attachments

| <u>District 1</u><br>1625 N. French Dr., Hobbs, NM 88240<br><u>District II</u><br>1301 W. Grand Avenue, Artesia, NM 88210<br><u>District III</u><br>1000 Rio Brazos Road, Aztec, NM 87410<br><u>District IV</u><br>1220 S. St. Francis Dr., Santa Fe, NM 87505 | State of New Mexico<br>Energy Minerals and Natural Resources<br>Oil Conservation Division<br>1220 South St. Francis Dr.<br>Santa Fe, NM 87505 | Revised June 10, 2003<br>Submit Original<br>Plus 1 Copy<br>to Santa Fe<br>1 Copy to Appropriate<br>District Office |
|--|---|--|
| REFINERIES,<br>AN  | LICATION FOR SERVICE COMI<br>COMPRESSOR, GEOTHERMAL<br>D CRUDE OIL PUMP STATIONS<br>CD Guidelines for assistance in completing the            | FACILITES  |
|  | New 🛛 Renewal 🗍 Modificatio   | n  |
| 1. Type: <u>Martinez Canyon Compres</u>  | ssor Station, Discharge Plan #GW-298  |  |
| 2. Operator: <u>Enterprise Products Ope</u>  | erating LLC, Operator: Enterprise Field Services  | s LLC, Owner   |
| Address: P. O. Box 4324. Housto  | on. TX 77210-4324   |  |

| Contact Person: | Clay Roesler | Phone: _713-803-5470_ |
|-----------------|--------------|-----------------------|
|                 |              | ,                     |

| Location: | SE/4 | SE/4         | Section _  | 16      | Township       | 27N         | Range | 6W |  |
|-----------|------|--------------|------------|---------|----------------|-------------|-------|----|--|
|           |      | Submit large | scale topo | graphic | map showing ex | act locatio | on.   |    |  |

4. Attach the name, telephone number and address of the landowner of the facility site. There are no significant changes at the facility since the last permit application on August 21, 2003.

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. There are no significant changes at the facility since the last permit application on August 21, 2003.

6. Attach a description of all materials stored or used at the facility. There are no significant changes at the facility since the last permit application on August 21, 2003.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. There are no significant changes at the facility since the last permit application on August 21, 2003.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. There are no significant changes at the facility since the last permit application on August 21, 2003.

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. There are no significant changes at the facility since the last permit application on August 21, 2003.

10. Attach a routine inspection and maintenance plan to ensure permit compliance. There are no significant changes at the facility since the last permit application on August 21, 2003.

11. Attach a contingency plan for reporting and clean-up of spills or releases. There are no significant changes at the facility since the last permit application on August 21, 2003.

Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
There are no significant changes at the facility since the last permit application on August 21, 2003.
Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. There are no significant changes at the facility since the last permit

## application on August 21, 2003.

3.

14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

| Name: <u>Clayton A. Roesler</u>          | Title: | Manager, Plans & Permitting |
|--|--------|-----------------------------|
| Signature: Contractor                    | Date:  | 10-20-08                    |
|  |        |                             |
| E-mail Address: <u>CRoesler@epco.com</u> |        |                             |



GW- 298 November 18, 2003 Page 3

Mr. David Bays

2.

3.

## ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-298 EL PASO FIELD SERVICES MARTINEZ CANYON COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS November 18, 2003

1. <u>Payment of Discharge Permit Fees:</u> Both the \$100.00 filing fee and the \$1,700.00 flat fee have been received by the OCD.

<u>Commitments:</u> El Paso Field Services will abide by all commitments submitted in the discharge permit renewal application letter dated August 21, 2003 and these conditions for approval.

<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 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.
- 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 Aztec 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 Field Services 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 Field Services 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 at the Martinez Canyon 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 Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services 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 Field Services

Print Name: <u>Bennie J. Armente</u> Signature: 15 . Jule Title: Manager

Date: <u>/- 5-</u>



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON Governor Joanna Prukop Cabinet Secretary

November 18, 2003

Lori Wrotenbery Director Oil Conservation Division

CERTIFIED MAIL RETURN RECEIPT NO. 3929-9994

Mr. David Bays El Paso Field Services 614 Reilly Ave. Farmington, NM 87401

RE: Discharge Permit Renewal GW-298 El Paso Field Services Martinez Canyon Compressor Station San Juan County, New Mexico

Dear Mr. Bays:

The ground water discharge permit renewal GW-298 for the El Paso Field Services Martinez Canyon Compressor Station located in the SE/4 SE/4 of Section 16, Township 27 North, Range 6 West, NMPM, San Juan 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 21, 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 Field Services of responsibility should operations result in pollution of surface water, groundwater or the environment. Nor does it relieve El Paso Field Services 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

Oil Conservation Division \* 1220 South St. Francis Drive \* Santa Fe, New Mexico 87505 Phone: (505) 476-3440 \* Fax (505) 476-3462 \* <u>http://www.emnrd.state.nm.us</u>





3107.C, El Paso Field Services 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 permit is for a period of five years. This permit will expire on July 14, 2008, and El Paso Field Services should submit an application in ample time before that 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 Field Services Martinez Canyon 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 with greater than 1,000 horsepower of \$1,700.00.

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

Sincerely,

Roger C. Ánderson Chief, Environmental Bureau Oil Conservation Division

RCA/eem Attachment

Xc: OCD Aztec Office

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## ATTACHMENT TO THE DISCHARGE PERMIT RENEWAL GW-298 EL PASO FIELD SERVICES MARTINEZ CANYON COMPRESSOR STATION DISCHARGE PERMIT APPROVAL CONDITIONS November 18, 2003

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- 1. <u>Payment of Discharge Permit Fees:</u> Both the \$100.00 filing fee and the \$1,700.00 flat fee have been received by the OCD.
- 2. <u>Commitments:</u> El Paso Field Services will abide by all commitments submitted in the discharge permit renewal application letter dated August 21, 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 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.
- 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 Aztec 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 Field Services 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 Field Services 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 at the Martinez Canyon 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 Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services 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 Field Services

Print Name:

Signature:

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

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

#### ACKNOWLEDGEMENT OF RE PT OF CHECK/CASH

|                                | I hereby acknowledge receipt of check No  | dated 9-5-03  |
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| •                              | or cash received on $\frac{9/9/03}{10}$ in  | the amount of \$ 1.800.00   |
| · .                            | from <u>Gulfterra</u> (EPFS)  |   |
|                                | for MARTINEZ CANYON C.S.  | GW-298  |
| • • •                          | Submitted by: Martus  | • Date: 9/9/02  |
|                                | Submitted to ASD by:  | Date:   |
|                                | Received in ASD by:   | Date:   |
| ·                              | Filing Fee New Facility   |   |
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| GULFTE<br>1001 Loui<br>HOUSTOI | RRA FIELD SERVICES, LLC<br>isiana, Suite 2700<br>N. TX: 77002<br>New Castle, DE 19720                           | CHECK DATE<br>09/05/2003<br><u>62-20</u><br>311<br><u>***\$1,800.00</u> |
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1001 Louisiana, Suite 2700 HOUSTON, TX 77002

REMITTANCE ADVICE

CHECK DATE CHECK NUMBER VENDOR NUM 09/05/2003 0000002667

STATE OF NEW MEXICO OIL CONSERVATION DIVISION 1220 S ST FRANCIS DR SANTA FE, NM 87505

#### **RETAIN FOR YOUR RECORDS**

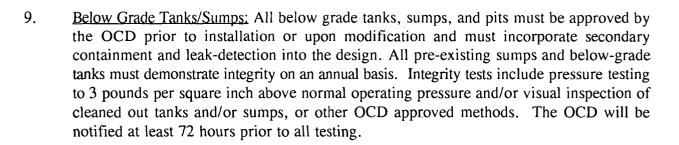
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## ATTACHMENT TO THE DISCHARGE PLAN GW-298 EL PASO FIELD SERVICES MARTINEZ CANYON COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (July 14, 1998)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$50.00 filing fee has been received. A flat fee of \$1,380.00 is required for discharge plans for compressor stations with horsepower rating greater than 3,000 horsepower. The required flat fee 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.
- 2. <u>El Paso Commitments:</u> El Paso Field Services will abide by all commitments submitted in the discharge plan application dated April 2, 1998.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
- 4. <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.
- 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 will be clearly labeled to identify their contents and other emergency notification information.



- 10. <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. The permittee 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>: 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.
- 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 Aztec District Office.
- 14. <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.
- 15. <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.

16. <u>Certification:</u> El Paso Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services 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 FIELD SERVICES

by Bering Hinte

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|           | Submitted to ASD by: 200  | de           | Date: 8/10/91                    | /                 |
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STATE OF NEW MEXICO



ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

July 14, 1998

CERTIFIED MAIL RETURN RECEIPT NO. Z-357-869-990

Mr. David Bays El Paso Field Services 614 Reilly Avenue Farmington, New Mexico 87401-2634

## RE: Discharge Plan GW-298 Martinez Canyon Compressor Station Rio Arriba County, New Mexico

Dear Mr. Bays:

The ground water discharge plan GW-298 for the Martinez Canyon Compressor Station located in the SE/4 SE/4 of Section 16, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan application dated April 2, 1998 and the conditions 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 10 working days of receipt of this letter.** 

The discharge plan 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 El Paso Field Services 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. David Bays Potter Canyon Compressor Station July 14, 1998 Page 2

Please note that 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 Field Services 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 approval is for a period of five years. This approval will expire on July 14, 2003, and El Paso Field Services 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 application for the El Paso Field Services Martinez Canyon Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50 plus a flat fee of \$1,380.00 for compressor stations with a horsepower rating greater than 3,000 horsepower. The OCD has received the filing fee.

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

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Sincerely,

Roger C. Anderson Chief, Environment Bureau Oil Conservation Division

RCA/wjf Attachment

xc: OCD Aztec Office

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ATTACHMENT TO THE DISCHARGE PLAN GW-298 EL PASO FIELD SERVICES MARTINEZ CANYON COMPRESSOR STATION DISCHARGE PLAN APPROVAL CONDITIONS (July 14, 1998)

- 1. <u>Payment of Discharge Plan Fees:</u> The \$50.00 filing fee has been received. A flat fee of \$1,380.00 is required for discharge plans for compressor stations with horsepower rating greater than 3,000 horsepower. The required flat fee 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.
- 2. <u>El Paso Commitments:</u> El Paso Field Services will abide by all commitments submitted in the discharge plan application dated April 2, 1998.
- 3. <u>Waste Disposal</u>: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.
- 4. <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.
- 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 will be clearly labeled to identify their contents and other emergency notification information.

Page 1 of 3

- 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 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.
- 10. <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. The permittee 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>: 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.
- 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 Aztec District Office.
- 14. <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.
- 15. <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.

16. <u>Certification:</u> El Paso Field Services, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. El Paso Field Services 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 FIELD SERVICES

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|--|--|---|--|--|--|--|--|
| <u>District I</u> - (505) 393-6161<br>P. O. Box 1980<br>Hobbs, NM 88241-1980<br><u>District II</u> - (505) 748-1283<br>811 S. First<br>Artesia, NM 88210<br><u>District III</u> - (505) 334-6178<br>1000 Rio Brazos Road<br>Aztec, NM 87410<br><u>District IV</u> - (505) 827-7131 |  | x 1980<br>NM 88241-1980<br>II - (505) 748-12<br>irst<br>NM 88210<br>III - (505) 334-6<br>D Brazos Road<br>IM 87410                                  | New Mexico<br>Energy Minerals and Natural Reso<br>Oil Conservation Dir<br>2040 South Pacheco<br>Santa Fe, New Mexico<br>(505) 827-7131 | vision Submit Original<br>Street RECEIVEL Submit Original<br>Plus 1 Copy<br>87505 27 W Bureau<br>to Santa Fe |  |  |  |
|  | DISCHARGE PLAN APPLICATION FOR SERVICE COMPANIES,<br>GAS PLANTS, REFINERIES, COMPRESSOR, AND CRUDE OIL PUMP STATIONS<br>(Refer to OCD Guidelines for assistance in completing the application) |   |  |  |  |  |  |
|  |  |   |  | Modification   |  |  |  |
|  | 1.   | Туре:   | Martinez Canyon Compressor Station, Discl  | narge Plan No. GW-298  |  |  |  |
|  | 2.   | Operator:   | El Paso Field Services Co.   |  |  |  |  |
| Address: 614 Reilly Avenue Farmington, NM 87401  |  |   |  |  |  |  |  |
|  |  | Contact Pers  | son: David Bays  |  |  |  |  |
|  | 3.   | Location:   | SE/4 SE/4 Section 16   | Township 27N Range 6W  |  |  |  |
|  | 4.   | Attach the name, telephone number and address of the landowner of the facility site.  |  |  |  |  |  |
|  | 5.   | Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.                         |  |  |  |  |  |
|  | 6.   | Attach a description of all materials stored or used at the facility.   |  |  |  |  |  |
|  | 7.   | Attach a description of present sources of effluent and waste solids. Average daily quality and daily volume of waste water must be included.       |  |  |  |  |  |
|  | 8.   | Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.   |  |  |  |  |  |
|  | 9.   | Attach a description of proposed modifications to existing collection/treatment/disposal systems.   |  |  |  |  |  |
|  | 10.  | . Attach a routine inspection and maintenance plan to ensure permit compliance.   |  |  |  |  |  |
|  | 11.  | . Attach a contingency plan for reporting and clean-up of spills or releases.   |  |  |  |  |  |
|  | 12.  | . Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.                               |  |  |  |  |  |
|  | 13.  | . Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other rules, regulations, and/or orders. |  |  |  |  |  |
|  | 14.  | 4. CERTIFICATION  |  |  |  |  |  |
|  |  | I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.                   |  |  |  |  |  |
|  |  | NAME:   | David Bays Title:  | Principal Environmental Scientist  |  |  |  |
|  |  | Signature:  | Daniel Bay Date  | : August 21, 2003  |  |  |  |

## EL PASO FIELD SERVICES COMPANY MARTINEZ CANYON COMPRESSOR STATION DISCHARGE PLAN GW-298 RENEWAL

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**1**.

Prepared for:

New Mexico Oil Conservation Division August 2003

El Paso Field Services Company 614 Reilly Avenue Farmington, NM 87401





#### Item 1

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

Martinez Canyon Compressor Site (Lateral C-25), is a natural gas compressor station owned and operated by El Paso Field Services (EPFS) Company. The site will include the following equipment:

- Pigging operations.
- One inlet scrubber.
- One portable skid-mounted Caterpillar 3612 natural gas engine. One utility cooler.
- One gas cooler.
- One absorber tower.
- One coalescing filter separator.
- One glycol regenerator skid.
- One 90 bbl glycol storage tank.
- One 210 bbl methanol storage tank.
- Two 500 bb] condensate storage tanks.
- One 120 bbl water and condensate tank.
- One 35 bbl skid drain tank.
- One 500 gallon engine lube oil tank.

The auxiliary equipment and tanks at the compressor site will be installed, maintained, and operated by EPFS. EPFS will be responsible for the hauling and disposal of the waste oil, used glycol filters, wash down water, and condensate and field liquids.

The site rated compressor horsepower will be 3068.

#### Item 2

Name of operator or legally responsible party and local representative.

Legally Responsible Party:

Mr. E. Randall West El Paso Field Services Company 4 Greenway Plaza Houston, TX 77046 (832) 676-5410 **Environmental Manager:** 

Mr. Douglas Jordan El Paso Field Services Company 4 Greenway Plaza Houston, TX 77046 (832) 676-5454

Operator

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El Paso Field Services Company 614 Reilly Avenue Farmington, NM 87401-2634 (505) 325-2841 1-800-203-1347 (24 hour emergency notification)

#### Item 3

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

Rio Arriba County, New Mexico Township 27 North, Range 6 West, SE/4 of the SE/4, Section 16 The topographic map, figure 1, is located in appendix 1.

#### Item 4

Attach the name, telephone number and address of the landowner of the facility site. State Land Office 4601 College Blvd. Farmington, NM 87402 (505) 326-5716

#### Item 5

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

A simplified process flow diagram (figure 2), site survey (figure 3) and site layout (figure 4) of the compressor site property are attached in appendix 1.

Natural gas will enter the site from EPFS's lateral line via both underground and above ground piping. The gas will pass through a unit scrubber, a compressor which is driven by a Caterpillar 3612 natural gas fueled engine and then to a separator and a glycol dehydrator. The gas will then be discharged into *EPFS's lateral line*-

The facility will also have weekly pigging operations. Condensate and Field liquids from the pigging operations, unit scrubber, and separator will be piped underground to two condensate storage tanks.

#### Item 6

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

Tanks T-101, T- 102, T- 104 and the methanol tank will be from 10 to 15 feet in height above grade. These tanks will rest on a gravel support ring fined with a high density polyethylene liner to aid leak detection. An unlined earthen berm designed to hold one and one-third (I ',) the capacity of the largest interconnected tanks will be constructed around the perimeter of the tanks to contain their contents in the event of *a* tank rupture.

Condensate will be produced during weekly pigging operations, and scrubber and separator operation at the facility. The condensate will be *transferred via pipelines from* the slug catcher, scrubber and separator to onsite condensate storage tanks, T-101 and T-102.

Skid drains will empty into a piping system that leads to a double-walled steel sump tank, T-106. The sump tank will collect used drips, leaks and spills of lube oil, rainwater

falling on the compressor skid and wash down water. The sump tank will be equipped with a manual leak detection system.

Tank T-107 will be a double-walled steel sump tank collecting produced water from the condensate tanks, T-101 and T-102.

Lube oil will be supplied to the engine by an on-fine reservoir on the compressor skid. Drips, leaks and spills of lube oil which occur on the compressor skid will be contained in tank T-106.

MSD sheets for materials at the site are maintained in EPFS's corporate office and are available upon request.

#### Item 7

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

#### Item 8

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

#### **Receiving Facilities**

Waste Management of Four Comers, 101 Spruce St., Farmington, NM (505) 327-6284 Three Rivers Trucking, 604 E. Murray Drive, Farmington, NM 87401 (505) 325-8017 Basin Disposal, Inc., 6 County Road 5046, Bloomfield, NM (505) 632-8936

#### Giant Refinery Inc., 111 County Road 4990, Bloomfield, NM (505) 632-8024

#### **Exempt Waste**

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Only exempt wastes such as water from condensate and Field liquids, and produced water will be disposed down Class II injection wells (Basin Disposal), used glycol dehydrator filters will be put into 55 gallon drums, drained of all free liquids and removed as needed by Waste Management of Four Comers.

#### lion-Exempt, Non-Hazardous Waste

Waste oil will be collected as generated from the compressor unit and removed from the site by Dawn Trucking. New lube oil will be brought to the site by vendors as needed and stored in the on-line reservoir. Waste oil from the compressor will be taken to EPFS Kutz Hydrocarbon Recovery Facility for storage pending recycling. Engine coolant will be replaced once per year and removed from the site by the current contractor, Dow, for recycling.

Wash down water from the compressor engine will be collected as generated in an underground storage tank. Wash down water will be brought to the facility as needed. A portable water washer is kept in the maintenance truck to wash the compressor engine. Wash down water will be taken to EPFS Kutz Hydrocarbon Recovery Facility for disposal.

#### **Hazardous Waste**

No RCRA,-Listed hazardous wastes will be generated at the facility.

#### **Other Solid Waste**

There will be no solid waste or miscellaneous trash disposal at the facility. All solid waste will **be** brought to the Waste Management dumpsters at the district offices.

### 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 unmanned but will be inspected daily by an operator. Maintenance will be *performed and records* will be kept *according to EPFS Company procedures*. *The* integrity of any buried piping installed at the facility will be tested prior to commencement of operation and then re-tested once every five years.

#### Item 11

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

EPFS Company will handle all spills and leaks immediately as required by EPFS 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. Copies of these regulations are attached in appendix 2.

#### Item 12

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

The Martinez Canyon Compressor Site (Lateral C-25) is located on Encinada Mesa at an elevation of 6540 feet asl (see figure 1). The northern boundary of Encinada Mesa is defined by Carrizo Canyon, a large drainage about 1.5 miles north of the station. The elevation in Carrizo Canyon due north of the compressor station is 6225 fees asl. Two smaller canyons flow northward into Carrizo Canyon cast and west of the compressor station. The elevation of Martinez Canyon, which lies about a half mile east of the compressor station, is about 6300 feet. Rincon Largo is about 1.5 miles west of the compressor station and also at an elevation of 6300 feet asl. Any precipitation runoff from the station drains to Martinez Canyon. The USGS Santo Peak 7.5 minute quadrangle shows all of these drainages as ephemeral streams.

The Eocene San Jose Formation underlies the compressor station and, as shown in **figure 5**, is the only exposed rock unit within miles of the site. The only other mapped unit, unconsolidated alluvium, is restricted to the major drainages. The San Jose Formation is a sequence of interbedded sandstones and mudstones and is subdivided into four members. In ascending order these are: Cuba Mesa, Regina, Llaves and Tapicitos. Our cursory examination of available geologic maps suggests that the compressor station lies within the upper portion of the San Jose Formation, perhaps on the Llaves Member. The Llaves is described as a coarse-grained arkose up to 1,300 feet thick in the center of the San Juan Basin. The topography surrounding the compressor station and our site observations demonstrate that the compressor station lies on a cliff forming sandstone unit (figure 1).

Stone and others (1983) provide data for only one water well in Township 27 N, Range 6W. This well is located within Section 8, but the 1983 report offers no specific location. This well produces from a water-bearing unit within the San Jose Formation at a depth of 210-225 feet. The depth to water is only 25 feet; clearly the unit exhibits strong artesian pressure. The topographic map shows a windmill in Martinez Canyon, about I mile southeast of the compressor station. Another windmill lies within Carrizo Canyon, about 1.5 miles north of the station.

We believe groundwater beneath the Martinez Canyon Compressor Site is over two hundred feet deep and is under artesian pressure. This pressure precludes the possibility of any leakage, spills or any other releases from entering groundwater within the San Jose Formation. We believe that only a release of catastrophic proportions

could enter the alluvial aquifer. The Discharge Plan process is not designed to address such catastrophic releases.

The alluvial aquifer is about a half mile east and more than 200 feet below the compressor station. Therefore, we conclude that effluent or leachate from the compressor station cannot move directly or indirectly into groundwater. A Discharge Plan is not required for the Martinez Compressor Site; however this document has been prepared as a conservative measure.

### 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 EPFS Company choose to permanently close 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.