

HBP - _31_

**PERMITS,
RENEWALS, &
MODS**

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

Ken McQueen
Cabinet Secretary

Matthias Sayer
Deputy Cabinet Secretary

David R. Catanach, Division Director
Oil Conservation Division



June 15, 2017

Ms. Pamela Phillips
Plains All American Pipeline, L.P.
P.O. Box 4648
Houston, Texas 77201-4648

**Re: Annual Temporary Permission To Discharge Hydrostatic Test Water
Plains All American Pipeline, L.P.
Permit: HBP - 031**

Dear Ms. Phillips:

The Oil Conservation Division (OCD) has received Plains All American Pipeline, L.P.'s (Plains) renewal request, dated June 9, 2017 and received by OCD on June 13, 2017, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new transmission pipelines of oil and gas or products thereof throughout the State of New Mexico, which expired on June 24, 2015. OCD acknowledges receipt of the filing fee (\$100.00) and temporary permission fee (\$150.00) with the June 9, 2017 request.

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

1. the volume does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources (upon specific request to OCD) is used for each test;
3. email or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event;
4. the discharge does not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
5. no discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED, and OCD prior to the discharge;

6. best management practices must be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
7. the discharge does not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);
8. Plains shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and release notification pursuant to OCD Rule 29 (19.15.29 NMAC);
9. the landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event; and
10. an annual report, summarizing each test of new pipeline with less than 25,000 gallons per hydrostatic test event, will be submitted to OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a. the location of hydrostatic test (Section/Township/Range or GPS coordinates);
 - b. the date of each test;
 - c. the volume of each discharge; and
 - d. the source and quality of test water (laboratory analysis, if necessary).

Annual temporary permissions shall expire one (1) year after issuance. **This temporary permission will expire June 14, 2018.** Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date. An annual temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of the permit.

This approval does not relieve Plains of responsibility should its operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Plains of responsibility for compliance with other federal, state or local regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District Offices

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey, Division Director
Oil Conservation Division



June 23, 2014

Mr. Wayne Roberts
Plains All American Pipeline, L.P.
P.O. Box 4648
Houston, Texas 77201-4648

**Re: Annual Temporary Permission To Discharge Hydrostatic Test Water
Plains All American Pipeline, L.P.
Permit: HBP - 031**

Dear Mr. Roberts:

The Oil Conservation Division (OCD) has received Plains All American Pipeline, L.P.'s (Plains) request, dated June 17, 2014 and received by OCD on June 20, 2014, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new transmission pipelines of oil and gas or products thereof throughout the State of New Mexico. Also, the OCD acknowledges receipt of the filing fee (\$100.00) with the June 17, 2014 request. This temporary permission will not become effective until OCD receives the temporary permission fee of \$150 pursuant to 20.6.2.3114 NMAC. Please make the check payable to the **Water Quality Management Fund**.

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

1. the volume does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources is used for each test;
3. email or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event;
4. the discharge does not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
5. no discharge shall occur to a surface water body without obtaining a National Pollution Discharge Elimination Systems (NPDES) permit from the US EPA, NMED, and OCD prior to the discharge;

6. best management practices must be implemented to contain the discharge onsite, to ensure that the discharge does not impact adjacent property, and to control erosion;
7. the discharge does not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);
8. Plains shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to OCD Rule 19.15.29 NMAC;
9. the landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event; and
10. an annual report, summarizing each test of new pipeline with less than 25,000 gallons per hydrostatic test event, will be submitted to OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a. the location of hydrostatic test (Section/Township/Range or GPS coordinates);
 - b. the date of each test;
 - c. the volume of each discharge; and
 - d. the source and quality of test water (laboratory analysis, if necessary).

Annual temporary permissions shall expire one (1) year after issuance. This temporary permission will expire June 24, 2015. Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date. An annual temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of the permit.

This approval does not relieve Plains of responsibility should its operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Plains of responsibility for compliance with other federal, state or local regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad A. Jones', enclosed within a large, loopy oval scribble.

Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District Offices