HITP - _34_

GENERAL CORRESPONDENCE

YEAR(S): _2012-2013_

Enterprise Products

ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS HOLDINGS LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING LLC

November 27, 2012

Federal Express

Mr. Brad Jones
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 St. Francis Drive
Santa Fe, New Mexico 87505

RECEIVED OCD
2012 NOV 28 P 12:33

RE: Submittal of a Notice of Intent to Perform a Hydrostatic Test
Carlsbad Extension Pipeline Phase I, Chesapeake Lateral
Eddy County, New Mexico

Dear Mr. Jones:

Enterprise Products Operating LLC (Enterprise) is submitting enclosed Notice of Intent (NOI) for a hydrostatic test of the Carlsbad Extension Pipeline Phase I, Chesapeake Lateral. Enterprise intends to dispose of the used hydrostatic test waste water in an OCD-approved facility; with no surface discharge of hydrostatic test water proposed.

Enterprise plans to conduct hydrostatic testing on the new 12-inch pipeline located in the NW ¼ of the NE ¼ of S21, T24S, R30E in Eddy County, New Mexico. Actual placement of water into the pipeline is scheduled to begin on Monday, November 26, 2012. Testing will begin on Wednesday, November 27, 2012, with transfer of wastewater and hauling to occur Saturday, December 1, 2012. Approximately 15,00 feet of new piping will be tested.

Enterprise has prepared the NOI and associated figures (maps and a sketch) according to "Guidelines for Hydrostatic Test Dewatering" dated January 11, 2007.

It is Enterprise's understanding that public notice will not be required for this permit. Two checks totaling $250.00 made out to the New Mexico Water Quality Management Fund are enclosed, submitted for the $100.00 filing fee and the $150.00 for the temporary permit fee.

Should you have any questions please feel free to contact me at (713) 381-1785.

Respectfully submitted,

James White

James G. "Jimmy" White
Sr Environmental Scientist

cc: James Heap

P. O. BOX 4324
HOUSTON, TX 77210-4324
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HOUSTON, TX 77002-5227
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Background Information:

- The Enterprise line is a new, welded, steel 12-inch diameter by 15,000 feet long pipeline called the Carlsbad Extension Pipeline Phase I, Chesapeake Lateral.
- The pipeline is part of a gathering system that transports natural gas from well sites to processing facilities.
- The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) requires periodic pressurized tests on all DOT-regulated pipelines and all newly installed pipelines to verify the integrity and safety of pipeline systems. Because the pipeline is part of a natural gas gathering system, waste water generated during hydrostatic testing is classified as RCRA-exempt waste water and does not require sampling prior to disposal.
- The pipe is currently scheduled to be filled with test water beginning Monday, November 26, 2012. Testing is scheduled to begin Wednesday, November 28, 2012, with transfer to frac tanks and hauling to a disposal facility planned for Saturday, December 1, 2012.

Notice of Intent Plan

Enterprise Products Operating LLC (Enterprise) is submitting this NOI plan as outlined in NMOCD Guidance Document; "Guidelines for Hydrostatic Test Dewatering" (revised January 11, 2007). The NOI plan includes the following items:

Item a. Name and address of the proposed discharger:

Legally Responsible Party	Enterprise Products Operating LLC
Mailing Address	Ms. Shiver Nolan, Sr. Compliance Administrator P.O. Box 4324 Houston, Texas 77210 713-381-6595
Local Representative	Mr. James Heap Enterprise Products Operating LLC 1031 Andrews Highway, Suite 320 Midland, TX 79701 432-686-5404

Item b. Location of the discharge, including a street address, if available, and sufficient information to locate the facility with respect to surrounding landmarks:

Carlsbad Extension Pipeline Phase I, Chesapeake Lateral, is located in Eddy County, New Mexico. Latitude and Longitude of the water transfer location are listed below. Waste water generated from hydrostatic testing will not be discharged on site. Waste water will be transferred from the pipeline to 5 frac tank(s) for staging within the 50-foot right-of-way (ROW) and further transfer into haul trucks (see attached Figure 9). Frac tanks will be oriented to remain inside the pipeline easement. Mesquite Services Inc., Permit Number C133-211, will haul the hydrotest water to disposal facility listed in Item i.

Transfer location where waste water will be transferred from pipe to frac tanks:
Latitude, Longitude: 32°12'34.10"N, 103°53'5.03"W.

Directions to the site from Carlsbad, New Mexico are:

- Physical directions from Carlsbad, NM:
  - South on US-285 for approximately 17.5 miles
  - Turn left onto Co Rd 720/Duarte Rd for approximately 1.3 miles
  - Turn right onto McDonald Rd for approximately 6.8 miles
  - Turn right onto Co Rd 746/McDonald Rd for approximately 6.2 miles
  - Turn North on dirt road to Carlsbad Extension Pipeline site for approx. 1.7 miles

Item c. Legal description of the discharge location:

Hydrotest waste water will not be discharged. Prior to hauling to disposal facility, temporary storage of waste water will occur in the NW ¼ of the NE ¼ of S21, T24S, R30E. Tanks will be set up within 10-15 feet of where waste water will be transferred out of the pipe.

Item d. Maps (site-specific and regional) indicating the location of the pipelines to be tested:

- Figure 1: Overview Map- regional aerial map showing the pipeline section undergoing testing, and the hydrostatic waste water staging area, roads, and NWI wetlands (none occur nearby) (sources noted on map)
- Figure 2: Waterways, Springs, and Seeps - Regional USGS topography map showing waterways and the absence of springs near the project area
- Figure 3: Land Ownership and Water Wells - Regional aerial map showing land ownership and water wells nearest the project site (PRRC Mapping Portal)
- Figure 4: Karst Areas - Regional aerial map showing mapped karst areas (PRRC Mapping Portal)
- Figure 5: Geology - Regional aerial map showing NM geology mapping classifications in and around the project area (PRRC Mapping Portal)
- Figure 6: Surface Waters - Regional aerial map of surface waters near the site (PRRC Mapping Portal)
- Figure 7: Subsurface mines - Regional aerial map showing only surface mines, subsurface mines are not mapped to occur at or near the project site (PRRC Mapping Portal)
- Figure 8: FEMA Firmette – Panel No. FM35015C1625D, digital database
- Figure 9: Site-specific Sketch – Sketch showing details of the waste water staging area including frac tank layout and transfer point from pipe

Item e. A demonstration of compliance to the following siting criteria or justification for any exceptions:

I. *Within 200 feet of a watercourse, lakebed, sinkhole, or playa lake;*
A PRRC Mapping Portal (Portal) database search and review of USGS topo maps were completed to satisfy this requirement. Additionally, Jimmy White made a site visit to the project area on November 7, 2012. The frac tank staging area is not located within 200 feet of a watercourse, lakebed, sinkhole, or playa lake (see Figures 1, 2, and 6).

II. *Within an existing wellhead protection area or 100-year floodplain;*

A Portal database search and review of FEMA panel FM35015C1625D were conducted on November 12, 2012, and again on November 21, 2012 (see Figures 3 and 8). According to searches, the proposed storage and transfer location does not lie within an existing wellhead protection area. The nearest water well is approximately 9,400 feet to the southeast.

Federal Emergency Management Administration (FEMA) flood insurance rate maps were searched on the FEMA website for 100-year floodplains in the proposed hydrostatic test water staging area. According to the FEMA Firmette website, the temporary frac tank staging area is not located within a 100-year floodplain (Panel No. FM35015C1625D). The project lies in Zone X (area of minimal flood hazard, outside the 500-year flood level) (FEMA, fema.gov).

III. *Within, or within 500 feet of, a wetland;*
A review of National Wetland Inventory (NWI) wetland database and a site visit was completed to satisfy this requirement. Wetlands do not lie within, or within 500 feet of a wetland (Figure 1).

IV. *Within the area overlying a subsurface mine; or*
A Portal database search of the Portal, Mines and Minerals layer was conducted to satisfy this requirement. The staging area does not overlie a subsurface mine. The Portal shows the nearest feature is a "Placer" (denoted by a green dot) located approximately 6,630 feet to the north-northeast (Figure 7).

V. *Within 500 feet from the nearest permanent residence, school, hospital, institution, or church;*
A Portal search, land ownership dynamics (project lies entirely on BLM-owned land), and personal inspection by James White, Enterprise Sr Environmental Scientist, on November 7, 2012, were conducted to satisfy this requirement. There are no residential, school, hospital, institutional, or church structures within 500 feet of the project area (Figure 3).

Item f. A brief description of the activities that produce the discharge;

Pressure testing with water, known as hydrostatic testing, is one of the tools pipeline operators use to verify pipeline integrity. The test involves filling the pipeline with water, then pressurizing the pipeline to a pressure higher than the standard operating pressure for approximately eight hours. The purpose of hydrostatic testing in a pipeline is to determine the extent to which potential defects might threaten the pipeline's ability to sustain maximum allowable operation pressure. If leaks or breaks occur, the pipeline is repaired or the affected areas is replaced, and then re-tested. Following this test, waste water will be hauled to a disposal facility and not discharged.

Item g. The method and location for collection and retention of fluids and solids;

See Item b for location of fluid collection. Municipal water is being used to test new pipe which will be part of a natural gas gathering system; solid accumulation is not anticipated. After the hydrostatic test has been conducted, waste water will be transferred with a pump and hose into five ±21,000 gallon frac tanks located within the ROW for staging and further transfer into transport trucks. Frac tanks will be placed within approximately 10-15 feet of the point of connection on the pipeline and be contained wholly within the ROW. Personnel will be present during transfers to monitor water transfer and loading. Individual tank valves will be closed and locked when not in use.

Item h. A brief description of best management practices to be implemented to contain the discharge onsite and to control erosion;

Enterprise intends to transfer waste water into one or more frac tank(s) for temporary storage. Drip pans will be used under pumps and at hose connections. Frac tanks will be interconnected but will have safety valves at each tank connection and will be located within secondary containment. Secondary containment, consisting of plastic liners, will be used under frac tanks sufficient to hold 1 1/3 the total volume of all tanks for interconnected tanks, or the volume of the largest tank, whichever is greater. All tanks will be contained within a single containment area. Plastic will be draped over dirt berms or hay bales surrounding frac tank staging area. Personnel will be present during transfer operations to close valves in case of leaks. Long-term storage is not proposed which will help prevent tank vandalism.

Item i. A request for approval of an alternative treatment, use, and/or discharge location (other than the original discharge site), if necessary;

Discharge is not proposed. Used waste water will be hauled to Dorstate SWD, Order No. SWD-247-A.

Item j. A proposed hydrostatic test wastewater sampling plan;

Pipe being tested is part of a gathering system bringing natural gas from wells to processing plants and thus, waste water is RCRA-exempt. Waste water is being hauled to a Class II disposal well and will not be sampled.

Item k. A proposed method of disposal of fluids and solids after test completion, including closure of any pits, in case the water generated from test exceeds the 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);

See also Items g and i.

Item l. A brief description of the expected quality and volume of the discharge;

The pipeline being tested is a new pipeline. Water will be municipal water sourced from the City of Carlsbad, New Mexico. Based on historical data collected from previous hydrostatic test events using similar methods and solutions, water quality is expected to be in compliance with regulatory limits. The volume of the hydrostatic test water is projected to be approximately 95,000 gallons.

Item m. Geological characteristics of the subsurface at the proposed discharge site;

Soils in the area are dominated by the Kermit – Berino fine sands. These sands are Quaternary eolian deposits and unconsolidated alluvial deposits that cover most of the underlying Quaternary older alluvium deposits of the upland plains and piedmont areas. These Quaternary units are between 30 and 150 feet thick and unconformably overlie older Permian formations. The Permian Rustler Formation outcrops in the area and is composed of siltstone, gypsum, sandstone and dolomite. No known karst features were identified in the area based on a Petroleum Recovery Research Center database search (accessed on November 26, 2012).

Item n. The depth to and total dissolved solids concentration of the ground water most likely to be affected by the discharge;

A Portal search was conducted to locate water wells near the project area. The nearest water well lies nearly 9,400 feet southeast of the staging area. Recorded distance to groundwater is approximately 400 feet below ground surface. Google Earth elevations show elevation at staging area is 3,353 feet above sea level, and elevation at nearest ground water well is 3,395 feet.

The first groundwater (uppermost aquifer) is likely present in the Rustler Formation. According to the New Mexico iWATERS database, accessed on November 26, 2012, wells drilled within 2-miles of the site encountered groundwater between 150 and 400 feet below the ground surface in the Rustler Formation. No TDS data was available in the New Mexico WAIDS or iWATERS database accessed on November 26, 2012. Based on the database chloride data, minimum TDS would range from 32 to 452. Throughout Eddy County, groundwater samples from formations at or near the surface are relatively fresh (less than 3000 TDS) [http://octane.nmt.edu/WaterQuality/maps/waterq.aspx].

Item o. Identification of landowners at, and adjacent to, the discharge collection/retention site. Landowners within 1/3-mile of the boundary of the temporary frac tank storage area within the Enterprise pipeline easement:

A Portal search was conducted and Enterprise ROW department queried to ascertain land ownership. Search and inquiry results are that the entire Chesapeake Lateral pipeline project and frac tank staging area are wholly on BLM land.

Figures

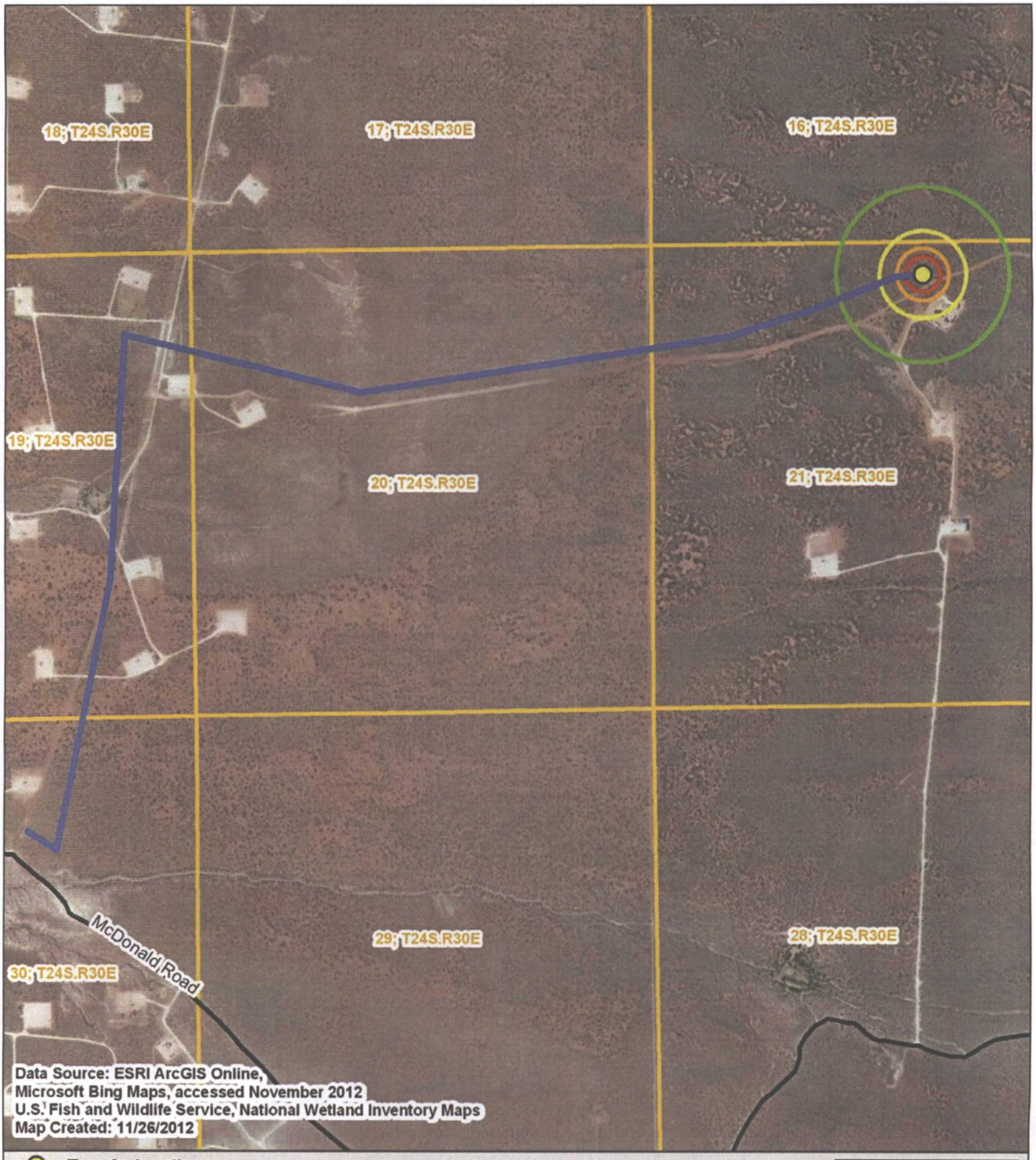
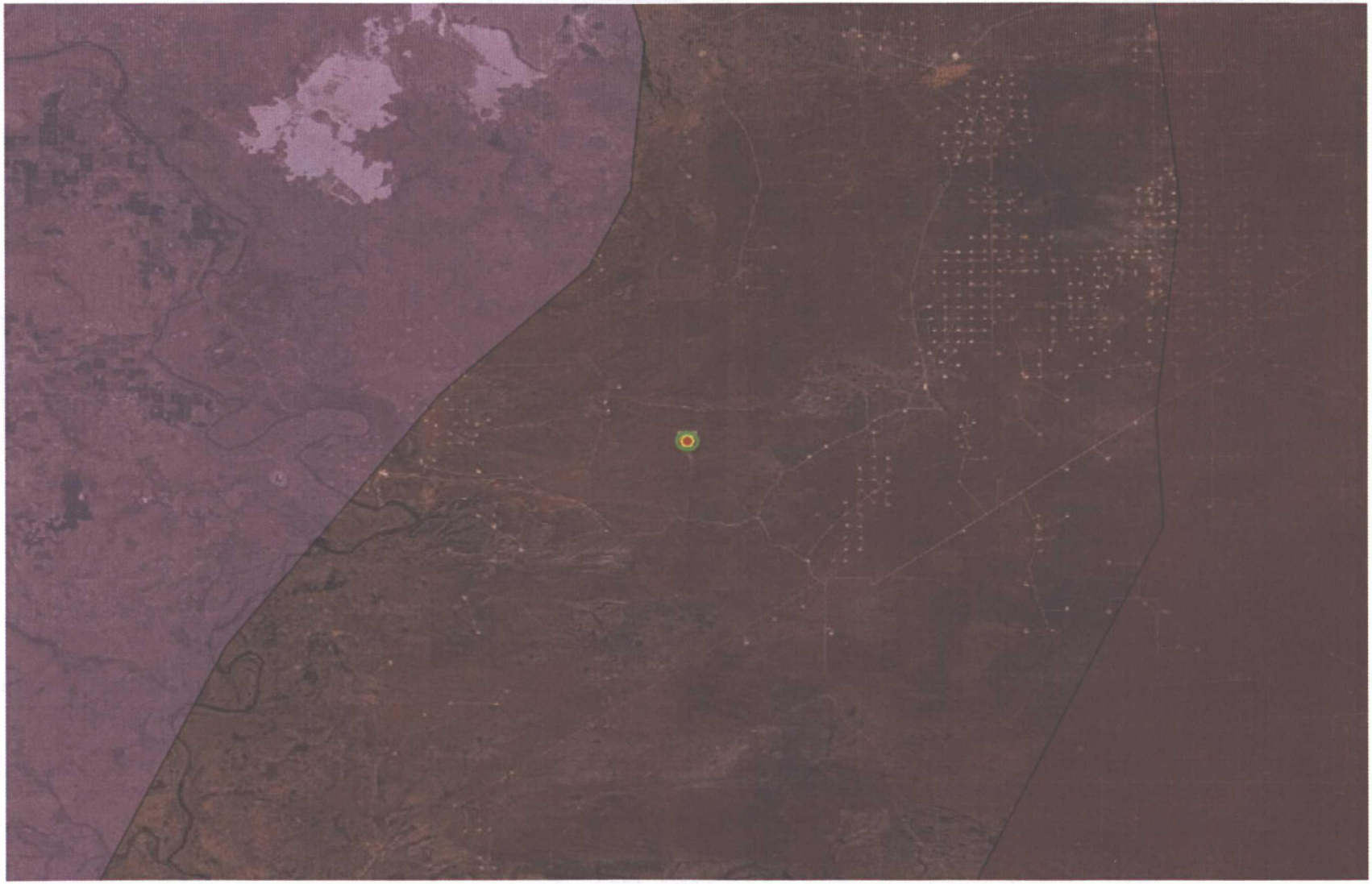


Figure 1
Overview Map

Figure 2
Waterways, Springs, and Seeps

Petroleum Recovery Research Center	Landownership & Waterwells	Figure: 3
	Enterprise - Carlsbad Expansion - Chesapeake Lateral	Nov 26, 2012



0 2 4mi

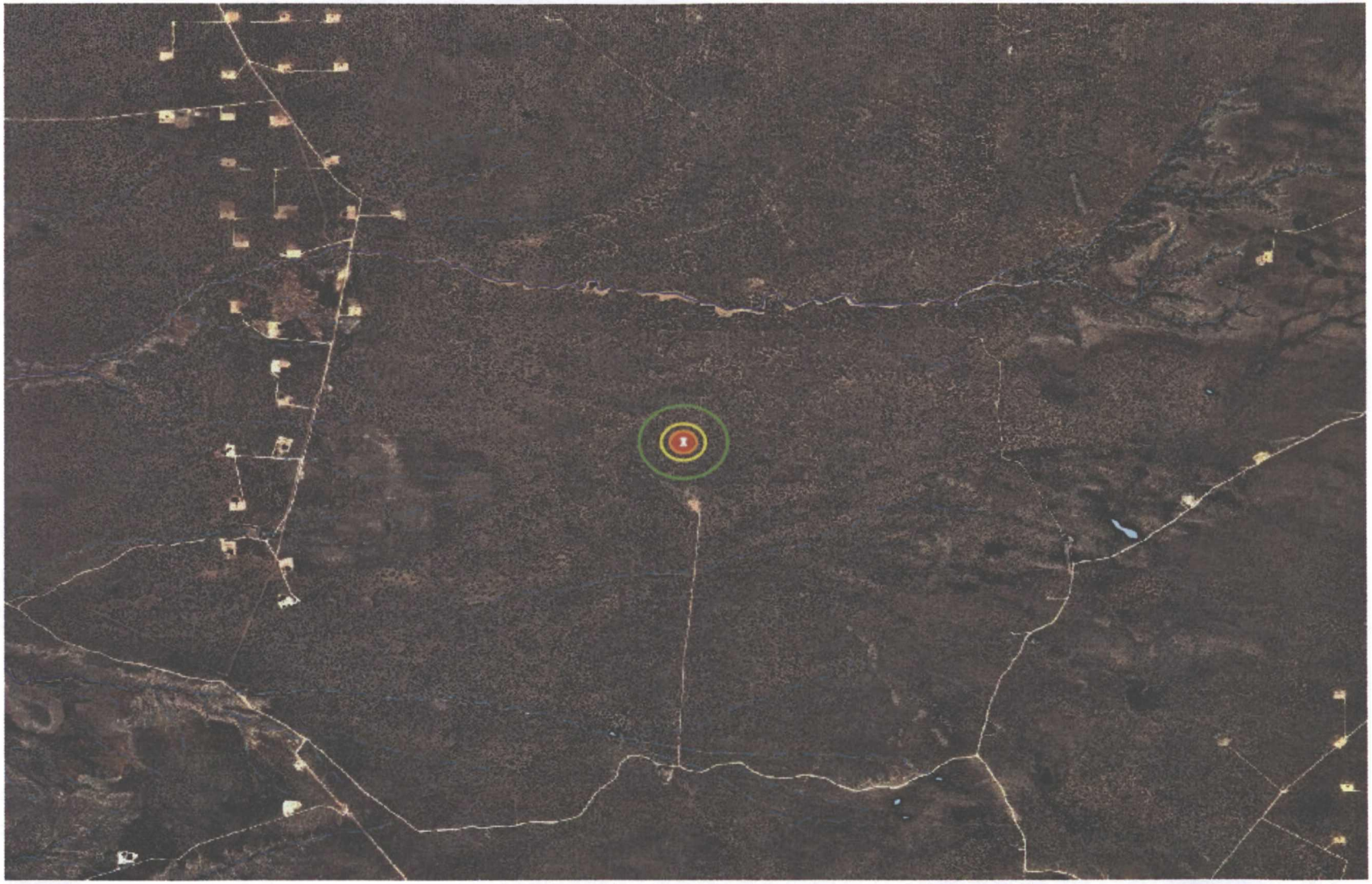
N W E S

Petroleum Recovery Research Center	Karst Map	Figure: 4
	Enterprise - Carlsbad Expansion - Chesapeake Lateral	Nov 26, 2012

0 1 2mi

N W E S

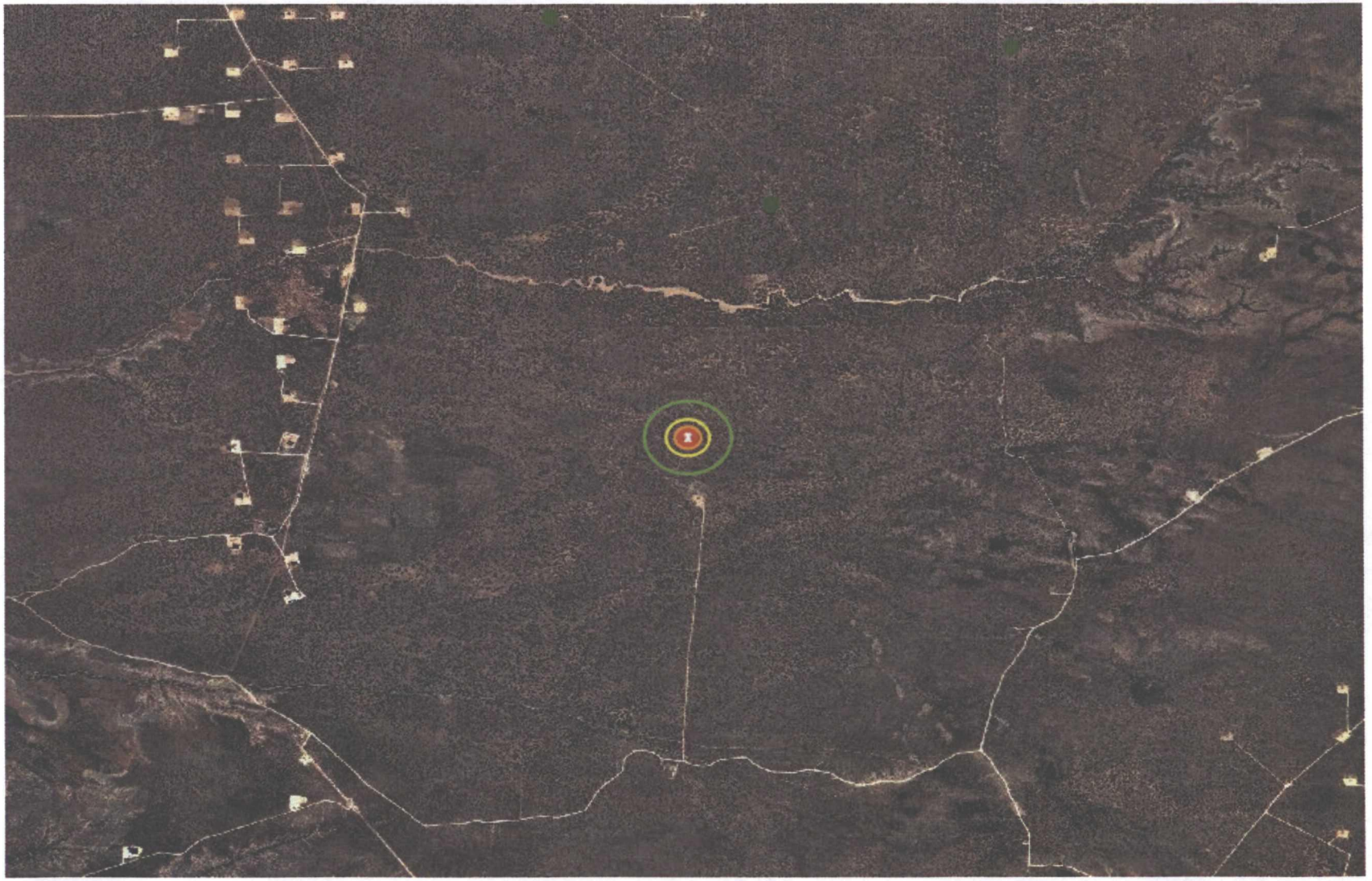
Petroleum Recovery Research Center	New Mexico Geology Map	Figure: 5
	Enterprise - Carlsbad Expansion - Cheaspeake Lateral	Nov 26, 2012



0 2000 4000ft

N
W E
S

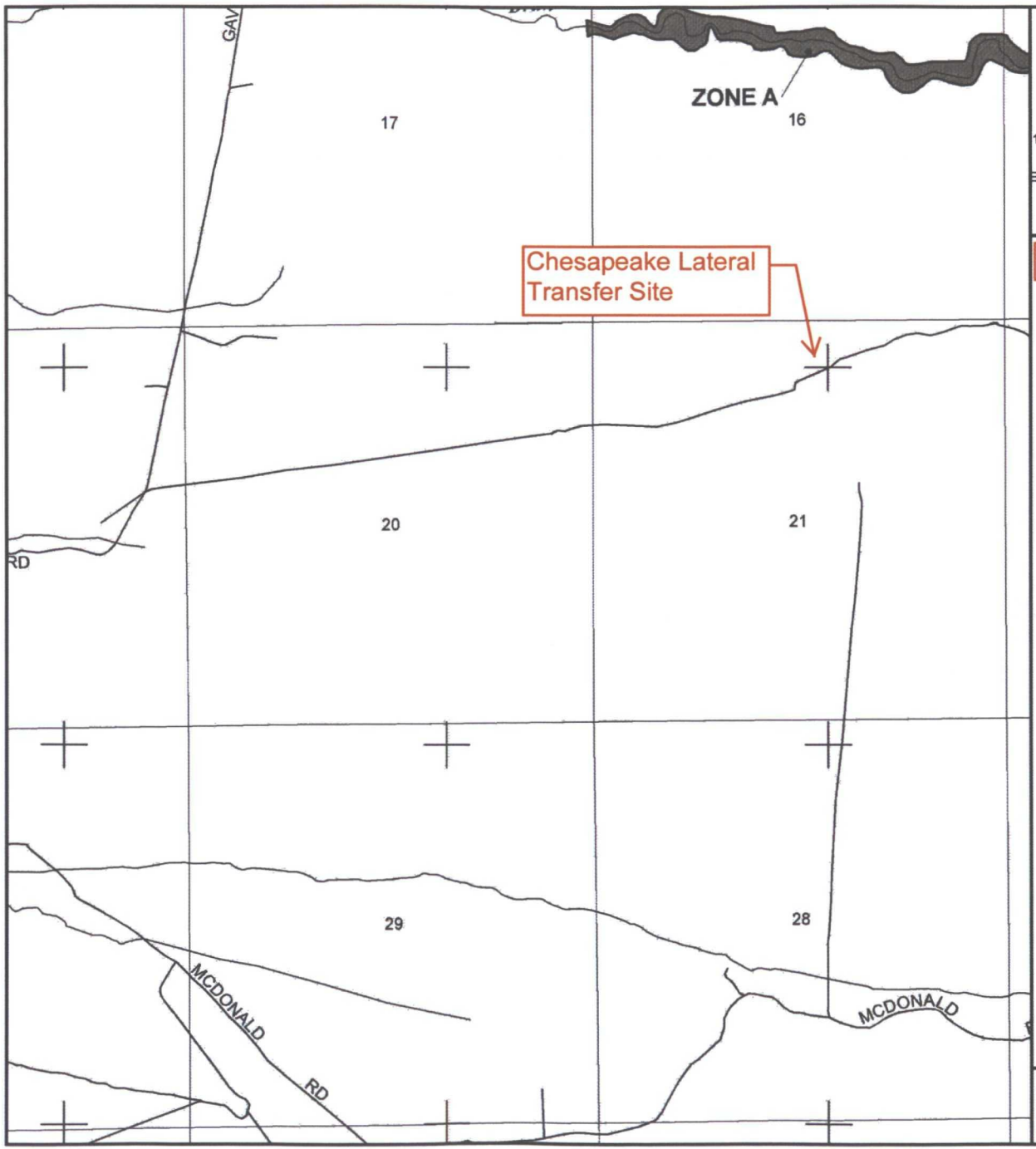
Petroleum Recovery Research Center	Surface Water Map	Figure: 6
	Enterprise - Carlsbad Expansion - Chesapeake Lateral	Nov 26, 2012



0 2000 4000ft

N W E S

Petroleum Recovery Research Center	Mines and Minerals (MILS) Map	Figure: 7
	Enterprise - Carlsbad Expansion - Chesapeake Lateral	Nov 26, 2012



MAP SCALE 1" = 2000'

1,000 0 1,000 2,000 3,000 4,000 FEET

METERS

Figure 8

NFIP NATIONAL FLOOD INSURANCE PROGRAM

PANEL 1625D

FIRM

FLOOD INSURANCE RATE MAP

EDDY COUNTY, NEW MEXICO AND INCORPORATED AREAS

PANEL 1625 OF 2000

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
EDDY COUNTY, UNINCORPORATED AREAS	350120	1625	D

Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
35015C1625D

EFFECTIVE DATE
JUNE 4, 2010

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

Figure 9
Enterprise Products Operating LLC
Chesapeake Lateral
Hydrostatic Waste Water Transfer Site