

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☒ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
☐ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions:** Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

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

1. Operator: Enterprise Products Operating, LLC OGRID #: \_\_\_\_\_

Address: P.O. Box 4324, Houston, TX 77210

Facility or well name: Manzanares EPFS Compressor Station Tank #13

API Number: \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_

U/L or Qtr/Qtr SE1/4/NE1/4 Section 17 Township 29N Range 09W County: San Juan

Center of Proposed Design: Latitude 36.727228° Longitude -107.794172° NAD: ☐ 1927 ☒ 1983

Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2. ☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC

Temporary: ☐ Drilling ☐ Workover

☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no

☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

☐ String-Reinforced

Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3. ☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 30 bbl Type of fluid: Waste oil, skid drain fluids, antifreeze, water  
Tank Construction material: Steel double walled and bottom  
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other Double wall tank with level detection and riser pipe in annular space for monitoring  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4. ☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5. **Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)

☒ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

☐ Alternate. Please specify \_\_\_\_\_

6.  
**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☒ Other Enclosed  
☐ Monthly inspections (If netting or screening is not physically feasible)

7.  
**Signs:** Subsection C of 19.15.17.11 NMAC

- ☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  
☐ Signed in compliance with 19.15.16.8 NMAC

8.  
**Variances and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

*Please check a box if one or more of the following is requested, if not leave blank:*

- ☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  
☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.  
**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC

*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

### General siting

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☒ Data obtained from nearby wells

☐ Yes ☒ No  
☐ NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (**Does not apply to below grade tanks**)

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. (**Does not apply to below grade tanks**)

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. (**Does not apply to below grade tanks**)

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain. (**Does not apply to below grade tanks**)

- FEMA map

☐ Yes ☐ No

### Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

### Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No



Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

#### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☒ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☒ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

#### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_



12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Climatological Factors Assessment  
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Quality Control/Quality Assurance Construction and Installation Plan  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit  
☐ Alternative
- Proposed Closure Method: ☒ Waste Excavation and Removal  
☐ Waste Removal (Closed-loop systems only)  
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)  
☐ In-place Burial ☐ On-site Trench Burial  
☐ Alternative Closure Method

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  
☒ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  
☒ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

|   |   |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site                        | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance   |   |



adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.  
**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.  
**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Ivan W. Zirbes

Title: Vice President-EHS&T

Signature: 

Date: 08-26-2016

e-mail address: snolan@eprod.com

Telephone: 713-381-6595

18.  
**OCD Approval:** ☒ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: 

Approval Date: 1/5/17

Title: Environmental Spec

OCD Permit Number: 15740

19.  
**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

☐ Closure Completion Date: \_\_\_\_\_

20.  
**Closure Method:**

- ☐ Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
- ☐ If different from approved plan, please explain.

21.  
**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- ☐ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☐ Plot Plan (for on-site closures and temporary pits)
- ☐ Confirmation Sampling Analytical Results (if applicable)
- ☐ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☐ Soil Backfilling and Cover Installation
- ☐ Re-vegetation Application Rates and Seeding Technique
- ☐ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD: ☐ 1927 ☐ 1983



22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

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

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_





August 2016

SMA #5124213

Mr. Tom Long  
Enterprise Products Operating, LLC  
Field Environmental-San Juan Basin  
614 Reilly Avenue  
Farmington, NM 87401

**BGT REGISTRATION PACKET FOR MANZANARES EPFS COMPRESSOR  
STATION TANK #13  
LATITUDE 36.727228°, LONGITUDE -107.794172°**

Dear Mr. Long:

Souder, Miller and Associates (SMA) has compiled the following BGT Registration Packet including Form C-144 in Accordance with the NMOCD Pit Rules per 19.15.17 NMAC. The tank is located at latitude 36.727228°, longitude -107.794172° within the fenced area of the Manzanares EPFS Compressor Station. Tank information is presented in Table 1.

| <b>Table 1: Tank Information</b>  |  |              |                                     |             |
|-----------------------------------|--|--------------|-------------------------------------|-------------|
| Name                              | Manzanares EPFS Compressor Station Tank #13  |              |                                     |             |
| Location                          | Latitude/Longitude   |              | Section, Township, Range            |             |
|                                   | 36.727228°   | -107.794172° | SE ¼ / NE ¼<br>Unit H<br>Section 17 | T29N<br>R9W |
| Date of Site Visit                | 4-Nov-15   |              |                                     |             |
| County                            | San Juan   |              |                                     |             |
| Land Owner                        | BLM  |              |                                     |             |
| Tank Capacity                     | 30 Barrels   |              |                                     |             |
| Tank Dimensions                   | 7.1' diameter x 5' height  |              |                                     |             |
| Tank Serial Number (If Available) | T-415 (on attached diagrams)   |              |                                     |             |
| Tank Contents                     | waste oil, skid drain fluids, antifreeze, water  |              |                                     |             |
| Tank Construction Notes           | Steel double wall tank with level detection and riser pipe in annular space for monthly monitoring |              |                                     |             |
| Tank Operation Notes              | Tank is inspected monthly  |              |                                     |             |



### **Siting Criteria (19.15.17.10 NMAC)**

The below-ground tank (BGT) is located at the Manzanares EPFS Compressor Station at an elevation of 5733 feet above mean sea level (amsl). The BGT meets all siting criteria listed in 19.15.17.10 NMAC with the exceptions for which variances are requested.

Depth to groundwater at the site is estimated to be 51 feet below ground surface (bgs). This data is supported by elevation differences between the site and the base of a nearby wash flowing from Manzanares Canyon to the San Juan River with definable banks. This data is further supported by the depth to groundwater in two nearby wells permitted by the New Mexico Office of the State Engineer (OSE) <sup>2</sup>. The BGT base is estimated at 3 feet bgs. Because the BGT base is thus estimated to be greater than 25 feet above the ground water level, a variance is not being requested for this siting criterion.

Figure 1 shows the vicinity of the BGT location and the location of the nearby OSE Wells. The base layer of Figure 1 is the ESRI provided Imagery Topo Map<sup>3</sup> and includes USGS Blue Lines<sup>4</sup>. An aerial imagery map of the site is provided as Figure 2 which shows the vicinity of the BGT with 500' and 1000' buffers. Figure 3 demonstrates the BGT is not located within 100 feet of any continuous flowing watercourse, any other significant watercourse, sinkhole, lakebed, wetlands or playa lake as measured from the ordinary high water mark<sup>5</sup>, or within 200 feet of a spring or freshwater well used for public or livestock consumption, as indicated by the aerial photo<sup>6</sup> and iWaters map layers<sup>2</sup>, or within 300 horizontal feet of any permanent residences, schools, hospitals, institutions or churches.

The BGT subject to the attached application for registration under 19.15.17 NMAC is located within the Manzanares EPFS Compressor Station boundaries and was in existence prior to the promulgation of 19.15.17 NMAC. A review of the best available data and a visual inspection of the siting criteria of 19.15.17 NMAC specific to the BGT in question demonstrate that the BGT does not appear to pose a threat to fresh water, public health or the environment.

### **Local Geology and Hydrology**

The Manzanares EPFS Compressor Station is located about 1 mile east of the San Juan River, between Blanco and Turley, New Mexico. The Compressor Station is located on an eroded surface of sandstone, shales and conglomerates belonging to the Paleocene Nacimiento Formation<sup>7</sup>. The younger, overlying San Jose Formation forms bluffs between 200 and 600 feet higher in elevation 3 miles to the west of the BGT location. The bluffs are composed mostly of medium-grained mixed clastic rocks<sup>8</sup>. Along the river valley, the surficial geology is composed of fluvial quaternary alluvium associated with the San Juan River<sup>8</sup>.

Groundwater is most conservatively estimated to be about 51 feet bgs (5682 feet amsl) at this site, based on the following documentation:





- Using the New Mexico Oil and Gas Association (NMOGA) differential method for “surface drainage influenced groundwater”, depth to groundwater is estimated to be 51 feet below the BGT at 5682 feet amsl, based upon the elevation of the wash located 0.45 miles to the north flowing from Manzanares Canyon to the San Juan River, at its closest location to the BGT.
- OSE POD record SJ-02883 is located 0.63 miles to the east, in a geologic and hydrologic regime similar to the BGT location. SJ-02883 reports depth to groundwater at 87 feet bgs. One additional OSE permitted well, SJ-03185, with a reported depth to groundwater of 100 feet bgs is 0.85 miles to the southeast of the BGT location.

### **Regional Geology and Hydrology**

The San Juan Basin is located in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons, topographic relief is generally low. Native vegetation is sparse and shrubby consisting primarily of desert scrub (sage and chamisa) in the lower elevations and juniper and piñon in the higher elevations. Drainage of the San Juan Basin is by the San Juan River and its associated tributaries, including the La Plata and the Animas Rivers. The San Juan River is a tributary of the Colorado River. The climate is arid to semi-arid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of physically weathered parent rock. Aeolian depositional systems are responsible for a majority of the material transport in the San Juan Basin, fluvial systems are also present though less predominant<sup>10</sup>.

The primary aquifers in the San Juan Basin are contained in Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial Deposits<sup>10</sup>. The Nacimiento Formation of Paleocene age occurs at the surface in a broad belt at the western and southern edges of the central San Juan Basin and dips beneath the San Jose Formation in the center. The lower part of the Nacimiento Formation is composed of interbedded black carbonaceous mudstones and white coarse grained sandstones. The upper part is comprised of mudstones and sandstones. Shales and conglomerates are often interbedded within the mudstones and sandstones, but they are not the primary rock type. The Nacimiento Formation is generally slope forming, even in the sandstone units. Thickness of the Nacimiento ranges from 418 to 2232 feet<sup>11</sup>. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm) and transmissivities are expected to be 100 ft<sup>2</sup>/d. Groundwater within these units flows towards the San Juan River<sup>10</sup>.



If there are any questions regarding this report, please contact myself or Reid Allan at 505-325-7535.

Sincerely,  
Souder, Miller & Associates



Jesse E Sprague  
Staff Scientist



Reid S. Allan  
Principal Scientist

**FIGURES:**

Figure 1 – Vicinity Map

Figure 2 – Site Map with 500' and 1000' buffers

Figure 3 – Site Map with 100', 200' and 300' buffers

**ATTACHMENTS:**

Form C-144

Variance Request

Tank Diagrams

Operation and Maintenance Plan

Depth to Groundwater Documentation





## **References**

<sup>2</sup>Office of the State Engineer (OSE) Water Administrative Technical Engineering Resource System (WATERS), September 4, 2015. "Water Wells – 2015 – OSE", released September, 2015.  
[http://gstore.unm.edu/apps/rqis/datasets/6925a8e3-6f8d-4334-a15e-bf95a11fdaaa/OSE\\_Wells\\_May\\_2015.original.zip](http://gstore.unm.edu/apps/rqis/datasets/6925a8e3-6f8d-4334-a15e-bf95a11fdaaa/OSE_Wells_May_2015.original.zip)

<sup>3</sup>ESRI ArcGIS Online, "USGSImageryTopo", August, 2013. The USGS Imagery Topo base map service from The National Map is a combination of imagery and contours, along with vector layers, such as geographic names, governmental unit boundaries, hydrography, structures, and transportation, to provide a composite base map that resembles the US Topo product. Vector data sources are the National Atlas for small scales, and The National Map for medium to large scales. Imagery data sources are Blue Marble: Next Generation at small scales and NAIP at large scales, with Global Land Survey (Landsat) imagery for medium scales that lack NAIP coverage. Coordinate System: Web Mercator Auxiliary Sphere (WKID 102100) <http://www.arcgis.com/home/item.html?id=c641cc5c41d44faba509959748098471>

<sup>4</sup>New Mexico Oil and Gas Association Training Manual for 19.15.17 NMAC (Pit Rule) "NMOGA & NMOCD Pit Rules Training.pdf" State of New Mexico, October 17, 2014.

<sup>5</sup>National Wetlands Inventory, September 2002. "San Juan Wetland/Riparian Project", R02Y02P01 San Juan, NMRGIS geodatabase. [http://rqis.unm.edu/gstore/datasets/757361ef-2000-4f2a-aff8-15fa0a8bd5db/nwi\\_san\\_juan\\_02.original.zip](http://rqis.unm.edu/gstore/datasets/757361ef-2000-4f2a-aff8-15fa0a8bd5db/nwi_san_juan_02.original.zip)

<sup>6</sup>Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community. November 2015 "World Imagery", Coordinate System: Web Mercator Auxiliary Sphere (WKID 102100)  
[http://server.arcgisonline.com/arcgis/services/World\\_Imagery/MapServer](http://server.arcgisonline.com/arcgis/services/World_Imagery/MapServer)

<sup>7</sup>Green, Gregory N., Jones, Glen E., 2009. "Digital Geologic Map of New Mexico – Formations"  
<http://gstore.unm.edu/apps/rqis/datasets/51349b33-92eb-4ab8-9217-81c82b5c3afa/nmmapdd83shp.original.zip>

<sup>8</sup>USGS Mineral Resources On-Line Spatial Data, Green, G.N., and Jones, G.E., 1997, The Digital Geologic Map of New Mexico in ARC/INFO Format: U.S. Geological Survey Open-File Report 97-0052, 9p.  
<http://pubs.er.usgs.gov/publication/ofr9752> <http://mrddata.usgs.gov/geology/state/state.php?state=NM>

<sup>9</sup>Source: "Manzanares EPFS Compressor Station and Wash Elevations" 36.727228° N, -107.794172° W. Google Earth. May 2, 2013. November 28, 2015. Elevation Datum: NAVD27.

<sup>10</sup>Stone, et.al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6.

<sup>11</sup>Kelley, et. Al., 2014, Hydrologic Assessment of Oil and Gas Resource Development of the Mancos Shale in the San Juan Basin, New Mexico. Open-File Report 566, New Mexico Bureau of Mines and Mineral Resources.



## Manzanares EPFS Compressor Station, Tank # 13 Variance Request

Enterprise requests a variance for the items listed below. The requested variances, per 19.15.17.15A, provide equal or better protection of fresh water, public health and the environment.

1. Signage

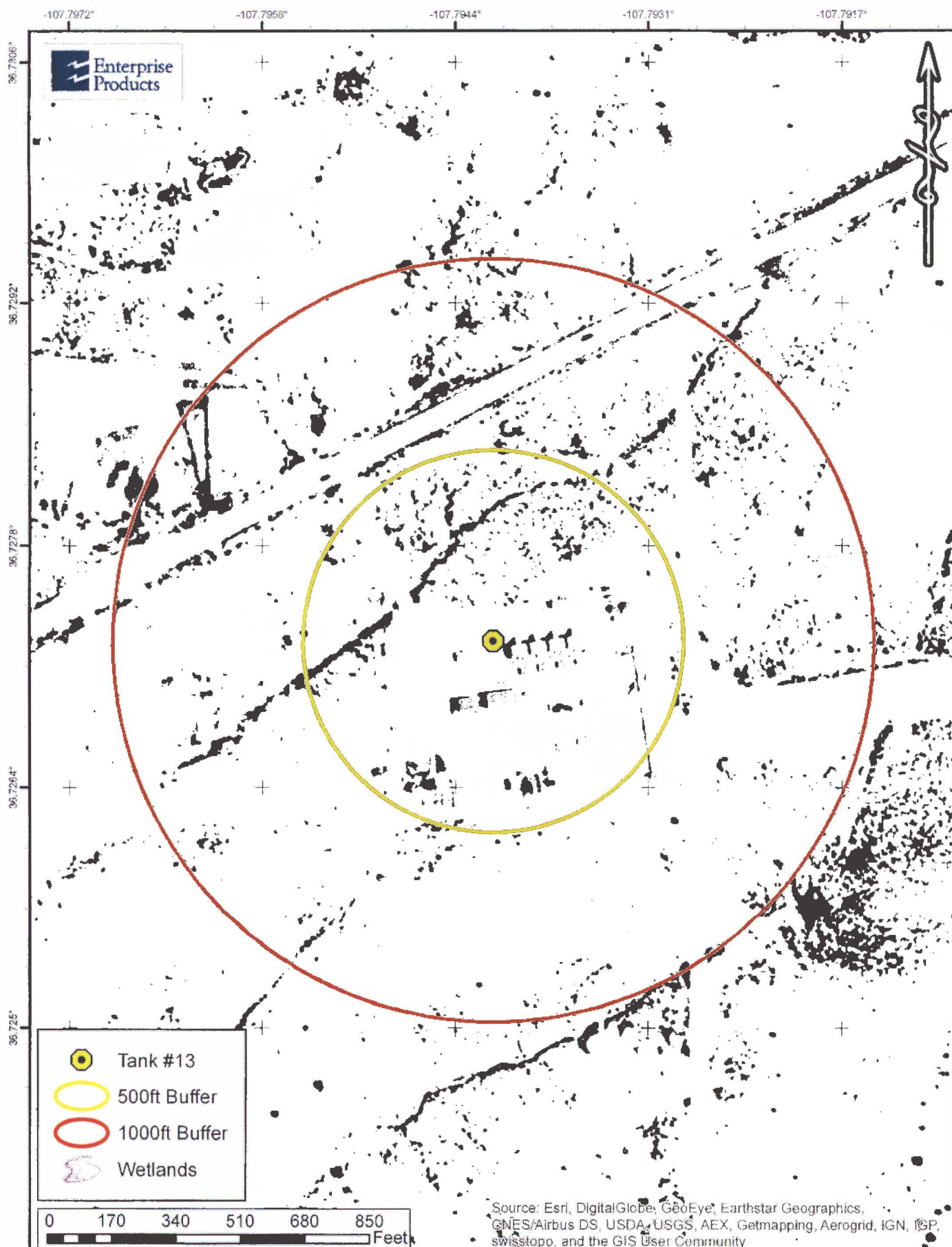
- BGT is located within a facility signed appropriate to NMAC 20.2.70, Title V General Construction Permit. The sign is legible and contains the operator's name, the location of the compressor station in decimal degrees and township section and range, and emergency contact telephone numbers. Additional signage relevant to the Title V air quality permit is also present and provides equal or better protection of fresh water, public health and the environment.

2. 2008 Pit Rules

- Manzanares EPFS Compressor Station Tank #13 was installed prior to the 2008 pit rules. The BGT does not pose an imminent threat to the protection of fresh water, public health or the environment.








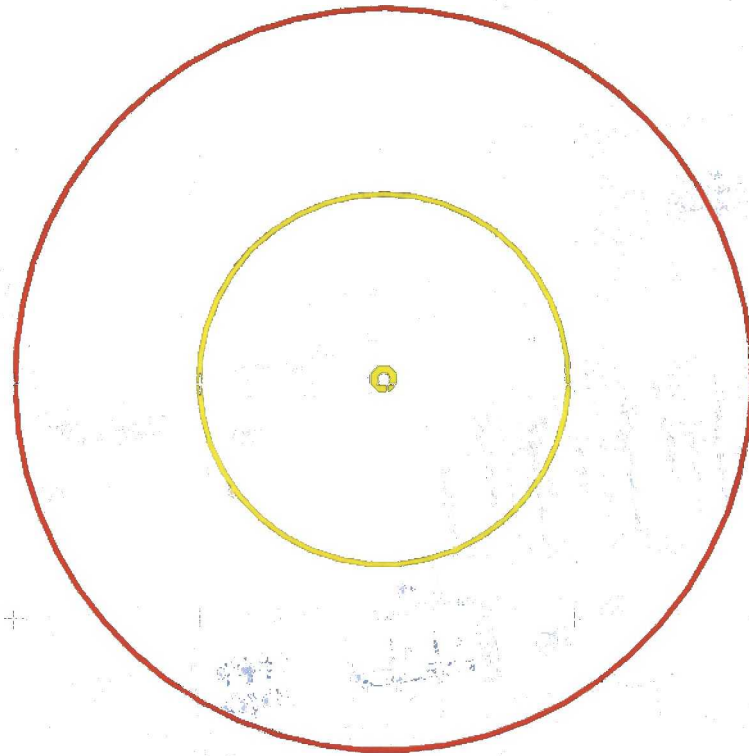
- Tank #13
- 500ft Buffer
- 1000ft Buffer
- Wetlands



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

|   |   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|---|---|--------------|--|-----------------|--------------|----------------|-----------------|--|--|---------------------|--|--|---------------------|--|--|-----------|--|--|
|  <p><b>SOUDER, MILLER &amp; ASSOCIATES</b><br/>         401 West Broadway Avenue<br/>         Farmington, NM 87401-5907<br/>         Phone (505) 325-7535 Toll-Free (800) 519-0098<br/> <a href="http://www.soudermiller.com">www.soudermiller.com</a></p> | <p>ENTERPRISE FARMINGTON, NEW MEXICO</p> <p><b>MANZANARES EPFS COMPRESSOR STATION</b></p> <p>TANK #13</p> <p>JULY, 2016</p> <p>SITE MAP</p> <p>SAN JUAN COUNTY NEW MEXICO SECTION 17, T29N, R9W</p> |              | <table border="1"> <tr> <td>Designed<br/>JES</td> <td>Drawn<br/>JES</td> <td>Checked<br/>APM</td> </tr> <tr> <td colspan="3">DATE: JULY 2016</td> </tr> <tr> <td colspan="3">PROJECTION WGS 1984</td> </tr> <tr> <td colspan="3">PROJECT NO: 5124213</td> </tr> <tr> <td colspan="3">FIGURE: 2</td> </tr> </table> | Designed<br>JES | Drawn<br>JES | Checked<br>APM | DATE: JULY 2016 |  |  | PROJECTION WGS 1984 |  |  | PROJECT NO: 5124213 |  |  | FIGURE: 2 |  |  |
|   | Designed<br>JES   | Drawn<br>JES | Checked<br>APM   |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   | DATE: JULY 2016   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   | PROJECTION WGS 1984   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   | PROJECT NO: 5124213   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
| FIGURE: 2   |   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   |   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   |   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   |   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |
|   |   |              |  |                 |              |                |                 |  |  |                     |  |  |                     |  |  |           |  |  |





- Tank #13
- 100ft Buffer
- 200ft Buffer
- 300ft Buffer



Bowler Ltd. DigitalGlobe, GeoEye, Earthstar Geographics,  
CNRS/Airbus DS, USDA, USGS, AeroGRID, IGN, IGP,  
swisstopo, and the GIS User Community



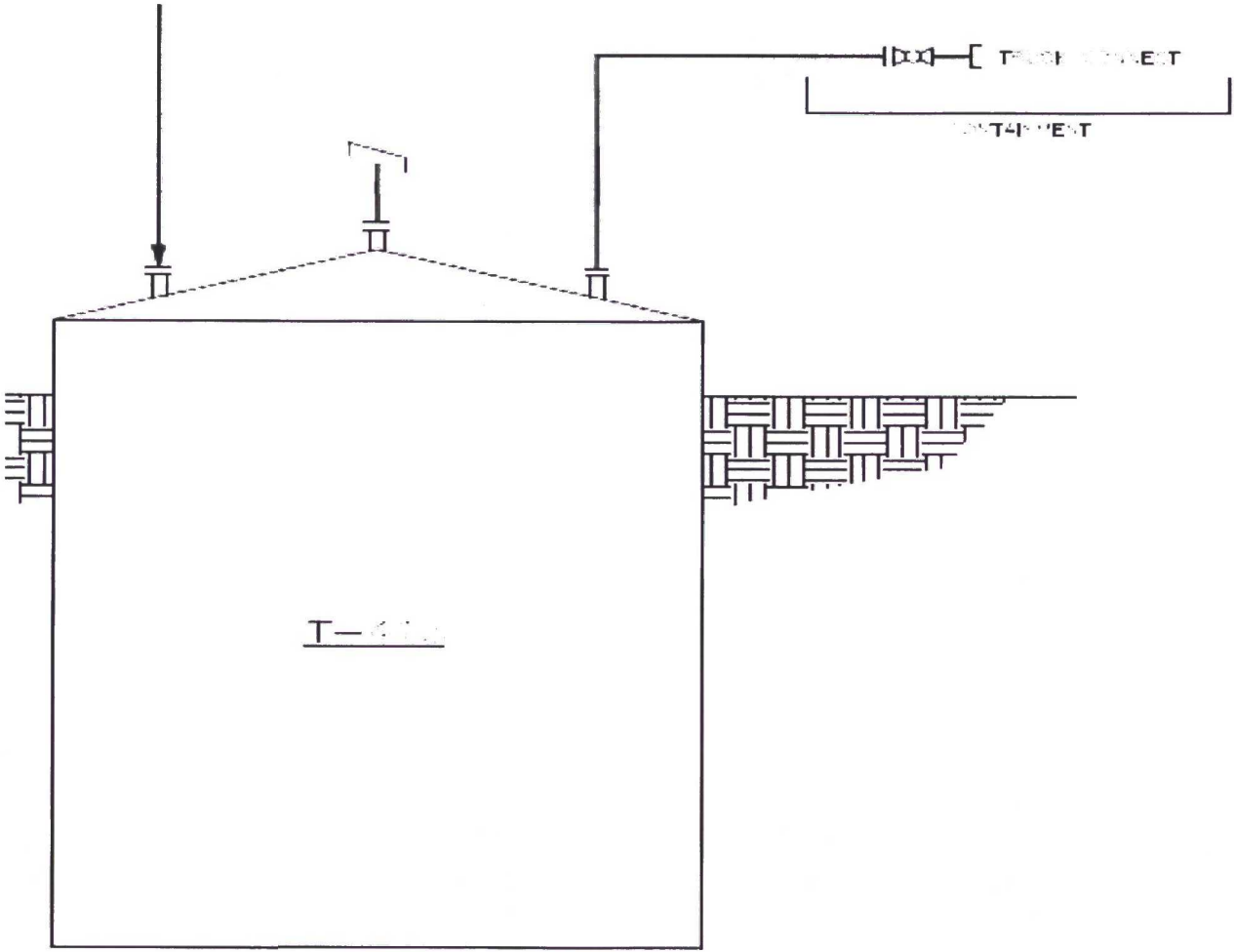
**SOUTER, MILLER & ASSOCIATES**  
401 West Broadway Avenue  
Farmington, NM 87401-5507  
Phone (505) 325-7555 Toll-Free (800) 513-0095  
[www.smaenvironment.com](http://www.smaenvironment.com)

ENTERPRISE FARMINGTON, NEW MEXICO  
**MANZANARES E&FS COMPRESSOR STATION**  
**TANK #13**  
**JULY, 2016**  
**SITE MAP**  
SAN JUAN COUNTY  
NEW MEXICO  
**SECTION 17, T28N, R2W**

|                       |                       |
|-----------------------|-----------------------|
| Designed: Diana       | Checked: [Signature]  |
| ISS: 1.15             | DATE: 08/01/2016      |
| PROJECT: Q10000051899 | PROJECT FILE: 0134213 |
| FIGURE: 3             |                       |

Manzanares E&FS Compressor Station, Section 17, T28N, R2W, San Juan County, New Mexico. This map was created using data from the following sources: Enterprise Products, USGS, USDA, USGS, AeroGRID, IGN, IGP, swisstopo, and the GIS User Community. The map is for informational purposes only and should not be used for legal or regulatory purposes. The map is not a warranty, representation, or endorsement of any products or services. The map is subject to change without notice. The map is not a warranty, representation, or endorsement of any products or services. The map is subject to change without notice.

Below Grade Tank Diagram  
Manzanares EPFS Compressor Station Tank #13





OCT 21 2016

**Enterprise Field Services, LLC  
Existing Buried Double-Wall Steel Tank(s)  
San Juan Basin - Below Grade Tank(s)  
Design and Construction Plan**

In accordance with Rule 19.15.17 NMAC, the following plan describes the general design and construction of the Below Grade Tank(s) (BGT) using double-wall steel tanks at Enterprise Field Services, LLC (Enterprise) facilities in the San Juan Basin of New Mexico.

**Plan requirements:**

1. The existing BGT(s) is/are located within a facility signed appropriately to NMAC 20.2.70, Title V General Construction Permit requirements. The sign is legible and contains the operator's name, the location of the compressor station in decimal degrees and township section and range, and emergency contact telephone numbers. Additional signage relevant to the Title V air quality permit is also present and provides equal or better protection of fresh water, public health and the environment than the 19.15.17.11 NMAC Subsection C signage requirement.
2. The existing BGT(s) is/are located within a facility with a minimum six foot high chain link fence topped with barbed or razor wire which provides equal or better protection of fresh water, public health and the environment than the 19.15.17.11 NMAC Subsection D fencing requirement.
3. The existing BGT(s) has/have an enclosed double wall steel top which provides equal or better protection of fresh water, public health and the environment than the 19.15.17.11 NMAC Subsection E netting requirement.
4. The existing BGT(s) foundation(s) is/are level and free of rocks, debris, sharp edges or irregularities and has compacted bottom and sidewalls that are stable for the soil conditions.
5. The existing BGT(s) is/are protected from rainwater run-on because the top of the BGT(s) is a minimum of six inches above the ground surface.
6. The existing BGT(s) is steel double-wall and bottom equipped with an Electronic Flow Meter (EFM) to monitor high liquid levels and automatically shuts off liquid discharges to prevent overflows. The annulus between the double walls is also monitored and inspected monthly.

## Operational Plan

NMAC 19.15.17.12

### OPERATIONAL REQUIREMENTS

Enterprise will operate and maintain the below-grade tank to contain liquids and solids and maintain the secondary containment system to prevent contamination of fresh water and protect public health and the environment.

Enterprise shall not discharge into or store any hazardous waste in the below-grade tank.

If the below-grade tank develops a leak, Enterprise shall remove all liquid above the damage or leak within 48 hours of discovery, notify the appropriate division office and repair the damage or replace the below-grade tank as applicable per 19.15.29 NMAC.

Enterprise shall operate and install the below-grade tank to prevent the collection of surface water run-on.

Enterprise shall not allow a below-grade tank to overflow or allow surface water run-on to enter the below-grade tank.

Enterprise shall remove any measurable layer of oil from the fluid surface of a below-grade tank.

Enterprise shall inspect the below-grade tank for leakage and damage at least monthly.

Enterprise shall document the integrity of each tank at least annually and maintain a written record of the integrity for five years.

Enterprise shall maintain adequate freeboard to prevent overtopping of the below-grade tank.



## CLOSURE REQUIREMENTS

Enterprise shall not commence closure without first obtaining approval of the closure plan submitted with the permit application or registration pursuant to 19.15.17.13 NMAC.

Enterprise shall close the below-grade tank by first removing all contents and transferring the materials to a division approved facility.

Enterprise shall test the soils beneath the below-grade tank as follows:

A minimum of one composite sample to include any obvious stained or wet soils, or other evidence of contamination shall be collected from under the below-grade tank and the sample shall be analyzed for the identified constituents with respective concentrations listed in Table I of 19.15.17.13 NMAC below.

| <b>Table I</b><br><b>Closure Criteria for Soils Beneath Below-Grade Tanks, Drying Pads Associated with</b><br><b>Closed-Loop Systems and Pits where Contents are Removed</b> |             |                                     |              |
|--|-------------|-------------------------------------|--------------|
| Depth below bottom of pit<br>to groundwater less than<br>10,000 mg/l TDS   | Constituent | Method*                             | Limit**      |
| ≤50 feet   | Chloride    | EPA 300.0                           | 600 mg/kg    |
|  | TPH         | EPA SW-846<br>Method 418.1          | 100 mg/kg    |
|  | BTEX        | EPA SW-846 Method 8021B<br>or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B<br>or 8015M | 10 mg/kg     |
| 51 feet-100 feet   | Chloride    | EPA 300.0                           | 10,000 mg/kg |
|  | TPH         | EPA SW-846<br>Method 418.1          | 2,500 mg/kg  |
|  | GRO-DRO     | EPA SW-846<br>Method 8015M          | 1,000 mg/kg  |
|  | BTEX        | EPA SW-846 Method 8021B<br>or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B<br>or 8015M | 10 mg/kg     |
| > 100 feet   | Chloride    | EPA 300.0                           | 20,000 mg/kg |
|  | TPH         | EPA SW-846<br>Method 418.1          | 2,500 mg/kg  |
|  | GRO-DRO     | EPA SW-846<br>Method 8015M          | 1,000 mg/kg  |
|  | BTEX        | EPA SW-846 Method 8021B<br>or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B<br>or 8015M | 10 mg/kg     |

\*Or other test methods approved by the division

\*\*Numerical limits or natural background level, whichever is greater

\*\*\* Or Method 8015 with GRO, DRO, & MRO

If any contaminant concentration is higher than the above parameters, the division may require additional delineation upon review of the results and Enterprise must receive approval before proceeding with closure.

If all contaminant concentrations are less than or equal to the parameters listed above, Enterprise can proceed to backfill the excavation with non-waste containing, uncontaminated, earthen material.

### CLOSURE NOTICE

Enterprise shall notify the appropriate division district office verbally, and in writing, at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Enterprise name and the location to be closed, including the unit letter, section, township, and range.

Enterprise shall notify the surface owner by certified mail (return receipt requested) that Enterprise plans closure operations at least 72 hours, but not more than one week, prior to any closure operation. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement.

### CLOSURE REPORT AND BURIAL IDENTIFICATION

Within 60 days of closure completion, Enterprise shall submit a closure report on form C-144, with necessary attachments to document all closure activities including sampling results, information required by 19.15.17 NMAC, and details on back-filling, capping and covering, where applicable. In the closure report, Enterprise shall certify that all information in the report and attachments is correct and that Enterprise has complied with all applicable closure requirements and conditions specified in the approved closure plan.

### TIMING REQUIREMENTS FOR CLOSURE

Within 60 days of cessation of operations, Enterprise shall remove liquids and sludge from a below-grade tank prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility.

Within six months of cessation of operations, Enterprise shall remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves. If there is any equipment associated with a below-grade tank, Enterprise shall remove the equipment, unless the equipment is required for some other purpose.

### SOIL COVER DESIGNS FOR BELOW-GRADE TANKS

The soil cover for closures after site contouring (where Enterprise has removed the below-grade tank and, if necessary, remediated the soil beneath the below-grade tank to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0) shall consist of the background thickness of topsoil or one foot of suitable material, whichever is greater.

Enterprise shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.



## RECLAMATION AND RE-VEGETATION

### RECLAMATION OF AREAS NO LONGER IN USE

All areas disturbed by the closure of the below-grade tanks, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.

Enterprise shall replace topsoils and subsoils to their original relative positions and shall be contoured to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the below-grade tank.

Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.

### OTHER REGULATORY REQUIREMENTS

The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of any operations subject to those provisions, provided the other requirements provide equal or better protection of fresh water, human health and the environment.

Enterprise shall notify the division when reclamation and re-vegetation are complete.



# New Mexico Office of the State Engineer Water Column/Average Depth to Water

(A CLW##### in the  
POD suffix indicates the  
POD has been replaced  
& no longer serves a  
water right file.)

(R=POD has  
been replaced,  
O=orphaned,  
C=the file is

closed) (quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

| POD Number               | POD Sub-Code | basin | County | Q 64 | Q 16 | Q 4 | Sec | Tws | Rng | X      | Y        | Depth Well | Depth Water | Water Column |
|--------------------------|--------------|-------|--------|------|------|-----|-----|-----|-----|--------|----------|------------|-------------|--------------|
| <a href="#">SJ 02883</a> |              |       | SJ     | 3    | 3    | 2   | 16  | 29N | 09W | 251496 | 4068078* | 123        | 87          | 36           |
| <a href="#">SJ 03185</a> |              |       | SJ     | 4    | 4    | 3   | 16  | 29N | 09W | 251290 | 4067283* | 220        | 100         | 120          |

Average Depth to Water: **93 feet**

Minimum Depth: **87 feet**

Maximum Depth: **100 feet**

**Record Count: 2**

**PLSS Search:**

**Section(s): 16**

**Township: 29N**

**Range: 09W**

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.