

GW - 46

**GENERAL
CORRESPONDENCE**

YEAR(S): 2008 - 2010



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OCT 10 AM 10 37

8300 Jefferson NE, Suite B
Albuquerque, NM
87113

p | 505.344.7373
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kleinfelder.com

October 9, 2008
File No. 93013.1-ALB08RP001

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

SUBJECT: Closure Plan for the Eunice A Compressor Station (GW-46)

Dear Mr. Jones:

On behalf of El Paso Natural Gas Company (EPNG) Kleinfelder West, Inc. is pleased to submit this closure plan for the Eunice A compressor station (Eunice A) (GW-46). Eunice A is located in Section 5, Township 21 South, Range 36 East, Lea County, New Mexico.

EPNG is in the process of decommissioning Eunice A and it will be replaced by the soon to be constructed Eunice C compressor station (Eunice C) (GW-379). Eunice A has been in operation since 1948 and is projected to be shut down in December 2008 after Eunice C becomes operational.

All connections from Eunice A to the existing transmission lines will be isolated and capped after Eunice C becomes operational. The boundary fence will remain, as EPNG owns the property and will continue to use it for pig traps for existing transmission lines that pass through the site. Eunice A contains 12 compressors and EPNG may opt to cannibalize some of the compressors for spare parts, and then salvage the remainder. All equipment will be removed from Eunice A, including buildings, vessels, and piping. Eunice A facilities and equipment will not be abandoned in place. Appendix A contains EPNG's demolition schedule and the site is depicted on Figure 1.

Liquids will be removed from all known vessels, engines, compressors, piping, and other equipment. Measures will be taken to prevent spills, runoff, dust, and impact to the environment and groundwater. Sampling will be conducted to characterize site conditions, and as practical, the site will be restored to its original topography. Appendix B contains the sampling plan and procedures that will be used during demolition. The sampling plan and procedures were developed by Eco-Logical Environmental Services Inc. of Midland, Texas.

Materials such as hazardous waste, PCBs or non-hazardous materials will be disposed in accordance with applicable State and EPA regulations. At the time of this letter and in the foreseeable future, EPNG will use the following disposal facilities:

PCBs:

Clean Harbors, Grassy Mountain, EPA Number UTD-991301748

P.O. Box 22750

Salt Lake City, UT 84122

Phone Number: (435) 884-8900

Other Hazardous Waste:

Clean Harbors, Lone Mountain Facility, EPA Number OKD065438376

Phone Number: (580) 697-3500

Non-Hazardous Waste, TCEQ Number 2158

Republic Services

P.O. Box 69055

Odessa, TX 79769

Phone Number: (432) 381-4722

Should you have any questions, please feel free to me at (505) 344-7373.

Respectfully submitted,

KLEINFELDER WEST, INC.

Reviewed by:



David Janney
Project Manager



Melani Oakley
Environmental Group Manager

Attachments: Figure 1, Eunice A Plant Sampling Locations
Appendix A, Demolition Schedule
Appendix B, Sampling Plan and Procedures

FIGURE 1

The potential source areas identified during the site walk-over are presented below. Each source area includes the constituent of concern, proper laboratory analytical method (indicated in parentheses), possible sampling locations, and sampling depths.

North Cooling Tower

Oil- PCBs to Aroclor 1268 (8082) & TOX (9077)

Corrate Corrosion Inhibitor- Dispose based on MSDS

Jacket Water Vessel

Liquids- TCLP Metals including Cr⁺³ (6010) and Cr⁺⁶ (SM 3500-CRD)

West Containment Area

Nalco totes of TRAC107 (4 totes), Engine oil (3 drums), Hydraulic oil (4 drums), Nalco antifoam (2-5 gallon containers), and Soap (1 drum) - El Paso will attempt to use all these products. Nalco owns the containers and product inside, so these containers will go back to Nalco.

Pump Bldg.

Transite siding- Asbestos (Polarized light microscopy)

Air compressors- PCBs to Aroclor 1268 (8082) & TOX (9077)

South Cooling Tower

Soil- Cr⁺³ (6010), Cr⁺⁶ (SRM 3500-CRD). Samples will be collected approximately 5 feet to 20 feet out from the tower on all sides to an estimated depth of 5 feet bgs. Contact Ian Yanagisawa (Houston Office) regarding previous investigations and sampling in this area.

Wood & Concrete- TCLP Metals including Cr⁺³ (6010) and Cr⁺⁶ (SM 3500-CRD). Composite samples will be collected of the wood, scale buildup, and sludge from within the tower basin.

South Transformer

Stained Concrete- PCBs to Aroclor 1268 (8082). A bulk concrete sample will be collected from the upper 1-2 inches in the stained location.

Soil- PCBs to Aroclor 1268 (8082). A composite soil sample will be collected surrounding the concrete pad at a depth of six (6) inches.

Sulfuric Acid Containment

Sulfuric Acid- Dispose based on MSDS

Soil- pH. Samples will be collected to a depth of five (5) feet bgs in the stained location.

Rectifier

Oil- PCBs to Aroclor 1268 (8082) and TOX (9077)

Concrete- PCBs to Aroclor 1268 (8082). A bulk concrete sample will be collected from the upper 1-2 inches in the stained location.

Soil- PCBs to Aroclor 1268 (8082). A composite soil sample will be collected surrounding the concrete pad at a depth of six (6) inches.

Southwest Meter Shed

Soils- Total Hg (7470). A mercury survey will be conducted in and around the shed. Samples will be collected to a depth of two (2) feet bgs in three (3) locations.

Starting Air AST

Liquids (if present) – PCBs to Aroclor 1268 (8082) and TOX (9077).

Soil- PCBs to Aroclor 1268 (8082). Samples will be collected to a depth of five (5) feet bgs in the stained area. Check for previous investigations and sampling in this area.

Used Oil Containment

Soil- TPH DRO/GRO (8015). Samples will be collected to a depth of five (5) feet bgs on each side of the secondary containment.

Compressor Bldg

Soil- PCBs to Aroclor 1268 (8082), Total Hg (7470). Check for previous mercury investigation and records. If no previous sampling then collect soil samples outside every door to a depth of two (2) feet.

Air piping liquids (if present) - PCBs to Aroclor 1268 (8082).

Concrete- PCBs to Aroclor 1268. A bulk concrete sample will be collected from the upper 1-2 inches in the stained location. Contact Ian Yanagisawa (Houston Office) regarding previous PCB investigations and sampling in this area. Conduct a PCB records review.

Floor Paint- TCLP Pb (6010). Collect two (2) composite samples of paint.

Tool drop area liquids (if present) – PCBs to Aroclor 1268 (8082).

Compressor engine- Composite paint sample from three (3) engines for PCBs to Aroclor 1268 (8082).

Rafters- Composite paint sample from east end rafter for PCBs to Aroclor 1268 (8082)

Soil staining adjacent to storage box located on east end- TPH DRO/GRO (8015). Samples will be collected to a depth of five (5) feet bgs adjacent to the box.

Oily Water Tank

Liquids- PCBs to Aroclor 1268 (8082), BTEX, TPH DRO/GRO (8015), and TOX (9077). If oil and water are present, each will be sampled.

Southeast Meter Shed

Soil- Total Hg (7470). A mercury survey will be conducted in and around the shed. Samples will be collected to a depth of two (2) feet bgs in three (3) locations.

Large Oil AST and Containment

Soil- TPH DRO/GRO (8015). Samples will be collected to a depth of five (5) feet bgs on each side of the secondary containment.

Air Compressor Bldg

Oil- PCBs to Aroclor 1268 (8082) & TOX (9077).

Concrete- PCBs to Aroclor 1268 (8082). Bulk concrete samples will be collected from the upper 1-2 inches next to each pad & beneath dryers.

Soil- PCBs to Aroclor 1268 (8082). Samples will be collected to a depth of five (5) feet bgs adjacent to air receiver vessel blowdown and instrument air blowdown.

Inlet Scrubber

Sludge, Liquids, & Solids- TCLP Package including TCLP Metals (6010) TCLP VOCs (8260), TCLP SVOCs (8270), RCI (SW-846), and TPH DRO/GRO (8015). Each matrix present will be sampled.

Classifier

Used Oil AST- No sampling. All waste oils are transported offsite via a line owned by Rice Engineering.

Grease Gun Storage

Soil- TPH DRO/GRO (8015). Samples will be collected to a depth of five (5) feet bgs on each side of the concrete pad and in visibly stained locations.

Control Bldg

Septic system on north side- Include proper closure procedures.

Vessel Demolition

All accessible vessels will be sampled during the assessment activities. Based on the waste characterization sample results, the waste will be profiled for either disposal or recycle. Once a waste has been characterized, the waste will be properly labeled as a hazardous or non-hazardous waste, and will include the appropriate generator information and accumulation start date. Hazardous and non-hazardous wastes will at no point be mixed to become one (1) waste stream and will remain several different distinct waste streams.

Liquids in piping, vessels, and equipment will be evacuated using a vacuum truck and either be transported for recycling or placed in drums for disposal. Solids within vessels will be placed in separate drums. Vessels which will be recycled for scrap will be triple rinsed and all rinse liquids and vessel contents will be placed in drums for disposal. Plastic will be placed around each vessel prior to beginning rinsing activities to prevent and/or minimize the impacts of a release to soil. During evacuation of vessels via a vacuum truck, a catch pan will be placed beneath all valves, hoses, and areas where it is likely for a leak to occur. .

Runoff Control

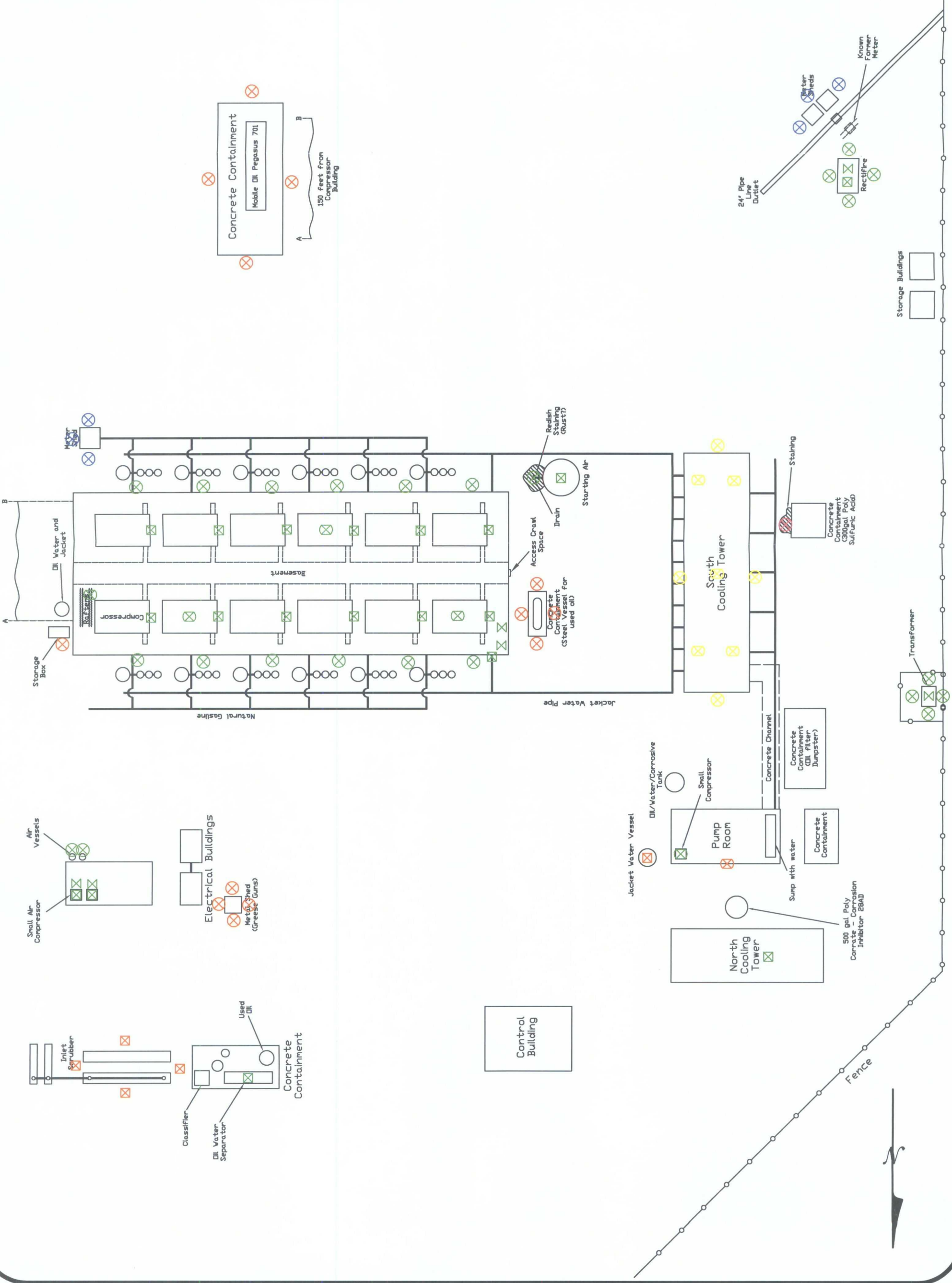
To prevent any off site migration of contaminants, there will be two lines of defense used. The first is to prevent the contaminants from getting on the ground where they can migrate off site and the second is a barrier around the work area. As mentioned above, plastic and catch pans will be used while emptying and cleaning all vessels, tanks, compressors, and other equipment containing contaminants. If there is still a potential for waste to migrate off site, a silt fence will be installed around the work site. This will not stop liquids, but will slow them enough to allow time for a dyke to be built down stream.

Dust Control

During demolition of the plant, water will be used to control dust. A water truck will be used to control dust outside. For any areas that may contain hazardous dust, such as asbestos, the area will be kept wet until the hazard is removed. No runoff is anticipated from this operation.

Site Restoration

Once facility demolition and decommissioning is complete, the site will be restored to its original topography. The site may be re-seeded with native grass seed at the request of the landowner to minimize soil erosion.



General Notes

Eunice A Plant Sampling Locations

Explanation

Soils	TPH DRO/GRO	⊗
Soils	Total Hg	⊗
Soils	PCB to Aroclor 1268	⊗
Soils	pH	⊗
Soils	Cr (6010) and Cr (SM 3500-CRD)	⊗
Liquids	PCBs to Aroclor 1268	⊗
Liquids	TCLP Metals	⊗
Concrete	PCBs to Aroclor 1268	⊗
Paint	TCLP Pb	⊗
Siding	Asbestos	⊗
Materials	PCBs to Aroclor	⊗
Materials	TCLP Metals	⊗
Materials	Cr (6010) and Cr (SM 3500-CRD)	⊗

No.	Revision/Issue	Date

Firm Name and Address

Eco-logical Environmental Services, Inc.
2200 Market
Midland, TX 79703
1 (800) 375-0100

Client Name and Address

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

Sheet

Project 982-3794

Date

Scale Not to Scale

APENDIX A

**Demolition Schedule
(EPNG)**

Description of Work

The closure and demolition of the Eunice Mainline Compressor Station (Eunice A, GW-46) for demolition and removal of all compressor station facilities, related equipment and buildings including the field office and the old area office will be filed with the Federal Energy Regulatory Commission (FERC). This action is being pursued due to replacement of Eunice A with the soon to be constructed Eunice C Compressor Station. Eunice A was constructed in 1948. Operations at Eunice A are scheduled to stop in December 2008 as the new Eunice C Compressor Station becomes operational. All piping connections to the pipeline system will be isolated and capped after Eunice C becomes operational. The boundary fence will remain, as El Paso owns the property and will continue to use the facility for pig traps for our transmission lines that pass through Eunice A. All known liquids will be removed from Eunice A. Eunice A contains 12 compressors, 11 Clark BA5's and 1 HBA5. EPNG may opt to use some of these compressors for spare parts and salvage the remainder.

Demolition Schedule:

Phase 1

- Decommission Facility (January 2009)
- Drain cooling tower coils
- Drain engine oil

Phase 2

- Comprehensive environmental records review for all facilities at the compressor station (2010)
- Sampling, testing and Waste Characterization Work plan (2010)
- ACM report (2010)

Phase 3

- Assess emissions for demolition equipment (2011)
- Complete Environmental Assessment (2011)
- Notification of NMED (2011)
- Notification of NMOCD (2011)
- Notification of FERC (2011)

Phase 4

The following compressor station facilities, related equipment and buildings including the field office and the old area office will be removed in 2012:

- Compressor building (60'W x 150'L)
- Compressor engines (12-reciprocating engines)
- Cooling Water Pump House (28'W x 50'L)

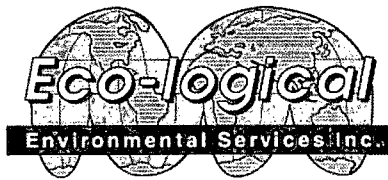
- Air Compressor Building (20'W x 40'L)
- Starting Air compressor
- Old Area Office (40'W x 30'L)
- Control Building (25'W x 20'L)
- Inlet Scrubbers (2)
- Glycol, Oil and Classifier tanks
- Air Receiving tank
- Cooling Tower (25'W x 100'L)
- Fin Fan Coolers (25'W x 60'L)
- Sulfuric Acid Containment Area and storage tank
- Lube Oil Containment Area and storage tank
- Meter Sheds (2)
- All station above ground piping
- All station below ground piping
- All electrical and controls wiring
- Station light poles

Phase 5

- Re-Vegetation of facility site (2012)

APPENDIX B

Sampling Plan and Procedures (Eco-Logical Environmental Services, Inc.)



September 30, 2008

MEMORANDUM

To: Steve Dines, El Paso Corporation
Mark McDaniel, El Paso Corporation
Mike Orr, El Paso Corporation
Eddie Childers, El Paso Corporation
Glenn Thompson, El Paso Corporation
Scott Springer, Eco-logical Environmental Services, Inc.

From: Jeff Merrell, Eco-logical Environmental Services, Inc.

Re: Eunice A Plant Pre-demolition Site Sampling Plan and Procedures

This memo summarizes the potential source areas and waste streams encountered during the site walk-over completed on February 28, 2008. The memo identifies the recommended sampling analysis per Stephen Dines and those analyses recommended by Eco-logical Environmental Services, Inc. (EES) based on previous site assessments, screening, and remediation at El Paso facilities.

Bulk samples will be collected for waste characterization purposes while wipe samples will only be used for screening.

Soil sampling procedures are included for surface sampling only since the need for subsurface sampling (>15') is not proposed at this time.

Surface Soil Sampling

During site assessment activities, potential COC source areas will be identified. Surface samples (0-5' bgs) will be collected from each of these areas. Surface samples will be collected following the removal of the upper 1-2 inches of soil/gravel with a clean stainless steel trowel. A stainless steel hand auger will be advanced to approximately 2-4 inches above the sample depth (i.e. 2', 5'), the additional soil cuttings will be removed and placed in a drum, and the hand auger will be decontaminated between advancing borings at different locations. At this point, the hand auger will be advanced to the required depth for sample collection. The sample will be placed into a 4-ounce laboratory supplied container and placed in a cooler on ice.

Throughout the workplan several samples will be collected from the upper five (5) feet. Initially only the six (6) inch sample will be submitted unless field screening indicates the presence of contaminants in the one (1) foot of two (2) feet sample. The remaining samples will be held by the laboratory pending the results of the initial sample.

Griswold, Jim, EMNRD


From: Griswold, Jim, EMNRD
Sent: Wednesday, October 08, 2008 3:12 PM
To: 'glen.thompson@elpaso.com'
Subject: Hydrostatic testing of lines at Eunice A Compressor Station (GW-46)

Contacts: Glen Thompson

Glenn,

Hydrostatic testing of lines at the Eunice A compressor station does not need to be undertaken if those lines are to be removed as part of the pending closure plan. Visual assessment of the piping and surrounding soils should be done during removal operations. If the lines are left in place, then they need to be properly tested to ensure there has not been any leakage since the prior testing.

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



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



July 9, 2008

Mr. Glen Thompson
Principal Environmental Representative
El Paso Natural Gas
3300 North "A",
Building Two, Suite 200
Midland, Texas 79705

RE: Discharge Permit Extension Request and Notification of Closure
El Paso Natural Gas
Eunice A Compressor Station – Permit GW-046
Location: NW/4, NW/4 Section 5 Township 21 South, Range 36 East, NMPM
Lea County, New Mexico

Dear Mr. Thompson:

The New Mexico Oil Conservation Division (OCD) has reviewed El Paso Natural Gas Company's (EPNG) request, dated June 13, 2008, to extend the permit expiration date for the Eunice A Compressor Station (GW-046) from October 11, 2008 to January 31, 2009. OCD understands that the Eunice A Compressor Station will be replaced by the Eunice C Compressor Station and the closure of the Eunice A Compressor Station will be initiated by year-end 2008.

OCD prefers not to begin the practice of extending the expiration date of existing or outstanding discharge permits. OCD will consider not requesting the renewal of Permit GW-046 if the following conditions are satisfied:

1. EPNG shall submit a closure plan for the Eunice A Compressor Station to the OCD for review and consideration of approval by the discharge permit's original expiration date, of October 11, 2008.
2. The closure plan shall include a proposed schedule of the closure activities and a commitment to a closure completion date.
3. EPNG shall complete the closure of the Eunice A Compressor Station (GW-046) based upon an OCD approved closure plan and by the timelines and completions dates of the OCD approved schedule.
4. EPNG shall submit a closure report to the OCD within 60 days after completion of the closure that demonstrates compliance to the approved closure plan.

Oil Conservation Division * 1220 South St. Francis Drive

* Santa Fe, New Mexico 87505

* Phone: (505) 476-3440 * Fax (505) 476-3462* <http://www.emnrd.state.nm.us>



Mr. Thompson
GW-046 EPNG Eunice C Compressor Station
July 9, 2008
Page 2 of 2

If any of the conditions above are not satisfied, OCD will require EPNG to renew the discharge permit for the Eunice A Compressor Station (GW-046).

Per Condition 16 of the discharge permit (GW-046), OCD accepts the June 13, 2008 letter as notice of closure and anticipates the submittal of a closure plan. An OCD approved closure plan is required prior to the implementation of any closure activities.

If there are any questions regarding this matter, please contact Brad A. Jones of my staff at (505) 476-3487 or brad.a.jones@state.nm.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne Price', with a long horizontal flourish extending to the right.

Wayne Price
Environmental Bureau Chief

LWP/baj

cc: OCD District III Office, Aztec

RECEIVED

June 13, 2008

2008 JUN 16 AM 11:04

Overnight Mail via UPS Tracking# 1Z 6R4 V49 01 5263 6578

Mr. Brad Jones
Environmental Engineer
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 476-3487 office
(505) 476-3462 fax

**RE: Discharge Permit Extension Request & Notification of Closure
El Paso natural Gas Company's
Eunice A Compressor Station
Discharge Permit# GW-046**

Dear Mr. Jones:

As per our conversation in April, El Paso Natural Gas Company (EPNG) is requesting an extension to the discharge permit for the Eunice A Compressor station, Discharge Permit# GW-046, which expires on October 11, 2008. EPNG is requesting that the expiration date of the discharge permit be extended to January 31, 2009.

As you are aware, a discharge permit application for a new compressor station, Eunice C, was submitted to your office on April 4, 2008. The new Eunice C Compressor Station is being constructed to replace the Eunice A Compressor Station. The station will also have increased pumping capacity to supply natural gas to a local power plant.

As part of an agreement between EPNG and the New Mexico Environment Department (NMED), **Eunice A Compressor Station is planned for closure by year-end 2008.**

EPNG is requesting the extension of the discharge permit to January 31, 2009 to allow for the additional time necessary to complete the closure of the Eunice A facility and transition to the Eunice C Compressor Station. Per Condition 16 of the discharge permit, EPNG will submit a closure plan prior to closure of the facility for the NMOCD's approval.

If you have any questions, please contact me at (432) 686-3268.

Sincerely,

EL PASO NATURAL GAS



Glen Thompson
Principal Environmental Representative

cc: Sandra Miller – Environmental Manager WPED
Kenny Morrow – Plains Area Operations Manager



Fax Transmittal Coversheet

Date and Time:

6/13/08 CENTRAL
3:30 p.m.

Pages Sent: 1 + coversheet

Name of Recipient:

BRAD JONES

Company of Recipient:

NMOCD

Complete Address:

1220 SOUTH ST. FRANCIS DRIVE, SANTA FE NM
87505

Fax Number:

(505) 476-3462

Name of Sender:

GLEN THOMPSON

Phone Number:

(432) 686-3268

Fax Number:

(432) 686-3269

Comments:

I'M FORWARDING THE ATTACHED
DISCHARGE PERMIT EXTENSION REQUEST, & NOTIFICATION
OF CLOSURE FOR EUNICE A PLANT. THE ORIGINAL IS
IN OVERNIGHT MAIL TO YOU.

GLEN THOMPSON



June 13, 2008

Overnight Mail via UPS Tracking# 1Z 6R4 V49 01 5263 6578

Mr. Brad Jones
Environmental Engineer
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
(505) 476-3487 office
(505) 476-3462 fax

**RE: Discharge Permit Extension Request & Notification of Closure
El Paso natural Gas Company's
Eunice A Compressor Station
Discharge Permit# GW-046**

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EPNG is requesting the extension of the discharge permit to January 31, 2009 to allow for the additional time necessary to complete the closure of the Eunice A facility and transition to the Eunice C Compressor Station. Per Condition 16 of the discharge permit, EPNG will submit a closure plan prior to closure of the facility for the NMOCD's approval.

If you have any questions, please contact me at (432) 686-3268.

Sincerely,

EL PASO NATURAL GAS

A handwritten signature in dark ink, appearing to read "Glen Thompson", written over a horizontal line.

Glen Thompson
Principal Environmental Representative

cc: Sandra Miller – Environmental Manager WPED
Kenny Morrow – Plains Area Operations Manager

TRANSACTION REPORT

P. 01

JUN-13-2008 FRI 02:38 PM

FOR:

RECEIVE

DATE	START	SENDER	RX TIME	PAGES	TYPE	NOTE	M#	DP
JUN-13	02:37 PM		47"	2	RECEIVE	OK		

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Thursday, January 31, 2008 10:25 AM
To: 'Duarte, Ricardo (Richard)'
Subject: EPNG Upcoming Discharge Plan Renewals - 2008
Attachments: Renewal WQCC Notice Regs.pdf; Discharge Plan App Form.pdf; Guidelines For Discharge Plans.pdf; PN Flow Chart.20.6.2renewal.pdf

Richard:

The Oil Conservation Division's (OCD) records indicate that the following discharge plans will expire this year:

GW-147 Deming Compressor Station (Luna County)	Expiration Date: 8/19/2008
GW-46 Eunice Compressor Station (Lea County)	Expiration Date: 10/11/2008
GW-151 Eunice B Compressor Station (Lea County)	Expiration Date: 11/05/2008

New Mexico Water Quality Control Commission regulations (WQCC) Section 3106.F (20.6.2.3106.F NMAC) specifies that 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. Please submit a permit renewal application, identifying any changes and updates, with a filing fee (20.6.2.3114 NMAC) of \$100.00 at least 120 days before the discharge plan expires. Please make all checks payable to the **Water Quality Management Fund** and addressed to the OCD Santa Fe Office. There is also a discharge plan permit fee, based on the type of facility, which OCD will assess after processing your application. An application form and guidance document is attached in order to assist in expediting this process.

In accordance with the public notice requirements (Subsection A of 20.6.2.3108 NMAC) of the newly revised (July 2006) WQCC regulations, "...to be deemed administratively complete, an application shall provide all of the information required by Paragraphs (1) through (5) of Subsection F of 20.6.2.3108 NMAC and shall indicate, for department approval, the proposed locations and newspaper for providing notice required by Paragraphs (1) through (4) of Subsection B or Paragraph (2) of Subsection C of 20.6.2.3108 NMAC." You are required to provide the information specified above in your permit renewal application submittal. Attached are a flow chart and the regulatory language pertaining to the new WQCC public notice requirements for your convenience. After the application is deemed administratively complete, the revised public notice requirements of 20.6.2.3108 NMAC must be satisfactory demonstrated to OCD. OCD will provide public notice pursuant to the revised WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

Please contact me by phone 505-476-3487 or email brad.a.jones@state.nm.us if you have any questions regarding this matter.

Sincerely,

1/31/2008

Brad

Brad A. Jones

Environmental Engineer

Environmental Bureau

NM Oil Conservation Division

1220 S. St. Francis Drive

Santa Fe, New Mexico 87505

E-mail: brad.a.jones@state.nm.us

Office: (505) 476-3487

Fax: (505) 476-3462