

HBP - 17

**GENERAL
CORRESPONDENCE**

**YEAR(S):
2009-2012**

April 8, 2011

RECEIVED OCD

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

2011 APR 14 P 1:09

7008 1830 0004 2686 4683

via certified mail 7008 1830 0004 2686 4683

RE: Request for Annual Temporary Permit
El Paso Natural Gas
Permit HBP-NM-017

Dear Mr. Jones

El Paso Natural Gas Company (EPNG) is submitting the following request for an Annual Temporary Permit to discharge waters from Hydrostatic Tests. The current permit expires on June 26, 2011. A check for \$250.00 that covers the filing and permission fees is being submitted separately to the Water Quality Management Fund. EPNG has also enclosed a pipeline system map that provides potential locations for the discharge of hydrostatic test water. This map is being submitted under a claim of confidentiality.

In order to maintain coverage under the Annual Temporary Permit, EPNG will comply with the following:

- The volume will not exceed 25,000 gallons per hydrostatic test;
- Water from a public/municipal water supply or other OCD-approved sources will be used for each test;
- Oral or written notification shall be provided to the OCD 72-hours prior to each hydrostatic discharge event;
- The discharge will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
- No discharge shall occur:

- Where ground water is less than 10 feet below ground surface
- Within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
- Within an existing wellhead protection area;
- Within or within 500 feet of a wetland; or
- Within 500 feet from the nearest permanent residence, school, hospital, institution or church

Best management practices shall be implemented to contain the discharge onsite, does not impact adjacent property, and to control erosion
The discharge will not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B and C of the

20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations)

The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location shall be properly notified of the activities prior to each proposed hydrostatic event; and

An annual report, summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:

The location of hydrostatic test (Section/Township/Range or GPS coordinates)

The date of each test;

The volume of each discharge; and

The source and quality of test water (laboratory analysis, if necessary).

If you have any questions, please contact Richard Duarte at 505-831-7763

Sincerely,

A handwritten signature in black ink, appearing to read "R.H. St. John".

Robert H. St. John
Principal Environmental Scientist

CC: Ms. Sandra Miller – Environmental Manager, PWED
Mr. Isaac Weaver- Manager, Pipeline Maintenance
Mr. Lloyd Moore – Supervisor, Pipeline Maintenance
Mr. Wayne Ritchie – Manager, Mechanical Maintenance, EPNG
Mr. Bryan Green – Manager, Mechanical Maintenance, EPNG
Mr. Richard Duarte – Principal Environmental Scientist, EPNG
Ms. Anu Pundari - Principal Environmental Scientist, EPNG
Mr. Glen Thompson - Principal Environmental Scientist, EPNG

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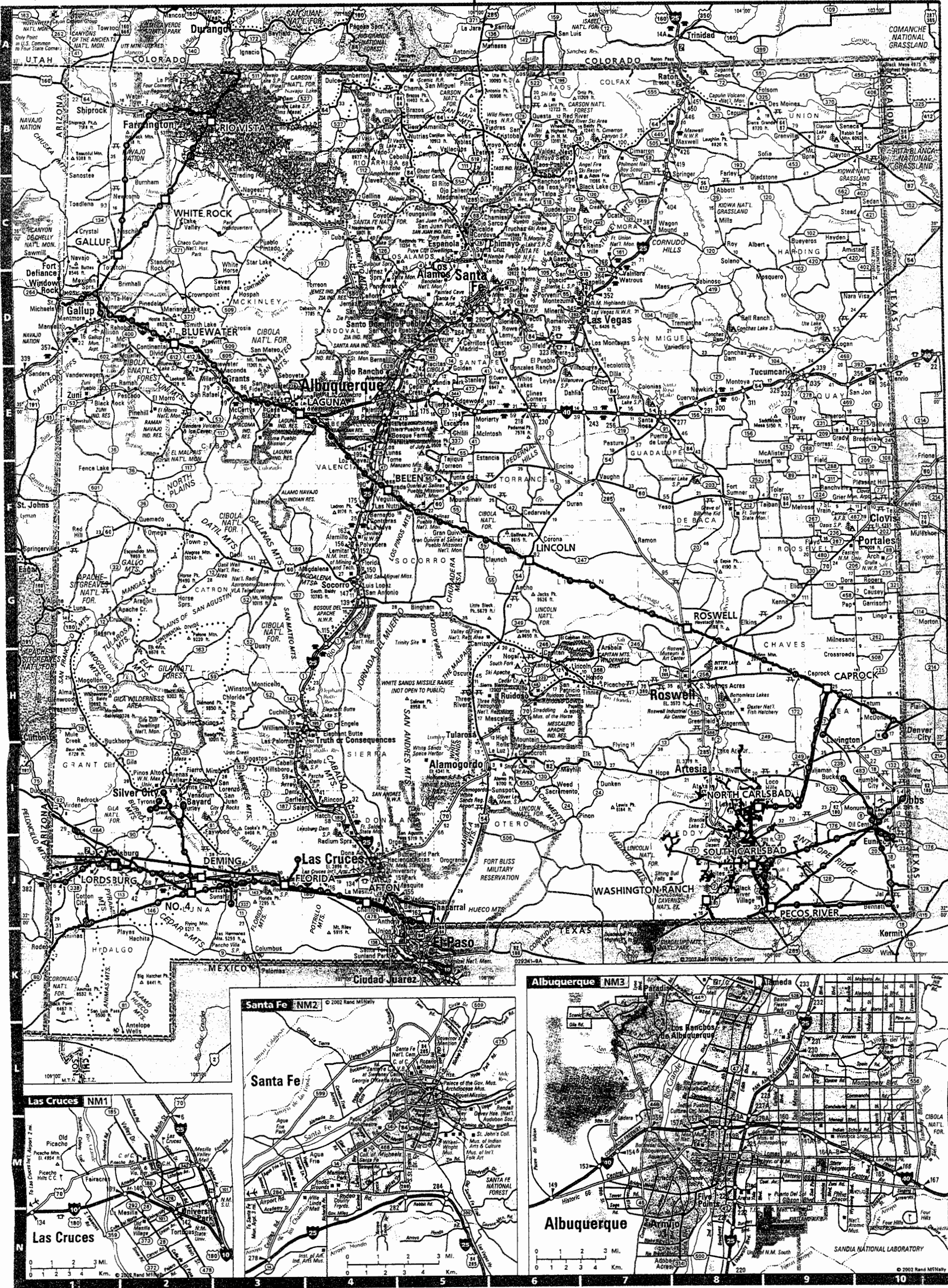
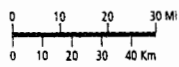
Nickname: Land of Enchantment
Land Area: 121,364 sq. mi. (rank: 5th)
Population: 1,819,046 (rank: 36th)
Largest City: Albuquerque, 448,607
Index of Cities on page 133



	Albuquerque	Alamogordo	Carlsbad	Grants	Hobbs	Santa Fe	Tucuman
Albuquerque	210	275	217	267	182	139	79
Alamogordo	146	275	179	165	457	414	354
Carlsbad	69	224	196	298	46	406	338
Grants	218	58	268	210	325	208	197
Hobbs	137	137	308	282	64	352	170
Santa Fe	191	298	136	69	208	167	
Tucuman	174	259	305	337	268	259	

Mileages in red arrow-heads; in black, between intersections.

Distance Scale



RECEIVED OCD

May 11, 2012

2012 MAY 14 A 11: 16

Mr. Brad Jones
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Certified Mail/ Return Receipt
7008 3230 0003 5240 4694

Re: Request for EPNG's Annual Temporary Discharge Permit HBP-NM-017

Dear Mr. Jones

El Paso Natural Gas Company (EPNG) is submitting the following request for an Annual Temporary Permit to discharge waters from hydrostatic tests from new pipe. This application was completed using the OCD's Guidelines for Hydrostatic Test Dewatering, revised January 11, 2007. The current permit expires on June 26, 2012. A check (# 1160127046) for \$250.00 that covers the filing and permission fees is being submitted separately to the Water Quality Management Fund. It was mailed from our Houston office to your office on May 9, 2012. EPNG has also enclosed a pipeline system map that provides potential locations for the discharge of hydrostatic test water.

With regard to the upcoming transition in ownership from El Paso Corporation to Kinder Morgan Inc, that will happen toward the end of this month. El Paso Natural Gas Company as an entity will continue with the same business function afterwards and, importantly, keep the same name.

In order to maintain coverage under the Annual Temporary Permit, EPNG will comply with the following conditions:

- 1) The volume will not exceed 25,000 gallons per hydrostatic test
- 2) Water from a public/municipal water supply or other OCD-approved sources will be used for each test
- 3) Oral or written notification shall be provided to the OCD 72-hours prior to each hydrostatic discharge event
- 4) The discharge will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal
- 5) No discharge shall occur
 - (a) Where ground water is less than 10 feet below ground surface;
 - (b) Within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - (c) Within an existing wellhead protection area;
 - (d) Within or within 500 feet of a wetland; or
 - (e) Within 500 feet from the nearest permanent residence, school, hospital, institution or church
- 6) Best management practices shall be implemented to contain the discharge onsite, does not impact adjacent property, and to control erosion
- 7) The discharge will not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations)
- 8) The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location shall be properly notified of the activities prior to each proposed hydrostatic event; and
- 9) An annual report, summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - (a) The location of hydrostatic test (Section/Township/Range or GPS coordinates)
 - (b) The date of each test;

- (c) The volume of each discharge; and
- (d) The source and quality of test water (laboratory analysis, if necessary).

If you have any questions, please contact me at 505-831-7763 or Cesar Ochoa at (915) 587-3694.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Duarte". The signature is fluid and cursive, with the first name "Richard" and last name "Duarte" clearly distinguishable.

Richard Duarte
Principal Environmental Representative

Copy (with enclosure):

CC: Ms. Sandra Miller – Environmental Manager, PWED

randmccally.com

Express Access Code: NM

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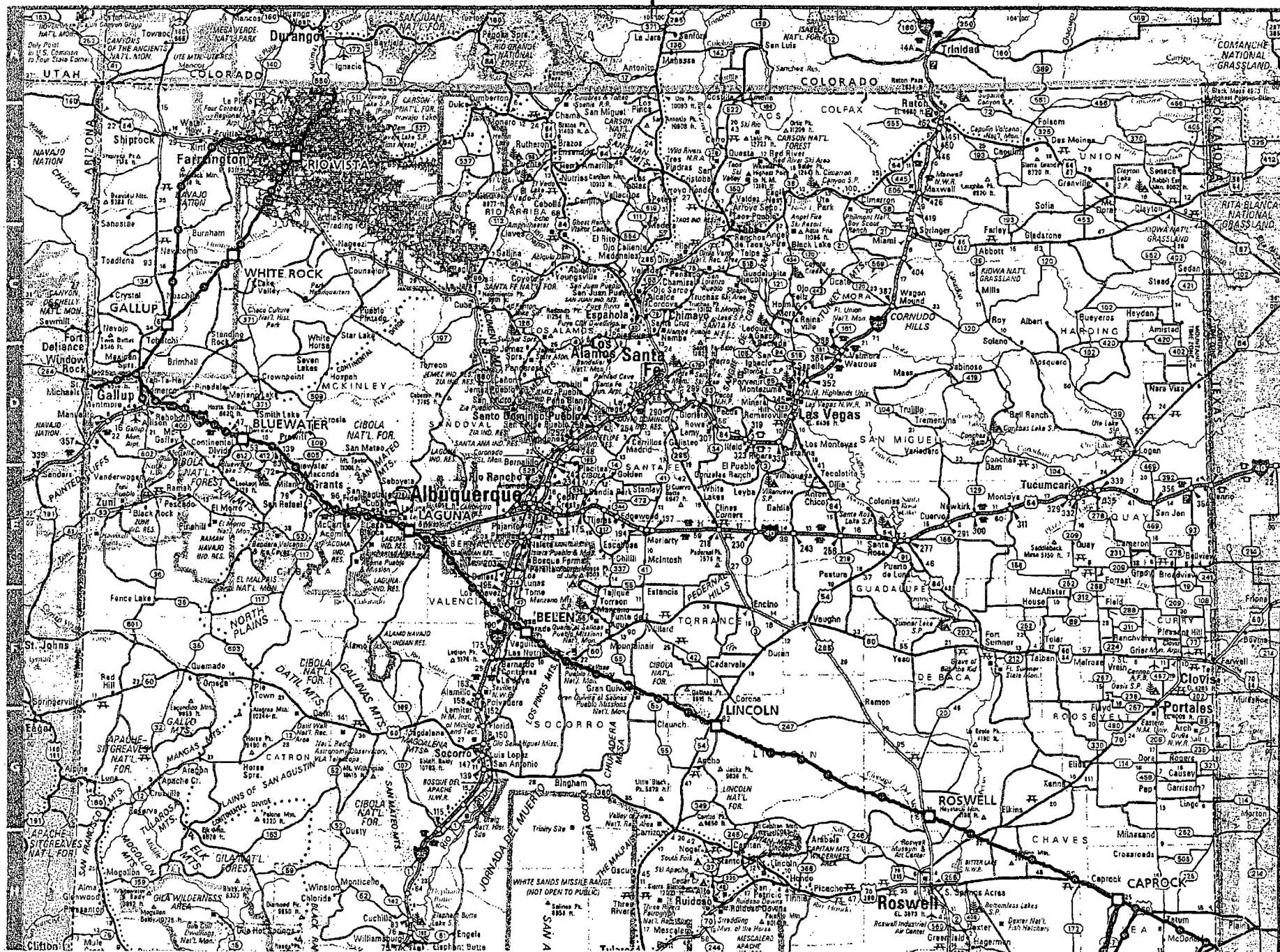
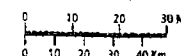
Nickname: Land of Enchantment
Land Area: 121,364 sq. mi. (rank: 36th)
Population: 1,819,046 (rank: 36th)
Largest City: Albuquerque, 448,607
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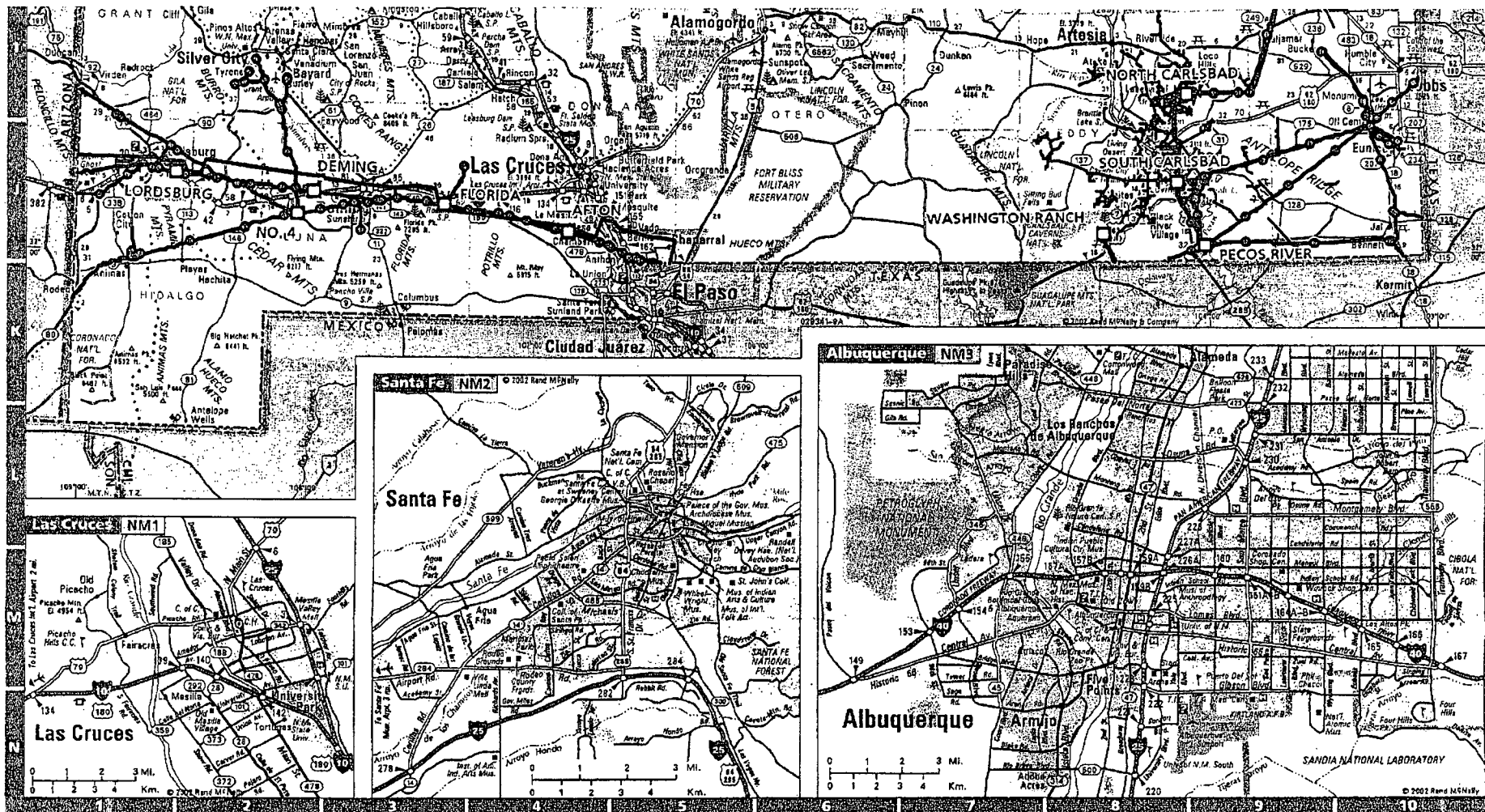


	Albuquerque	Alamogordo	Carlsbad	Grants	Hobbs	Santa Fe	Tucumcari
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Las Cruces	69	224	196	298	46	406	338
Santa Fe	218	58	268	210	325	208	197

Mileages in red between red arrowheads; in black between intersections.

Distance Scale





ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check (No. 1160127046 dated 5/9/12

or cash received on _____ in the amount of \$ 100.00

from EL PASO Natural Gas

for HBP-17

Submitted by: Lawrence Powers Date: 5/16/12

Submitted to ASD by: Ju - R Date: 5/16/12

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASE

I hereby acknowledge receipt of check No. 1160127046 dated 5/9/12

or cash received on _____ in the amount of \$ 150⁰⁰

from El Paso Natural Gas

for HBP-17

Submitted by: LAWRENCE ROMERO Date: 5/16/12

Submitted to ASD by: [Signature] Date: 5/16/12

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other TEMP PERMISSION

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 4/26/11

or cash received on _____ in the amount of \$ 150⁰⁰

from TENNESSEE GAS PIPELINE

for HBP-17

Submitted by: Lawrence Powers Date: 4/29/11

Submitted to ASD by: Shawn Powers Date: 4/29/11

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other TRAP PERMITS FEE

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 4/26/11

or cash received on _____ in the amount of \$ 100⁰⁰

from Tennessee Gas Pipeline

for HBP-17

Submitted by: Lawrence Rencio Date: 4/29/11

Submitted to ASD by: Lawrence Rencio Date: 4/29/11

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 6/4/10

or cash received on _____ in the amount of \$ 100⁰⁰

from El Paso Natural Gas

for HBP-017

Submitted by: Lawrence Ponce Date: 6/8/10

Submitted to ASD by: Lawrence Ponce Date: 6/8/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Filing Fee

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 6/4/10

or cash received on _____ in the amount of \$ 150.00

from El Paso Natural Gas

for HBP-017

Submitted by: Lawrence R. H. O. Date: 6/8/10

Submitted to ASD by: Lawrence R. H. O. Date: 6/8/10

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Temp Permission

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

EL PASO NATURAL GAS COMPANY
1001 LOUISIANA STREET
HOUSTON, TX 77002

REMITTANCE ADVICE

CHECK DATE 06/04/2010
CHECK NUMBER 1160108377
VENDOR NUM 0000002667

RECEIVED OCD

2010 JUN -7 P 1:11

WATER QUALITY MANAGEMENT FUND
C/O OIL CONSERVATION DIVISION
1220 S SAINT FRANCIS DR
SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00408499	CKEPGTR-100660 EPNG-HBP-NM017	06/03/2010	0.00	250.00
TOTAL			\$0.00	\$250.00

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Tuesday, June 30, 2009 3:40 PM
To: 'Pundari, Anu N'
Subject: RE: Hydrostatic Test Discharge - Deming Area, week of July 6

Dear Ms. Pundari,

OCD has reviewed the laboratory analytical results provided in the email below and has determined that water from El Paso's Deming Station well can be utilized for this hydrostatic test event. If El Paso wishes to pursue OCD's determination of El Paso's Deming Station well as an approved source for utilization of such water for additional hydrostatic test events, then the OCD will require that El Paso demonstrate that the water from the Deming Station well does not exceed any of the constituent concentrations identified in Subsection A, B, and C of 20.6.2.3103 NMAC (testing of all constituents will be required).

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

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

From: Pundari, Anu N [<mailto:Anu.Pundari@ElPaso.com>]
Sent: Monday, June 29, 2009 5:44 PM
To: Jones, Brad A., EMNRD
Subject: RE: Hydrostatic Test Discharge - Deming Area, week of July 6

Dear Mr. Jones,

Attached is a summary of analytical results from testing in March2008.

The water meets the 20.6.2.3103 NMAC except for those constituents noted on the spreadsheet.

There were (8) constituents that were not tested.

- Two of the constituents are standards for Irrigation Use. The water will not be used for irrigation so these are not applicable.
- Uranium was not tested but Alpha, Beta, and Combined Radium were below the SDWA MCL.
- Five constituents were organic compounds. There was a long list of organic compounds analyzed. All the organic compounds were below the detection limit.

The hazardous waste regulations allow the use of generator knowledge without a need for analytical testing. The air regulations allow the use of credible evidence. Other government agencies have utilized "actionable evidence" in the past. The courts allow the use of "preponderance of evidence".

Therefore, even though we did not test for the (8) constituents, based on credible evidence, we do not expect to exceed the limit for these (8) constituents. In addition, with groundwater at a depth of 200 feet or more, there is no likelihood of impact to groundwater from these (8) constituents.

Please grant approval to utilize the water from the Deming water well for the upcoming hydrostatic test.

Thanks so much.

Anu Pundari

P.S. Tomorrow, I will contact our Laboratory and ask for the COC and copy of the report from the Laboratory that analyzed the samples.

From: Jones, Brad A., EMNRD [mailto:brad.a.jones@state.nm.us]
Sent: Monday, June 29, 2009 12:42 PM
To: Pundari, Anu N
Subject: RE: Hydrostatic Test Discharge - Deming Area, week of July 6

Dear Mr. Pundari,

In order for the OCD to consider approval, El Paso Natural Gas Company must demonstrate (by submittal of the laboratory analytical results and COC) that the water from El Paso's Deming Station well does not exceed the constituent concentrations identified in Subsection A, B, and C of 20.6.2.3103 NMAC. Please submit the appropriate laboratory analytical results for our review.

Brad

From: Pundari, Anu N [mailto:Anu.Pundari@ElPaso.com]
Sent: Monday, June 29, 2009 1:01 PM
To: Jones, Brad A., EMNRD
Subject: Hydrostatic Test Discharge - Deming Area, week of July 6
Importance: High

Dear Mr. Jones,

As part of a pipeline project, we will be hydrostatically testing new pipe.

The total amount of the discharge will be less than 12000 gallons. The location of the test will be 32deg 9' 19.348" N, 108deg 7' 59.009" W. Test date is tentatively July 9th.

The water source is a water well at El Paso's Deming Station. The well is on company property. The water was tested in 2008 and met the Safe Drinking Water Act MCLs.

The attached permit states that we need approval to utilize water from the Deming Station well. Please grant us approval to utilize the water from the Deming Station water well.

If you have any questions, please contact me at (520) 663-4222 or email me at anu.pundari@elpaso.com

We appreciate your assistance.

Anu Pundari

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Corporation are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.

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

Jones, Brad A., EMNRD

From: Pundari, Anu N [Anu.Pundari@ElPaso.com]
Sent: Monday, June 29, 2009 5:44 PM
To: Jones, Brad A., EMNRD
Subject: RE: Hydrostatic Test Discharge - Deming Area, week of July 6
Attachments: 2008030331.pdf; Deming Hydrostatic Test June29 2009.xls

Dear Mr. Jones,

Attached is a summary of analytical results from testing in March 2008.

The water meets the 20.6.2.3103 NMAC except for those constituents noted on the spreadsheet.

There were (8) constituents that were not tested.

- Two of the constituents are standards for Irrigation Use. The water will not be used for irrigation so these are not applicable.
- Uranium was not tested but Alpha, Beta, and Combined Radium were below the SDWA MCL.
- Five constituents were organic compounds. There was a long list of organic compounds analyzed. All the organic compounds were below the detection limit.

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Therefore, even though we did not test for the (8) constituents, based on credible evidence, we do not expect to exceed the limit for these (8) constituents. In addition, with groundwater at a depth of 200 feet or more, there is no likelihood of impact to groundwater from these (8) constituents.

Please grant approval to utilize the water from the Deming water well for the upcoming hydrostatic test.

Thanks so much.

Anu Pundari

P.S. Tomorrow, I will contact our Laboratory and ask for the COC and copy of the report from the Laboratory that analyzed the samples.

From: Jones, Brad A., EMNRD [mailto:brad.a.jones@state.nm.us]
Sent: Monday, June 29, 2009 12:42 PM
To: Pundari, Anu N
Subject: RE: Hydrostatic Test Discharge - Deming Area, week of July 6

Dear Mr. Pundari,

In order for the OCD to consider approval, El Paso Natural Gas Company must demonstrate (by submittal of the laboratory analytical results and COC) that the water from El Paso's Deming Station well does not exceed the constituent concentrations identified in Subsection A, B, and C of 20.6.2.3103 NMAC. Please submit the appropriate laboratory analytical results for our review.

Brad

From: Pundari, Anu N [mailto:Anu.Pundari@ElPaso.com]
Sent: Monday, June 29, 2009 1:01 PM
To: Jones, Brad A., EMNRD

Subject: Hydrostatic Test Discharge - Deming Area, week of July 6
Importance: High

Dear Mr. Jones,

As part of a pipeline project, we will be hydrostatically testing new pipe.

The total amount of the discharge will be less than 12000 gallons. The location of the test will be 32deg 9' 19.348" N, 108deg 7' 59.009" W. Test date is tentatively July 9th.

The water source is a water well at El Paso's Deming Station. The well is on company property. The water was tested in 2008 and met the Safe Drinking Water Act MCLs.

The attached permit states that we need approval to utilize water from the Deming Station well. Please grant us approval to utilize the water from the Deming Station water well.

If you have any questions, please contact me at (520) 663-4222 or email me at anu.pundari@elpaso.com

We appreciate your assistance.

Anu Pundari

This email and any files transmitted with it from the El Paso Corporation are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.

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



LABORATORY SERVICE REPORT

REQUESTOR: Campbell, Dave
Deming, NM
(505) 544-5234

REPORT DATE: 4/15/2008
REQUEST NO: 2008030331
APPROVED BY: Campbell, Darrell
PENDING REQ. ID: 2008030331

DEPARTMENT: Tucson Division
DISTRIBUTION: Duarte, Richard; Richardson, James D
PERFORMED BY: Transwest Geochem

Request Description: Annual Domestic Water - Deming Station
Date Received: 3/3/2008
Date Completed: 4/15/2008

Sample No: 1 Sampled By: Lorenzo Hernandez Sample Date: 3/3/2008 12:55:00 PM
Received Vol.: Received Date: 3/3/2008
Description:
Analysis: WP Domestic Water - SDWA TWGC
Purpose: Disposal/Environmental Concerns
Matrix: Water
Location: EPNG - Tucson - Deming - 6514 - 0000+0 - Office - Coffee Shop Sink
Field Data:
Pressure: Solid pH: Liquid pH: 8.4

Data: See attached sheet(s).

Comments:

Sample: 1

Metals

Aluminum (mg/l)	< 0.10
Barium (mg/l)	0.0047
Beryllium (mg/l)	< 0.0005
Boron (mg/l)	0.11
Cadmium (mg/l)	< 0.0020
Calcium (mg/l)	5
Chromium (mg/l)	< 0.0050
Copper (mg/l)	0.0049
Iron (mg/l)	< 0.10
Magnesium (mg/l)	< 1.0
Manganese (mg/l)	< 0.0030
Nickel (mg/l)	< 0.0020
Potassium (mg/l)	4.2
Silver (mg/l)	< 0.0050
Sodium (mg/l)	83
Zinc (mg/l)	< 0.050

This report has been prepared for the private and exclusive use of El Paso Corporation and its affiliates and its delivery to any other person is upon the expressed understanding and condition that no representations or warranties, expressed or implied, are contained herein with respect to any of the information set forth in the report. If the purpose of this sample(s) is "External Corrosion", "Internal Corrosion", and/or "Pigging Samples", the interpretation of this report is the responsibility of Pipeline Services. Field Operations will only be contacted by Pipeline Services if the results require any action to be taken.

Request: 2008030331

Sample:

1

Antimony (mg/l)	< 0.0020
Arsenic (mg/l)	0.0057
Lead (mg/l)	< 0.0020
Selenium (mg/l)	< 0.0020
Thallium (mg/l)	< 0.0005
Hardness (mg/l)	16
Mercury (mg/l)	< 0.0002

Anions

Bromide (mg/l)	< 0.10
Chloride (mg/l)	7.9
Nitrate (as N) (mg/l)	< 1.0
Nitrite (as N) (mg/l)	< 0.010
Sulfate (mg/l)	19
Fluoride (mg/l)	0.64

General Analyses

Alkalinity, Bicarbonate (As CaCO ₃) (mg/l)	170
Alkalinity, Carbonate (As CaCO ₃) (mg/l)	< 20
Alkalinity, Hydroxide (As CaCO ₃) (mg/l)	< 20
Alkalinity, Total (As CaCO ₃) (mg/l)	170
Cyanide, Total (mg/l)	< 0.010
Spec. Conductance @25 C (µmhos/cm)	360
Chromium, Hexavalent (mg/l)	< 0.010
pH	8.7
Temperature °C.	18.3
Silica (mg/l)	48
Total Dissolved Solids (mg/l)	270
Total Suspended Solids (mg/l)	< 10
Turbidity (NTU)	0.2
Asbestos (MFL)	< 0.2

Radiochemical Activity

Gross Alpha (pCi/L)	9.4+/-1.5
Gross Beta (pCi/L)	3.7+/-0.9
Radium 226 (pCi/L)	<0.3
Radium 228 (pCi/L)	<0.3
Total Radium (pCi/L)	<0.3

504.1 Analysis

1,2-Dibromo-3-chloropropane (DBCP) (µg/l)	< 0.0097
1,2-Dibromoethane (EDB) (µg/l)	< 0.0097

508.1 Analysis

Aldrin (µg/l)	< 0.0099
Aroclor 1016 (µg/l)	< 0.050
Aroclor 1221 (µg/l)	< 0.099
Aroclor 1232 (µg/l)	< 0.099
Aroclor 1242 (µg/l)	< 0.099
Aroclor 1248 (µg/l)	< 0.099
Aroclor 1254 (µg/l)	< 0.099
Aroclor 1260 (µg/l)	< 0.099

Sample:**1**

Chlordane (µg/l)	< 0.099
Dieldrin (µg/l)	< 0.0099
Endrin (µg/l)	< 0.0099
gamma-BHC (Lindane) (µg/l)	< 0.0099
Heptachlor (µg/l)	< 0.0099
Heptachlor epoxide (µg/l)	< 0.0099
Methoxychlor (µg/l)	< 0.0099
Toxaphene (µg/l)	< 0.099

515.4 Analysis

2,4,5-TP (Silvex) (µg/l)	< 0.050
2,4-D (µg/l)	< 0.10
Dalapon (µg/l)	< 1.0
Dicamba (µg/l)	< 0.20
Dinoseb (µg/l)	< 0.20
Pentachlorophenol (µg/l)	< 0.040
Picloram (µg/l)	< 0.10

524.2 Analysis

1,1,1,2-Tetrachloroethane (µg/l)	< 0.5
1,1,1-Trichloroethane (µg/l)	< 0.5
1,1,2,2-Tetrachloroethane (µg/l)	< 0.5
1,1,2-Trichloroethane (µg/l)	< 0.5
1,1-Dichloroethane (µg/l)	< 0.5
1,1-Dichloroethene (µg/l)	< 0.5
1,1-Dichloropropene (µg/l)	< 0.5
1,2,3-Trichlorobenzene (µg/l)	< 0.5
1,2,3-Trichloropropane (µg/l)	< 0.5
1,2,4-Trichlorobenzene (µg/l)	< 0.5
1,2,4-Trimethylbenzene (µg/l)	< 0.5
1,2-Dibromo-3-chloropropane (µg/l)	< 0.5
1,2-Dibromoethane (µg/l)	< 0.5
1,2-Dichlorobenzene (µg/l)	< 0.5
1,2-Dichloroethane (µg/l)	< 0.5
1,2-Dichloropropane (µg/l)	< 0.5
1,3,5-Trimethylbenzene (µg/l)	< 0.5
1,3-Dichlorobenzene (µg/l)	< 0.5
1,3-Dichloropropane (µg/l)	< 0.5
1,4-Dichlorobenzene (µg/l)	< 0.5
2,2-Dichloropropane (µg/l)	< 0.5
2-Chlorotoluene (µg/l)	< 0.5
4-Chlorotoluene (µg/l)	< 0.5
4-Isopropyltoluene (µg/l)	< 0.5
Benzene (µg/l)	< 0.5
Bromobenzene (µg/l)	< 0.5
Bromochloromethane (µg/l)	< 0.5
Bromodichloromethane (µg/l)	< 0.5
Bromoform (µg/l)	< 0.5
Bromomethane (µg/l)	< 0.5
Carbon tetrachloride (µg/l)	< 0.5
Chlorobenzene (µg/l)	< 0.5
Chloroethane (µg/l)	< 0.5

Request: 2008030331

Sample:

1

Chloroform (µg/l)	1.1
Chloromethane (µg/l)	< 0.5
cis-1,2-Dichloroethene (µg/l)	< 0.5
cis-1,3-Dichloropropene (µg/l)	< 0.5
Dibromochloromethane (µg/l)	< 0.5
Dibromomethane (µg/l)	< 0.5
Dichlorodifluoromethane (µg/l)	< 0.5
Ethylbenzene (µg/l)	< 0.5
Hexachlorobutadiene (µg/l)	< 0.5
Isopropylbenzene (µg/l)	< 0.5
m,p-Xylene (µg/l)	< 0.5
Methyl tert-butyl ether (µg/l)	< 0.5
Methylene chloride (µg/l)	< 0.5
Naphthalene (µg/l)	< 0.5
n-Butylbenzene (µg/l)	< 0.5
n-Propylbenzene (µg/l)	< 0.5
o-Xylene (µg/l)	< 0.5
sec-Butylbenzene (µg/l)	< 0.5
Styrene (µg/l)	< 0.5
tert-Butylbenzene (µg/l)	< 0.5
Tetrachloroethene (µg/l)	< 0.5
Toluene (µg/l)	< 0.5
trans-1,2-Dichloroethene (µg/l)	< 0.5
trans-1,3-Dichloropropene (µg/l)	< 0.5
Trichloroethene (µg/l)	< 0.5
Trichlorofluoromethane (µg/l)	< 0.5
Trihalomethanes, Total (µg/l)	1.1
Vinyl chloride (µg/l)	< 0.5

525.2 Analysis

Alachlor (µg/l)	< 0.071
Atrazine (µg/l)	< 0.099
Benzo(a)pyrene (µg/l)	< 0.020
Butachlor (µg/l)	< 0.051
Di(2-ethylhexyl)phthalate (µg/l)	< 0.59
Di(2-ethylhexyl)adipate (µg/l)	< 0.59
Hexachlorobenzene (µg/l)	< 0.099
Hexachlorocyclopentadiene (µg/l)	< 0.099
Mctolachlor (µg/l)	< 0.089
Metribuzin (µg/l)	< 0.20
Propachlor (µg/l)	< 0.075
Simazine (µg/l)	< 0.050

531.1 Analysis

3-Hydroxycarbofuran (µg/l)	< 0.50
Aldicarb (µg/l)	< 0.50
Aldicarb Sulfone (µg/l)	< 0.50
Aldicarb Sulfoxide (µg/l)	< 0.50
Carbaryl (µg/l)	< 0.50
Carbofuran (µg/l)	< 0.50
Methomyl (µg/l)	< 0.50
Oxamyl (µg/l)	< 0.50

Request: 2008030331

Sample: 1

547 Analysis

Glyphosate (µg/l) < 6.0

548.1 Analysis

Endothall (µg/l) < 5.0

549.2 Analysis

Diquat (µg/l) < 0.40

1613-B Analysis

2,3,7,8-TCDD (pg/l) < 1.05

GROUP ANALYTE	New Mexico WQCC Limits (mg/L)	Deming Station
		Sample Date: 3/3/2008
Metals		
Aluminum	5	<0.10
Barium	1	0.0047
Boron	0.75	0.11
Cadmium	0.01	<0.0020
Chromium	0.05	<0.0050
Copper	1	0.0049
Iron	1	<0.10
Manganese	0.2	<0.0030
Nickel	0.2	<0.0020
Silver	0.05	<0.0050
Zinc	10	<0.050
Arsenic	0.1	0.0057
Lead	0.05	<0.0020
Selenium	0.05	<0.0020
Mercury	0.002	<0.0002
Anions		
Chloride	250	7.9
Nitrates (as N)	10	<1.0
Sulfate	600	19
Flouride	1.6	0.64
General Analysis		
Cyanide	0.2	<0.0010
pH	6 to 9	8.7
Total dissolved solids	1000	270
Radiochemical Activity		
Gross Alpha	NA	9.4 +/-1.5
Gross Beta	NA	3.7 +/-0.9
Radioactivity:Ra-226 & Ra-228	30	<0.3
Organic Constituents		
Benzene	0.01	<0.005
PCBs	0.001	<0.001
Toluene	0.75	<0.005
Carbon Tetrachloride	0.01	<0.005
1, 2 Dichloroethane	0.01	<0.005
1, 1-Dichloroethylene	0.005	<0.005
ethylbenzene	0.75	<0.005
total xylenes	0.62	<0.005
methylene chloride	0.1	<0.005
Chloroform	0.1	<0.005
1,1 -dichloroethane	0.025	<0.005
1,1,1-trichloroethane	0.06	<0.005

1,1,2-trichloroethane	0.01	<0.005
1,1,2,2-tetrachloroethane	0.001	<0.005
vinyl chloride	0.001	<0.005
benzo-a-pyrene	0.0007	<0.0002
Constituents Not Tested		
Cobalt	0.05	Not Tested, will not be used for Irrigation Use
Molybdenum	1	Not Tested, will not be used for Irrigation Use
Uranium	0.03	Not Tested. Total Radium, Gross Alpha, and Gross Beta were below SDWA MCL Limits. Expect Uranium to also be below Limit.
ethylene dibromide	0.0001	Dibromoethane was tested and below 0.005 mg/L. Expect ethylene dibromide to be below limit.
1,1,2,2-Tetrachloroethylene	0.02	Not Tested. With very low concentrations of other organic constituents, expect 1,1,2,2 - Tetrachloroethylene to be below Limit.
1,1,2-Trichloroethylene	0.1	Not Tested. With very low concentrations of other organic constituents, expect 1,1,2 Trichloroethylene to be below Limit.
PAHs:	0.03	Not Tested. With Hexachlorobenzene <0.001 mg/L and with very low concentrations of other organic constituents, expect PAHs to be below limit.
Phenols	0.005	Not Tested. With very low concentrations of other organic constituents, expect Phenols to be below Limit.

Jones, Brad A., EMNRD

From: Jones, Brad A., EMNRD
Sent: Monday, June 29, 2009 1:42 PM
To: 'Pundari, Anu N'
Subject: RE: Hydrostatic Test Discharge - Deming Area, week of July 6

Dear Mr. Pundari,

In order for the OCD to consider approval, El Paso Natural Gas Company must demonstrate (by submittal of the laboratory analytical results and COC) that the water from El Paso's Deming Station well does not exceed the constituent concentrations identified in Subsection A, B, and C of 20.6.2.3103 NMAC. Please submit the appropriate laboratory analytical results for our review.

Brad

From: Pundari, Anu N [mailto:Anu.Pundari@ElPaso.com]
Sent: Monday, June 29, 2009 1:01 PM
To: Jones, Brad A., EMNRD
Subject: Hydrostatic Test Discharge - Deming Area, week of July 6
Importance: High

Dear Mr. Jones,

As part of a pipeline project, we will be hydrostatically testing new pipe.

The total amount of the discharge will be less than 12000 gallons. The location of the test will be 32deg 9' 19.348" N, 108deg 7' 59.009" W. Test date is tentatively July 9th.

The water source is a water well at El Paso's Deming Station. The well is on company property. The water was tested in 2008 and met the Safe Drinking Water Act MCLs.

The attached permit states that we need approval to utilize water from the Deming Station well. Please grant us approval to utilize the water from the Deming Station water well.

If you have any questions, please contact me at (520) 663-4222 or email me at anu.pundari@elpaso.com

We appreciate your assistance.

Anu Pundari

This email and any files transmitted with it from the El Paso Corporation are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.

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

Jones, Brad A., EMNRD

From: Pundari, Anu N [Anu.Pundari@ElPaso.com]
Sent: Monday, June 29, 2009 1:01 PM
To: Jones, Brad A., EMNRD
Subject: Hydrostatic Test Discharge - Deming Area, week of July 6
Attachments: NM Hydro Permit HBP-17_2009-2010 for New Pipe Discharges Less Than 25000 gallons.pdf
Importance: High

Dear Mr. Jones,

As part of a pipeline project, we will be hydrostatically testing new pipe.

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Anu Pundari

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



New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

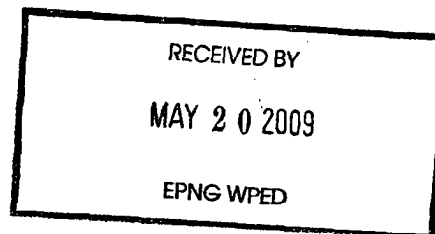
Joanna Prukop
Cabinet Secretary
Reese Fullerton
Deputy Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



May 18, 2009

Mr. Robert St. John
El Paso Natural Gas Company
3300 North "A" - Building Two
Suite 200
Midland, Texas 79705



**Re: Annual Temporary Permission To Discharge Hydrostatic Test Water
Renewal of HBP - 017**

Dear Mr. St John:

The Oil Conservation Division (OCD) has received El Paso Natural Gas Company's (EPNG) request, dated May 1, 2009, for an annual temporary permission to discharge small quantities of hydrostatic test wastewater generated from the testing of new natural gas pipelines throughout the State of New Mexico. EPNG's current permit expires June 26, 2009.

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

1. the volume does not exceed 25,000 gallons per hydrostatic test;
2. water from a public/municipal water supply or other OCD approved sources is used for each test;
3. oral or written notification must be provided to the OCD 72 hours prior to each hydrostatic discharge event;
4. the discharge does not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
5. no discharge shall occur:
 - a. where ground water is less than 10 feet below ground surface.
 - b. within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
 - c. within an existing wellhead protection area;
 - d. within, or within 500 feet of a wetland; or

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>



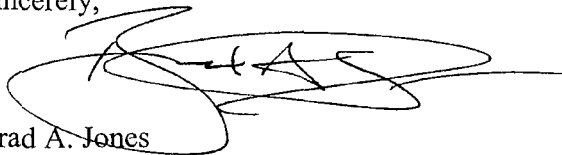
- e. within 500 feet from the nearest permanent residence, school, hospital, institution or church;
6. best management practices must be implemented to contain the discharge onsite, does not impact adjacent property, and to control erosion;
7. the discharge does not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);
8. the landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location must be properly notified of the activities prior to each proposed hydrostatic test event;
9. EPNG shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to WQCC Regulation 20.6.2.1203 NMAC and OCD Rule 29 (19.1529 NMAC); and
10. an annual report, summarizing all tests of new pipeline with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:
 - a. the location of hydrostatic test (Section/Township/Range or GPS coordinates);
 - b. the date of each test;
 - c. the volume of each discharge; and
 - d. the source and quality of test water (laboratory analysis, if necessary).

Annual temporary permissions shall expire one (1) year after issuance. **This temporary permission will expire June 26, 2010.** Renewal requests for annual temporary permission to discharge shall be submitted forty-five (45) days prior to the expiration date. An annual temporary permission may be revoked or suspended for violation of any applicable provisions and/or conditions of the permit.

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

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

Sincerely,



Brad A. Jones
Environmental Engineer

BAJ/baj
cc: OCD District Offices

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 4/28/07

or cash received on _____ in the amount of \$ 150⁰⁰

from EL PASO NATURAL GAS CO

for HBP-17

Submitted by: LAVINIA ROAJO Date: 5/13/09

Submitted to ASD by: LAVINIA ROAJO Date: 5/13/09

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other TEMPERARY PERMIT

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 4/28/09

or cash received on _____ in the amount of \$ 100⁰⁰

from El Paso Natural Gas Co

for HBP-17

Submitted by: Lawrence Poreno Date: 5/13/09

Submitted to ASD by: Lawrence Poreno Date: 5/13/09

Received in ASD by: _____ Date: _____

Filing Fee ☒ New Facility _____ Renewal _____

Modification _____ Other Filing Fee

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

RECEIVED

2009 MAY 8 AM 11 46

May 1, 2009

Mr. Jim Snyder
New Mexico Oil Conservation Division
1220 South St. Francis Drive **via certified mail 7008 1300 0002 4446 8876**
Santa Fe, NM 87505

RE: Request for Annual Temporary Permit
 El Paso Natural Gas
 Permit HBP-NM-017

Dear Mr. Snyder

El Paso Natural Gas Company (EPNG) is submitting the following request for an Annual Temporary Permit to discharge waters from Hydrostatic Tests. The current permit expires on June 26, 2009. Enclosed is a check for \$250.00 that covers the filing and permission fees. EPNG has also enclosed a pipeline system map that provides potential locations for the discharge of hydrostatic test water.

In order to maintain coverage under the Annual Temporary Permit, EPNG will comply with the following:

The volume will not exceed 25,000 gallons per hydrostatic test;
Water from a public/municipal water supply or other OCD-approved sources will be used for each test;
Oral or written notification shall be provided to the OCD 72-hours prior to each hydrostatic discharge event;
The discharge will not enter any lake, perennial stream, river or their respective tributaries that may be seasonal;
No discharge shall occur:

Where ground water is less than 10 feet below ground surface
Within 200 feet of a watercourse, lakebed, sinkhole or playa lake;
Within an existing wellhead protection area;
Within or within 500 feet of a wetland; or
Within 500 feet from the nearest permanent residence, school, hospital, institution or church

Best management practices shall be implemented to contain the discharge onsite, does not impact adjacent property, and to control erosion
The discharge will not cause any fresh water supplies to be degraded or to exceed standards as set forth in Subsections A, B and C of the

Mr. Jim Snyder

May 1, 2009

Page 2

20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations)

The landowner(s) of each proposed discharge and/or collection/retention or alternative discharge location shall be properly notified of the activities prior to each proposed hydrostatic event; and

An annual report, summarizing all tests of new pipe with less than 25,000 gallons per hydrostatic test event, will be submitted to the OCD within 45 days after the temporary permission expiration date and shall contain the following information:

The location of hydrostatic test (Section/Township/Range or GPS coordinates)

The date of each test;

The volume of each discharge; and

The source and quality of test water (laboratory analysis, if necessary).

If you have any questions, please contact me at 432.686.3289.

Sincerely,



Robert H. St. John
Principal Environmental Scientist

CC: Ms. Sandra Miller – Environmental Manager, PWED
Mr. Isaac Weaver- Manager, Pipeline Maintenance
Mr. Lloyd Moore – Supervisor, Pipeline Maintenance
Mr. Wayne Ritchie – Manager, Mechanical Maintenance, EPNG
Mr. Bryan Green – Manager, Mechanical Maintenance, EPNG
Mr. Richard Duarte – Principal Environmental Scientist, EPNG
Ms. Anu Pundari - Principal Environmental Scientist, EPNG
Mr. Glen Thompson - Principal Environmental Scientist, EPNG

EL PASO NATURAL GAS COMPANY
P.O. BOX 4430
HOUSTON, TX 77210-4430

REMITTANCE ADVICE

CHECK DATE 04/28/2009
CHECK NUMBER 07574413
VENDOR NUM 0000002667

WATER QUALITY MANAGEMENT FUNDS
1220 S ST FRANCIS DR
SANTA FE, NM 87505

RETAIN FOR YOUR RECORDS

Refer Payment Inquires to EPGTR - 713-420-4200

Voucher ID	Invoice Number	Invoice Date	Discount	Paid Amount
00372360	CKREQ090424 For EPNG - HBP-NM-017	04/24/2009	0.00	250.00
TOTAL			\$0.00	\$250.00