HITP - _14_

GENERAL CORRESPONDENCE

YEAR(S): _2010_

elpaso Natural Gas

October 12, 2010

RECEIVED OCD
2010 OCT 15 P 1:31

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

via certified mail 7008 1830 0004 2686 4607

RE: El Paso Natural Gas Company
NOI – Hydrostatic Test Discharge Application
Dona Ana County, NM

Dear Mr. Jones:

El Paso Natural Gas has enclosed a copy of a hydrostatic test discharge application for used pipe in Dona Ana County, New Mexico. EPNG is proposing to test approximately 2 miles of 26-inch steel natural gas pipeline. The pipeline is currently in use. EPNG originally requested a start date of November 1, 2010 in the attached application. Due to scheduling difficulties, EPNG would like to begin the hydrostatic test the week of November 29, 2010.

EPNG has also enclosed both an application filing fee of $100.00 as well as the permit fee of $600 in accordance with NMWQCC guidelines.

If you have any questions concerning this submission or require additional information or clarification, please contact me at your convenience at (432) 333-5532.

Sincerely,
El Paso Natural Gas Company

Robert St. John
Principal Environmental Representative

Atc

cc: Ben Mittelstadt – Principal Engineer, EPNG
Sandra Miller – Environmental Manager, PWED
Division Environmental Files – El Paso Pipeline 5.3

El Paso Natural Gas
1550 Windway Odessa, Texas 79761
PO Box 4718 Odessa, Texas 79760

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Bright People. Right Solutions.

October 7, 2010
File No. 109637.6-ALB10RP001

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

Subject: Submittal of a Notice of Intent to Perform a Hydrostatic Test
Pipeline Number 1100 – West of Town of Anthony
Dona Ana County, New Mexico

Dear Mr. Jones:

On behalf of the El Paso Natural Gas Company (EPNG), Kleinfelder West, Inc. (Kleinfelder) is pleased to submit this Notice of Intent (NOI) for a hydrostatic test of the 1100 Pipeline. As with numerous previous pipeline hydrostatic tests, EPNG intends to dispose of the used hydrostatic test water in a Class 1 injection well therefore; no surface discharge of hydrostatic test water is planned.

As required by the United States Department of Transportation Pipeline and Hazardous Materials Safety Administration regulations, EPNG is planning to conduct pipeline reconditioning work on its 26-inch 1100 pipeline located west of the Town of Anthony, New Mexico starting November 1, 2010. EPNG will be hydrostatically testing approximately 1.84 miles of existing pipeline in order to assess whether the operating pressure of the line can be increased.

Kleinfelder has included the required information for the NOI as stated in the "Guidelines for Hydrostatic Test Dewatering" dated January 11, 2007. Attached to this NOI are the following:

- Background Information;
- Notice of Intent;
- Figure 1, EPNG 1100 Pipeline Undergoing Hydrostatic Test;
- Figure 2, Temporary Frac tank Staging Location for Hydrostatic Test Water
- Appendix A, Certification of Siting Criteria;
- Appendix B, Water Well Information within 1,000 feet of the Temporary Frac Tank Storage Area and Figure B-1;
- Appendix C, Mine Information within 1,000 feet of the Temporary Frac Tank Storage Area and Figure C-1;
- Appendix D, Federal Emergency Management Administration Flood Insurance Rate Map (Figure D-1);
- Appendix E, Information on Landowners within 1/3 Mile of the Boundary of the Temporary Frac Tank Staging Area (Figure E-1); and
- Appendix F, Public Notice text in English and Spanish.

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Checks totaling $700.00 made out to the New Mexico Water Quality Control Commission are included to cover the $100 filing fee and the $600 permit fee. As deemed necessary by the NMOCD, EPNG is prepared to post a public notice regarding this event in accordance with Subsection A, and B, D and F of NMAC 20.6.2.3108 at the frac tank staging areas (Figure D-1), the Anthony, New Mexico Post Office, and published in the Las Cruces Sun-News newspaper.

Kleinfelder prepared this NOI in a manner consistent with the level of care and skill ordinarily exercised by other members of Kleinfelder's profession practicing in the same locality, under similar conditions and at the date the services are provided. The information provided in this document is based on our understanding of the information provided by EPNG. The work performed was based on project information provided by EPNG.

Should you have any questions, please feel free to contact Eileen Shannon or Barbara Everett (Kleinfelder) at (505) 344-7373, or Robert St. John (EPNG) at (432) 333-5523.

Respectfully submitted,
KLEINFELDER WEST, INC.

Eileen L. Shannon, P.G
Project Manager

Reviewed by:

Barbara J. Everett, P.G.
Program Manager

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Background Information

- The EPNG Pipeline number 1100 is an existing 26-inch (outside diameter) natural gas pipeline that has been in service over 50 years.
- This transportation pipeline is part of a network that transports natural gas (sweet and dry) that is suitable for immediate consumer use.
- Based upon recent experience with the NMOCD, EPNG understands that the water used for testing this pipeline system is generally classified as non-exempt RCRA waste and is subject to the Water Quality Control Commission (WQCC) Regulations.

Notice of Intent Plan

On behalf of EPNG, Kleinfelder is submitting this NOI plan as outlined in NMOCD Guidance document, "Guidelines for Hydrostatic Test Dewatering," (revised January 11, 2007). The NOI plan includes the following items:

Item a. Name and address of the proposed discharger;

Legally Responsible Party	Mr. Phil Baca, Director El Paso Natural Gas Company Tucson Division 5151 E. Broadway Blvd., Ste. 1680 Tucson, AZ 85711 520.663.4224
Local Representative	Mr. Robert St. John El Paso Natural Gas Company 1550 Wind Way Odessa, TX 79761 432.333.5532
Operator	
Physical Address	El Paso Natural Gas Company El Paso Area Office 12600 McCombs El Paso, TX 79934
Mailing Address	El Paso Natural Gas Company El Paso Area Office 12600 McCombs El Paso, TX 79934

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

The section of the 1100 Pipeline to be tested is northwest of Anthony New Mexico. The eastern end of the segment that will undergo hydrostatic testing (the beginning of test section) is located at MP 223+5700. MP 223+5700 is located approximately 1,900 feet north-northeast of the intersection of Harding Street and Three Saints Road, adjacent to the Anthony drainage channel. The western end segment undergoing hydrostatic testing is at MP 226+0200 which is located approximately 3,000 feet north-northeast of the intersection of NM Highway 28 and West Bernio Road. MP 226+0200 is adjacent to the Lower Chamberino drainage channel and

is approximately 1,350 feet east-northeast of the intersection of the La Mesa and Lower Chamberino drainage channels. The entire length of the 1100 Pipeline to be tested is approximately 1.84 miles. The width of the EPNG easement along this portion of the 1100 Pipeline is 150 feet. The location of the portion of the 1100 Pipeline to be hydrostatically tested is shown on Figure 1.

The proposed hydrostatic test is being conducted to assess the ability to upgrade the operating pressure of the pipeline from approximately 600 pounds per square inch (psi) to approximately 740 psi; therefore, the pipeline will not be cleaned to remove oil residue and other trace contaminants prior to testing. The source of water used for the hydrostatic test will be fresh drinking water from the Town of Anthony or other local municipal water supplies. The test water will be temporarily stored in frac tanks located within the EPNG easement.

Thirteen frac tanks will be located within the EPNG easement near MP 224. The tanks will be oriented in a manner that provides at least a 10-foot buffer between the tanks and the boundary of the EPNG easement. The frac tanks will be located within a lined bermed area as described in detail in Item g. The approximate coordinates for the center of the proposed frac tank staging area are Latitude 32° 03' 34.58" North, Longitude 106° 38' 58.51" West.

The segment of the 1100 Pipeline undergoing testing is as follows: MP 223+5700 in Section 9, Township 26 South, Range 3 East to MP 226+0200 in Section 6, Township 26 South, Range 3 East (Figure 1). Approximately 205,842 gallons of water will be used for the hydrostatic test.

Item c. Legal description of the discharge location;

Introduction, removal, and storage of hydrostatic test water will occur in the frac tank staging area just south of MP 224 at the following location:

> NE 1/4 of the SE 1/4 of Section 8, Township 26 South, Range 3 East in Dona Ana County, New Mexico (See Figure 1).

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

Figure 1 is a site-specific map showing topography, the pipeline section undergoing testing, and the hydrostatic test water staging area. Figure 2 is a larger site-specific map showing details of the hydrostatic test water staging area.

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

- ***i. Within 200 feet of a watercourse, lakebed, sinkhole, or playa lake;***
- ***ii. Within 1,000 feet of an existing wellhead protection area or 100-year floodplain;***
- ***iii. Within, or within 500 feet of, a wetland;***
- ***iv. Within the area overlying a subsurface mine; or***
- ***v. Within 500 feet from the nearest permanent residence, school, hospital, institution or church.***

According to Mr. Robert St. John, EPNG's Principal Environmental Scientist, evidence of some of the above listed features was present within the required radius limits of the proposed hydrostatic test water staging area. Mr. St. John conducted a site visit to look for the presence of watercourses, lakebeds, sinkholes, playa lakes, wells, wetlands, residences, schools,

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hospitals, institutions, mines and churches. Exceptions to the siting criteria are stated in the Certification of Siting Criteria included in Appendix A.

Mr. Ray Melendrez of the New Mexico Environment Department, Drinking Water Bureau was contacted to obtain information regarding wellhead protection areas located within 1,000 feet of the temporary staging area for the water. Mr. Melendrez indicated that there are no wellhead protection areas within 1,000 feet of the temporary frac tank staging area. A copy of the email from Mr. Melendrez is included in Appendix B.

A search for surrounding water wells was completed to satisfy a portion of this requirement. The NMOCD Pit Rule Mapping Portal Database and the NMOSE Waters Database were used for this search, which was conducted on October 5, 2010. According to the database searches, two water wells are located within 1,000 feet of the temporary frac tank staging area (MP 224+0200). Well LRG 13403 POD 1 is private domestic water well located approximately 300 feet north east of the temporary frac tank location. It is a shallow well, with a total depth of 140 feet and a screened interval of 120-140 feet. Well LRG 01281 S-2, located approximately 900 feet southeast of the site is a shallow irrigation well. No well log information is available for this well. Figure B-1, generated from this portal, shows the wells within 1,000 feet of this location also included in Appendix B.

Mr. Mike Tompson with the New Mexico Abandoned Mine Lands Program (505-476-3427) was contacted to assess the presence of abandoned subsurface mines in the vicinity of the temporary frac tank staging area. According to Mr. Tompson, there is no record of abandoned subsurface mines in that area. A copy of the email from Mr. Tompson is attached in Appendix C. According to the NM Tech "Pit Rule Mapping Portal" data base, there are no active or inactive mines in the vicinity of the temporary frac tank staging areas. Figure C-1 generated from this portal shows no mines within 1,000 feet of this location is also included in Appendix C.

Federal Emergency Management Administration (FEMA) flood insurance rate maps were generated from the FEMA website to search for 100-year floodplains in the proposed hydrostatic test water staging area. According to the FEMA website, the temporary frac tank staging area is not located within a 100-year floodplain. The 100-year floodplain around the Rio Grande is located approximately 3,600 feet to the west. The central portion of the pipeline segment under test, however, passes under the river at this location. The FEMA flood insurance rate map for this area is included in Appendix D.

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

Pressure testing with water, known as hydrostatic testing, is one of the tools pipeline operators use to verify pipeline integrity. The test involves purging the natural gas from the pipeline, cleaning the pipeline with an aqueous, non-hazardous cleaning fluid, filling the pipeline with water, then pressurizing the pipeline to a pressure higher than the standard operating pressure for approximately nine hours. The purpose of hydrostatic testing in a pipeline is to determine the extent to which potential defects might threaten the pipeline's ability to sustain maximum allowable operation pressure. If leaks or breaks occur, the pipeline is repaired or the affected areas is replaced, and then re-tested. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) requires periodic pressurized tests on all DOT-regulated pipelines and all newly installed pipelines to verify the integrity and safety of pipeline systems.

This proposed hydrostatic test, however, is being conducted to assess the ability to increase the operating pressure of the pipeline from approximately 600 pounds per square inch (psi) to approximately 740 psi; therefore, the pipeline will not be cleaned to remove oil residue and other trace contaminants prior to testing. EPNG will blow down the entire 20 mile (approximately)

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long valve section and then cut the line and install test heads to test only the short segment of line that lies between within MP 223+5700 and MP 226+0200. The source of water used for the hydrostatic test will be fresh drinking water from the Town of Anthony or other local municipal water supplies. The water will be stored in frac tanks located within the EPNG easement. Approximately 205,845 gallons of fresh water will be used for the hydrostatic test.

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

Approximately 205,845 gallons of water will be used for hydrostatic testing of the 1100 Pipeline. Fresh water from the Town of Anthony or other local municipal water supplies will be transported via tanker truck to the temporary frac tank staging area located at MP 224+0200 and placed into the frac tanks via hoses between the tanker trucks and the frac tanks. The fresh water will also be transferred from the frac tanks to the pipeline via hoses. After use, the hydrostatic test water will be removed from the pipeline via hoses and/or flexible pipe using drip pans under the connection points and stored in 13 frac tanks with secondary containment at the hydrostatic test water staging area (Figure 2). The secondary containment under the frac tanks will consist of 80 mil plastic sheeting placed over a perimeter berm constructed of straw bales and secured with metal "T" posts. The frac tanks will be located within 50 feet of the point of connection on the 1100 pipeline. All individual tank valves will be closed and locked when not in use. Solids are not anticipated to be produced from the hydrostatic testing.

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

EPNG intends to discharge the hydrostatic test water into frac tanks for temporary storage. The frac tanks will be located within a lined bermed area as described above in Item g. Once analytical results are obtained for the hydrostatic test water, the water will be transported from the project site in DOT-approved tanker trucks to Key Energy in Farmington, New Mexico. The water will be disposed of in a Class I injection well operated by Key Energy. No upland discharges are planned or intended.

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

In the event that the hydrostatic test water is found to be unsuitable for down-hole injection, EPNG will acquire a temporary identification number from the US Environmental Protection Agency for the waste, and it will be properly transported and disposed of at a RCRA permitted Treatment, Storage, and Disposal facility. EPNG will provide the name and address of the facility and the appropriate disposal documentation to the NMOCD.

Item j. A proposed hydrostatic test wastewater sampling plan;

EPNG will not collect nor analyze a pre-test sample of the water obtained from a local municipal water supply. Water quality analytical data supplied by the municipal water entity will be used as a baseline to determine if the water is suitable for use.

Approximately 205,842 gallons of fresh water will be transferred via tanker trucks from the Town of Anthony into 13 frac tanks located within EPNG's 1100 Pipeline easement at the east end of the segment under test (See location information under Item c., and Figures 1 and 2).

After the hydrostatic testing of the 1100 Pipeline, this same volume of water will be transferred from the pipeline back into the same frac tanks that were previously used to store the fresh water. A single pre-disposal composite sample (one sample from each frac tank) will be collected from each of the 13 frac tanks and submitted to an EPA-approved analytical laboratory.

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The post-hydrostatic test water samples will be analyzed for corrosivity, ignitability, reactivity, toxicity, and/or other characterization as required by Key Energy. Analytical results of the post-hydrostatic test water analysis will be submitted to the NMOCD with a recommendation for disposal of the hydrostatic test water into a Class 1 injection well.

Item k. A proposed method of disposal of fluids and solids after test completion, including closure of any pits, in case the water generated from test exceeds the standards as set forth in Subsections A, B, and C of the 20.6.2.3103 NMAC (the New Mexico Water Quality Control Commission Regulations);

All fluids will be containerized, tested, and transported for disposal as described under item i and f. No solid waste is anticipated. In the event that the hydrostatic test water is found to be unsuitable for down-hole injection well disposal, a temporary identification number will be acquired from the US Environmental Protection Agency for the waste, and it will be properly transported and disposed of at a RCRA-permitted Treatment, Storage, and Disposal facility. EPNG will provide the name and address of the facility and the appropriate disposal documentation to the NMOCD.

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

The hydrostatic test water will be analyzed to assess if the constituent concentrations meet Key Energy's disposal requirements for their Class 1 injection well. Based on historical data collected from previous hydrostatic test events using similar methods and solutions, the water quality is expected to be in compliance with regulatory limits. The volume of the hydrostatic test water is expected to be approximately 205,842 gallons.

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

Regional Features

The temporary water staging area is located within the southeastern corner of the Mesilla Basin. The Mesilla Basin is a large asymmetric basin covering approximately 1,000 square miles that is part of the southeastern Basin and Range Physiographic province. The Mesilla Basin contains thick fill deposits, locally as much as 3,000 feet. These deposits are mostly unconsolidated sands and gravels and include the major fresh-water aquifers of the region. With respect to both water-supply and groundwater recharge, widespread channel deposits of the modern and ancestral Rio Grande system are a major component of the upper fill sequence. The Mesilla Valley Fault is the structural feature that forms this part of the basin.

Site Geology

The temporary frac tank staging area is located on river alluvium overlying the Upper Santa Fe Unit (USF). The river alluvium consists of sand and pebble to cobble gravel, with thin, organic-rich silty sand to silty clay lenses as much as 100 feet thick. The river alluvium in the temporary frac tank water storage area consists mainly of gravel and coarse sand with some silt and clay. The USF consists of sand and pebble gravel, with thin discontinuous beds and lenses of sandstone, silty sand, and silty clay, usually non-indurated, with local zones cemented with calcite other minerals including silicate clays local iron-manganese oxides, gypsum, silica, and zeolite that range from 200 to 750 feet thick in the central basin.

The USF is underlain by the Middle and Lower Santa Fe Units (MSF) that consists of interbedded sand, silty sand, silty clay, and sandstone that ranges between 300 and 1,000 feet thick in the central part of the basin. The USF is underlain by the Middle and Lower Santa Fe

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Units (MSF) and LSF) that consists of sand to silty sand, with lenses of discontinuous beds of sandstone, silty clay, and mudstone (Hawley, et. al., 1992).

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

Regional Hydrogeology

The fill of the Mesilla Basin has two basic hydrologic components: Santa Fe Group basin fill and the post Santa Fe Group Rio Grande Valley fill. In terms of volume and areal extent, the Santa Fe Group forms the bulk of basin-fill deposits. It comprises a very thick sequence of alluvial, eolian, and lacustrine sediments deposited in intermontane basins of the Rio Grande rift structural province during an interval of about 25 million years starting in late Oligocene time. Widespread filling of several structural sub-basins, which in aggregate form the Mesilla Basin, ended about 700,000 years ago (early Middle Pleistocene time) with the onset of Rio Grande (Mesilla) Valley incision.

Post-Santa Fe Group valley fills include inset deposits of the ancestral Rio Grande and tributary-arroyo systems that form terraces bordering the modern floodplain, and river and arroyo alluvium of the inner valley area that has been deposited since the last major episode of Rio Grande Valley incision in late Pleistocene time (about 15,000 to 25,000 years ago). The two basic hydrogeologic components of the Mesilla Basin model include:

1. Structural and bedrock features. They include basin-boundary mountain uplifts, bedrock units beneath the basin fill, fault zones within and at the edges of basin that influence sediment thickness and composition, and igneous-intrusive and -extrusive rocks that penetrate or are interbedded with basin deposits and in some areas control the movement of water in the hydro-stratigraphic units.

2. Hydrostratigraphic units. The mappable bodies of basin and valley fill are grouped on the basis of origin and position in a stratigraphic sequence. Genetic classes include ancestral-river, present river-valley, basin-floor playa, and piedmont alluvial fan deposits. Time-stratigraphic classes include units deposited during early, middle and late stages of rift-basin filling (i.e. lower, middle and upper Santa Fe Group), and post-Santa Fe valley fills (e.g. channel and floodplain deposits of the Rio Grande, and fan alluvium of tributary arroyos) (Hawley, et al., 1992).

Local Groundwater Hydrology

Locally, groundwater is present in four major hydrostratigraphic units: river alluvium, USF, MSF, and LSF. The river alluvium forms the upper part of the shallow aquifer and groundwater in the vicinity of the temporary frac tank staging area location is expected to range between eight and 12 feet below ground surface in the river alluvium (Hawley, et al., 1992). Groundwater will also be present at depth in the USF, MSF, and LSF at the temporary frac tank storage area location.

Water quality data of shallow wells in the Anthony and Chamberino areas, total dissolved solids concentrations ranged between 290 and 3,622 milligrams per liter (Terracon et al., 2003). In these wells, concentrations of some metals and organic constituents exceeded the USEPA maximum contaminant levels.

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Item n. Identification of landowners at and adjacent to the discharge collection/retention site.

Landowners within 1/3-mile of the boundary of the temporary frac tank storage area within the EPNG pipeline easement:

A landowners list and a map showing their locations are provided in Appendix E. EPNG will provide all affected landowners with a brief description of the work involved.

As deemed necessary by NMOCD, a public notice will be posted in accordance with Subsections A, B, D and F of NMAC 20.6.2.3108 at the frac tank staging area (Figures 2 and D-1), the Anthony, New Mexico Post Office, and published in the Las Cruces Sun-News newspaper. Copies of the English and Spanish versions of the public notices are presented in Appendix E.

References

Hawley, J., Lozinsky, R.,1992, Hydrogeologic Framework of the Mesilla Basin in New Mexico and Western Texas, New Mexico Bureau of Mines and Mineral Resources, Open File Report 323.

New Mexico Office of the State Engineer, iWaters database, accessed October 2010 accessed from http://nmwrrs.ose.state.nm.us/nmwrrs/index.html.

NMOCD Pit Rule Mapping Portal database search, accessed October 2010 from http://216.93.164.45/prrc_MF/.

Terracon, John Shomaker & Associates, Inc., Livingston Associates, LLC, Inc., Zia Engineering and Environmental, Inc., Sites Southwest, 2003, The New Mexico Lower Rio Grande Regional Water Plan.

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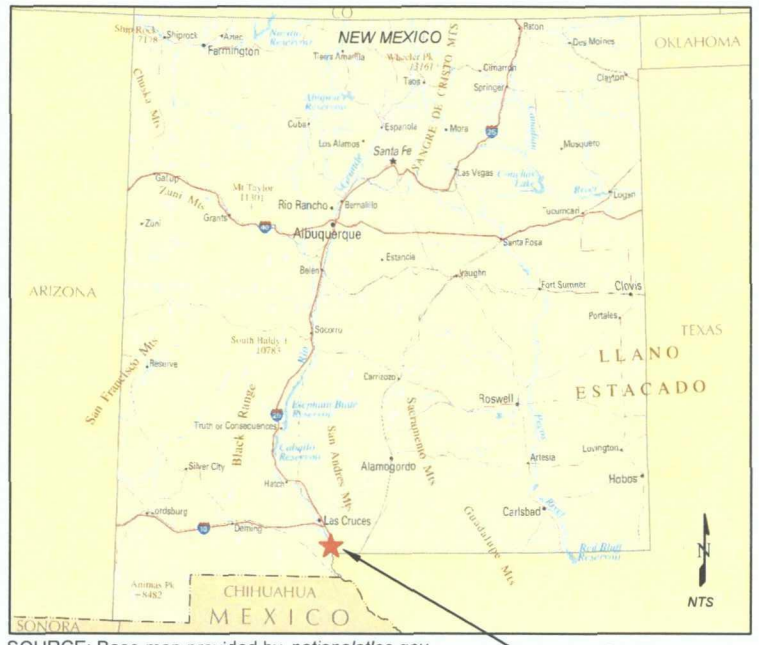
FIGURES



SOURCE: Base map provided by *nationalatlas.gov*.

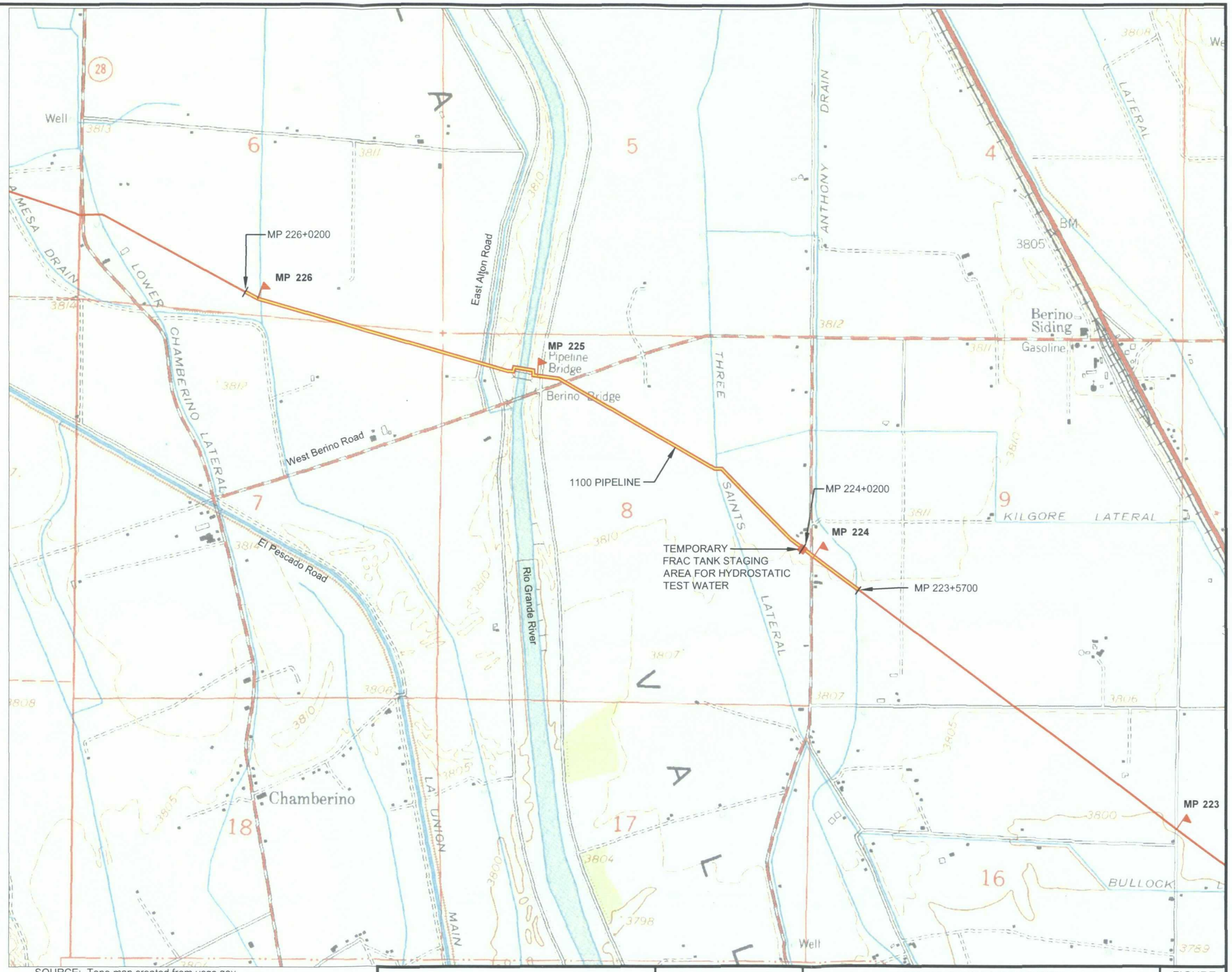
APPROXIMATE SITE LOCATION

LEGEND

- APPROXIMATE EPNG 3201 WEST PIPELINE
- APPROXIMATE HYDROSTATIC TEST LOCATION
- APPROXIMATE HYDROSTATIC TEST WATER FRAC TANKS LOCATION
- APPROXIMATE MILE POST MARKERS
- APPROXIMATE SITE LOCATION

NOTE:

EPNG 1100 Pipeline recreated from 01100.00-042 20 and 01100.00-042 10 Expanded Job Markup.PDF from EPNG.



SOURCE: Topo map created from usgs.gov.

N

1500 0 750 1500 ft

APPROXIMATE SCALE: 1 inch = 1500 feet

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PROJECT NO.	109637
DRAWN:	AUG 2010
DRAWN BY:	JDS
CHECKED BY:	DJ
FILE NAME:	109637_01_0.dwg

EPNG 1100 PIPELINE UNDERGOING HYDROSTATIC TEST

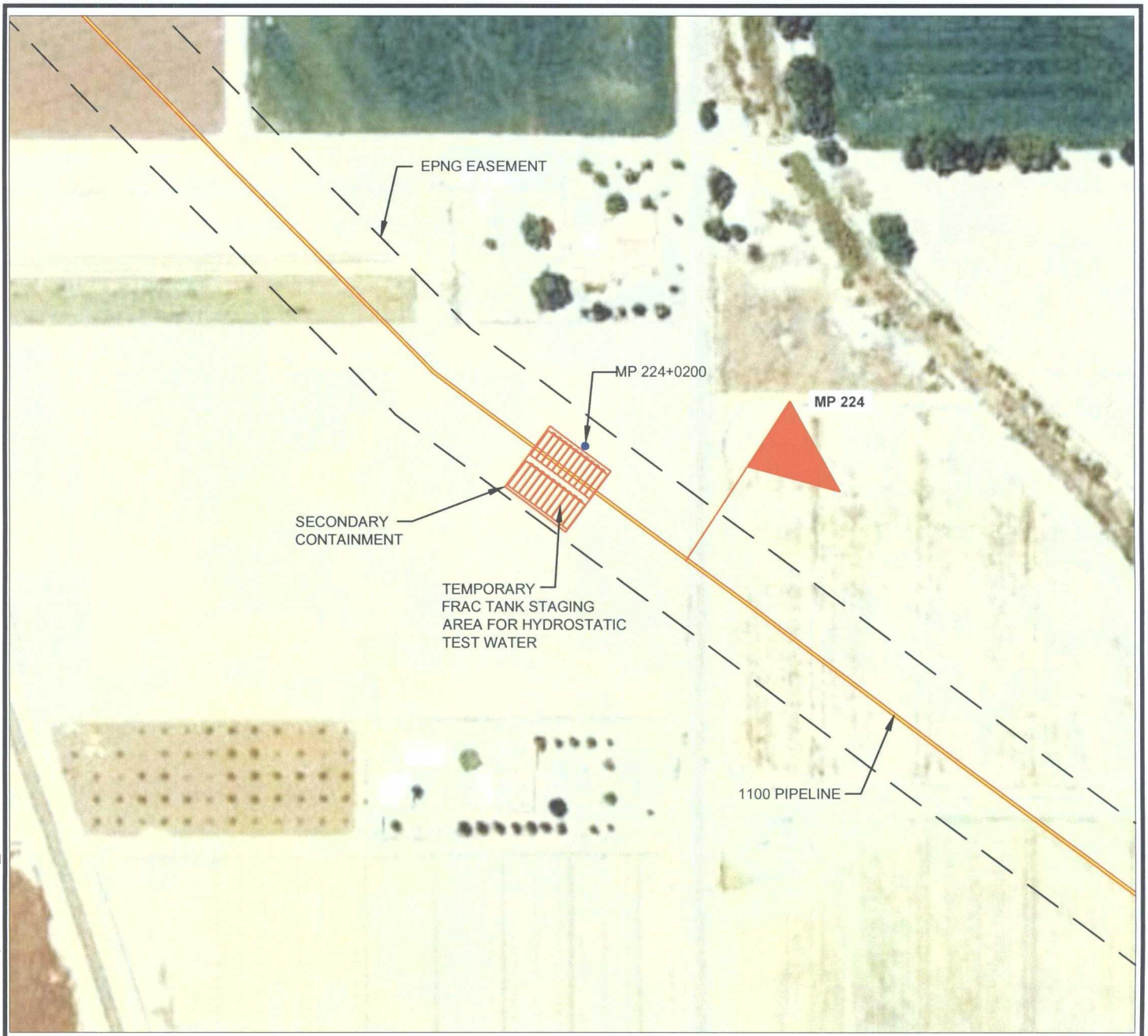
EPNG - 1100 PIPELINE HYDROSTATIC TEST
DONA ANA COUNTY
NEW MEXICO

ORIGINATOR: David Jannen
APPROVED BY: EJS 10/7/10

DRAWING CATEGORY: 1

FIGURE **1**

ATTACHED IMAGES: Images: New Mexico State Map.bmp Images: STAGING.jpg
ATTACHED XREFS:
Pleasanton, Ca
CAD FILE: G:\Environ\CURRENT WORK FOLDER PROJECTS\109637 - EPNG Pipeline Hydro Test Discharge Permits\6 - 1100 Pipeline\2.0 Technical\Figure LAYOUT: FIG 1



N

200 0 100 200 ft

APPROXIMATE SCALE: 1 inch =200 feet

SOURCE: Aerial map created from Google Earth Pro.

NOTE:
EPNG 1100 Pipeline recreated from 01100.00-042 20 and 01100.00-042 10 Expanded Job Markup.PDF from EPNG.

LEGEND

- APPROXIMATE LOCATION OF EPNG 1100 PIPELINE
- APPROXIMATE HYDROSTATIC TEST SEGMENT LOCATION
- APPROXIMATE LOCATION OF HYDROSTATIC TEST WATER FRAC TANKS
- PIPELINE CONNECTION POINT
- EPNG EASEMENT

ATTACHED IMAGES: Images: New Mexico State Map.bmp Images: STAGING.jpg
ATTACHED XREFS:
ALBUQUERQUE, NM CAD FILE: C:\DOCUME~1\PDan\LOCALS~1\Temp\AcPublish_5552\ LAYOUT: FIG 2

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PROJECT NO.	109637
DRAWN:	AUG 2010
DRAWN BY:	JDS
CHECKED BY:	DJ
FILE NAME:	109637_01_0.dwg

TEMPORARY FRAC TANK STAGING AREA FOR HYDROSTATIC TEST WATER

EPNG 1100 HYDROSTATIC TEST
DONA ANA COUNTY
NEW MEXICO

ORIGINATOR: David Janney
APPROVED BY: ELS 10/7/10
DRAWING CATEGORY: 1

FIGURE
2

APPENDIX A

Certification of Siting Criteria

1 Certification of Siting Criteria

Hydrostatic Testing of Line 1100

On September 10, 2010, I, Robert St. John, performed a site visit to look for the presence of the items listed below. Some were observed within the specified distance for each item listed below from the edge of the pipeline right of way to site where the water storage tanks will be located at mile post 224 + 0200 on Line 1100 in Dona Ana County, NM. The hydro-test water will also be introduced to the pipeline at this site. A note beside each item below describes my observations.

i. Within 200 feet of a watercourse, lakebed, sinkhole, or playa lake; *NOTE: Yes. An irrigation canal and Rio Grande River bypass are within 300 feet of the planned frac tank storage area.*

ii. Within 1,000 feet of an existing wellhead protection area or 100-year floodplain; *NOTE : I will defer to the statement and research from our consultant, Kleinfelder. This information is included as part of the NOI.*

iii. Within, or within 500 feet of, a wetland; *NOTE: Yes. A Rio Grande River bypass is within 300 feet of the planned frac tank storage area.*

iv. Within the area overlying a subsurface mine; *NOTE: No.*

v. Within 500 feet from the nearest permanent residence, school, hospital, institution or church. *NOTE: Yes. The nearest homes are 100 feet north and south of the area where the tanks are planned to be staged. El Paso has verbal approval from the landowner to use the land.*

On behalf of El Paso Natural Gas, I state that the above information is complete and true to the best of my knowledge.

Robert St. John
Environmental Representative

9-30-2010
Date

APPENDIX B

Water Well Information within 1,000 feet of the Temporary Frac Tank Storage Area

Eileen Shannon

From: Ray NMENV Melendrez <ray.melendrez@state.nm.us>
Sent: Tuesday, October 05, 2010 4:11 PM
To: Eileen Shannon
Subject: RE: Well Head Protection Areas - follow-up David Janney email

Hello Eileen,

This is to confirm that there are no wellhead protection areas within 1000 feet of the Google Earth Placemark for any regulated public water systems.

If you have any questions or need more clarification please contact me.

Thanks,

Ray Melendrez
Drinking Water Bureau
New Mexico Environment Department
District 3 Area Manager
1170 N. Solano Dr., Suite M
Las Cruces, NM 88001
Phone: (575) 647-7955
Fax: (575) 526-3891

From: Eileen Shannon [mailto:EShannon@kleinfelder.com]
Sent: Tuesday, October 05, 2010 10:11 AM
To: Melendrez, Ray, NMENV
Subject: Well Head Protection Areas - follow-up David Janney email

Hi Ray,

EPNG revised the location for the storage of their frac tanks from the location in the attached email between you and David Janney to the following.

Please confirm that there are no wellhead protection areas within 1000 feet of the center section line between Sections 8 and 9 T26S, R3E, approximately 2500 feet north of the intersection of Three Saints Street and Harding Road (Google Earth Placemark attached). It sounds like we should OK based on your description in the earlier email, but I wanted to confirm. Please call or email if you have questions.

I hope to get this to the client today – so sorry for the short notice

Eileen L. Shannon
Project Manager
Kleinfelder West, Inc.
9019 Washington NE, Building A
Albuquerque, NM 87113

o| (505) 344-7373 (Ext. 212)
f| (505) 344-1711
c| (505) 307-0722

Google Earth streams the world over wired and wireless networks enabling users to virtually go anywhere on the planet and see places in photographic detail. This is not like any map you have ever seen. This is a 3D model of the real world, based on real satellite images combined with maps, guides to restaurants, hotels, entertainment, businesses and more. You can zoom from space to street level instantly and then pan or jump from place to place, city to city, even country to country.

Get Google Earth. Put the world in perspective.

(http://earth.google.com)

0 200 400ft

N W E S

Petroleum Recovery Research Center	Wells in the Vicinity of MP 224+0200	Figure: B-1
	EPNG Line 1100 Dona Ana Co., NM	Oct 05, 2010

APPENDIX C

Mine Information within 1,000 feet of the Temporary Frac Tank Storage Area

David Janney - RE: EPNG 1100 Pipeline

From: "Tompson, Mike, EMNRD" <Mike.Tompson@state.nm.us>
To: "David Janney" <DJanney@kleinfelder.com>
Date: 8/27/2010 11:10 AM
Subject: RE: EPNG 1100 Pipeline

David,

We have no record of any abandoned mines in these four sections:

Section 6, Township 26S, Range 3E
Section 7, Township 26S, Range 3E
Section 8, Township 26S, Range 3E
Section 9, Township 26S, Range 3E

Mike Tompson
New Mexico Abandoned Mine Land Program
(505) 476-3427

From: David Janney [mailto:DJanney@kleinfelder.com]
Sent: Friday, August 27, 2010 10:47 AM
To: Tompson, Mike, EMNRD
Subject: Re: EPNG 1100 Pipeline

Greetings:

On another note. I am preparing another hydrostatic discharge permit for EPNG, just west of Anthony in Dona Ana Co. Do you have a few minutes to check for active or inactive mines primarily within 1,000' of 32 4.147 N Lat and 106 40.574 W Long? This is the S/2 Sec 6,Twp 26S, R 3E. This is the west end of the test segment. Can you also, however, check Sections 6, 7, 8, and 9? I checked on the PRRC mapping portal and did not find any but we still need the email from EMNRD.

A figure and Google image are attached.

Regards,

David Janney, PG
Senior Geologist

Kleinfelder
9019-A Washington NE
Albuquerque, NM 87113
505.344.7373 Phone
505.344.1711 Fax
505.702.4620 Cell

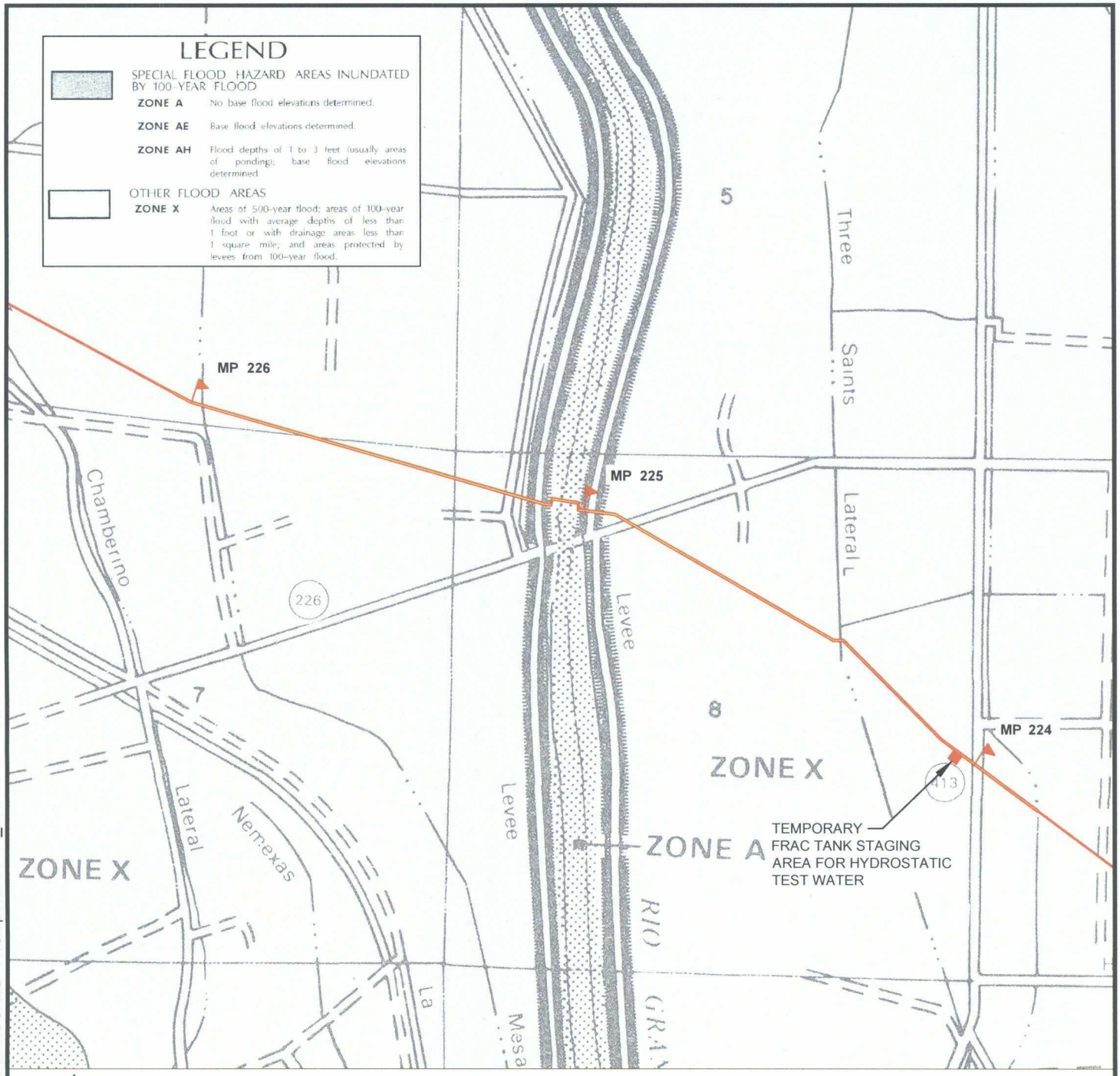
0 200 400ft

N
W E
S

Petroleum Recovery Research Center	Mines in the Vicinity of MP 224+0200	Figure: C-1
	ELNG Line 1100, Dona Ana Co., NM	Oct 05, 2010

APPENDIX D

Federal Emergency Management Administration Flood Insurance Rate Map



N

1500 0 750 1500 ft

APPROXIMATE SCALE: 1 inch =1500 feet

LEGEND

APPROXIMATE EPNG 1100 PIPELINE

APPROXIMATE HYDROSTATIC TEST SEGMENT

APPROXIMATE HYDROSTATIC TEST WATER FRAC TANKS

SOURCE: Fema map created from http://msc.fema.gov.

NOTE:
EPNG 1100 Pipeline recreated from 01100.00-042 20 Expanded Job Markup .PDF from EPNG.

ATTACHED IMAGES: Images: New Mexico State Map.bmp Images: STAGING.jpg
ATTACHED XREFS: CAD FILE: C:\DOCUME~1\PDan\LOCALS~1\TempVAcPublish_5984\ LAYOUT: FIG 3
Pleasanton, Ca

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PROJECT NO.	109637
DRAWN:	AUG 2010
DRAWN BY:	JDS
CHECKED BY:	DJ
FILE NAME:	109637_01_0.dwg

FEMA FLOOD INSURANCE MAP

EPNG 1100 HYDROSTATIC TEST
DONA ANA COUNTY
NEW MEXICO

ORIGINATOR: David Janney
APPROVED BY: ELS 10/7/10

DRAWING CATEGORY: 1

FIGURE **D-1**

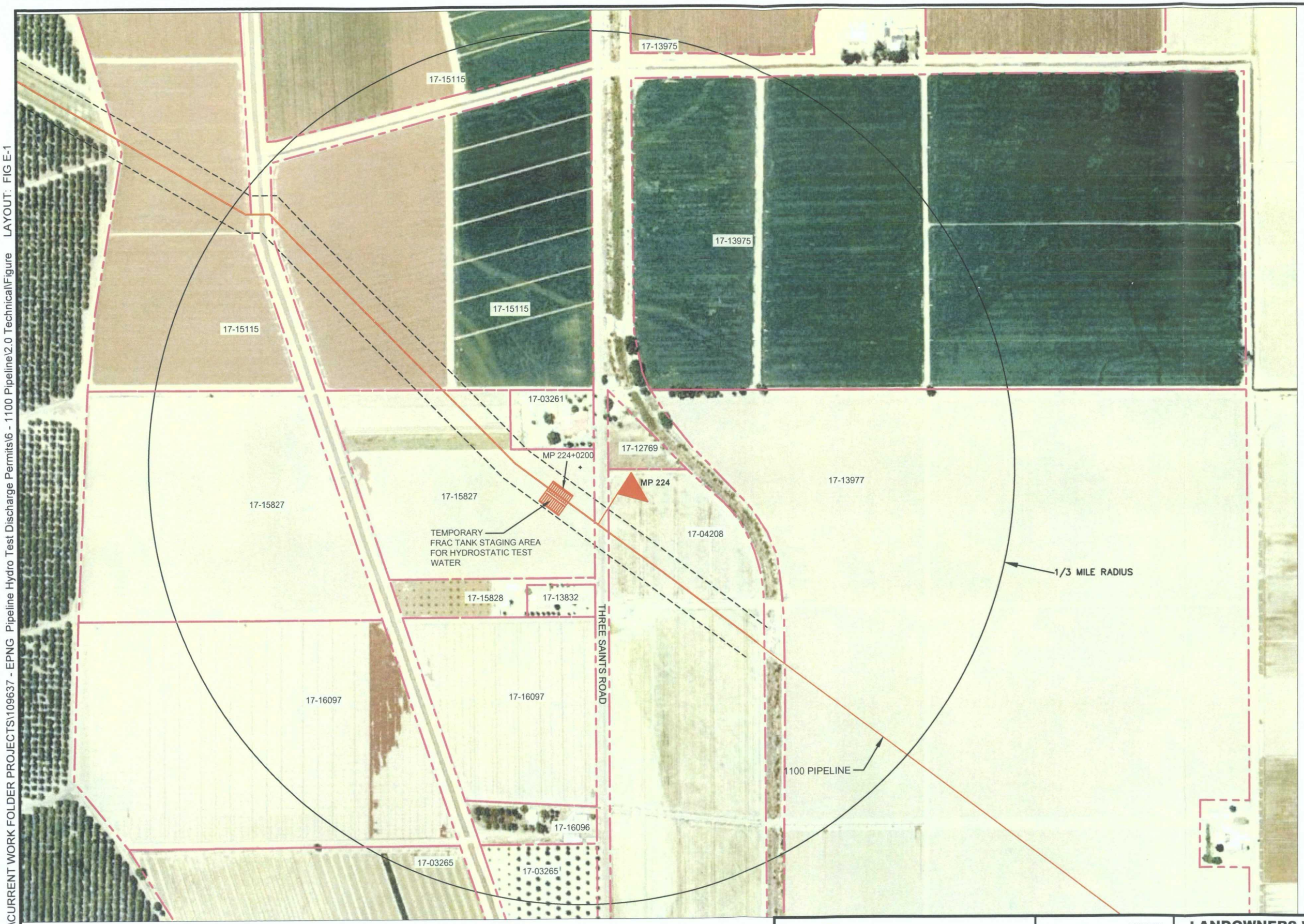
APPENDIX E

Landowners within 1/3 Mile of the Boundary of the Temporary Frac Tank Storage Area

Landowners Within a 1/3 Mile Radius of Temporary Frac Storage Tank Area
1100 Pipeline, Dona Ana County, NM

Parcel Information (MAP CODE)	PARCEL_ID	ACCOUNT NUMBER	NAME	MAIL ADDRESS	CITY	STATE	ZIP CODE	CLERK Reception#	PHYSICAL ADDRESS	ACRES	R_T_S
4-015-152-285-015	17-12769	211080	NEW MEXICO CHILE & SPICE INC	PO BOX 1796	ANTHONY	NM	88021	33403	4220 THREE SAINTS RD 2	1.09000003	3E 26S 9
4-015-152-032-411	17-04208	231270	MCREYNOLDS GLENN C & KRISTI	500 PETTIT RD	ANTHONY	NM	88021	519630		30.97999954	3E 26S 9
4-014-152-426-310	17-03261	238348	NM CHILE & SPICE INC	PO BOX 1796	ANTHONY	NM	88021	68815	4217 THREE SAINTS RD	1	3E 26S 8
4-014-152-515-350	17-13832	157060	TRUJILLO WILFRED H & MARY LOU	4189 THREE SAINTS RD	ANTHONY	NM	88021-8976	953638	4189 THREE SAINTS RD	0.87	3E 26S 4
4-014-152-460-350	17-15828	187663	TRUJILLO WILFRED H & MARY LOU	4189 THREE SAINTS RD	ANTHONY	NM	88021-8976	511505		2.06999993	3E 26S 8
4-014-152-446-490	17-03265	185121	RP3 FARMS LLC	2025 THREE SAINTS RD	ANTHONY	NM	88021-8927	730546		37	3E 26S 8
4-014-152-385-402	17-16097	73067	NELSON JOE A & JANICE A REV TR	4901 VINTON RD	ANTHONY	NM	88021	514075		40.47000122	3E 26S 8
4-014-152-430-311	17-15827	211080	NEW MEXICO CHILE & SPICE INC	PO BOX 1796	ANTHONY	NM	88021	33404		38.20999908	3E 26S 8
4-014-152-500-440	17-16096	255495	NELSON JOE A & JANICE A	4901 VINTON RD	ANTHONY	NM	88021	803848	3925 THREE SAINTS RD	1.85000002	3E 26S 8
4-014-152-300-100	17-15115	257980	COLONIA CHILI COMPANY INC	PO BOX 1047	SANTA TERESA	NM	88008-1047	BK 256 PG 303-307		116.5400009	3E 26S 8
4-015-152-134-195	17-13975	231932	DERUYTER EDWARD P & CORRY E CO-TRS	PO BOX 10	MESQUITE	NM	88048	522293	401 W BERINO RD	141.0700073	3E 26S 9
4-015-152-172-400	17-13977	231932	DERUYTER EDWARD P & CORRY E CO-TRS	PO BOX 10	MESQUITE	NM	88048	522293		115.5599976	3E 26S 9

Information from Dona Ana County Tax Assessor's Website (http://gis.donaanacounty.org/advparcels/viewer.htm), October 7, 2010



LEGEND

- APPROXIMATE PARCEL BOUNDARIES
- 17-12769 PARCEL ID
- APPROXIMATE HYDROSTATIC TEST LOCATION
- APPROXIMATE HYDROSTATIC TEST WATER FRAC TANKS LOCATION
- APPROXIMATE MILE POST MARKERS

N

400 0 200 400 ft

APPROXIMATE SCALE: 1 inch = 400 feet

SOURCE: Aerial map created from Google Earth Pro.

NOTE:
EPNG 1100 Pipeline recreated from 01100.00-042 20 and 01100.00-042 10
Expanded Job Markup.PDF from EPNG.

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PROJECT NO.	109637
DRAWN:	OCT 2010
DRAWN BY:	PD
CHECKED BY:	ES
FILE NAME:	109637_01_0.dwg

LANDOWNERS WITHIN 1/3 MILE RADIUS OF TEMPORARY FRAC TANK STORAGE

EPNG - 1100 PIPELINE HYDROSTATIC TEST
DONA ANA COUNTY
NEW MEXICO

ORIGINATOR: E. SHANNON
APPROVED BY: ES 10/7/10

DRAWING CATEGORY: 1

FIGURE **E-1**

ATTACHED IMAGES: Images: New Mexico State Map.bmp Images: STAGING.jpg
ATTACHED XREFS:
Pleasanton_Ca
CAD FILE: G:\Environ\CURRENT WORK FOLDER PROJECTS\109637 - EPNG Pipeline Hydro Test Discharge Permits\6 - 1100 Pipeline\2.0 Technical\Figure LAYOUT: FIG E-1

APPENDIX F

Public Notice Text in English and Spanish

PUBLIC NOTICE

The United States Department of Transportation (USDOT) requires periodic pressurized tests on all USDOT-regulated pipelines. El Paso Natural Gas Company (EPNG) hereby gives notice that the following discharge permit application has been submitted to the NM Oil Conservation Division (NMOCD) in accordance with 20.6.2 of the New Mexico Administrative Code (NMAC). The local EPNG mailing address is: El Paso Natural Gas, San Juan Area Office, P.O. Box 127, Bloomfield, NM 87413.

EPNG has submitted an application to perform a hydrostatic test of the 1100 Pipeline on the EPNG pipeline easement in Section 8, Township 26 South, Range 3 East in Dona Ana County, New Mexico. The purpose of hydrostatic (testing with water) is to determine the extent to which potential defects might threaten the pipeline's ability to sustain maximum allowable operation pressure. The test involves purging or blowing-down the natural gas from the pipeline, filling the pipeline with water, and then pressurizing the pipeline to a pressure higher than the desired increased standard operating pressure for a specified duration of time.

A portion (1.84 miles) of the 26-inch diameter EPNG 1100 pipeline will be hydrostatically tested. Up to 205,842 gallons of fresh water, from the Town of Anthony, will be transported via tanker trucks and initially stored in 13, 21,000-gallon frac tanks located in the NW 1/4 of the SE 1/4 of Section 8, Township 26 South, Range 3 East. This location is northwest of Anthony, New Mexico, at the east end of the segment to be tested, at EPNG Mile Post 224+0200. The location is on the west side of Three Saints Road, approximately 2,000 feet north of the intersection of Three Saints Road and Harding. The width of the EPNG easement along this portion of the 1100 Pipeline is 150 feet. Following hydrostatic testing, hoses and/or flexible pipes with drip pans under the points of connection will be used to transfer the used test water from the pipeline into the frac tanks. A composite sample of this water will be analyzed by an EPA-approved analytical laboratory for waste characterization analysis of corrosivity, ignitability, reactivity, toxicity, and/or other characterization as required by Key Energy. Used test water will be removed from the frac-tanks within ten calendar days from the testing completion date. The hydrostatic test water will not be discharged. After receipt of NMOCD approval, it will be properly transported and injected into a permitted Class 1 injection well operated by Key Energy of Farmington, NM.

The shallowest groundwater likely to be affected by a leak, accidental discharge, or spill exists at a depth of approximately eight feet below the ground surface. The shallowest aquifer system may have total dissolved solids concentrations less than 1,000 milligrams per liter.

The notice of intent outlines how hydrostatic test water and waste will be properly managed, including handling, storage, and final disposition. The plan also includes procedures for the proper management of leaks, accidental discharges, and spills to the waters of the State of New Mexico.

For additional information, to be placed on a facility-specific mailing list for future notices, or to submit comments please contact:

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

The NM Energy, Minerals and Natural Resources Department will accept comments and statements of interest regarding this hydrostatic test and will provide future notices for this pipeline upon request.

AVISO PÚBLICO

El Ministerio de Transporte de los Estados Unidos (USDOT) requiere pruebas periódicas de presión en todas las tuberías reguladas por el USDOT. Por medio de la presente, la compañía El Paso Natural Gas (EPNG) da por notificado que el permiso de la siguiente descarga ha sido sometido a la división de la conservación de Aceite (Petroleo) de Nuevo México (NMOCD) de acuerdo con el código administrativo # 20.6.2 de Nuevo México. La dirección local de correo de EPNG es: El Paso Natural Gas, San Juan Area Office, P.O. Box 127, Bloomfield, NM 87413.

El Paso Natural Gas ha introducido una solicitud para realizar una prueba hidrostática en la tubería 1100 ubicada en la servidumbre (o área de servicio) perteneciente a EPNG localizada en la sección ocho (8) del Township 26 Sur con el Range 3 Este en el condado de Dona Ana, Nuevo México. El propósito de la prueba hidrostática (utilizando agua) es determinar el grado de los posibles o potenciales defectos que pudiesen amenazar (disminuir) la capacidad de la tubería de mantener la presión máxima de operación permitida. La prueba hidrostática implica la purga del gas natural de la tubería (vaciado de la tubería), llenado de la tubería con agua, y finalmente la presurización de la tubería a una presión más alta que la presión estándar deseada de operación por un determinado tiempo.

Una porción (1,84 millas) de la tubería 1100 de 26 pulgadas de diámetro perteneciente a EPNG será ensayada (probada) hidrostáticamente. Hasta un máximo de 205.842 galones de agua fresca, provenientes del pueblo de Anthony, serán transportados por camiones cisternas (camiones tanques) e inicialmente almacenados en 13 tanques de 21.000 galones de capacidad (frac-tanks) que están localizados en el NW 1/4 del SE/4 de la sección 8, Township 26 Sur, Range 3 Este. Esta ubicación es al Noroeste de Anthony, Nuevo Mexico, en la terminación Este del tramo a ser ensayado en el Poste Cota 226+0200 perteneciente a EPNG. Esta ubicación es en el lado Oeste de la Three Saint Road (Carretera de los Tres Santos) aproximadamente a 2.000 pies al Norte de la intersección de Three Saints Road y la Harding Road (Carretera Harding). El ancho de la servidumbre de EPNG para este tramo de la tubería 1100 es de 150 pies. Después de la prueba hidrostática, mangueras y/o las tuberías flexibles serán utilizadas para transferir el agua utilizada durante la prueba a los tanques (frac-tanks). Una muestra de esta agua será analizada por un laboratorio (de pruebas analíticas) aprobado por la Agencia de Protección Ambiental (EPA) para realizar un análisis de disposición de desechos por corrosividad, capacidad de ignición, reactividad, toxicidad y cualquier otro tipo de caracterización requerido por Key Energy. El agua utilizada durante la prueba hidrostática será removida de los tanques (frac-tanks) dentro de un periodo de diez (10) días calendarios después que la prueba hidrostática haya sido terminada. El agua utilizada durante la prueba hidrostática no será descargada al ambiente. Después de haber recibido la aprobación por parte de NMOCD, el agua utilizada será transportada e inyectada en un pozo de inyección permisado con la Clase 1 y operado por Key Energy en Farmington, Nuevo México.

El agua subterránea superficial probablemente será afectada por una fuga (goteo), una descarga accidental, o por un derrame que pudiese existir a una profundidad aproximada de 8 pies por debajo de la superficie de tierra. El sistema del acuífero superficial probablemente tiene una concentración total de sólidos en suspensión menor a 1.000 miligramos por litro.

La notificación de intención especifica claramente de cómo se va a proceder, ejecutar y/o manejar el agua utilizada durante la prueba hidrostática y desechos producidos, incluyendo su manejo, almacenaje, y disposición final de los mismos. El plan también incluye los procedimientos para el manejo apropiado de fugas, descargas accidentales, y de derrames en las aguas del Estado de Nuevo México.

Para información adicional, para ser colocado en la lista de personas a quienes se les enviaran futuras notificaciones relacionadas con instalaciones/facilidades, o enviar para comentarios, favor contactar a:

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

El Departamento de Energía, Recursos Naturales y Minerales de Nuevo México aceptará comentarios y declaraciones de interés correspondientes a esta prueba hidrostática y proporcionará futuras notificaciones bajo petición.