GW-090

General Correspondence

YEAR(S): 2010 - 2015

ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

May 24, 2011

UPS Tracking No. 1Z 875 525 03 4619 7932

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87504

Re: Submittal of Drainline Testing Report, Transwestern Pipeline Company, P-4 Compressor Station, GW-090

Dear Mr. Lowe:

By this letter, Transwestern Pipeline Company is submitting the drainline testing results and report for the above referenced facility as required by Condition 10 of facility's discharge plan.

You will note that the drainline testing methodology for the facility was completed in two phases. The first phase completed on 5/23/2011, consisted testing all low pressure underground wastewater drainlines using the approved testing methodology which was used during the 2006 drainline testing program and is presented in **Attachment A**. This testing was accomplished by Transwestern Pipeline Company and showed all underground wastewater drainlines to be structurally sound and not leak. The field notes taken during this testing program for each low pressure drainline are presented in **Attachment B**.

The second phase of testing also completed on 05/23/2011 consisted of testing all underground high pressure process lines using the methodology which was presented to you in an email in January 2011 (**Attachment C**). The results of this testing showed that all high pressure lines were also structural sound and not leaking. The field notes and results of this testing are presented in **Attachment D**.

The presentation of this report satisfies the drainline and process line testing requirements as referenced in Condition 10 of GW-090.

6381 N. Main
Roswell, NM 88201

Should you have any additional question or require further information concerning this submittal, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Sr. Environmental Specialist

Roswell Compressor Station envisions file no.

Attachment A
Low Pressure Testing Methodology

For each low pressure drain line tested, the following methodology was employed. A test header was constructed by isolating each drain line and attaching and sealing a 90 degree elbow of the same pipe diameter to one of the two drain pipe ends. A seven (7) ft vertical pipe of the same pipe diameter was attached and sealed to the exposed vertical end of the 90 degree elbow. At the terminal end of the exposed low pressure drain pipe a test plug was temporarily inserted and sealed. The drain line and attached test header were then filled with water or the liquid medium normally encountered in the pipe to a marked level on the vertical pipe of 6.95 ft. above the horizontal elevation of the drain pipe. This water level head created a positive pressure of 3.0 psi on the existing piping system. This pressure was then allowed to equilibrate in the pipe and the test was conducted for a period of thirty (30) minutes to determine water loss in the pipe. Any water leakage would be indicated by a drop in the water level of the vertical pipe below the 6.95 ft mark.

Attachment B
Field Notes and Results Low Pressure Testing

Water to pit drains
level marked 6:25 Am end time 7:00 AM
no Change in level. (have picture)

Water to oily Waste tank.
level marked 6:25 Am end time 7:00 AM
no Change in level. (have picture)

~~Water~~ used oil piping from
turbine building. level marked 6:25 AM
end time 7:00 AM no Change in level.

~~Water~~ lube oil system tested
with 24.8 pounds on lube oil line
Start at 6:10 AM end time 7:03 AM
end pres. 25.0 pounds.

Attachment C
High Pressure Testing Methodology

HIGH PRESSURE DRAINLINE TESTING METHODOLOGY AND RESULTS

1. Prior to initiating the high pressure process line testing, a baseline reading was completed by walking over the ground surface of all high pressure underground process lines with a flame ionization detector (FID) at an approximate one (1) foot distance above ground surface (ags) to determine if possible natural gas interferences were present from adjacent equipment or that any of the pressurized lines to be tested were leaking. The instrument used to detect leaking natural gas prior to initiating the test was a Detecto-Pak 4, Flame Ionization Hydrocarbon Detector, Serial No. 1500549011, manufactured by Heath Consultants, Inc. Houston, TX. The sensitivity range of this instrument was 10.0 ppm. Baseline readings detected no leaking natural gas from any high pressure process line or the presence a positive interference.

2. Each process line was then pressurized with natural gas at a rate of 345.2 to 820.0 psi (calibrated with a certified gauge) depending upon the pipeline safety limits of the pipe. Readings from the gauge were taken after the line pressure had equilibrated and prior to initiation of the test. The pressurized natural gas remained in the process line for two approximately two (2) hours. At the end of the two hour equilibration period, a reading was taken from the calibrated gauge and was again walked over with the Detecto–Pak 4 at the same approximate one foot (ags) elevation to determine the presence of natural gas leaking from any line.

3. The results of the gauge reading and walkover after the approximate two hour pressurization period showed there to be no leaking natural gas from the high pressure underground process lines and that the integrity of these lines were structurally sound All testing was then concluded.

Attachment D
Field Notes and Results High Pressure Testing

drain line test 5/23/2011

fuel skid pres start 345.2 time 6:25 am
end pres. 345.0 sniff before test 0 reading
on meter. sniff during pres. 0 reading.
end pres. time 7:10 am

Pig received to mist extractor
start time 6:15 am pres. 819.9
end pres. 820.0 end time 7:00 am
sniff before test 0 reading. sniff
during pres. 0 reading.

Scrubber dump to mist extractor
start time 6:15 am pres 819.9
end time 7:00 am pres. 820.0
sniff before test 0 reading.
sniff during pres. 0 reading.

mist extractor to pipeline Condensate tank.
start time 6:15 am pres. 819.9
end pres. 820.0 end time 7:00 am
sniff before test 0 reading.
sniff during pres 0 reading.