

GW - 194

INSPECTIONS & DATA



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

June 26, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-149

Mr. Keith Boedecker
Meridian Oil, Inc.
P.O. Box 4289
Farmington, NM 87499-4289

**RE: Discharge Plan Inspections
GW-193 and GW-194
San Juan and Rio Arriba Counties, New Mexico**

Dear Mr. Boedecker:

The New Mexico Oil Conservation Division (OCD) on June 6, 1996 along with yourself and Mr. Randy Graves of Meridian Oil Inc. inspected the Sandstone (GW-193) and Frances Mesa (GW-194) compressor stations. The inspections purpose was to determine compliance with the previously approved OCD discharge plans for the facilities. The information that follows will address the concerns of the OCD at the above mentioned facilities.

1. GW-193 or Sandstone Compressor Station, see photo No. 2 MOI GW-193.

The bermed area with-in the tank farm has signs of hydrocarbon contamination, MOI needs to clean up the soils and determine the extent of vertical and horizontal contamination, as well as look at design and operating practices at the site. (i.e. - truck load line spill containment box-the lines extend to far outward and cause liquids to be spilled outside of the box area.)

2. GW-193 or Sandstone Compressor Station, see photo No. 3 MOI GW-193.

The soil on the blank plastic needs to be characterized as exempt or non-exempt, and disposed of properly according to proper regulatory classification.

3. GW-193 or Sandstone Compressor Station, Pollution prevention and housekeeping:

- A. The TEG storage tank needs some sort of impermeable pad and curb type containment.
- B. The sump on the end of the suction filter separator needs to be cleaned and inspected yearly. Note: All future sump installations will have secondary containment with leak detection and must be approved by the Santa Fe OCD Division office before installation.
- C. The Dehydration unit skid appeared to have TEG spilling outside of the metal containment skid-also the still appears to be upsetting on a regular basis. MOI needs to evaluate these operational or design problems and address them so that spillage of TEG may be eliminated.

Mr. Keith Boedecker
MOI: GW-193 & GW-194
June 26, 1996
Page 2

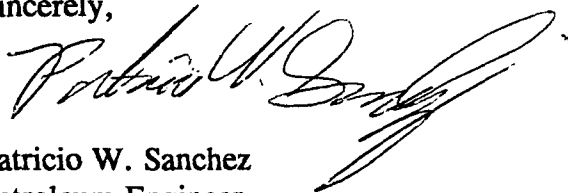
- D. Compressor skids and the area around them have visible lube oil contamination - MOI needs to purpose a soil clean-up around the skids and put in place better operating practices and evaluate current skid spill containment for its adequacy.
- E. MOI needs to store empty drums on their side with the bungs in place and horizontal to the ground. MOI also needs to store drums that contain fluids other than fresh water on an impermeable pad and curb type containment. All drums and items that contain chemicals need to be properly labeled as to their contents.
- D. MOI needs to verify where all solid wastes (i.e. RCRA Subtitle D and RCRA Exempt) go to and if there are changes from the previously approved OCD discharge plan.
- F. The below grade tank needs to have the secondary containment visually checked at least monthly and documented.

4. **GW-194 or Frances Mesa Compressor Station**, Many of the same items listed above for the Sandstone Compressor also apply to the Frances Compressor station as well. Also, inside of the compressor building MOI had 55 gallon drums with a screen on the bottom with a small 1" ball valve for draining into the below grade drain system. MOI needs to make sure that none of this fluid that is drained from these drums is characteristic or listed hazardous waste. Further these fluids are clearly non-exempt from RCRA subtitle C regulations and shall not be allowed for injection into Class II UIC wells. MOI will need to determine the appropriate disposal option for this waste.

5. **GW-194 or Frances Mesa Compressor Station**, See photo No. 4 MOI GW-194, This tank area needs to addressed as required in "1. **GW-193 or Sandstone Compressor Station**," above.

If you have any questions regarding this matter feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer
Environmental Bureau OCD

Attachment

XC: Mr. Denny Foust - Geologist.

Mr. Keith Boedecker
MOI: GW-193 & GW-194
June 26, 1996
Page 3

**ATTACHMENT NO.1 - MOI GW-193
SANDSTONE COMPRESSOR**



PHOTO NO. 1 6/6/96



PHOTO NO. 2 6/6/96

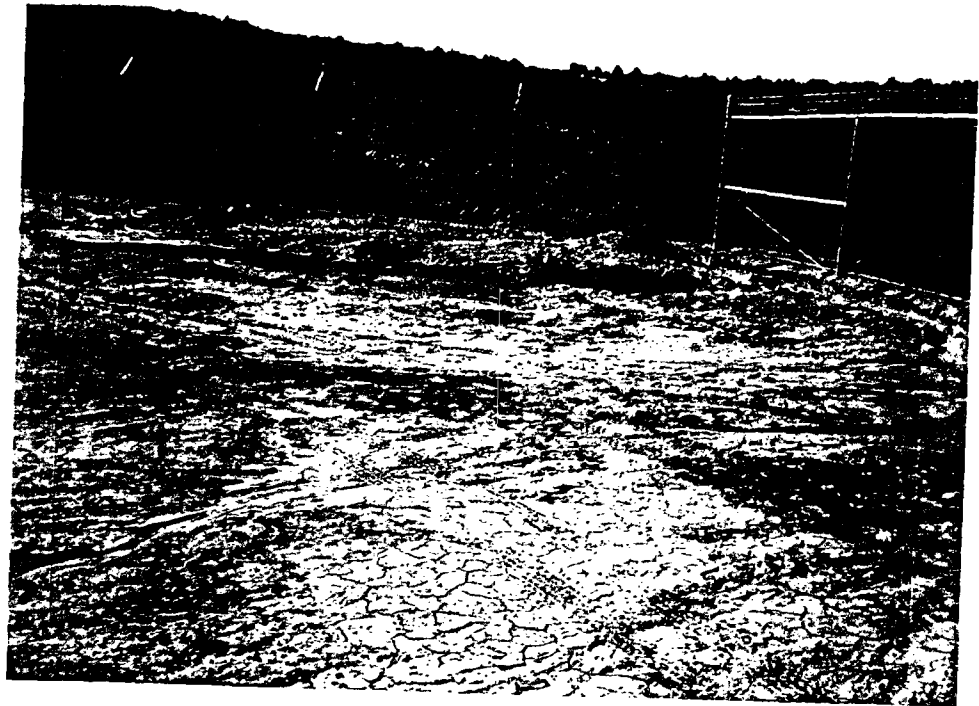


PHOTO NO. 3

6/6/96



PHOTO NO. 4

6/6/96

Mr. Keith Boedecker
MOI: GW-193 & GW-194
June 26, 1996
Page 4

**ATTACHMENT NO.2 - MOI GW-194
FRANCES MESA COMPRESSOR**

MOI GW-194

(PHOTOS BY OGD)



PHOTO NO. 1

6/6/96

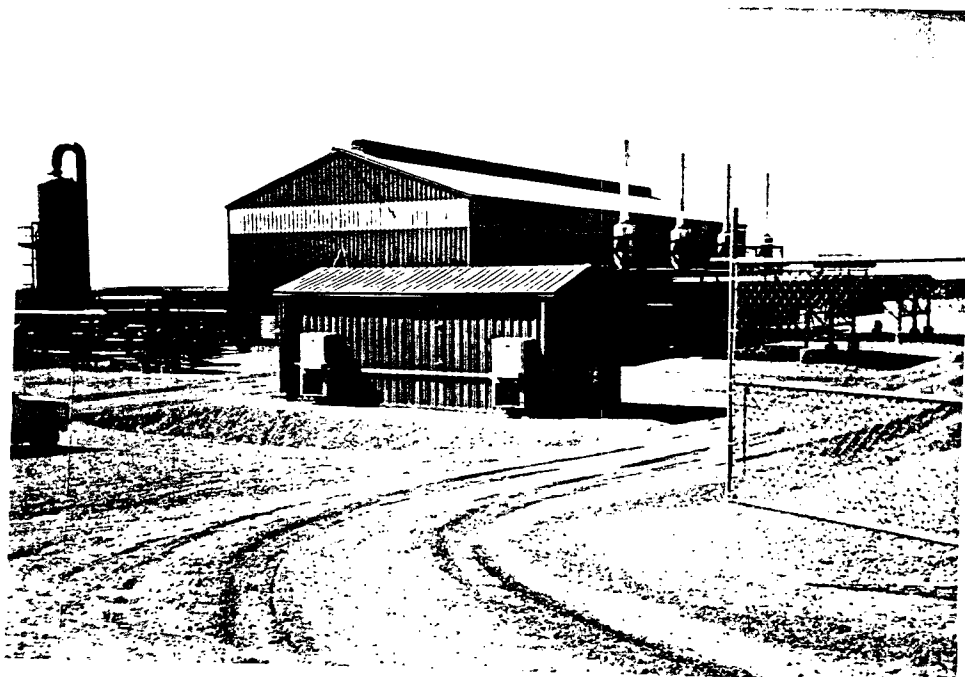


PHOTO NO. 2

6/6/96

MOI GW-194

(PHOTOS BY)

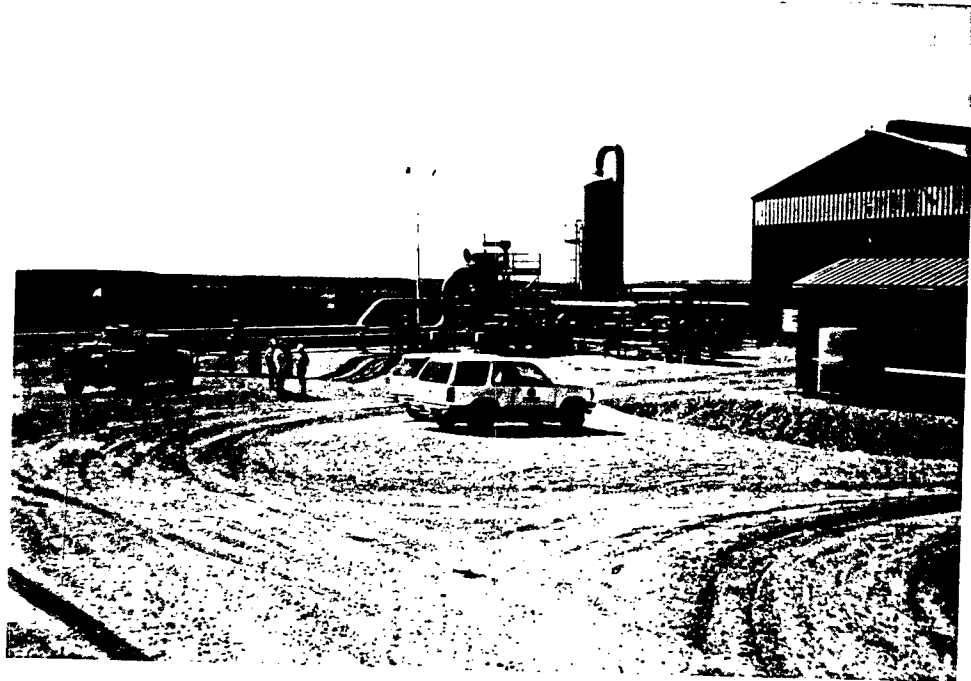


PHOTO NO.3

6/6/96

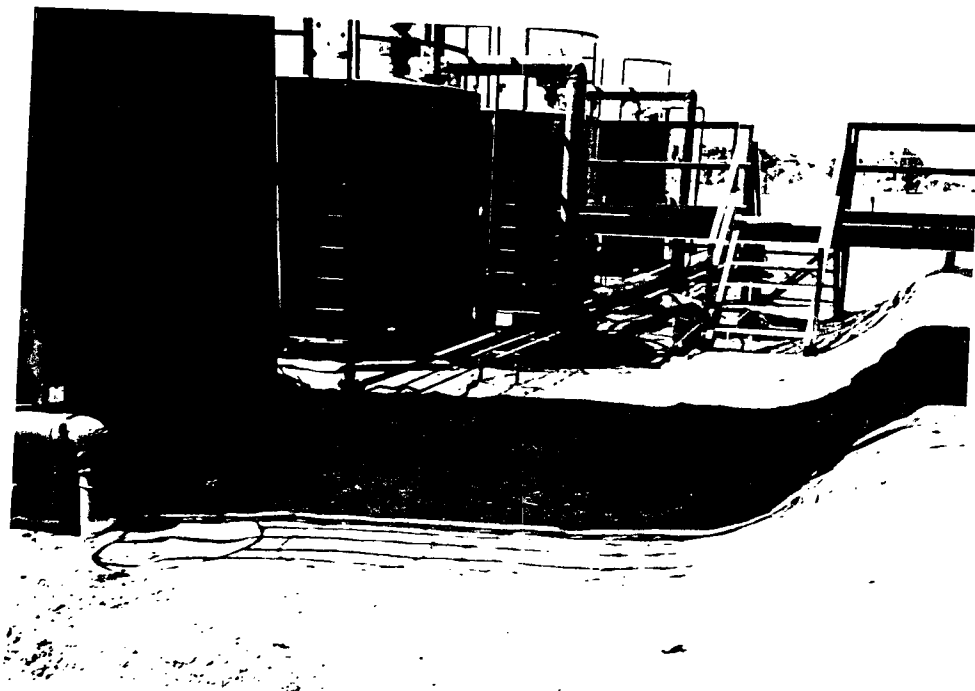


PHOTO NO.4

6/6/96

MOI GW-14 (PHOTOS BY OGD)



PHOTO NO. 5