

**GW - 209**

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# **INSPECTIONS & DATA**

**Lowe, Leonard, EMNRD**

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**From:** Fernald, Donald [dferald@epco.com]  
**Sent:** Tuesday, August 25, 2009 3:17 PM  
**To:** Lowe, Leonard, EMNRD; Hebert, Beth  
**Cc:** Seale, Runell; Powell, Brandon, EMNRD; KurtSandoval@jicarillaoga.com; Smith, David; Lee, Stephen  
**Subject:** RE: GW-209, Lindrith CS Inspection Reply

Thanks Leonard.

1. We are developing a work plan for remediation of the area around the tanks recently taken out of service and anticipate the work will start in the coming month.
2. Approximately six (6) cubic yards of soil that were stockpiled on plastic has been sent to a licensed land farm for treatment. We did not conduct laboratory analysis on this exempt hydrocarbon impacted soil, but the PID data was well over 1,000 ppm. This soil was generated during some exploratory "pot-holing" around the tank battery.

Please let us know if you have additional questions.

Sincerely,

Don Fernald  
EHS&T  
614 Reilly Avenue  
Farmington, NM 87401  
O: 505-599-2141  
C: 505-486-6668  
F: 505-599-2119  
[dferald@epco.com](mailto:dferald@epco.com)

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**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Tuesday, August 18, 2009 1:47 PM  
**To:** Hebert, Beth  
**Cc:** Fernald, Donald; Seale, Runell; Powell, Brandon, EMNRD; KurtSandoval@jicarillaoga.com  
**Subject:** GW-209, Lindrith CS Inspection Reply

Ms. Hebert,

1. OCD has confirmed the C-133 submittal as noted in inspection response. The OCD will await the work plan submittal.
2. What are the level of hydrocarbons in the pile slated for landfarm remediation? What is the volume of contaminated soil?
3. Issue closed. OCD appreciates Enterprises efforts to adhere to their discharge permit conditions.

Please submit additional information when obtained.

llowe

**Leonard Lowe**

## **Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, August 18, 2009 1:47 PM  
**To:** 'bhebert@eprod.com'  
**Cc:** 'Fernald, Donald'; Seale, Runell; Powell, Brandon, EMNRD; 'KurtSandoval@jicarillaoga.com'  
**Subject:** GW-209, Lindrith CS Inspection Reply

Ms. Hebert,

1. OCD has confirmed the C-133 submittal as noted in inspection response. The OCD will await the work plan submittal.
2. What are the level of hydrocarbons in the pile slated for landfarm remediation? What is the volume of contaminated soil?
3. Issue closed. OCD appreciates Enterprises efforts to adhere to their discharge permit conditions.

Please submit additional information when obtained.

llowe

### **Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>



Enterprise Products™

ENTERPRISE PRODUCTS PARTNERS LP  
ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER  
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

August 14, 2009

Certified Mail  
7008 3230 0002 4442 9286

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

RECEIVED OGD  
2009 AUG 18 A 11:26

**Re: Enterprise Field Services, LLC  
Lindrith Compressor Station -GW-209  
NE/4, SE/4, Section 18, Township 24 North, Range 5 West, NMPM  
Rio Arriba County, NM**

Dear Mr. Lowe:

Enterprise Field Services, LLC (Enterprise) is submitting this letter in response to the site inspection conducted at the Lindrith Compressor Station on June 9, 2009, and items listed in the Inspection Report letter dated July 7, 2009.

- open
1. The above ground tanks noted in the inspection report were recently taken out of service. Plans are underway to remove the existing tanks to accommodate remedial activities associated with hydrocarbon impacted soils within the berm of these storage tanks. A C-141 form was completed in January 2008 and a copy of the form was emailed to Mr. Leonard Lowe of the NMOCD on July 8, 2009. Scheduling is currently underway to remove the surface tanks and associated piping. Once these materials are removed, remedial activities will be initiated. Remedial actions will include excavation of hydrocarbon impacted soils in this area following the NMOCD's Guidelines for Remediation of Spills, Leaks and Releases, dated 1993. Excavated hydrocarbon impacted soils will be transported to an NMOCD approved land farm for treatment. Confirmation sampling of the excavation will be completed in accordance with the NMOCD guidance document. A third-party environmental consulting firm will be contracted to oversee remedial activities and prepare a remedial activities report. Once excavated areas have been confirmed to have met NMOCD guidelines, the excavation will be backfilled with clean soil. If hydrocarbon impacted soils are not deemed practicable to excavate to accommodate remedial objectives, Enterprise will submit an alternative remedial work plan to achieve the NMOCD guidelines. A work plan and notification will be provided to the NMOCD prior to initiating remedial activities. Remedial activities are anticipated to be initiated within the next 60 days.

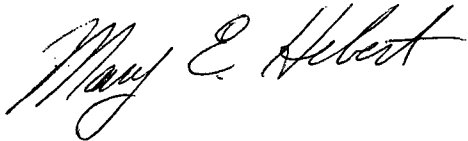
Enterprise Field Services, LLC  
Lindrith Compressor Station -GW-209  
NE/4, SE/4, Section 18, Township 24 North, Range 5 West, NMPM  
Rio Arriba County, NM  
page 2

2. Two small piles of hydrocarbon impacted soils removed during the initial remedial clean up around the tanks (photos 6 & 7) have been staged for transport to an approved land farm. A NMOCD Certificate of Waste C-138 has been completed. This exempt hydrocarbon impacted materials will be transported to an approved land farm for treatment in the coming weeks.
- ✓ 3. Below grade tanks are currently being monitored on a monthly basis by inspecting the secondary portal for liquids indicating leaks. The potential release around the below grade tank identified in photo 8 of the NMOCD's inspection report will be investigated. If hydrocarbon releases are evident as identified by field sampling and testing, remedial measures will be initiated at the time of the activities associated with the above ground tanks.

If you have questions or require additional information, please contact Don Fernald, Environmental Scientist at (505) 599-2141 or me directly at (713) 381-6518.

Yours truly,

**Enterprise Field Services LLC**  
**Enterprise Products Operating LLC**



Mary E. Hebert  
Director, Environmental Compliance

/sjn

cc: Joe Velasquez, Enterprise  
Ralph Morris, Enterprise  
Runell Seale, Enterprise  
Bennie Armenta, Enterprise  
Randy Baysinger, Enterprise  
Leo Francisco, Enterprise  
David Smith, Enterprise

## **Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, July 07, 2009 12:08 PM  
**To:** Roesler, Clayton  
**Cc:** Powell, Brandon, EMNRD; 'Seale, Runell'; Fernald, Donald; 'KurtSandoval@jicarillaoga.com'  
**Subject:** GW-209 Lindrith Inspection Letter  
**Attachments:** GW-209, Inspection Letter.pdf; GW-209, Inspection Photos.pdf

Mr. Roesler,

Good afternoon,

Here is the inspection letter for the Lindrith compressor station.

The facility is in overall good condition.

llowe

### **Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>



# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor  
Joanna Prukop  
Cabinet Secretary

**Mark Fesmire**  
Division Director  
Oil Conservation Division



July 7, 2009

Mr. Clay Roesler

**Re: Inspection Report, GW-209  
Lindrith Compressor Station, Enterprise Products Operating, L.P.  
Rio Arriba County, New Mexico**

Dear Mr. Roesler:

The Oil Conservation Division (OCD) performed an onsite inspection of Enterprise Products Operating, L.P., Lindrith compressor station located in NE/4 SE/4 Section 18, Township 24 North, Range 5 West, NMPM, Rio Arriba County, New Mexico on June 9, 2009.

Enterprise Products Operating shall address the following concerns (reference photos in attachment):

1. **Photos 1 – 5:** Two, Out-of-Service, above ground storage tanks have evidence of visual staining within the bermed containment area and the secondary containment area is unlined. Owner/operator is reminded of Condition 15 (WQCC Regulation 20.6.2.1203 NMAC) of its discharge permit. OCD notes that the new tank batteries were in place at the time of inspection and that all liquids are routed to these tanks. Owner/Operator shall submit to the OCD a work plan to remove/remediate the old tank batteries. Owner/operator shall submit a C-141 to report the releases from the two above ground storage tanks.
2. **Photo 6 & 7:** Owner/operator is reminded that waste shall not be on site more than 180 days unless approved by the division and shall be placed on an impermeable barrier, see Condition 6 for details. Owner/operator shall ensure that its practices comply with condition 6.
3. **Photo 8 & 9:** Three below-grade tanks were noted to be onsite. All leak detection systems were inspected and determined to be dry. Owner/operator shall properly monitor and record the leak detection system for all below-grade tanks. The below grade tank in **Photo 8** has evidence of overflow. Owner/operator shall address all discharges from the below-grade tank and instill measures to prevent it from reoccurring.

Enterprise Products Operating L.P. shall submit resolutions to all **items stated above by August 15, 2009**. If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us).

Sincerely,



Mr. Clay Roesler  
July 7, 2009  
Page 2

Leonard Lowe  
Environmental Engineer

xc:   OCD District III Office, Aztec  
      Runell Seale, EPCO  
      Don Fernald, EPCO  
      Kurt Sandoval, Jicarilla O & G



OCD Inspection: Enterprise Lindrith GW - 209

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Don Fernald, Runell Seale and Clay Roesler

Date: 06.09.09

Time: 11:18 – 12:05

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Photo 1: Out of service condensate/H<sub>2</sub>O tank, 1 of 2.



Photo 2: Out of service condensate/H<sub>2</sub>O tank, 2 of 2.



Photo 3: Discharge around AST noted in Photo 1. Unlined bermed area.



Photo 4: Discharge around AST noted in Photo 2. Unlined bermed area.



Photo 5: Discharge of unused tank.



Photo 6: A staged soil area.

OCD Inspection: Enterprise Lindrith GW - 209

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Don Fernald, Runell Seale and Clay Roesler

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Photo 7: Another stage soil area.



Photo 8: 1 of 3 BGT on-site, verified DRY detection system.



Photo 9: 2 of 3 BGT on-site, verified DRY detection system.



# OCD ENVIRONMENTAL BUREAU

## SITE INSPECTION SHEET

DATE: 12/12/00 Time: 8:45AM

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☒ Brine St. ☐ Oilfield Service Co. ☐  
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐  
Other ☐ \_\_\_\_\_

Discharge Plan: No ☐ Yes ☒ DP# GW-209

FACILITY NAME: LINDRITH CS

PHYSICAL LOCATION: 10 MILES EAST OF HWY 550

Legal: QTR NE QTR SE Sec 18 TS 24N RSW County Rio ARriba

OWNER/OPERATOR (NAME) EPFS

Contact Person: DAVID BAYS Tele:# 599-2256

### MAILING

ADDRESS: 614 REILLY, FARMINGTON State NM ZIP 87401

Owner/Operator Rep's: \_\_\_\_\_

OCD INSPECTORS: ED MARTIN AND DENNY FOUST

1. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

ALL STORED CORRECTLY.

2. **Process Areas:** All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

OK

3. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

OK

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

LABELING ON UNLEADED GASOLINE TANK NEEDS TO  
BE RE-DONE. ALSO DIESEL TANK.

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

OK

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

OK

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? Yes ☒ No ☐

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ☒ NO ☐ IF NO DETAIL BELOW.

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS    NO ☒ YES ☐ IF YES DESCRIBE BELOW!    Undetermined ☐

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

GOOD. LEAK DETECTION QUARTERLY.

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

OK

12. Does the facility have any other potential environmental concerns/issues?

No

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

No

14. ANY WATER WELLS ON SITE?    NO ☒ YES ☐ IF YES, HOW IS IT BEING USED?

Miscellaneous Comments:

GOOD SITE.

Number of Photos taken at this site: 0

LINDRITH CS

SOME CONTAMINATION AROUND ETHYLENE  
GLYCOL TANK FROM 2-3 YEARS AGO.  
OVERFLOW PREVENTER INSTALLED.

DEYDRATOR (GLYCOL) STORAGE AREA.

LEAK DETECTION INSPECTION ONCE PER QUARTER

LABELING ON UNLEADED GASOLINE AGT  
NEEDS TO BE RE-DONE. ALSO DIESEL TANK.

LABELING ON ALCOHOL TANK OUTSIDE FENCE  
SHOULD BE MORE PROMINENT.