


GW - 232

INSPECTIONS & DATA



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



September 30, 2008

Ms. Mary E. Hebert
Director, Field Environmental
P.O. Box 4324
Houston TX 77210-4324

**Re: Closure Inspection Report, GW-232
Trunk "A" Compressor Station
Chavez County, New Mexico**

Dear Ms. Hebert:

The Oil Conservation Division (OCD) performed an onsite closure inspection of Enterprise Field Services LLC's Trunk "A" compressor station located in Section 10, Township 23 South, Range 26 East, NMPM, Chavez County, New Mexico on August 27, 2008. Jennifer Corser and Paul Murray of Enterprise guided the inspection.

A letter written to the OCD on February 6, 2008 indicates that this facility is closed and is not providing compression of gas and has submitted their closure report. The inspection determined the following, please reference photos to the attached inspection photo sheet.

1. **Photos 1 & 2:** Compressor concrete slab is still on site with protruding underground conduits. Enterprise shall remove concrete slab and conduits.
2. **Photo 3 – 6:** Used and remaining debris, tanks and barrels need to be removed and properly disposed of, **photo 4**, show tank bottoms located directly on the ground. Waste shall never be placed directly on the ground. Enterprise shall properly remove unused items, waste and clean up any soil contamination on site.
3. **Photo 15:** An unused saddle tank is left in the yard. If tank is not longer needed for operation of this facility it shall be removed from site. Enterprise shall remove this tank if not in use.

The Oil Conservation Division has concluded that due to the remaining above referenced items the facility has yet to be properly closed. All equipment that pertained to the operation and use of the compressor and are currently non-operational shall be removed from the site. Any contamination or remaining waste shall be properly disposed of and resolved. Therefore the OCD request that Enterprise Field Services submit a complete closure plan to resolve these findings within **30 days, by October 31, 2008**, of this dated inspection letter. Submit the plan to Mr. Jim Griswold of the Santa Fe OCD Environmental Bureau office, the current Enterprise permit reviewer.



At the time of inspection the OCD was informed that this location is still in use for transferring and the metering of natural gas including the use of three above ground storage tanks and a below grade tank. The OCD has concluded the following of the operational used equipment, please reference photos to the attached inspection photo sheet.

1. **Photo 7, 11, 12:** The integrity of liner underneath the three above ground storage tanks is a concern to the OCD. The liners are not properly seamed and welded throughout. Enterprise Field Services shall properly reline this containment area.
2. **Photo 8 – 10:** The integrity of the below grade tank needs to be verified. Liquids are present within its leak detection system. The leak detection appears to have a breach in its upper boundary, **photo 10**, where detection of false readings may result. Enterprise Field Services shall remove the liquids from the detection system and prevent any unnecessary fluids from entering. The OCD also requests the engineering design drawing of this tank.
3. **Photo 13:** this above ground storage tank has a visible pin-hole leak. This is unacceptable. Enterprise Field Services shall either repair the tank or replace it immediately.

The OCD is requesting that Enterprise Field Services **submit a discharge plan application** for the remaining tanks and activity located at this station. The OCD has concluded that the conditions of all tanks on location do not adhere to best management practices. Enterprise Field Services has **30 days, by October 31, 2008** to submit a renewal application for this facility. The application shall provide resolution to the leaking tank, the liner and the below grade tank. Submit the application to Mr. Jim Griswold.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492, E-mail Leonard.Lowe@state.nm.us or Jim Griswold at (505) 476-3465, E-mail Jim.Griswold@state.nm.us.

Sincerely,



Leonard Lowe
Environmental Engineer

xc: Jennifer Corser, Enterprise Field Services Environmental Specialist
Jim Griswold, OCD Santa Fe, Hydrologist
Mike Bratcher, OCD District II Office, Artesia

OCD Inspection: EPCO Trunk A, GW - 232

Inspector(s): Leonard Lowe

Company Rep: Jennifer Corser and Paul Murray

Date: 08.27.08

Time: 8:30 - 9:45

Page 1

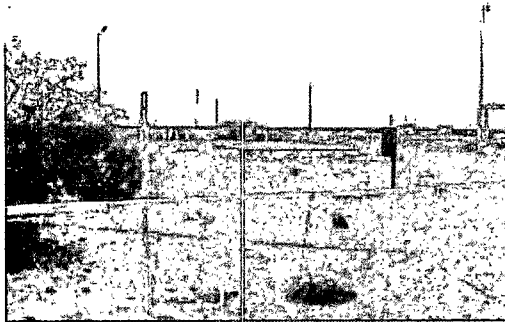


Photo 1: Cement slab from compressor location remaining.

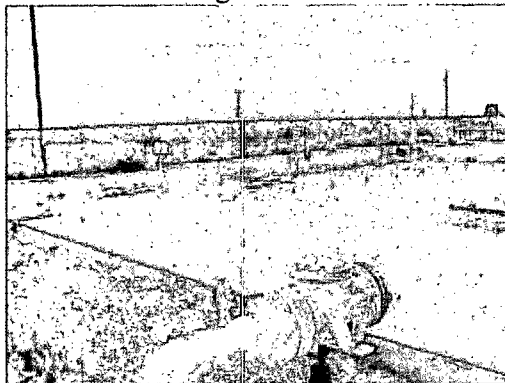


Photo 2: Close up of located compressor slab.

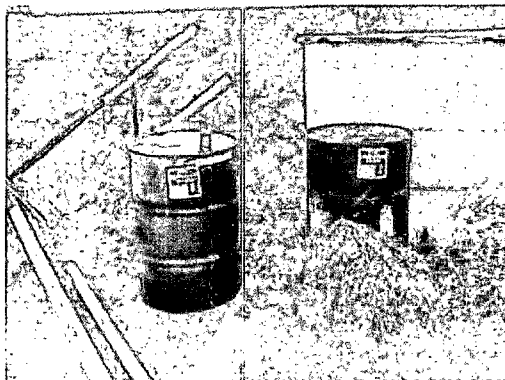


Photo 3: Located on the east side of yard, identified barrels located on ground. White colored bin has oil.



Photo 4: Assumed tank bottoms disposed on ground on east side.



Photo 5: Residuals in empty tank.

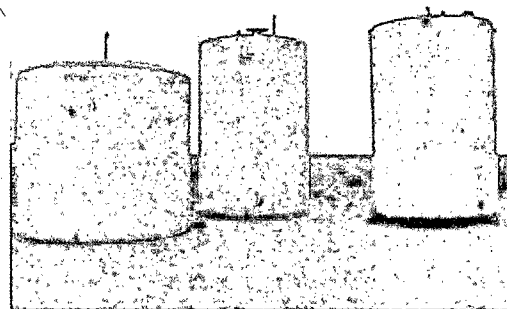


Photo 6: Used tanks not in use.

OCD Inspection: EPCO Trunk A, GW - 232

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Page 2

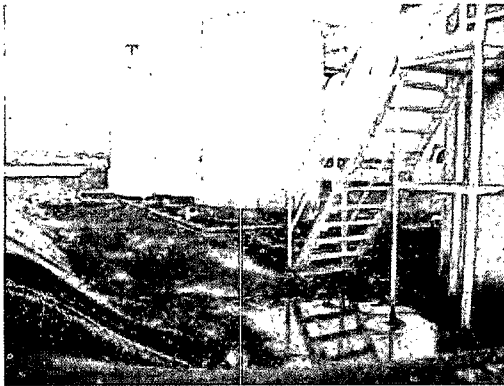


Photo 7: Three AST's still in use, Trunk A. Residual fluids in secondary. BGT located near stairs.

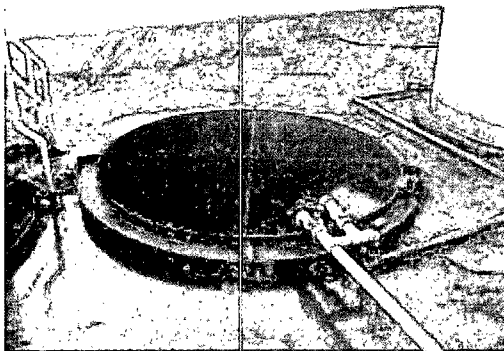


Photo 8: BGT surround by fluids.

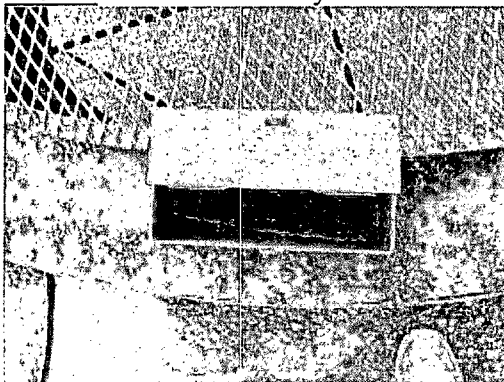


Photo 9: Leak detection of BGT, has fluids.

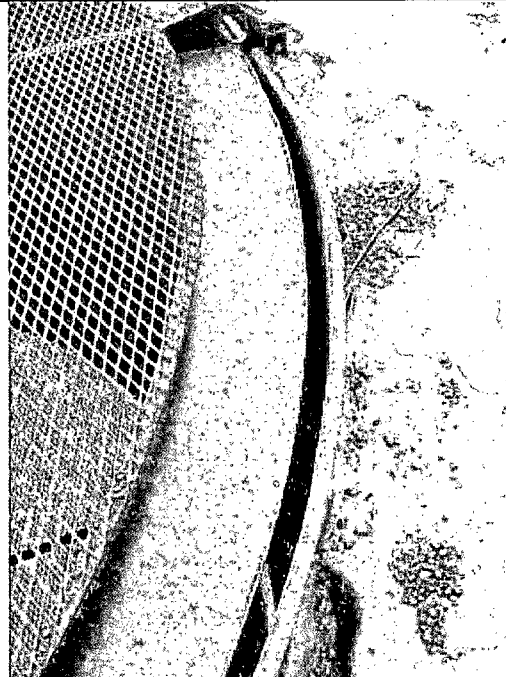


Photo 10: Unsealed cover of BGT. Opening is in secondary area.

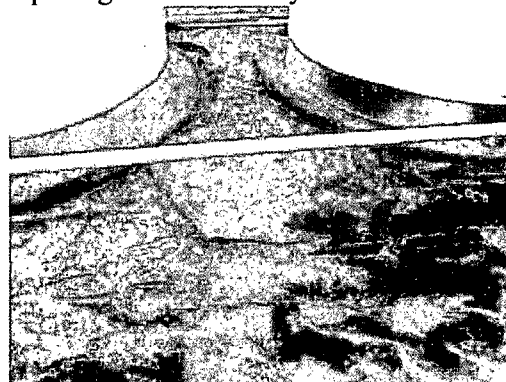


Photo 11: Liners are not sealed or appear to be one continuous barrier.

OCD Inspection: EPCO Trunk A, GW - 232

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Page 3



Photo 12: Liners around AST batteries not properly sealed.



Photo 13: "Pipeline Liquids" tank located on far east side of battery has a pin hole leak. A temporary insufficient plug is in place blocking leak.

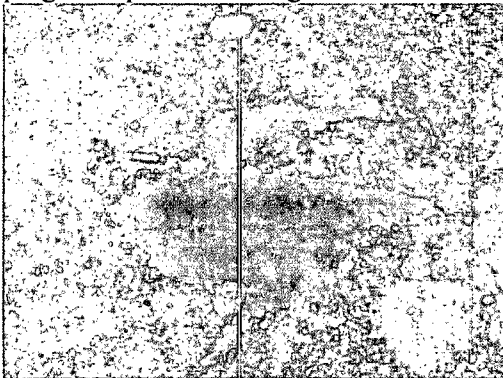


Photo 14: Unknown reddish dirt located on the southwest side of the yard.

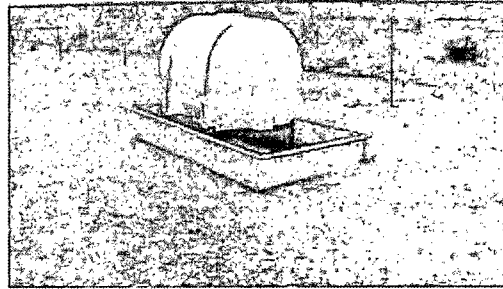


Photo 15: Saddle tank, unused, located on southwest side of yard.



Enterprise Products™

February 6, 2008

**ENTERPRISE PRODUCTS PARTNERS LP
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Federal Express
8623-6902 6207

Brad A. Jones, Environmental Engineer
Environmental Bureau
New Mexico M Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Discharge Plan GW-232 Closure Report
1 Trunk A Compressor Station**

Dear Mr. Jones:

In accordance with conditions of the above ground water discharge plan GW-232, Enterprise Field Services LLC (Enterprise) is providing notice that the above-referenced compressor station is no longer in operation and respectfully requests that this plan be closed. In keeping with your instructions, Enterprise conducted an inspection of the compressor station on January 31, 2007, and certifies that the compressor has been removed and that no visual evidence of environmental contamination exists associated with operation of this equipment.

The site is secured by perimeter fencing to control access to active natural gas pipeline operations. Above-ground equipment at the site includes an idled concrete foundation where the compressor formerly existed, two horizontal separators, an active above-ground tank farm located within an above-ground, lined earthen containment structure, a meter station, above-ground piping and a staging area for idled equipment. One of the above-ground separators used in conjunction with the removed compressor is idle. Some visual evidence of hydrocarbon contamination was observed on surface soil within the lined containment system of the active tank farm. This does not present a potential source of environmental contamination; however, due to the good integrity and effectiveness of the aforementioned containment structure.

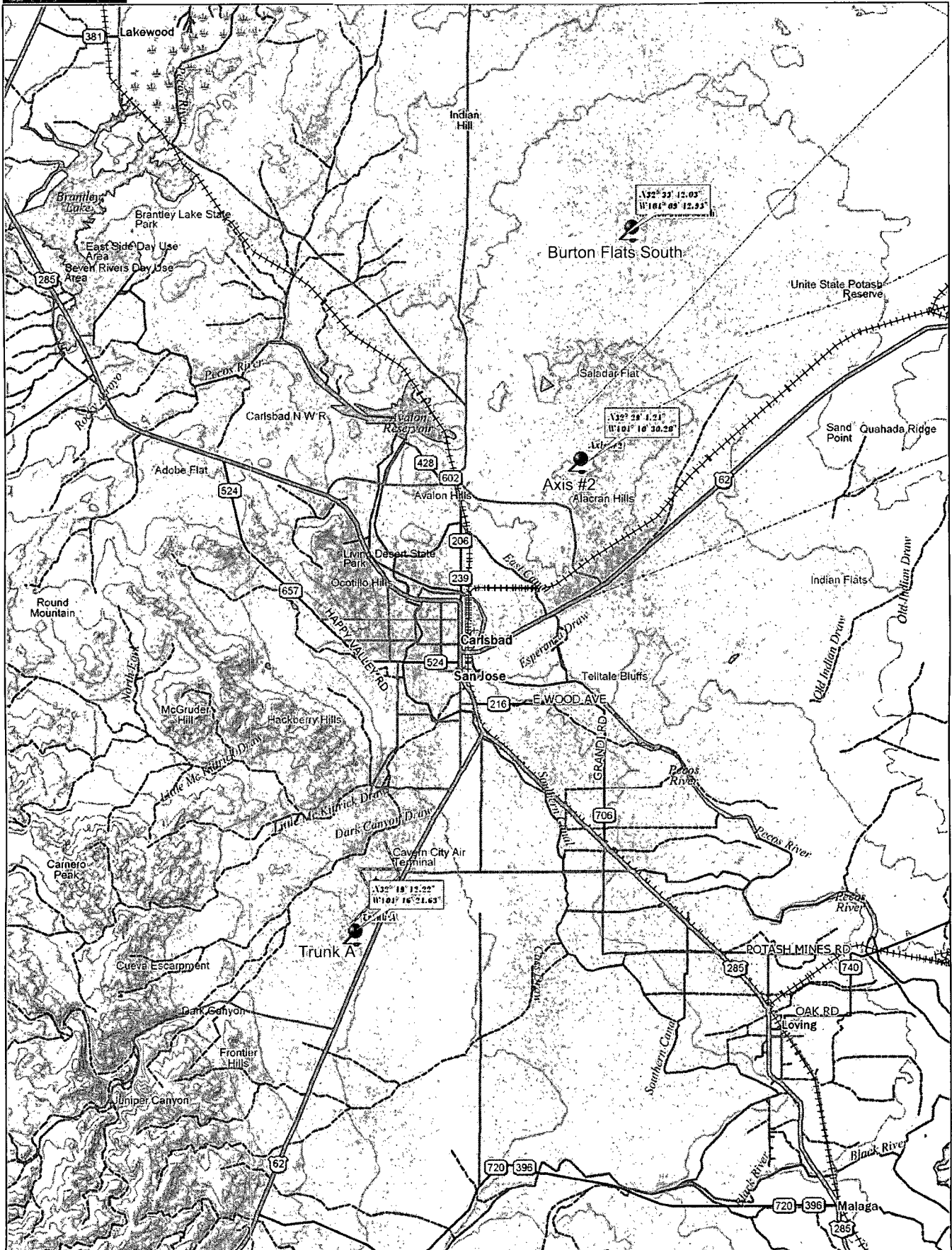
Included as attachments are a site location map and photographs of the facility taken during the site reconnaissance by our environmental field representative. If you have questions or need additional information concerning this project, please contact David O'Leary, our environmental field representative at 432-212-3490, or me directly at 713-880-6518.

Yours truly,

Mary E. Hebert
Director, Field Environmental

/s/jn

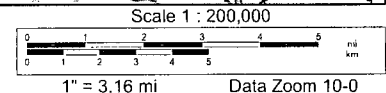
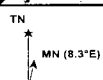
cc: David Jaquez, Carlsbad
Kenneth Ragsdale, Monahans
Derrell Morrow, Midland



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Attachment B – Trunk A Site Photos

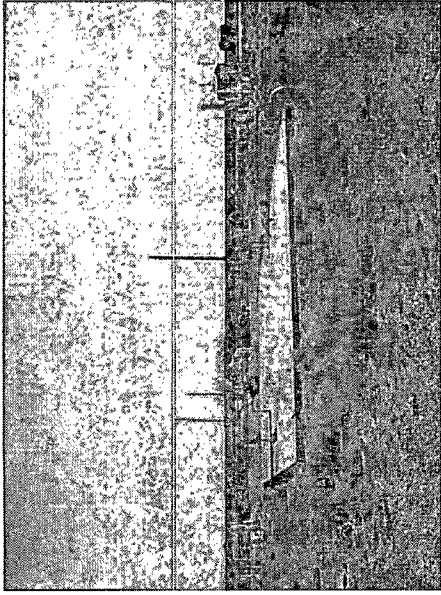


Photo 1 – Compressor Pad

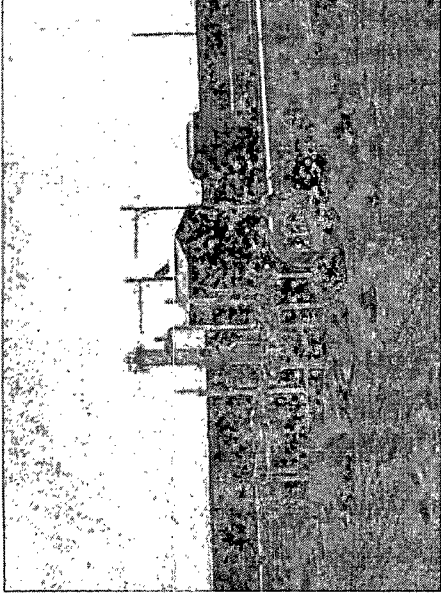


Photo 2 – Meter Station (in-service)

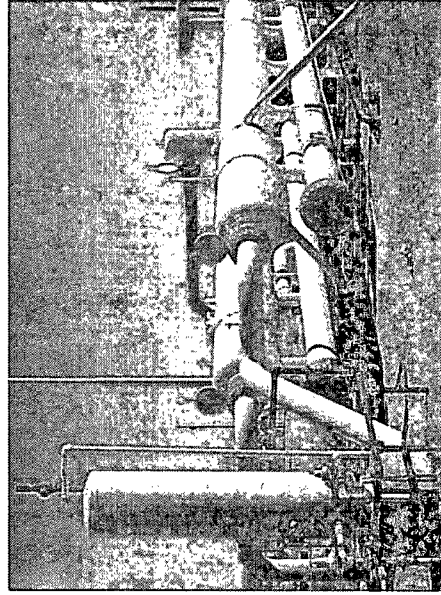


Photo 3 – Separators (idled unit on left)

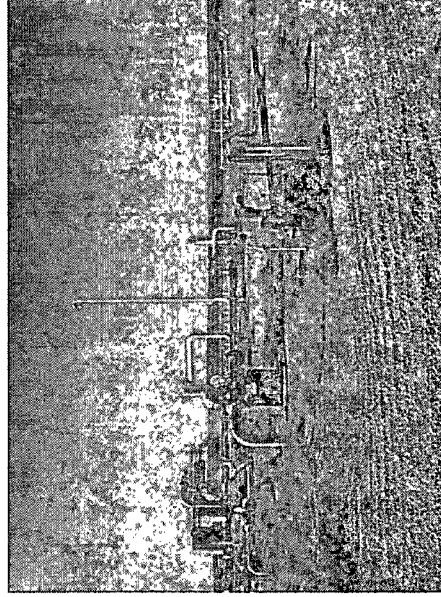


Photo 4 – View across Compressor Pad to Separators

Attachment B – Trunk A Site Photos (Continued)

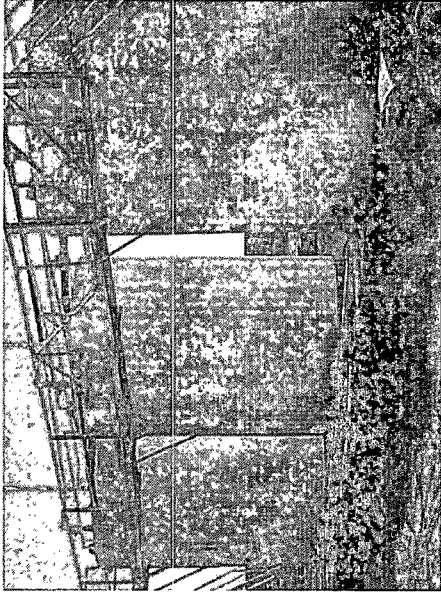


Photo 5 – Facility Tanks

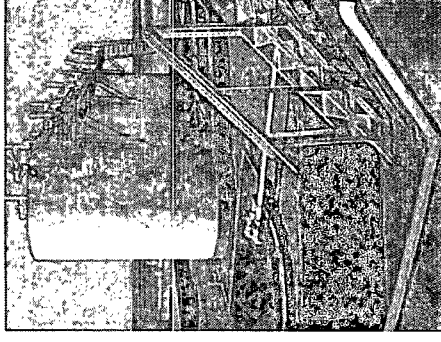


Photo 6 – Tank Farm Containment Area

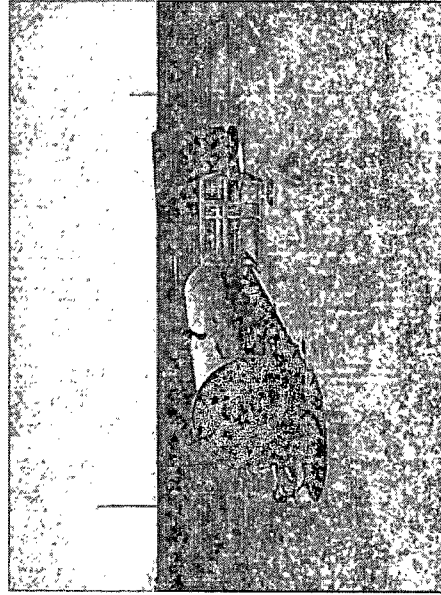


Photo 7 – Idle Equipment Staging Area

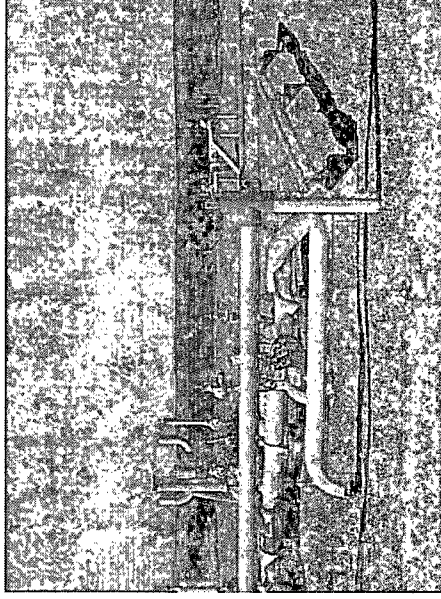


Photo 8 – Above-Ground Process Piping

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 5/17/01 Time: 8:00 AM - 8:30 AM CR. 265 GILLOCK
5 mi. S. OF CARLSBAD

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 ☐ GW# GW-232

FACILITY NAME: EPNG TRUNK A C.S.

PHYSICAL LOCATION: 5 mi. S. OF C'BAD, CR 265 (GILLOCK)

Legal: QTR QTR Sec TS R R County FOOY

OWNER/OPERATOR (NAME) EPNG

Contact Person: DAVID BAYS Tele:# _____

MAILING ADDRESS: _____ State _____ ZIP _____

Owner/Operator Rep's: _____

OCD INSPECTORS: ED MARTIN

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.

OK

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.

Good

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.

OK

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.

N/A

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

OK

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.

NEED TESTING

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.

NEED PRESSURE TESTING

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

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.?

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

15. Documents reviewed:

Miscellaneous Comments:

Photos taken: _____

Documents Reviewed/Collected: _____