

GW - 391

# INSPECTION

(Drain-lines, Sump, BGT, Site, etc.)

## Low, Leonard, EMNRD

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Wednesday, December 02, 2009 2:16 PM  
**To:** 'Cory Smith'  
**Subject:** RE: Beeline Discharge Plan

Cory,

GW-386, Bisti and GW-387, Buena Serte

are the ONLY TWO permits that identify specifics in CONDITION 16 as part of the inspection. A work plan identifying and resolving those issues AND all items stated within the permit need to be addressed in the WORK PLAN.

GW-390 through GW-394

There are no specifics stated within CONDITION 16. A work plan to cover all aspects of the permit conditions needs to be submitted. I understand that these may take some time, so an extension may be granted if Beeline request.

Overall, all these items need to be addressed within 5 years. My main focus is on below-grade tanks and unlined AST's.

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/>

-----Original Message-----

**From:** Cory Smith [mailto:CSmith@elmridge.net]  
**Sent:** Wednesday, December 02, 2009 1:46 PM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** RE: Beeline Discharge Plan

Mr. Lowe,

Do you want a plan addressing the concerns in section 16 of the approval letter or the entire site.

Cory Smith  
BeeLine Gas Systems  
(505)634-1144

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**From:** Lowe, Leonard, EMNRD [Leonard.Lowe@state.nm.us]  
**Sent:** Wednesday, December 02, 2009 1:32 PM  
**To:** Cory Smith  
**Subject:** Beeline Discharge Plan

Cory,

For clarification:

RE: GW-386, GW-387, GW-390, GW-391, GW-392, GW-393, GW-394

The OCD would like to receive a WORK PLAN for areas of concern for ALL the NEW discharge permitted facilities you have with the OCD by January 29, 2010.

If these work plans are not able to be submitted, OCD would like notification of this, on or by January 29, 2010.

llowe

Leonard Lowe  
Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
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Elm Ridge Exploration Co., LLC d.b.a.

## **Beeline Gas Systems**

2001 E. Blanco Blvd.  
P. O. Box 1280  
Bloomfield, NM 87413  
(505) 634-1144

November 25, 2009

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505  
Attn: Leonard Lowe

Subject: Discharge Permit Number GW- 391

Dear Mr. Lowe,

Please see the attached plans developed by Beeline Gas Systems to comply with Paragraphs 16 and 19 of the above referenced discharge permit. Paragraph 16 lists several deviations that must be corrected. Our proposed corrective actions are shown as the captions to your photos in Attachment 1. The plan to address small spills, as required in Paragraph 19, is shown as Attachment 2. Please note that this facility meets the H<sub>2</sub>S requirements of NMAC PART 11(19.15.11, HYDROGEN SULFIDE GAS). A copy of our H<sub>2</sub>S Inspection Report for this facility is shown as Attachment 3.

The deviations listed in Paragraphs 16 and 19 will be corrected and a report of our corrective actions will be submitted to NMOCD by January 29, 2010 per the requirements of Paragraph 16. Major projects to correct deviations such as non-compliant underground or above ground tanks will be completed in a reasonable time giving consideration to potential for discharge, availability of materials, availability of crews for installation, and weather conditions.

If you have any questions or comments please contact me at the above number or by email at [csmith@elmridge.net](mailto:csmith@elmridge.net).

Sincerely,



Cory Smith  
Regulatory Compliance  
Beeline Gas Systems

Cc: Neil Rensvold – Houston

Attachments: Attachment 1: GW-391 Work Plan Attachment 2: Small Spill Plan Attachment 3: H<sub>2</sub>S Inspection  
10/13/09

Beeline Gas Systems  
Kenny Compressor Station GW-391  
NMOCD Photo Concerns



Photo 1: AST within bermed area. No immediate action required at this time.

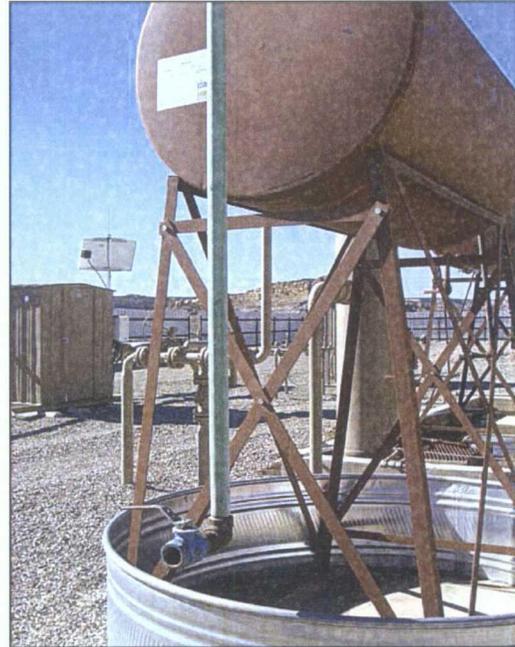


Photo 3: Repipe valve to be within existing secondary containment or install a catch basin. .



Photo 1-2: Backside of AST bermed area. No immediate action required at this time.



Photo 4: Below grade tank needs liners. Future plans to replace with an approved tank.

Beeline Gas Systems  
Kenny Compressor Station GW-391  
NMOCD Photo Concerns



Photo 5: Below grade tank.



Photo 7: Barrel will be removed from service.



Photo 6: Remediate spill, eliminate source of discharge.



Photo 8: Remediate spills, eliminate the source of discharge.

# Beeline Gas Systems

## Small Spill Plan

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Beeline Gas Systems plan to address small spills located in and around the facilities in an efficient and cost effective manner is to:

- Identify the source of the spill and stop it.
- Excavate saturated soils and remediate the site with bioremediation.
- Take precautionary measures to prevent a reoccurrence.

Beeline Gas Systems will store contaminated soils in containers onsite within secondary containment until enough soil is collected (~55gal drum). We will transport it to an OCD approved land farm for all required testing and disposal. Precautionary measures to prevent reoccurrence may include equipment repair, additional equipment, and personnel training.

**Bee Line Gas Systems H2S Inspection**

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Inspector: Tony Ferrari

Date of Inspection: 10 13 109

**Site**

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HMGP

Otero

Marcus

Kenny

S. Lybrook

Other

Bisti

Buena Suerte

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**H2S Inspection**

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H2S Present if so How Much PPM 0.5 ppm

No H2S Present

**Equipment Used**

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Hand Held Gas Monitoring Device

Draeger Tube Range 1 to 4 ppm

**Comments**

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H<sub>2</sub>O - 215

x   
Signature