

GW-128

**General
Correspondence**

YEAR(S): 2010 - 2014

Lowe, Leonard, EMNRD

From: Grajeda De Babb, Patricia [PGrajedaDeBabb@dcpmidstream.com]
Sent: Tuesday, September 20, 2011 1:21 PM
To: Lowe, Leonard, EMNRD
Subject: FW: Notification of Drain line Integrity Testing

Mr. Lowe,
This is the email notification I sent out this morning.

Thanks,
Patricia

From: Grajeda De Babb, Patricia
Sent: Tuesday, September 20, 2011 8:45 AM
To: Leking, Geoffrey R, EMNRD (GeoffreyR.Leking@state.nm.us) (GeoffreyR.Leking@state.nm.us)
Cc: 'richard.inge@state.nm.us'; 'randy.dade@state.nm.us'; Bradford, Johnnie
Subject: Notification of Drain line Integrity Testing

To Whom It May Concern,

DCP Midstream will be performing an integrity test on the drain lines at the South Hat Mesa Booster Station Friday September 23, 2011 beginning at approximately 8 AM in case OCD wants to witness the test. This notification is according to Discharge Permit (GW-128) Condition 12 B " The owner/ operator shall notify the OCD at least 72 hours prior to all testing".

Thanks,

Patricia A. Grajeda de Babb
Env Eng/ Specialist II

DCP Midstream
E-mail: PGrajedadeBabb@dcpmidstream.com

Lowe, Leonard, EMNRD

From: Warren, Keith [KWARREN@dcpmidstream.com]
Sent: Thursday, November 04, 2010 8:49 AM
To: Lowe, Leonard, EMNRD
Subject: RE: GW-128 Request

Leonard,

Thank you for the quick responses to both this, and the Artesia Gas Plant correspondences detailing our upcoming planned work. I am traveling this week and am trying to pull this information together for you as quickly as I can. I anticipate having a complete response to your Artesia questions and comments by close of business tomorrow, and I will do my best to have answers to these comments/questions by close of business Monday.

Again, I appreciate your support in reviewing these notifications in a timely fashion. I look forward to answering your questions in a similarly quick manner.

Sincerely,

Keith

Keith Warren, P.E.
Environmental Engineer IV
DCP Midstream, LP
Office: (303) 605-1936
Fax: (303) 605-1957
Cell: (303) 301-4446

From: Lowe, Leonard, EMNRD [<mailto:Leonard.Lowe@state.nm.us>]
Sent: Thursday, November 04, 2010 8:39 AM
To: Warren, Keith
Cc: VonGonten, Glenn, EMNRD
Subject: GW-128 Request
Importance: High

Mr. Warren,

Good afternoon,

Re: Modification of Discharge Permit (GW-128)

19.15.2.7 DEFINITIONS: B. Definitions beginning with the letter "B" (5)

"Below-grade tank" means a vessel, excluding sumps and pressurized pipeline drip traps, where a portion of the tank's sidewalls is below the surrounding ground surface's elevation. Below-grade tank does not include an above ground storage tank that is located above or at the surrounding ground surface's elevation and is surrounded by berms.

PART 17 PITS, CLOSED-LOOPED SYSTEMS, BELOW-GRADE TANKS AND SUMPS

19.15.17.7 DEFINITIONS:

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, November 04, 2010 8:39 AM
To: 'Warren, Keith'
Cc: VonGonten, Glenn, EMNRD
Subject: GW-128 Request

Importance: High

Mr. Warren,

Good afternoon,

Re: Modification of Discharge Permit (GW-128)

19.15.2.7 DEFINITIONS: B. Definitions beginning with the letter “B”. (5)

“Below-grade tank” means a vessel, excluding sumps and pressurized pipeline drip traps, where a portion of the tank's sidewalls is below the surrounding ground surface’s elevation. Below-grade tank does not include an above ground storage tank that is located above or at the surrounding ground surface’s elevation and is surrounded by berms.

PART 17 PITS, CLOSED-LOOPED SYSTEMS, BELOW-GRADE TANKS AND SUMPS

19.15.17.7 DEFINITIONS:

H. “Sump” means an impermeable vessel, or a collection device incorporated within a secondary containment system, with a capacity less than 500 gallons, which remains predominantly empty, serves as a drain or receptacle for de minimis releases on an intermittent basis and is not used to store, treat, dispose of or evaporate products or wastes.

A few inquiries:

1. What is the depth to ground water at this facility?
2. It is indicated that there will be a “880 gallon environmental drain sump” will be “double walled” to be placed here. Does ‘double walled’ mean, double wall and double bottom (tank within a tank design)? Or is it a double wall with a single wall bottom? Referring to the rules this ‘sump’ is a below-grade tank according to the submitted description. Attachment 3 of your submittal appears that this ‘sump’ is a single bottom tank. What part of this tank will be submerged or not have its sides visible?
3. The submitted report notes that an indicator will respond once a volume indicates 75% capacity. Is that the volume capacity of the sump, the leak detection area or the both the sump/leak detection area? Please clarify.

Please respond.

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

Website: <http://www.emnrd.state.nm.us/ocd/>



DCP Midstream
370 17th Street, Suite 2500
Denver, CO 80202
303-595-3331

RECEIVED
OCD
A 11:02
2010 OCT 15 A 11:02:02

October 14, 2010

UPS NEXT DAY AIR (Tracking Number 1Z F46 915 13 9960)

Mr. Glenn von Gonten
Environmental Bureau
Oil Conservation Division
New Mexico Energy, Minerals
& Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

10.22.10 Still in review
yet to be approved.

11.03.10 in Review

Subject: South Hat Mesa Compressor Station
Modification of Discharge Permit (GW-128)
Lea County, New Mexico

Mr. von Gonten:

DCP Midstream, LP (DCP Midstream) is providing you with the following information regarding upcoming changes being made to the South Hat Mesa Compressor Station facility. Plans for the changes described below are currently being finalized in hopes of completing construction at the facility in the coming weeks. I am providing this information (following recent discussions with Leonard Lowe) in the hope that we can secure your approval to proceed with the work, in an expedited manner. DCP Midstream does not believe the changes described will result in any significant modification in the potential discharge of any water contaminants, nor will any water quality standard be exceeded as a result of these changes.

DCP Midstream is planning to add a new compressor and associated engine (collectively known as #8 Compressor) at the South Hat Mesa facility. The #8 Compressor will be placed atop a concrete foundation equipped with an environmental drain system. The concrete foundation will prevent incidental leaks of oil, antifreeze, and other compressor unit fluids from making contact with the ground surface in the immediate vicinity of the equipment. In addition, the foundation will be equipped with a collection and drain system that is designed to direct any precipitation that comes into contact with the equipment and foundation to a storage tank for future off site disposal. This system is included to prevent stormwater that may come into contact with de minimis amounts of oil and other equipment fluids, from discharging from the facility via sheet flow stormwater runoff. A copy of the facility plot plan showing the locations of the new equipment is provided as Attachment 1.

The collected precipitation will be directed to one of two 210-barrel slop oil tanks via an environmental drain sump. DCP Midstream will be adding a second 210-barrel slop oil tank at the facility, as well as a second environmental drain sump, to support the addition of #8



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303-595-3331

Compressor. The new 210-barrel slop oil tank will be placed adjacent to the existing 210-barrel slop oil tank. As part of this equipment addition, DCP Midstream will be reconstructing the existing slop oil tank secondary containment structure to accommodate placement of the new tank. The reconstructed secondary containment will include an impermeable polysynthetic liner, and will be sized to provide at least 133% of the sum of the two tanks available volume (420 barrels). A figure showing the details of the new 210-bbl tank and a calculation sheet showing the available volume for secondary containment provided by the reconstructed berm are provided as Attachment 2.

Before being transferred to the facility slop oil tanks, fluids captured by the foundation drain system will gravity flow to a new 880-gallon environmental drain sump. In addition to the foundation drains, liquids removed from the compressor's first stage inlet scrubber will also be directed to the sump. The new sump will be constructed of fiberglass, and will be double-walled to provide appropriate secondary containment in order to minimize the potential for an inadvertent release of oil or other fluids. Four leak detection view ports will be provided for completion of required periodic leak detection system inspections. Level controls will be incorporated into the sump design to provide timely emptying of the sump via an electric transfer pump once the sump level reaches 50% capacity. The sump will also be equipped with an electronic level alarm system to notify operators at a constantly manned station of a potential overflow situation, should levels in the sump reach 75% of sump capacity. A drawing showing the details of the double-walled sump is included as Attachment 3. The environmental drains and inlet scrubber liquids associated with #6 Compressor and #7 Compressor will also be redirected from the existing drain sump to the new drain sump in an effort to more evenly distribute the liquid load handled by each sump. All piping associated with these changes will be constructed of carbon steel and will be properly protected from external corrosion following procedures outlined in our mechanical integrity program.

As we have discussed previously, DCP Midstream does not believe that the New Mexico Water Quality Act, NMSA 1978, §§74-6-1 to 17, and the regulations adopted under that act are applicable to compressor stations. Further, even if the Water Quality Act and regulations applied, the WQCC regulations do not require a discharge plan for this facility. The South Hat Mesa Compressor Station does not have any discharges that may move directly or indirectly into groundwater. Therefore, DCP Midstream does not believe that a discharge plan is required under the WQCC regulations. Since the WQCC regulations do not require a discharge plan, DCP Midstream is under no legal obligation to modify Discharge Plan GW-128.

Pleased be advised that DCP Midstream's submittal of this facility information does not waive DCP Midstream's objection to the NMOCD's position regarding applicability of the WQCC regulations.



DCP Midstream
370 17th Street, Suite 2500
Denver, CO 80202
303-595-3331

If you have any questions concerning DCP Midstream's position or the information contained within this request, please contact me at (303) 605-1936. Please send all correspondence regarding this request to me at 370 17th Street, Suite 2500, Denver, CO 80202.

Sincerely,
DCP Midstream, LP

A handwritten signature in black ink, appearing to read 'KW', with a long horizontal line extending to the right.

Keith Warren, P.E.
Environmental Engineer

Enclosures

cc: Leonard Lowe, New Mexico Oil Conservation Division
Kenneth Winn, DCP Midstream
Johnnie Bradford, DCP Midstream

**ATTACHMENT 1
AMENDED FACILITY PLOT PLAN**

ATTACHMENT 2
NEW SLOP OIL TANK DETAILS AND SECONDARY CONTAINMENT
CALCULATION

NO.	REVISION	DATE	BY	CHK
A	ISSUED FOR APPROVAL	1/20/10	CP	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-

GENERAL NOTES:

- SEE CPSC STANDARD DRAWINGS, STDWELD-1 FOR APPLICABLE INFORMATION & STDWELD-2 FOR INFORMATION AS REFERENCED IN NOZZLE SCHEDULE. FOR DIMENSIONAL FABRICATION TOLERANCES SEE CPSC STANDARD DRAWING DS-0002.
- FOR LOCATIONS OF ALL APPLICABLE CAUTION TAGS & CPSC LOGOS SEE DRAWING LBL-001.
- ALL DIMENSIONS ARE FROM TOP OF TANK BOTTOM PLATE, UNLESS OTHERWISE SPECIFIED.
- ALL BOLT HOLES TO STRADDLE MAJOR VESSEL CENTERLINES, UNLESS OTHERWISE SPECIFIED.
- TANK SHALL BE CLEANED, INSIDE AND OUTSIDE PER SSPC-SP 2 (HAND TOOL CLEANING) OR AT SHOP OPTION PER SSPC-SP 3 (POWER TOOL CLEANING) AS A MINIMUM, UNLESS OTHERWISE SPECIFIED.

REFERENCE DRAWINGS:
 CO-100-001 EXTENDED NECK CLEANOUT

CHALLENGER PROCESS SYSTEMS CO.
 8100 N.W. 157th ST., SUITE 100, MIAMI, FL 33187
 1955 EAST 190th STREET, MIAMI, FL 33166

12-F YEAR BUILT 2010

AP

0021

SHELL THICKNESS AS APPLICABLE

DECK THICKNESS AS APPLICABLE

DESIGN PRESSURE 16 OZ.

ERECTED BY CPSC

CHALLENGER PROCESS SYSTEMS CO.
 SERIAL NUMBER 2DB873-01-01

NOMINAL DIAMETER 10'-0"

NOMINAL HEIGHT 15'-0"

NOMINAL CAPACITY 210 BBL.

BOTTOM THICKNESS .25" TYPE FLAT

SHELL THICKNESS AS APPLICABLE

DECK THICKNESS AS APPLICABLE

DESIGN PRESSURE 16 OZ.

ERECTED BY CPSC

NAME PLATE DETAIL 6

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APPROVED FOR FABRICATION

DATE 2/26/10

BY: ENG. MOR. 20873

DATE 2/26/10

APPROVED FOR FABRICATION

DATE 2/26/10

BY: 20873

DATE 2/26/10

APPROVED FOR FABRICATION

DATE 2/26/10

BY: 20873

DATE 2/26/10

CHALLENGER PROCESS SYSTEMS CO.
 A DIVISION OF WILSON-JENSEN INC. CO.
 P.O. 249 / WHITEHOUSE, TEXAS 75791

CUSTOMER: DCP MIDSTREAM, LP

SCALE: NO SCALE

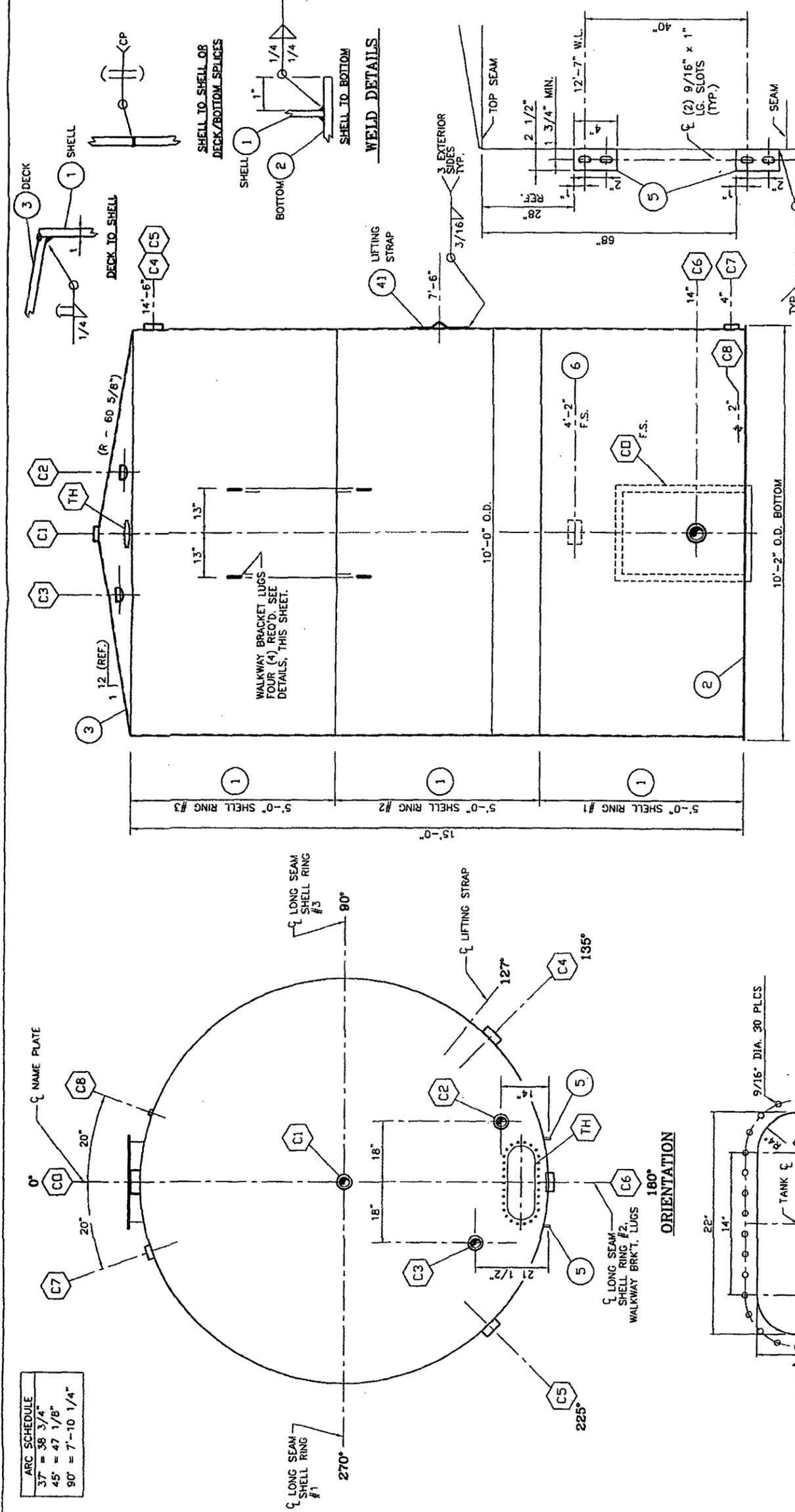
CUSTOMER P.O. # 31254

ROW FILE: 20873011

SHIP ORDER NO.: 20873

10'-0" O.D. x 15'-0" HIGH
 210 BBL API 12F TANK

MARK	SIZE	RATING	FACING	SERVICE	THICK.	REINFORCEMENT	WELD DETAIL	REMARKS
TH	8"	-	-	-	-	-	-	-
C8	1"	3000#	CPLG	THIEF HATCH	-	-	-	-
C7	3"	API	CPLG	ROLL LINE	1"	-	-	-
C6	4"	API	H. CPLG	PIPE-LINE CONN.	2"	-	-	-
C5	4"	API	H. CPLG	OVERFLOW	2"	-	-	-
C4	4"	API	H. CPLG	OVERFLOW	2"	-	-	-
C3	3"	API	CPLG	AUX. VENT	2"	-	-	-
C2	3"	API	CPLG	FILL LINE	2"	-	-	-
C1	3"	API	H. CPLG	PRIMARY VENT	2"	-	-	-
CO	24"x36"	API	PLATE	CLEANOUT	STD.	-	-	-



MATERIAL SPECIFICATIONS:

ROOF: SA-36

DOWNCOMER: SA-53B ERW

SHELL: SA-36

STRUCTURAL: SA-36

COUPLINGS: API 5L GR. B. SA-105

BOLTS: SA-307B SA-325

NUTS: SA-563A

FLANGES: N/A

GASKETS: BUNA N. SBR. RUBBER

DESIGN NOTES:

OPERATING PRESSURE: ATMOSPHERIC

OPERATING TEMP: AMBIENT

DESIGN PRESSURE: 16 OZ./0.5 VAC

DESIGN TEMP: AMBIENT

CORROSION ALLOWANCE: 0

INSULATION: N/A

JOINT EFFICIENCY: N/A

RADIOGRAPHY: NONE

STRESS RELIEVING (PWHIT): NO

HYDROTEST: AIR TEST ALL WELDS, WITH SOAP SOLUTION, @ 1.5 PSIG.

CONSTRUCTION: API SPECIFICATION 12E, TWELFTH EDITION

INSPECTED BY: CHALLENGER PROCESS SYSTEMS

PAINTING: INTERIOR: BUFF & GRIND FOR COATING BY OTHERS.

EXTERIOR: BRUSH BLAST PER SSPC-SP-7. APPLY 1 COAT HIGH BUILD ALIPHATIC URETHANE @ 3.0-6.0 MILS DFT. - DEYTHANE 359, COLOR: WHITE

NOZZLE SCHEDULE

MARK	SIZE	RATING	FACING	SERVICE	THICK.	REINFORCEMENT	WELD DETAIL	REMARKS
TH	8"	-	-	-	-	-	-	-
C8	1"	3000#	CPLG	THIEF HATCH	-	-	-	-
C7	3"	API	CPLG	ROLL LINE	1"	-	-	-
C6	4"	API	H. CPLG	PIPE-LINE CONN.	2"	-	-	-
C5	4"	API	H. CPLG	OVERFLOW	2"	-	-	-
C4	4"	API	H. CPLG	OVERFLOW	2"	-	-	-
C3	3"	API	CPLG	AUX. VENT	2"	-	-	-
C2	3"	API	CPLG	FILL LINE	2"	-	-	-
C1	3"	API	H. CPLG	PRIMARY VENT	2"	-	-	-
CO	24"x36"	API	PLATE	CLEANOUT	STD.	-	-	-

THIEF-HATCH CUTOUT
 ONE (1) REQUIRED

OUTSIDE EDGE OF TANK

NOTE: ALL ELEVATIONS SHOWN ARE FROM TOP SIDE OF BOTTOM PLATE, UNLESS OTHERWISE NOTED.

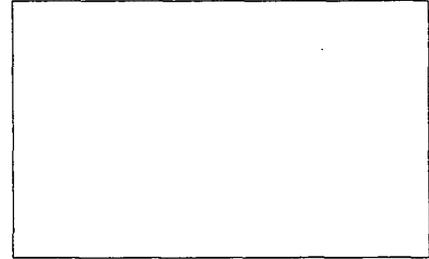
MARK	SIZE	RATING	FACING	SERVICE	THICK.	REINFORCEMENT	WELD DETAIL	REMARKS
TH	8"	-	-	-	-	-	-	-
C8	1"	3000#	CPLG	THIEF HATCH	-	-	-	-
C7	3"	API	CPLG	ROLL LINE	1"	-	-	-
C6	4"	API	H. CPLG	PIPE-LINE CONN.	2"	-	-	-
C5	4"	API	H. CPLG	OVERFLOW	2"	-	-	-
C4	4"	API	H. CPLG	OVERFLOW	2"	-	-	-
C3	3"	API	CPLG	AUX. VENT	2"	-	-	-
C2	3"	API	CPLG	FILL LINE	2"	-	-	-
C1	3"	API	H. CPLG	PRIMARY VENT	2"	-	-	-
CO	24"x36"	API	PLATE	CLEANOUT	STD.	-	-	-

**Secondary Containment (Berm) Volume Calculations
South Hat Mesa Compressor Station - Proposed Updated Berm**

Volume of Containment Structure

Berm Type	Rectangular, Tapered
Height (ft)	2.67
Width 1-bottom (ft)	18.17
Width 2-top (ft)	23.17
Length 1-bottom (ft)	64.70
Length 2-top (ft)	69.70

Containment Volume (bbl) 659.71



Picture Unavailable

Additional Containment Volume from Below-Grade Sump

Sump Shape (none)	
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (bbl)	0

Additional Containment Volume - Manual Input

Enter Volume (bbl) 0.00
Describe Additional Vol:

Freeboard Standard: 133% of Largest Tank Volume (Only if site has NM Discharge Plan) AND 25 yr, 24-hr Rainfall

25 yr, 24-hr Rainfall (in) 4
Volume Displaced (bbl) 95.88

Largest Tank Volume Calculations

Tank ID	Slop Oil Tank	Piping exists to allow filling Slop Oil tanks simultaneously
Tank Contents	slop oil	
Tank Shape	Cylinder	
Tank Orientation	Vertical	
Diameter (ft)	10.00	
Length (ft)	15.00	
Calculated Volume (bbl)	209.83	8812.8 gallons
Labeled Volume (bbl)*	420.00	<i>*If container not labeled use delete key to clear the cell.</i>

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet Tank (ft)	Width Rect. Tanks Only (ft)	Volume (bbl)	Volume of Secondary Containment Displaced (bbl)
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					

Enter displacement from other obstructions, in barrels (1 ft³ = 0.178 barrels):
Describe Obstructions:

Summary

Containment Capacity (bbl)	660
Volume Displaced by Rainfall (bbl)	96
Volume Displaced by Tanks & Obstructions (bbl)	0.00
Berm Volume Less Tank & Rainfall Displacement (bbl)	564
Largest Tank Capacity (bbl)	420

% of Largest Tank Volume Contained 134% *Result must equal 100% or greater to allow for adequate precipitation from 25 yr, 24-hr Rainfall, AND*
% of Largest Tank Volume Contained (133% std) 157% *Result must equal 133% or greater to meet NM Discharge Plan requirements.*

**ATTACHMENT 3
NEW ENVIRONMENTAL DRAIN SUMP DETAILS**

