

GW - 187

**INSPECTIONS &
DATA**



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 S. PACHECO
SANTA FE, NEW MEXICO 87505
(505) 827-7131

July 9, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-275

Ms. Leigh E. Gooding
Williams Field Services
P.O. Box 58900, M.S. 2G1
Salt Lake City, Utah 84158-0900

**RE: Discharge Plan Inspections
GW-187, GW-208. and GW-233
San Juan and Rio Arriba Counties, New Mexico**

Dear Ms. Gooding:

The New Mexico Oil Conservation Division (OCD) on June 3, 4, and 5, 1996 along with Williams Field Service operators and POI operators inspected the La Cosa (GW-187), Hart Mountain (GW-208), and La Jara (GW-233) 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. **Note: For WFS information the OCD has enclosed duplicate copies of all photos taken during the inspections.**

1. GW-187 or La Cosa Compressor Station, (Inspected 06/05/96)

A. The overall house keeping and pollution prevention in place at the site appears to be in compliance with OCD discharge permit GW-187. However, during the inspection it learned that the gas compressed by La Cosa CDP is actually discharging into the Transwestern Blanco Hub at the Tailgate of the Kutz plant and not being discharged into the Milagro Gas plant as is stated in the permit. If this is the case it appears that none of the wastes generated at this site would meet the Exploration and Production Exemption from RCRA Subtitle C - please clarify the status of this station and propose proper waste effluent disposal options pursuant to the waste's regulatory status. **WFS will respond to this point with-in 30 days of receipt of this inspection report.**

B. The below grade tank needs some way for the secondary containment to be monitored - WFS needs to check the secondary containment monthly and keep written documentation as to the results of the monthly monitoring. In the event that fluid is verified in the secondary containment WFS will notify the OCD and propose remedial action to be taken.

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2. **GW-208 or Hart Mountain Compressor Station, (Inspected 06/04/96)**

A. Overall the site appears to be in compliance with the OCD discharge permit GW-208 - However, housekeeping is a concern. (See photo GW-208 photo No. 03 date: 06/04/96) , Also this tank is in need of a label.

3. **GW-233 or La Jara Compressor Station,(Inspected 06/03/96)**

A. See Photo GW-233 No. 07 Date:06/03/96,

There appears to be a 15'X100' bioremediation cell on the site - The OCD Santa Fe Division would like to know by whom and when was the cell approved and what monitoring requirements are in place in the treatment zone? The OCD has developed specific guidelines for landfarm operations which would be applicable to this bioremediation cell from an operational standpoint. Also, are the contents of the cell exempt from RCRA Subtitle C Regulations? If not then the contaminated soil(s) must be properly characterized/sampled per 40 CFR Part 261. Further since this site is under discharge plan the chemical constituents of WQCC regulations are also of concern as well as typical OCD pit closure analylates BTEX and TPH. WFS will respond to this point with-in 30 days of receipt of this inspection report.

Note: All OCD rules/regulations/and guidelines are available on the Internet at WWW.EMNRD.STATE.NM.US.

B. Other items of concern - the solvents in use at the station may be hazardous and WFS needs to evaluate the continued use of these solvents and potential RCRA problems that may result from their use.

C. Labeling - various chemical and tank storage containers need to be properly and clearly labeled.(Used filter storage tank)

D. The disposal/recycling of batteries needs to be addressed.

If there any questions regarding this report feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez

Petroleum Engineer

XC: Mr. Denny Foust - Geologist.

P 594 835 275

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PS Form 3800, April 1985

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**ATTACHMENT NO.1 - WFS GW-187
La Cosa COMPRESSOR**

<WFS> GW-187 (PHOTOS BY OCD)

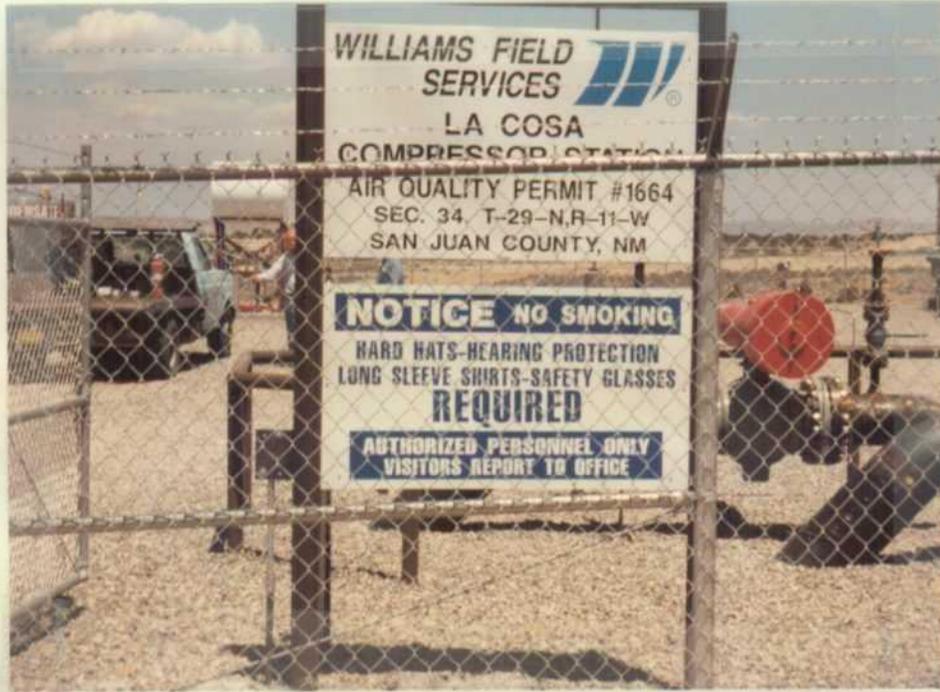


PHOTO NO. 01

DATE: 06/05/96



PHOTO NO. 02

DATE: 06/05/96

<WFS> GW-187 (PHOTOS BY OCD)



PHOTO NO. 03

DATE: 06/05/96