

GW - 1883

**INSPECTIONS &
DATA**

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

REQ 7/27/00
HP 1020
APP 8/3/95
EXP. 8/3/05

DATE: 10/12/00 Time: 1:00 pm

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-188-3

FACILITY NAME: HART CANYON #3 CS

PHYSICAL LOCATION: _____

Legal: QTR QTR Sec 8 TS 31N R 9W County SAN JUAN

OWNER/OPERATOR (NAME) EL PASO FIELD SERVICES

Contact Person: DAVID BAYS Tele:# 325-2841

MAILING
ADDRESS: 614 REILLY AV. FARMINGTON State NM ZIP 87401

Owner/Operator Rep's: _____

OCD INSPECTORS: DENNY FOWST AND 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.

SEE ITEM #4

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.

OIL LEAKING ONTO PAD (NO CURB) AND THEN ONTO GROUND.
CONTAMINATION AROUND EXHAUST STACK.

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.

OK

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

ANTI-FREEZE TANK NOT LABELED. TWO UNLABELED
DRUMS IN CONTAINMENT AREA FOR ANTI-FREEZE

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.

N/A

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.

SEE NOTE # 2

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 ?

Miscellaneous Comments:

Number of Photos taken at this site: 0

Hart Canyon #3

GW-188-3

Bulls Oil Tanks leaking - staining
inside berm. Probably from
the pump.

✓ ANTI-FREEZE TANK NOT LABELED.

✓ 2 UNLABELED DRUMS IN CONTAINMENT

✓ AREA FOR ANTI-FREEZE. ANBITROL.

SOUTH END.

LUBE OIL LEAKING ONTO PAD (SKID) AND

Then on to ground. CONTAMINATION

AROUND SKID.

BLOWOVER FROM EXHAUST - CONTAMINATION

ON GROUND AROUND THAT AREA.



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

February 20, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-963-024

Mr. David Bays
EPFS
P.O. Box 4990
Farmington, NM 87499

RE: Discharge Plan Inspections
3B-1, Hart Canyon No. 1, 2, and 3
GW-188, 188-1, 188-2, 188-3
San Juan County, New Mexico

Dear Mr. Bays:

The OCD along with EPFS personnel inspected the 3B-1 Compressor Station and its related gathering compressors Hart Canyon No.1, Hart Canyon No.2, and Hart Canyon No.3 located in San Juan County, New Mexico. The purpose of these inspections was to ensure that the above mentioned discharge plans all newly built compressor sites were in compliance with the NMOCD approved discharge plans. During the inspections NMOCD took photographs of the above mentioned facilities and duplicate copies of these photos are enclosed for EPFS' reference. The bullet points that follow will note areas of improvement for the above mentioned facilities.

- The secondary containment needs to be checked on a more frequent basis - perhaps monthly and by operations personnel rather than lab personnel. Also a record of these inspections should be maintained at the 3B-1 site control room so that the NMOCD may view the findings of such inspections. The same also applies for secondary containment area and the below grade valve box between the two tanks.
- Minor housekeeping points such as the racking of small oil spills so that they may biodegrade onsite. Any mislabelled drums shall be properly labeled and all empty drums shall be stored on their side with the bungs in place and horizontal to the ground.
- All product drums need to be stored upright with the bungs in place and on pad and curb type containment.

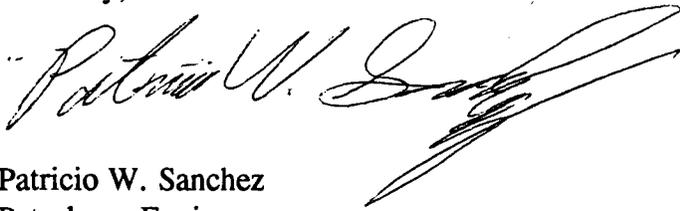
Mr. David Bays
February 20, 1996
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- The open top fiber glass tanks that are located at the Hart Canyon facilities need some sort of impermeable liner to be placed underneath them. (See photo No. 4 EPFS GW-188-2.)
- All drip pots shall be drained to a closed container not to the ground, and should be transferred to the produced water tank at each site.
- Tank hatches and vents need to be checked for design problems so that blow-over will stop at the 3B-1 site.
- The environmental spill control rail that surrounds each compressor need to be checked to ensure that lube oil will not drip from the compressor skid to the ground.

Overall these facilities appear to be well maintained and in compliance with the OCD Discharge Plan permit conditions for each site.

Should EPFS have any questions regarding this inspection please feel free to call me at (505)-827-7156.

Sincerely,



Patricio W. Sanchez
Petroleum Engineer

xc: Denny Foust - Aztec District.

EPFS HART CANYON NO.3

Discharge Plan Inspection

2/12/96 GW-188-3

Photos by NMOCD

EPFS Hart Canyon No.3 GW-108-3



Photo No. 1 EPFS Hart Canyon No.3 2/12/96



Photo No. 2 EPFS Hart Canyon No.3 2/12/96

GW-188-3



Photo No. 3 Hart Canyon No. 3 2/12/96