GW - 21

INSPECTIONS & DATA

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Thursday, July 09, 2009 10:34 AM
To: Roesler, Clayton
Cc: Powell, Brandon, EMNRD; 'Seale, Runell'; Fernald, Donald
Subject: GW-211, Largo Canyon CS Inspection Letter
Attachments: GW-211, Inspection Letter.pdf; GW-211, Inspection Photos.pdf

Mr. Roesler,

If you have any questions please submit them to me.

Thank you for your attention.

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Leonard Lowe
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New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division

July 9, 2009

Mr. Clay Roesler

Re: Inspection Report, GW-211
Largo Compressor Station, Enterprise Products Operating, L.P.
Rio Arriba County, New Mexico

Dear Mr. Roesler:

The Oil Conservation Division (OCD) performed an onsite inspection of Enterprise Products Operating, L.P., Lindrith compressor station located in unit letter I Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico on June 9, 2009.

Enterprise Products Operating shall address the following concerns (reference photos in attachment):

1. **Photos 1 – 3:** A spill occurred in early 2008. The spill has impacted ground water at a depth of 25 feet. The spill has been monitored for 1.5 years. Owner/operator shall initiate remediation as soon as possible of groundwater contamination. Submit all historical monitoring documentation to the Santa Fe office. Photo 2 – 3, two below-grade tanks are shown, one of the two tanks has fluids within its leak detection system. Owner/operator shall investigate the cause for these fluids and prove integrity of the tank.
2. **Photo 4:** This below-grade tank's leak detection system was verified to be dry. During the inspection, the leak detection systems for two of the three BGT ports were not easily accessible indicating that the leak detection systems are not frequently inspected. Owner/operator shall monitor and keep record of all leak detection systems on a monthly basis. All leaks shall be addressed accordingly. See condition 11 for details.
3. **Photo 5 - 7:** The liner within this bermed, above ground storage area has deteriorated. Photo 7, there appears to be residuals seeping through the berm. Owner/operator shall re-establish a liner for the ASTs area and clean up all contamination. Submit all proposed plans to the OCD for approval.
4. **Photo 8 – 10:** There were a few areas with visual stained soils within the facility's yard. Owner/operator shall follow best management practices to prevent such future discharges. If such discharges occur owner/operator shall address them accordingly. See Condition 14, 15, and18 for details.
5. **Photo 11:** Fluids were noted to be present within a catch basin. Owner/operator shall clean out and inspect the containment area. The presence of fluids and its below-grade construction qualifies this containment as a below-grade tank, unless the owner/operator treats it as a sump. Fluids must be removed within 72 hours. See Condition 11 and 14 for details.

6. **Photo 12 – 13:** This open top container appears to have integrity issues. There is seepage at the corners of the containment. Owner/operator shall either repair or replace container. All fluids shall be removed within 72 hours. See Condition 14 for details.

Enterprise Products Operating L.P. shall submit resolutions to all **items stated above by August 30, 2009**. If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us.

Sincerely,

Leonard Lowe
Environmental Engineer

xc: OCD District III Office, Aztec
Runell Seale, EPCO
Don Fernald, EPCO

OCD Inspection: Enterprise Largo GW - 211

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Don Fernald, Runell Seale and Clay Roesler

Date: 06.09.09 Time: 9:30 – 10:35

Photo 1: Unlined AST's where spill occurred 1.5 years ago.

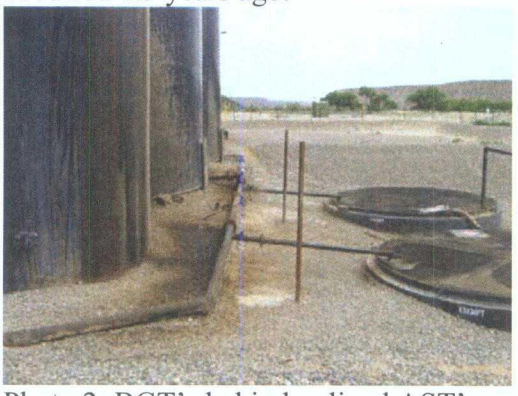

Photo 2: BGT's behind unlined AST's where spill occurred. GW impacted, as of inspection monitored only but not remediated.

Photo 3: Leak detection of one BGT has fluids the other BGT could not verify leak detection system due to un-removable port.

Photo 4: BGT verified DRY.

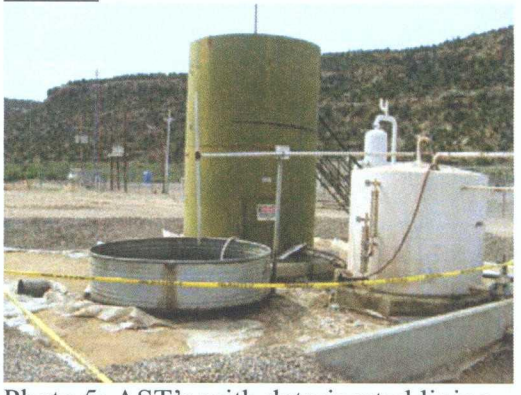

Photo 5: AST's with deteriorated lining.

Photo 6: Torn lining.

Photo 7: Exterior of bermed area of unlined AST's appears to have seepage.

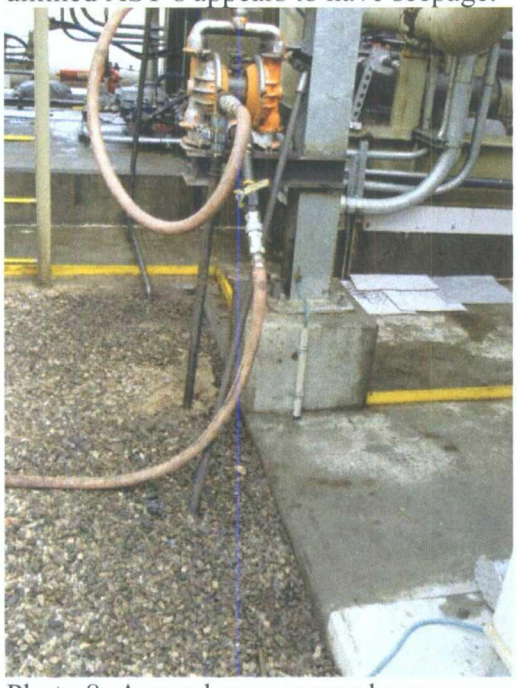

Photo 8: Around compressor have discharges on to ground.

Photo 9: Discharges around compressor.

Photo 10: Discharges near compressor.

Photo 11: Catch pan has fluids.

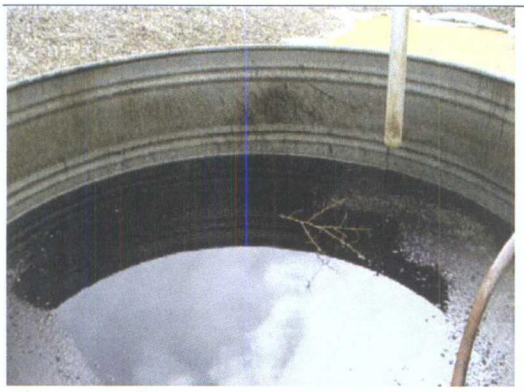

Photo 12: Containment has idle fluids, not water.

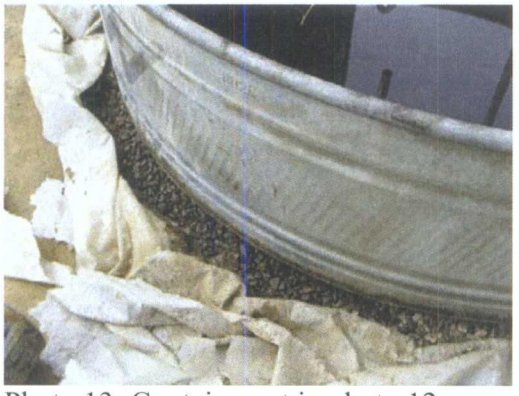

Photo 13: Containment in photo 12 appears to have seepage of contents.

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 10-12-00 Time: 10:00 Am

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-211

FACILITY NAME: LARGO COMPRESSOR STATION

PHYSICAL LOCATION: 22 MILES NORTH OF HWY 64

Legal: QTR ___ QTR ___ Sec 15 TS 26N R 7W County RIO ARRIBA

OWNER/OPERATOR (NAME) EPFS

Contact Person: DAVID BAYS Tele:# 599-2256

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

Owner/Operator Rep's: _____

OCD INSPECTORS: ED MARTIN AND DENNY FOUST

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.

OK

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.

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.

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.

OK

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 ☐

STAFF USES PORTABLE TOILETS

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.

CONTAMINATION AROUND TRIETHYLENE GLYCOL SURGE TANK. THIS NEEDS TO BE RAKED OUT AND TURNED SO EVAPORATION CAN TAKE PLACE.

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.?

No

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

Miscellaneous Comments:

Number of Photos taken at this site: _____

LARGO CS

Discharge
TRI-E SURGE TANK
SOME CONTAMINATION AROUND GLYCOL ~~STORAGE~~

AREA FOR DEHYDRATOR.

2 Compressor @ 1085 each.