GW - 227

WORK PLANS

Duke Energy® Field Services

370 17th Street, Suite 2500
Denver, Colorado 80202
303-595-3331 – main
303-605-1957 – fax

September 5, 2006

Mr. Ben Stone
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

RE: Closure Workplan
Lee Compressor Station, Lea County New Mexico (GW-227)
Unit A (NE/4 NE/4), Section 24, Township 17 South, Range 35 East

Dear Mr. Stone:

Duke Energy Field Services, LP (DEFS) has prepared the following workplan to complete a site closure at the DEFS Lee Compressor Station (GW-227) also known as the Gillespie/Feagan located in Lea County, New Mexico (Figure 1). The closure workplan was developed based on DEFS decision to cancel discharge plan GW-227 and close the site. Under the discharge plan, a closure plan must be submitted to the New Mexico Oil Conservation Division (NMOCD) for approval.

BACKGROUND INFORMATION

The site is located approximately 8 miles southwest of Lovington in Lea County, New Mexico. The legal description is Unit A of Section 24, Township 17 South, Range 35 East. The site is relatively flat with a gentle slope to the north and east. Groundwater across the site is estimated to be 43 feet below ground surface (bgs) based on the New Mexico Office of State Engineers water well database.

The site plan of the facility can be found on Figure 2. A list of remaining equipment was drafted based on the site plan and discussions with field personnel. The equipment list can be found in Appendix A.

CLOSURE ACTIVITIES

The anticipated closure activities associated with the Lee Compressor Station will entail DEFS removing all remaining equipment from the site. During the closure activities, the site will be visual inspected to determine if any hydrocarbon-impacted soil is present at the site. If no hydrocarbon-impacted soil is encountered, the site will be leveled and reseeded with native grass.

If hydrocarbon-impacted soils are encountered at the site, the impacted soil will be remediated following the NMOCD *Guidelines for Remediation of Leaks, Spills and Releases, August, 1993* and using the site characteristics as discussed in the following table to determine the remedial goals for this site.

NMOCD Ranking Criteria for the DEFS Lee Compressor Station		
Criteria	Site Characteristic	Ranking Score
Depth to Water*	43' bgs	20
Well Head Protections	> 1000 feet	0
Distance to Surface Water	200-1000 Horizontal Feet	10
Ranking Score		**30**

*New Mexico Office of State Engineers water well database.

Based on the above site specific ranking score, hydrocarbon-impacted soil, if encountered, will be remediated to the following clean up levels:

- Benzene - 10 parts per million (ppm)
- BTEX - 50 ppm
- TPH (EPA 8015M) - 100 ppm

A photo ionization detector (PID) might be used to screen potential hydrocarbon-impacted soil. If the headspace reading is ≤100 ppm, the PID reading will be used as a substitute to laboratory analysis for benzene/BTEX. If the PID is not used for screening, confirmation soil samples will be analyzed for BTEX using EPA Method 8021B.

Hydrocarbon-impacted soil that is found to be higher than the clean up criteria will be excavated and properly disposed at an NMOCD approved facility. Confirmation soil samples will then be collected within the base and sidewalls of the excavation to confirm that the hydrocarbon-impacted soils have been removed to below the NMOCD clean up standards for this site.

After the confirmation soil samples confirm the impacted soil has been removed to below the NMOCD clean up standards, the excavation will be backfilled with clean fill material and the area reseeded with native grass.

A closure report will be completed summarizing all field activities and analytical results. The closure report will also request that no further action will be needed at this site.

Upon your approval of this workplan, field activities will be scheduled. A 48 hour notice will be given to the NMOCD Hobbs district office informing them of the start up of the field activities. If you have any questions pertaining to this closure workplan, please give me a call at 303-605-1718.

Sincerely
Duke Energy Field Services, LP

Stephen Weathers P.G.
Sr. Environmental Specialist

cc: Larry Johnson - NMOCD Hobbs District Office
Lynn Ward – DEFS Midland Office
Environmental Files - Denver

Figures

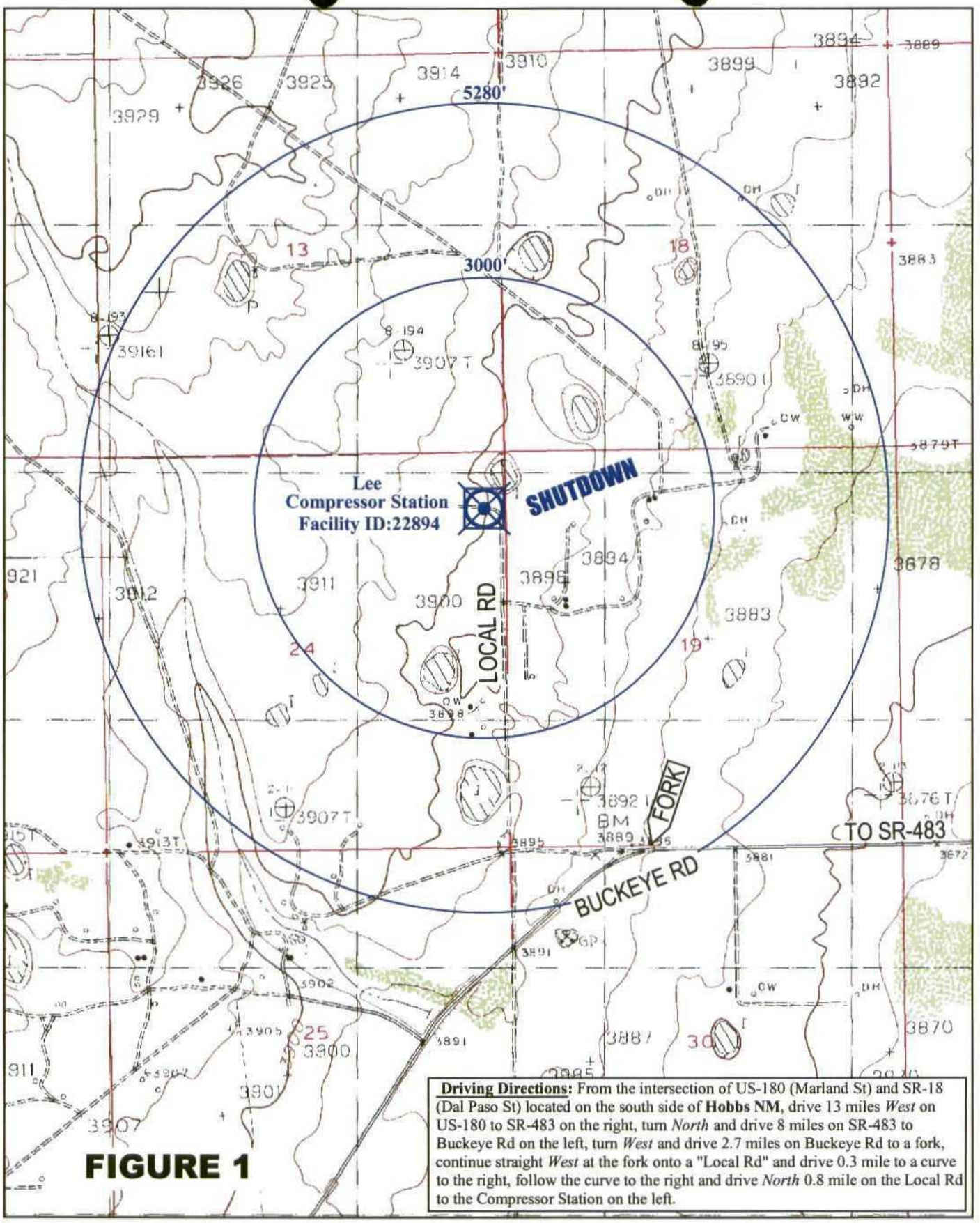

FIGURE 1

Driving Directions: From the intersection of US-180 (Marland St) and SR-18 (Dal Paso St) located on the south side of **Hobbs NM**, drive 13 miles *West* on US-180 to SR-483 on the right, turn *North* and drive 8 miles on SR-483 to Buckeye Rd on the left, turn *West* and drive 2.7 miles on Buckeye Rd to a fork, continue straight *West* at the fork onto a "Local Rd" and drive 0.3 mile to a curve to the right, follow the curve to the right and drive *North* 0.8 mile on the Local Rd to the Compressor Station on the left.

0 1 mile

0 1 kilometer

Duke Energy® Field Services

Lee Compressor Station

Lea County, New Mexico
Zone 13 UTMH 649507m UTMV 3633047m
Lat. 32° 49' 31" Long. 103° 24' 10"

PHOTO VERIFIED

VICINITY

NEW MEXICO

32103G4 Lovington SW
Source: USGS 1:24,000 scale
Drawn by: JRE
Revised by:
Date: 9-6-06
ENVIRONMENTAL AFFAIRS DEPARTMENT

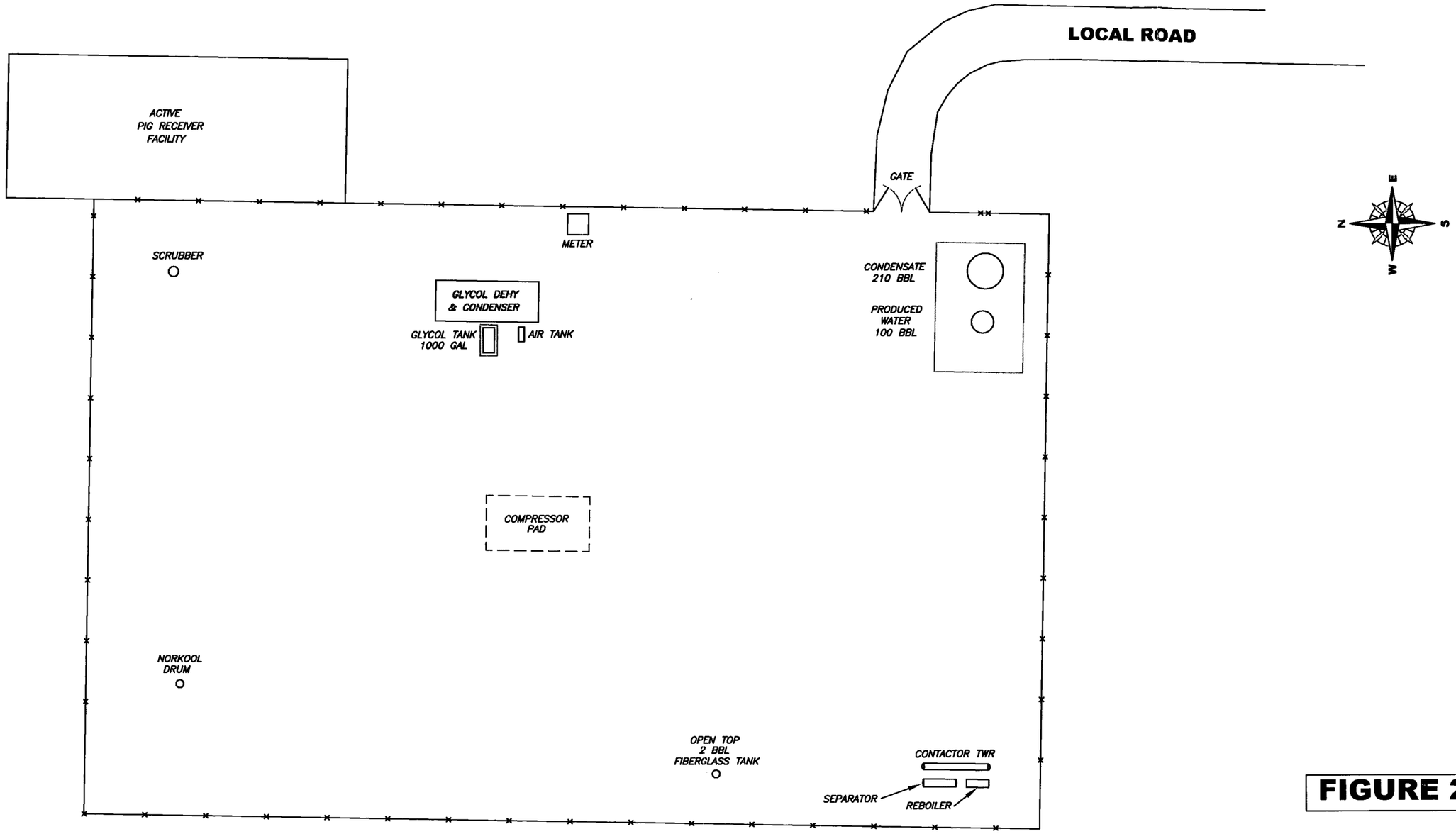

FIGURE 2

NOT TO SCALE
NOTE: SCALE IS APPROXIMATE.
DRAWING IS BASED ON A
FIELD SKETCH; ACTUAL
FACILITIES MAY VARY IN SIZE
AND POSITION FROM THOSE
REPRESENTED HERE.

PLOT PLAN

REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.
0	9-8-06	DRAWN FROM HAND SKETCH (NO DATE)	J.R.E.	S.W.W.		

REV	DATE	REVISION	BY	CHK'D	ENGR.	ENGR. MGR.

Duke Energy® Field Services

LEE COMPRESSOR STATION
LINAM GATHERING SYSTEM

Eddy County
NEW MEXICO

DWG. NO.\data\EhsDrawings\Mapping\NewMexico\Linam\Lee_Plot

Appendix A
Lee Compressor Station

Facility Description: Caliche 300' x 180'

Tanks
1 – 210 bbl Condensate Tank
1 – 100 bbl Produced Water Tank
Both tanks located inside earthen berm containment with no visible staining.

Junked Equipment located in SW corner of the site
1 – 2' x 20' Contactor Tower (Max WP 142 psi)
1 – 30" x 10' Separator (Max WP 125 psi @ 100 degrees F)
1 – Small Reboiler (no plate)
1 – approx. 2 bbl fiberglass tank (open top)

Central Area of Location
1 – 10' x 20' concrete compressor pad
1 – 55 gal drum (full) of Norkool 50/50 in the northwest corner of the location

Glycol Skid Area
Glycol dehy with condenser
1 – 36" x 10' scrubber (Max WP 750 psi @ 200 degrees F)
1 – 36" x 20 contactor (Max WP 1440 @ 100 degrees F)
1 Glycol reboiler (375,000 Btu/hr)
Burner (500,000 Btu/hr)
Concrete skid/containment 20' x 10'
1 – 55 gal drum containing glycol filters
1 – 1000 gal AST of Glycol
1 – 55 gal drum under Glycol AST of Norkool 50/50 (partially full)
1 – 20" x 4' pressure tank (Max WP 125 psi @ 250 degrees F)

Meter Run Building (No Meter)
5' x 3' concrete pad