

GW - 254

**INSPECTIONS &
DATA**

1996

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December 30, 1996

Environmental and
Oil Conservation Division

Mr. Patricio W. Sanchez
Petroleum Engineering Specialist
Environmental Bureau - - OCD
2040 South Pacheco Street
Santa Fe, NM 87505

Dear Mr. Sanchez,

RE: OCD Inspection Reports for GW-263 and GW-254

The inspection of the Animas Compressor Station was completed on October 22, 1996. The inspection report was received on October 30, 1996. In reviewing the report of the Animas Compressor Station there are no issues that need to be addressed by PNM Gas Services. All waste generated at the facility will be non-exempt and will be disposed of by OCD guidelines for non-exempt waste.

The inspection of the Star Lake Compressor Station was completed on October 23 1996. The inspection report was received on October 30, 1996.

The following addresses each issue in the report:

1. Drum Storage
All drums are properly labeled. All empty drums will be stored properly. Mark Vice is responsible for the labeling of all drums and the proper storage of empty drums. A daily inspection will be performed.
2. Process Area - No Issues
3. Above Ground Tanks:
A visual inspection of the condensate tank is done once a week. The tank is gauged and the results documented.
4. Above Ground Saddle Tanks: No Issues
5. Tank Labeling:
All tanks have been checked for proper labels. All tanks are labeled with the correct labels.
6. Below Grade Tank/Sumps
All below grade sumps are cleaned and inspected yearly and the results are documented and maintained at the facility.
7. Underground Process/Wastewater Lines:
PNM Gas Services will notify OCD at least 72 hours prior to underground process/wastewater line testing so that the OCD may have the opportunity to witness the testing.
8. Onsite/Offsite Waste Disposal and Storage Practice:
The facility does not generate Hazardous Waste and no Hazardous Waste number is required.
9. Class V Wells - No Issues

10. Housekeeping:

A preventive maintenance program is in place with daily inspection done in order to be proactive in controlling minor leaks.

11. Spill Reporting

Spill Manual Training is given annually to all employees. All spills are reported immediately to Supervision and the Environmental Department. All spills will be reported by the Environmental Department pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office.

12. Does the facility have any other potential environmental concerns/issues?

The Reverse Osmosis Unit discharges its by product to the ground and is channeled to a ranchers pond where his livestock is watered. This has been the practice for a number of years. There is an oral agreement PNM Gas Services and the rancher has in order to do this.

The discharge water from the R.O. Unit has been sent to AEN Laboratory in Albuquerque for analysis. The results of the analysis will be sent to the OCD immediately upon receipt of the results by PNM Gas Services

13. Does the facility have any other environmental permits, i.e. SPCC, Storm Water, etc.?

The facility does not require a storm water plan. The facility does have a SPCC plan. The lagoons may have been permitted at one time, but no longer require a permit or inspection by the State.,

The lagoons were inspected by the State Land Office when Star Lake had a resident population of

35. The number of residents at Star Lake currently is about 5.

The lagoons receive only domestic toilet/gray/black water. No industrial effluent is released to the ponds.

If you have any questions, you can contact me at 324-3763.

Sincerely,



Denver Bearden
Administrator III
Environmental Services Department

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Environment Bureau
Oil Conservation Division

cc: Denny Foutz
Jesse Evans
Gerald Crespin
Jean Arya

DISCHARGE PLAN INSPECTION

FACILITY NAME: GW-254 LOCATION: SE/4 Section 15,
Township 29 North, Range 13 West, NMPM, San Juan
County, New Mexico. "Animas Compressor Station"

DATE: 10/22/96 OWNER: PNMGS

OCD INSPECTORS: Denny Faust and Pat Sanchez
"New Facility Discharge Plan." (Photos did not develop)

1. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

No Compliance issues.

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.

No Compliance issues.

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 facilities or modifications to existing facilities must place the tank on an impermeable type pad.

No Compliance Issues.

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.

No Compliance Issues.

5. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

No Compliance Issues.

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 that do not have secondary containment and leak detection 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 /or sumps.

No Compliance issues.

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 there after. Companies 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 so that an OCD representative may witness the testing.

No Compliance issues.

8. **Onsite/Offsite Waste disposal and storage practices,** are all non-exempt wastes properly characterized and disposed of? Does the facility have an EPA hazardous waste number?

No compliance issues. All wastes are Non-exempt.

9. **Class V Wells:** Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

Non-applicable.

10. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure. Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

No compliance issues.

11. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office.

No compliance issues.

12. **Does the facility have any other potential environmental concerns/issues?**

No other potential concerns identified -
- facility appears to be well maintained.

13. **Does the facility have any other environmental permits - i.e. SPCC, Storm water Plan, etc?**

Did not ask the question of facility personnel.