

GW - 344  
"LIVE"

INSPECTION

## **Lowe, Leonard, EMNRD**

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**From:** Lingnau, James A. [JLingnau@targaresources.com]  
**Sent:** Friday, July 31, 2009 10:40 AM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Wrangham, Calvin W.; Woodell, Rebecca F  
**Subject:** FW: South Eunice GW-344 Sump Closure Request  
**Attachments:** Eunice South Compressor Station BGT Location.jpg

Leonard,

See plot plan attached showing relative location of the new BGT per your request.

Thank you for your prompt response,

James Lingnau  
Eunice Area Manager

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**From:** Wrangham, Calvin W.  
**Sent:** Thursday, July 30, 2009 12:34 PM  
**To:** Lingnau, James A.  
**Cc:** Keiser, Jessica; Ninan, Susan V.  
**Subject:** FW: South Eunice GW-344 Sump Closure Request

James, I talked Leonard a few minutes ago on this. Can you do a sketch to show where the BGT is going to be in relation to the station? Maybe mark it on a plot plan. Scan and email to him. Then we should do soil samples under the proposed tank area before we pour the secondary containment concrete so we have background info for later. Then we are okay to proceed as he details below.

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**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Thursday, July 30, 2009 12:25 PM  
**To:** Wrangham, Calvin W.  
**Cc:** Johnson, Larry, EMNRD; Leking, Geoffrey R, EMNRD  
**Subject:** RE: South Eunice GW-344 Sump Closure Request

Mr. Wrangham,

Good afternoon,

Thank you for your submittal of the removal of the TWO Below-Grade tanks located between Compressors # 30 & # 31 at the Eunice South Compressor Station.

The OCD approves the submitted plan for BGT removal per the following conditions.

The design of the replacement BGT is approved.

- OCD request a schematic of where this new tank will be located.
- OCD request that photographs be taken during the installation of this tank and when completed.
- OCD *recommends* that a back ground soil sample be taken prior to the pouring of the concrete. This may be used for future references that will benefit Targa

Removal of the two below-grade tanks.

- OCD request that photographs be taken during the removal process of these tanks.
- OCD request a schematic of locations where soil samples were taken.

- Where does Targa intend to dispose of the removed tanks?

Submit a final report to the OCD once all work is done pertaining to these tanks. Notify OCD upon new findings during this work.

Notify the Hobbs OCD office, Larry Johnson or Geoffrey Leking, Environmental representatives when the Below-grade tanks are about to be removed. They may want to witness.

I will be waiting on the above information.

Thank you for your attention.

llowe

**Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

---

**From:** Wrangham, Calvin W. [mailto:CWrangham@targaresources.com]  
**Sent:** Monday, July 20, 2009 3:11 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Lingnau, James A.; Keiser, Jessica; Woodell, Rebecca F; Ninan, Susan V.; Embrey, Donald M  
**Subject:** South Eunice GW-344 Sump Closure Request

Mr. Lowe, per our conversation find attached the BGT closure information. A hard copy is in the mail to yourself and Mr. von Gonten. Please respond as soon as possible. Targa has crews working at the site and is ready to begin BGT secondary containment construction.

Thanks, Cal Wrangham.

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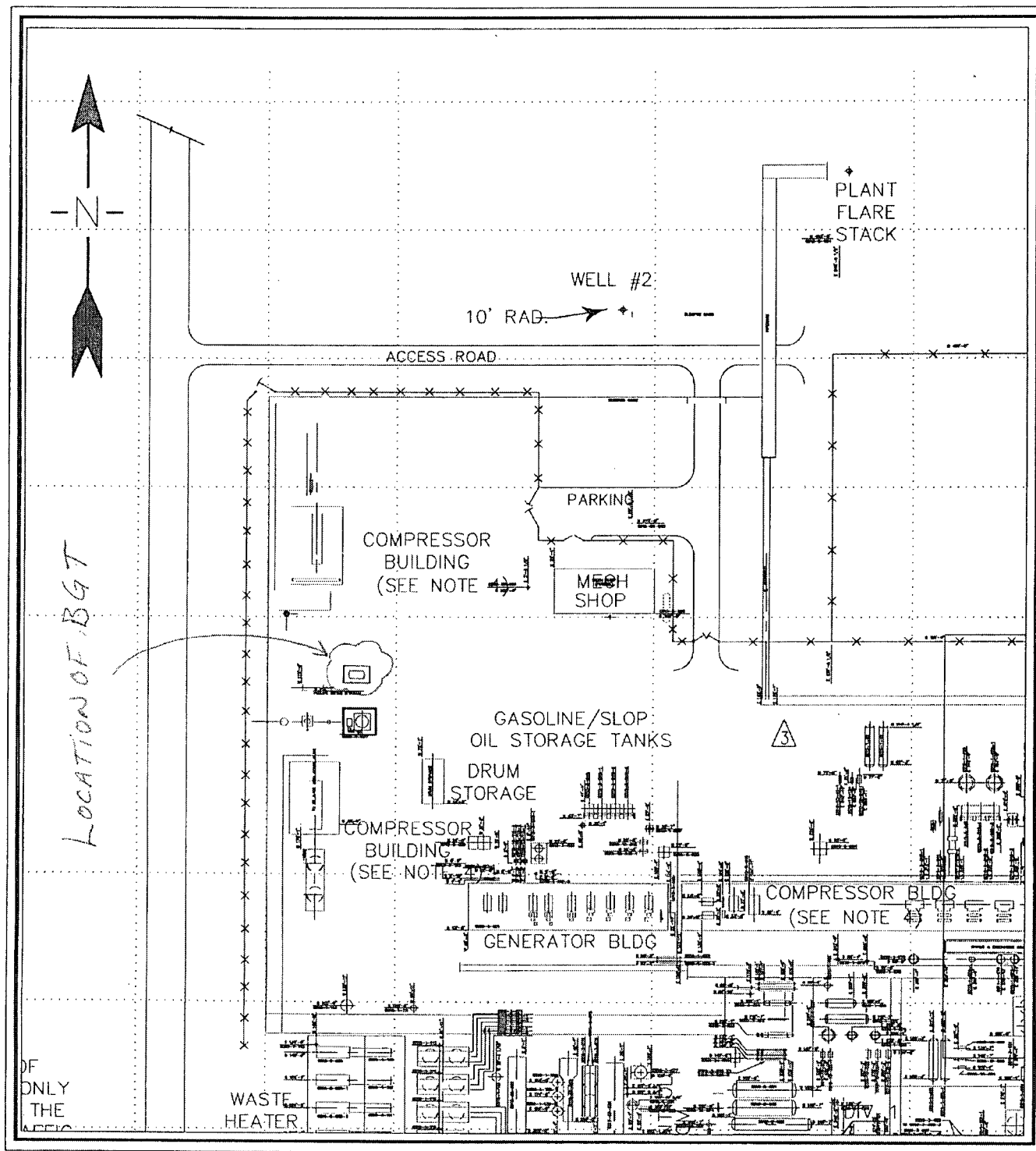
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**TARGA**

SOUTH EUNICE BOOSTER  
PLOT PLAN  
NW CORNER

## **Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Tuesday, July 07, 2009 4:25 PM  
**To:** 'Wrangham, Calvin W.'  
**Cc:** Johnson, Larry, EMNRD; Hill, Larry, EMNRD  
**Subject:** Inspection Report GW-344 COMPLETE RESPONSE

Mr. Wrangham,

OCD's response to your June 30, 2009 letter in reference to the GW-344 Inspection Letter

1. All AST's holding fluids other than clean water or are gaseous at STP shall have proper berms with sufficient volume capacity for secondary containment. Any structures that are not within the operating realm of the S. Eunice compressor stations shall be addressed so. All secondary containments shall be kept clean of debris.
2. **Addressed in previous e-mail. OCD will be waiting on closure work plan.**
3. Targa shall keep these and such containers clean.
4. Targa shall address all leaks in a timely manner.
5. **Addressed in previous e-mail. OCD will be waiting on closure work plan.**
6. Targa shall reference Condition 15 of their permit to address this discharge. Targa shall keep OCD informed on the progress implementing preventive measures to keep such discharges from occurring.
7. Targa is reminded that covering up contaminated soils is NOT ALLOWED. Doing so will result in WQCC penalties, 20.6.2.1219 PENALTIES ENFORCEMENT, COMPLIANCE ORDERS, PENALTIES, ASSURANCE OF DISCONTINUANCE. OCD will be waiting on the final results of the testing and removal of additional soils.
8. Targa shall ensure that all containment areas are properly maintained.

The OCD appreciates Targa's efforts to resolve these issues.

Targa shall submit progress reports for the following numbered items, 2, 5, 6, 7 until final resolution on September 30, 2009.

llowe

### **Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

## **Lowe, Leonard, EMNRD**

---

**From:** Wrangham, Calvin W. [CWrangham@targaresources.com]  
**Sent:** Monday, July 06, 2009 4:05 PM  
**To:** Lowe, Leonard, EMNRD  
**Subject:** RE: Inspection Report GW-344

Thanks.

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**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Monday, July 06, 2009 5:02 PM  
**To:** Wrangham, Calvin W.  
**Cc:** mark@laenvironmental.com  
**Subject:** Inspection Report GW-344

Mr. Wrangham,

As per our conversation this afternoon in reference to your recently submitted response to the OCD Inspection letter:

The **OCD grants your extension request** to September 30, 2009 of your closure plans of all current below grade tanks located at the site.

Reference your discharge permit, GW-344 condition 15, for spill reporting.

1. Submit a C-141 for all releases
2. Submit a work plan for procedures to remove each below-grade tank
3. Refer to the OCD rules for testing around below-grade tanks
4. OCD approval is needed prior to installing new below-grade tanks

The OCD does not require Targa to submit a modification to the discharge application for this work. These concerns were identified by OCD and are being addressed accordingly through the inspection letter. All modifications will be addressed on the next discharge plan renewal application, due 120 days before July 12, 2011.

I will send a full response to all your replies stated within the June 30, 2009 letter later.

llowe

**Leonard Lowe**  
Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

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**TARGA**

RECEIVED

2009 JUL 6 PM 1 38

June 30, 2009

Mr. Glenn von Gonten  
Acting Environmental Bureau Chief  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Re:    *Inspection Report – GW-344  
Versado Gas Processors LLC  
Eunice South Compressor Station  
Lea County, New Mexico***

Dear Mr. von Gonten:

Versado Gas Processors LLC (Versado) is jointly owned by Texaco Exploration and Production, a wholly-owned subsidiary of Chevron Corporation, and Targa Midstream Services Limited Partnership (Targa). Targa serves as the operator of Versado's facilities. Targa is in receipt of the Oil Conservation Division's (OCD) inspection report (report) for the Eunice South Compressor Station in Lea County, New Mexico dated May 14, 2009. The inspection was performed on April 21, 2009.

Targa takes its environmental obligations very seriously. Upon receipt of the report, Targa began an immediate response to the investigator's alleged violations. Targa has requested personnel of Larson & Associates, Inc. (LAI) to review the letter and address certain items that the OCD identified as possible violations of its discharge permit. Items to be addressed by LAI include:

1. Preparing closure plans for the two (2) existing drain sumps (below grade tanks) located between the compressor buildings near the west side of the facility. Targa is committed to replacing the sumps with a new sump that meets the requirements and rules of the OCD. The new sump will utilize components of the existing main sump, which meets the OCD's requirements, located near the east-central area of the facility. Installation of the new sump may require a modification to discharge permit GW-344 and LAI has been charged with preparing the modification request as well as a plan for closing the current location of the main sump.
2. In addition, LAI will inspect areas identified by the OCD as requiring maintenance to ensure that Targa has complied with the request of the OCD.

The OCD imposed a deadline of July 1, 2009, for Targa to address the deficiencies and submit a report. Targa requests additional time to submit a response due to the decision to close the sumps and construct a new sump. Targa requests the OCD to grant an extension until **September 30, 2009**, to submit the closure plan(s) and permit modification for the replacement sump. Your approval of this request is appreciated.

Targa is committed to meeting or exceeding the OCD's expectations with respect to environmental compliance in the operation of not only its South Eunice Compressor Station, but at all of its operations in New Mexico. We look forward to resolving these issues in our operations and ensuring that items such as these are not repeated.

The following serves to provide a response to each of the alleged violation as well as address other concerns outlined by the OCD in the report. Targa would be pleased to meet with the OCD to review the plans and outlines for completing all the work at the Department's convenience.

***Alleged Violation***

- 1. Photo 1-5, and 12 – The secondary containment are full of debris and sediments. One berm is deteriorated. Excess materials in these containments reduce the 133% volume needed to sustain the large volume.***

Photo 1. As communicated during the inspection this secondary containment and the equipment within it was taken out of service in 2000 when the processing plant was shutdown. This equipment is being demolished and removed.

Photo 2-5. These concrete pads are not intended to be secondary containment. The equipment in this area is pressure vessels and piping. There are no storage tanks. Targa has cleaned the concrete areas of debris and blow sand.

Photo 12. This area is within the secondary containment around a lubricating oil storage tank. Blow sand continually accumulates in these areas. The area has been cleaned and the containment visually inspected for integrity.

***Alleged Violation***

- 2. Photo 6-8 – The secondary containment for the below grade tanks must be cleaned out and inspected or leaks. This containment should be kept clean at all times other than for its intended use of catching fluids. A few cracks were noted on the outer edge of the cement berm. A secondary containment is meant to catch fluids and not to hold them indefinitely. At the time of the inspection, Targa was not able to determine the integrity of the secondary containment. Targa shall clean, inspect, and prove integrity of the containment and properly maintain the below grade tank. OCD does not consider this to be a sump.***

This below grade tank's containment was visually inspected and did not show any signs of cracking other than that along the top edge of the cement as seen in photo #8. Targa plans to remove this tank from service in its current location and will be moved to a new location to replace the two sumps on the West side of the plant near the engines.

A closure plan will be submitted for the removal of this tank.

***Alleged Violation***

- 3. Photo 9 – Catch pan needs to be cleaned and properly maintained. Targa shall ensure that all catch pans are properly maintained and that no fluids are left standing for greater than 72 hours.***

The blow sand and debris in the catch pan has been removed. Targa employees have been instructed to monitor and remove liquids from containment areas within 72 hours.

***Alleged Violation***

- 4. Photo 10 & 11 – A leaking conduit was noted. Targa shall ensure that such scenarios are addressed in a timely manner and any discharges on the ground be properly cleaned up.***

The piping was stained from a previous leak. The piping has been cleaned and will be monitored.

***Alleged Violation***

5. ***Photo 13-26 – Two below grade tanks located between the compressor buildings appear to have their contents discharged on the ground. At the time of inspection there were several indications of new soil dispersed over contaminated soil areas, in particular photo 16-18. The covering of contaminated areas is not remediating the problem, but only increasing the waste volume. Targa shall immediately clean up all contamination around the below grade tanks. Targa shall cease the practice of covering contaminated areas with clean soil. Targa shall investigate the cause of the discharge from the below grade tanks and place measures to prevent such future discharges.***

The contaminated soil around these sumps is being removed by hand digging. The majority of the soil has been removed but the process has been slow due to the areas under the pipe racks. The soil will be tested and further removal will be done as necessary to meet OCD guidelines. Targa plans to remove these two sumps and replace with the below ground tank discussed in item #2.

A closure plan will be submitted for the removal of these two sumps.

***Alleged Violation***

6. ***Photo 27 & 32-35 – The northern most compressor building has hydrocarbon leaking from the building on to the ground. Targa shall investigate the cause of these discharges and prevent it from reoccurring. Targa shall clean up and properly dispose of the soil contamination. It appears the building floor catch basin has overflowed. Targa shall clean out the basin of the two compressor buildings.***

The soil behind the northern most compressor building has been removed. The floor basin below the engine room grating has been cleaned on the North engine room and is in progress on the South engine room. The drains in these buildings were installed on a level surface without a sloping grade to properly catch fluids. Targa is in the process of installing an angle iron retaining rail to prevent fluids from leaving the buildings.

***Alleged Violation***

7. ***Photo 28-31 – There is evidence of clean soil being placed over contaminated areas. This is not an allowable practice and is a violation of the discharge permit.***

The contaminated soil identified in these photos has been removed. The area will be tested and further removal will be done as necessary to meet OCD clean up guidelines. Employee training on DP has been completed (June 18) to ensure employees are aware of appropriate cleanup practices.

***Alleged Violation***

8. ***Photo 36-38 – OCD performed an inspection of this facility on January 31, 2006 and determined there was a housekeeping issue with these above ground storage tanks. These tanks were found to be in the same condition during this inspection as previously noted. Targa shall immediately clean out the secondary containment and inspect the integrity of the liner.***

The blow sand and debris has been removed from this area. Targa addressed this area after the previous inspection as noted but it continues to accumulate blow sand and tumble weeds as seen in these photos. The liner was visually inspected for rips, tears, or other integrity concerns and appears to be in good condition.

The report also requested that Targa inform their employees of the discharge plan permit conditions GW-344. Targa ES&H personnel held a training session for all Eunice employees on June 18, 2009. Training for Monument Area employees to review their discharge plan permit was conducted during the 1<sup>st</sup> quarter 2009 and training for Saunders is scheduled for July, 2009.

Targa is also auditing the other permitted facilities for compliance with their discharge plans and addressing any potential items.

Also, please find the answers to your questions from the report:

1. What is the volume capacity of the two below grade tanks? Targa is planning to remove these tanks from service. The volume is approximately 620 gallons.
2. Are these below grade tanks engineered with a secondary containment with leak detection? If so provide the monitoring record for each. Targa is planning to remove these tanks from service. The secondary containment is concrete and did not have inspection ports.
3. What fluids are contained in these tanks? Targa is planning to remove these tanks from service. The fluids include lube oil, water, and condensate.
4. Determine the cause of the leak and spills from the compressor buildings. The drains in these buildings were installed on a level surface without a sloping grade to properly catch fluids.
5. What does Targa intend to do to prevent future leaking from the compressor buildings? Targa is in the process of installing an angle iron retaining rail to prevent fluids from leaving these buildings. See response to No. 6 alleged violation above.

Please contact me at (432) 425-7072 or by email at [cwrangham@targaresources.com](mailto:cwrangham@targaresources.com) , or James Lingnau, Eunice area Manager at (575) 394-2534 ext 226 or by email at [jlingnau@targaresources.com](mailto:jlingnau@targaresources.com) if you have any questions or require additional information. Thank You.

Sincerely,  
**Targa Midstream Services Limited Partnership**



Cal Wrangham  
ES&H Manager

Attachments

Cc: Mr. Leonard Lowe, OCD  
Mr. Larry Johnson, Environmental Engineer, District I Hobbs  
Mr. Clark White, Targa - Vice President  
Mr. James Lingnau, Targa – Eunice Area Manager  
Ms. Jessica L. Keiser, Targa – Assistant VP ES&H

**Lowe, Leonard, EMNRD**

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Thursday, May 14, 2009 2:56 PM  
**To:** VonGonten, Glenn, EMNRD  
**Cc:** 'Homer, Jenee' M'; Sanchez, Daniel J., EMNRD; Johnson, Larry, EMNRD  
**Subject:** GW-344, Inspection - NOV letter  
**Attachments:** NOV-Inspection Letter.pdf

This was sent out to Mr. Cal Wrangham of Targa Resources today.

llowe

**Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
Office: 505-476-3492  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>

# New Mexico Energy, Minerals and Natural Resources Department

**Bill Richardson**

Governor

Joanna Prukop

Cabinet Secretary

Reese Fullerton

Deputy Cabinet Secretary

Mark Fesmire

Division Director

Oil Conservation Division



May 14, 2009

Cal Wrangham  
6 Desta Drive, Suite 3300  
Midland, Texas 79705

**IMMEDIATE ATTENTION REQUIRED- DEADLINE ENCLOSED**  
**CERTIFIED LETTER: 7002 2030 0003 3687 5275**

**Subject: Notice of Violation**

**Re: Inspection Report, GW-344**  
**Eunice – South Compressor Station**  
**Targa Resources Inc.**  
**Lea County, New Mexico**

Dear Mr. Wrangham:

The Oil Conservation Division (OCD) performed an inspection of Targa's Eunice – South Compressor Station located in Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico on Tuesday, April 21, 2009. This facility's permit expires on July 12, 2011.

The inspection concluded the following (reference photos in attachment):

1. **Photo 1 – 5 & 12:** The secondary containments are full of debris and sediments. One berm is deteriorated. Excess materials in these containments reduce the 133% volume needed to sustain the largest volume. Targa shall clean out and properly maintain these secondary containments. Reference *Condition 9* of the permit for details.
2. **Photo 6 – 8:** The secondary containment for the below-grade tank must be cleaned out and inspected for leaks. This containment should be kept clean at all times other than for its intended use of catching fluids. A few cracks were noted on the outer edge of the cement berm. A secondary containment is meant to catch fluids and not to hold them indefinitely. At the time of inspection Targa was not able to determine the integrity of the secondary containment. Targa shall clean, inspect and prove integrity of the containment and properly maintain the below grade tank. Targa shall submit the latest hydrostatic test report for all drain lines to this below grade tank. OCD does not consider this to be a sump.
3. **Photo 9:** Catch pan needs to be cleaned and properly maintained. Targa shall ensure that all catch pans are properly maintained and that no fluids are left standing greater than 72 hours. Reference *Condition 14* of your permit for details.
4. **Photo 10 & 11:** A leaking conduit was noted. Targa shall ensure that such scenarios are addressed in a timely manner and any discharges on to the ground be properly cleaned up.

Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462 \* <http://www.emnrd.state.nm.us>



5. **Photo 13 – 26:** Two below-grade tanks located between the compressor buildings appear to have their contents discharged on to the ground. At the time of inspection there were several indications of new soil dispersed over contaminated soil areas, in particular photos 16 – 18. The covering of contaminated areas is not remediating the problem, but only increasing the waste volume. Targa shall immediately clean up all contamination around the below grade tanks. Targa shall cease the practice of covering contaminated areas with clean soil. Targa shall investigate the cause of the discharge from the below grade tanks and place measures to prevent such future discharges.
6. **Photo 27 & 32 - 35:** The northern most compressor building has hydrocarbon leaking from the building on to the ground. Targa shall investigate the cause of these discharges and prevent it from reoccurring. Targa shall clean up and properly dispose of the soil contamination. It appears that the building floor catch basin has overflowed. Targa shall clean out the basin of the two compressor buildings.
7. **Photo 28 – 31:** There is evidence of clean soil being placed over contaminated areas. This is not an allowable practice and is a violation of the discharge permit.
8. **Photo 36 – 38:** OCD performed an inspection of this facility on January 31, 2006 and determined that there was a housekeeping issue with these above ground storage tanks. These tanks were found to be in the same condition during this inspection as previously noted. Targa shall immediate clean out the secondary containment and inspect the integrity of the liner.

**OCD has determined that Targa is in violation of its discharge permit.** Targa Resources, Inc. shall address these concerns **by July 1, 2009**. Upon completion Targa must submit a final report with accompanying photos to OCD's Santa Fe office for review.

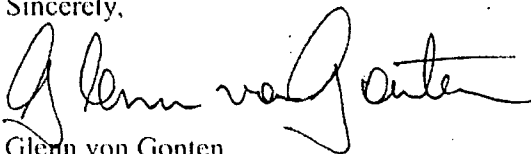
Targa Resources Inc. must inform their employees of the discharge plan permit conditions GW-344. Targa Resources Inc. must review their other permitted facilities and address all items within their permit conditions.

Targa Resources shall address these inquiries:

1. What is the volume capacity of the two below-grade tanks?
2. Are these below grade tanks engineered with a secondary containment with leak detection? If so provide the monitor record for each tank.
3. What fluids are contained in these tanks?
4. Determine the cause of the leaks and spills from the compressor buildings.
5. What does Targa intend to do to prevent future leaking from the compressor buildings?

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us).

Sincerely,



Glenn von Gonten

Acting Environmental Bureau Chief

xc: Jence' Homer, Project Manager Chevron  
Larry Johnson, Environmental Engineer, District I Hobbs

Mr. Cal Wrangham  
May 14, 2009  
Page 3

Daniel Sanchez, Enforcement and Compliance manager

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

Time: 8:10 – 11:00

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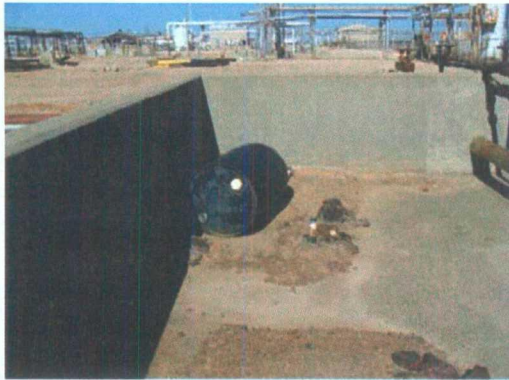


Photo 1: Debris in secondary containment.



Photo 2: Waste in secondary containment.



Photo 3: Used filters near secondary containment.



Photo 4: Sediment in secondary containment.



Photo 5: Breached secondary containment wall.



Photo 6: Large below grade tank located within the gas plant boundaries, east of the compressor station.

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

Time: 8:10 – 11:00

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Photo 7: BGT with residuals in secondary containment area.

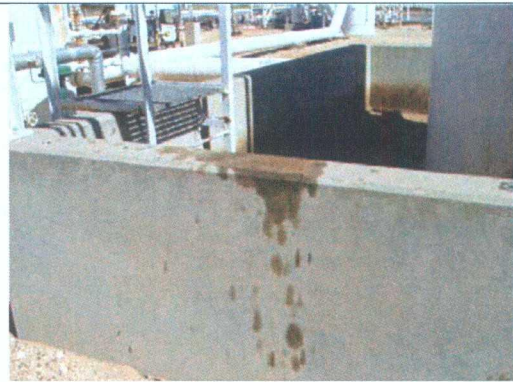


Photo 10: Leaking on to berm wall.



Photo 8: BGT with cracked containment.



Photo 11: Source of leak ID in Photo 10.



Photo 9: Drip pan with sediments.



Photo 12: Sediment and hydrocarbon staining in secondary containment area.

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

Time: 8:10 – 11:00

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Photo 13: BGT located between compressor buildings.



Photo 16: New soil with exposed contamination.



Photo 14: Another BGT located between compressor buildings.



Photo 17: New soil around BGT area.



Photo 15: New soil around leaked conduits near BGT's.



Photo 18: New soil.

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

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Photo 19: Contaminated soil.



Photo 22: Contaminated soil.



Photo 20: Close up of contaminated soil.



Photo 23: Contaminated soil.



Photo 21: BGT with new soil and contaminated soil around.



Photo 24: Contaminated soil.

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

Time: 8:10 – 11:00

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Photo 25: Contaminated soil around BGT.



Photo 26: Contaminated soil around BGT.

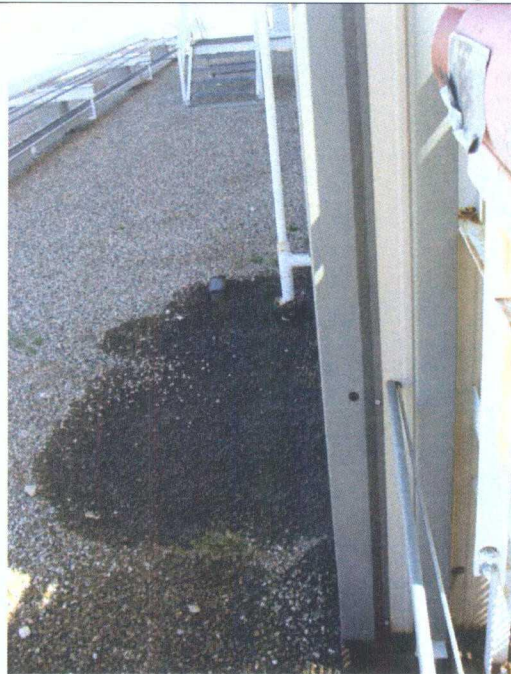


Photo 27: Hydrocarbon fluids leaked from compressor building.

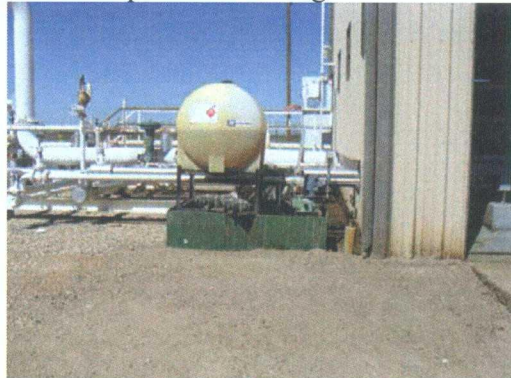


Photo 28: New soil located at entrance of compressor building.

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

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Photo 29: New soil near compressor building entrance exposed underlying contaminated soil.



Photo 32: Contaminated soil near compressor building.



Photo 30: New soil near large door of compressor building.



Photo 33: Exposed contaminated soil near compressor building.



Photo 31: Cleaned area around compressor building location.



Photo 34: Contaminated soil near compressor building.

OCD Inspection: Targa, Eunice South C.S., GW - 344

Inspector(s): Leonard Lowe

Company Rep: Jenee' Homer, Cal Wrangham and Associates

Date: 04.21.09

Time: 8:10 – 11:00

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Photo 35: Hydrocarbon waste breaching the compressor building.



Photo 38: \*\* These tanks were noted in a previous inspection, 01/31/06. \*\*



Photo 36: \*\* These tanks were noted in a previous inspection, 01/31/06. \*\*



Photo 37: \*\* These tanks were noted in a previous inspection, 01/31/06. \*\*