

GW - 298

INSPECTION

(Drain-lines, Sump, BGT, Site, etc.)

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 07, 2009 12:15 PM
To: 'bhebert@eprod.com'
Cc: 'Fernald, Donald'; Seale, Runell
Subject: GW-298, Martinez Canyon CS OCD Response

Ms. Hebert,

The OCD has reviewed the submitted response from Enterprise on the OCD inspection, permit condition 16.

The OCD appreciates Enterprises efforts to resolving the permit condition issues.

All items are considered resolved except for Item 3, lining of AST's OR removing AST's in general and rerouting all fluids to Chaco Plant. Being that there has not been a decision yet as to what route Enterprise wishes to take. OCD likes both options. Once Enterprise decides what they intend to do, submit those plans to the OCD for final approval.

Please keep OCD informed on what was decided upon for the above ground storage tanks.

llowe

Leonard Lowe

Environmental Engineer
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ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER

July 31, 2009

Certified Mail
7008 3230 0002 4472 9553

Mr. Glenn von Gonten, Acting Environmental Bureau Chief
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1220 St. Frances Drive
Santa Fe, NM 87505

**Re: Enterprise Field Services, LLC
Martinez Canyon Compressor Station -GW-298
SE/4, SE/4, Section 16, Township 27 North, Range 6 West, NMPM
Rio Arriba County, NM**

Dear Mr. von Gonten:

Enterprise Field Services, LLC (Enterprise) is submitting this letter in response to the site inspection conducted at the Martinez Canyon Compressor Station on June 9, 2009, and items listed in Number 16 of the Discharge Permit approval conditions.

- ✓ 1. The facility has four (4) below grade tanks which are designed with secondary walls and inspection ports. A monthly inspection procedure for the facility tanks has been implemented. A copy of the most recent inspection is included in Attachment "A".
- ✓ 2. The tanks on site have been properly labeled and include the National Fire Protection Agency diamond labels, tank number and tank contents. Drums or other smaller containers have been removed from the site or will be labeled appropriately if to be used or stored at the facility. Photographs of these corrective actions are included in Attachment "B".
3. Above ground storage tanks are required to be properly lined. Enterprise is currently evaluating the need for removing condensate and produced water liquids from the facility gathering system at Martinez Canyon Compressor Station and storing the liquids at the facility until they can be trucked to another facility for processing. This evaluation includes collecting the liquids in a pressurized vessel at the station inlet and then injecting the liquids into the facility discharge pipeline. The liquids would be then carried via pipeline further downstream for processing at a central facility (Chaco Plant). Once the engineering evaluation is completed, Enterprise will determine if such a project is feasible and if so, will notify the NMOCD that the liquid storage facilities at Martinez Canyon Compressor Station will be removed in 2010.

STILL
OPEN

Enterprise Field Services, LLC
Martinez Canyon Compressor Station -GW-298
SE/4, SE/4, Section 16, Township 27 North, Range 6 West, NMPM
Rio Arriba County, NM

If the project is not deemed feasible, Enterprise will proceed with installing a lined containment system in 2010. The containment system would accommodate 133% of the liquids from the largest tank or combination thereof if they have a common header. The lined containment system would likely be a combination of solar resistant 30 mil HDPE and spray-on liner. Several of these lined containment systems have been installed and found to be adequate to handle releases and spills from the tanks. Additionally, the liner would not be covered with gravel or other material to allow inspection of the integrity of the liner on a routine basis (documented monthly) and removal of accumulated liquids within the containment. A photo of a similarly installed system is included in Attachment "C".

If you have questions or require additional information, please contact Don Fernald, Environmental Scientist at (505) 599-2141 or me directly at (713) 381-6518.

Yours truly,

Enterprise Field Services LLC
Enterprise Products Operating LLC



Mary E. Hebert
Director, Environmental Compliance

/sjn
attachments

Enterprise Field Services, LLC
Martinez Canyon Compressor Station -GW-298
SE/4, SE/4, Section 16, Township 27 North, Range 6 West, NMPM
Rio Arriba County, NM

Attachment "A"
Facility Monthly Inspection Checklist to comply with NMOCD
Discharge Permit and SPCC Requirements

Enterprise Field Services, LLC
Martinez Canyon Compressor Station -GW-298
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Rio Arriba County, NM

MONTHLY \$2.00 INSPECTION FEE / SPEED DISCHARGE PLAN INSPECTION FEE \$50

Marine Gascon, Computer Station

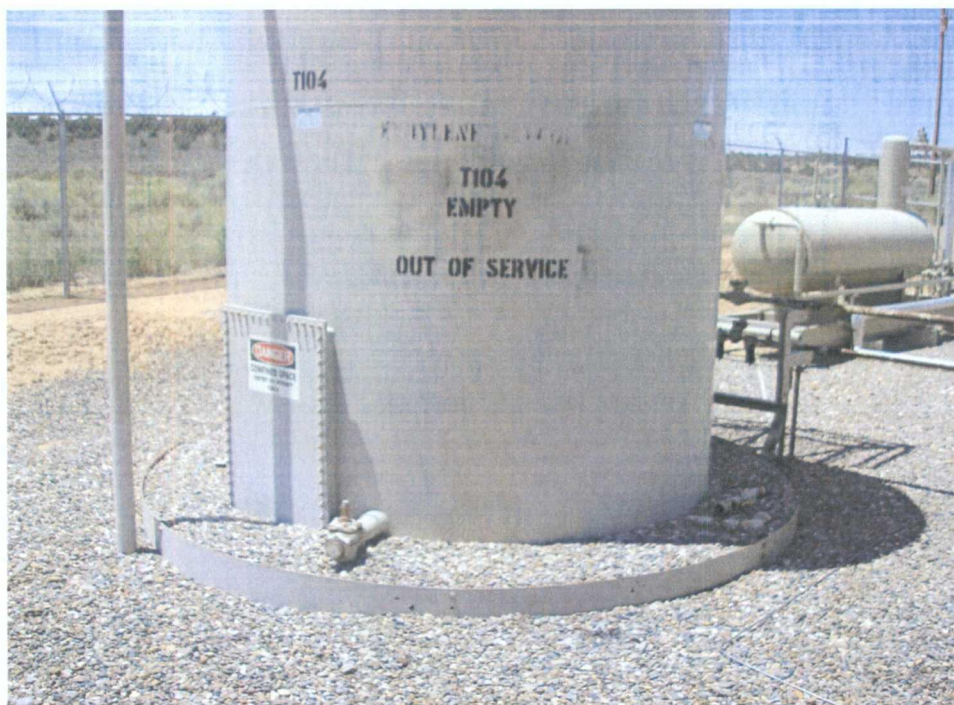
[illegible]

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Martinez Canyon Compressor Station -GW-298
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Rio Arriba County, NM

Attachment "B"
Facility Labeling and Signage

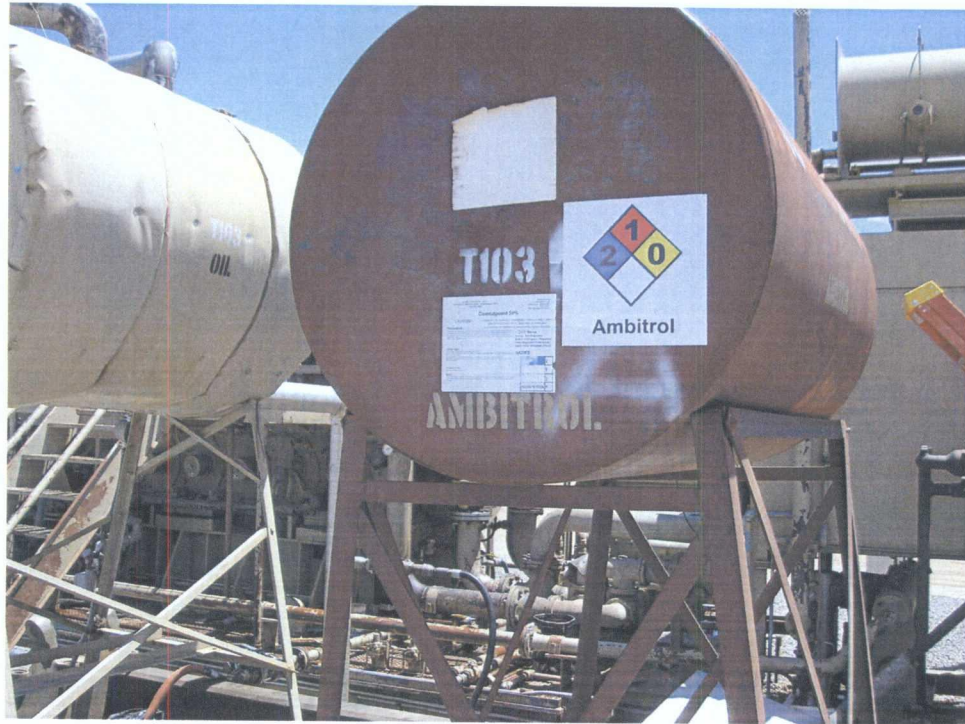


Sub-Drain Tanks labeled "Condensate" with NFPA Diamond.



Out of Service Tank

Enterprise Field Services, LLC
Martinez Canyon Compressor Station -GW-298
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Ambitrol Tank with label.



Sub-Grade Waste Oil Tank (Non-Exempt) with label.

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Sub-Grade drain tank used to capture condensate/produced (exempt) water from pigging operations with label.

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Small container used to drain filters and for temporary storage of used oil

Attachment "C"

Photo of facility liquids storage with lined secondary containment system that may be implemented at Martinez if tanks are to remain in place.

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16. OCD Inspections: The OCD performed an inspection of this facility on June 9, 2009. Mr. Clay Roesler and Runell Seale witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this, OCD inspection concluded the following:

1. **Photo 1 – 3:** The facility has 4 below grade tanks. They are all designed with a secondary containment (tank within a tank) with a leak detection system. Verification of leak detection systems were all found to be dry. During the inspection, the leak detection system for all BGT ports were not easily accessible indicating that the leak detection system are not frequently inspected. The owner/operator shall monitor and keep record of these leak detection systems on a monthly basis. See Condition 11 for details.
2. **Photo 4 – 6:** Containers were not labeled. The owner/operator shall properly label all containers. See Condition 10 for details.
3. **Photo 7 – 10:** All above ground storage tanks (AST) need to be properly lined. The owner/operator shall submit to the OCD a work plan to line all above ground storage tanks. See Condition 9 for details. This was also noted in the 2003 permit, Condition 6. At the time of inspection tanks were still not lined. **Enterprise is currently in violation of their discharge permit.**

Enterprise shall resolve items 1 and 2 and submit a work plan for item 3 **by August 3, 2009.**

PHOTOS ARE ATTACHED TO THE
PERMIT.

VIEW THEM UNDER "PERMITS"