

GW - 301

INSPECTION

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

Lowe, Leonard, EMNRD

From: Fernald, Donald [dfernal@epco.com]
Sent: Friday, August 14, 2009 11:59 AM
To: Lowe, Leonard, EMNRD; Hebert, Beth; Powell, Brandon, EMNRD
Cc: Seale, Runell; Lee, Stephen
Subject: RE: GW-301, Inspection Report Response (Manzanares CS)

Hi Leonard,

T411 & T412 are no longer in service.

Thanks,

Don Fernald
EHS&T
614 Reilly Avenue
Farmington, NM 87401
O: 505-599-2141
C: 505-486-6668
F: 505-599-2119
dfernal@epco.com

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Friday, August 14, 2009 11:43 AM
To: Hebert, Beth; Powell, Brandon, EMNRD
Cc: Fernald, Donald; Seale, Runell
Subject: GW-301, Inspection Report Response (Manzanares CS)

Ms. Hebert,

The OCD appreciates Enterprises efforts in resolving the inspection results.

Below-grade tanks: please submit a work plan for the removal of T411 and T412. Any particular reason for the BGT removals?

Submit the evaluation and proposed work on the AST's when completed. Provide OCD a status on September 25, 2009 if the evaluation has not been resolved.

Two items are still considered open from the inspection results.

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

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 14, 2009 11:43 AM
To: 'bhebert@eprod.com'; Powell, Brandon, EMNRD
Cc: 'Fernald, Donald'; Seale, Runell
Subject: GW-301, Inspection Report Response (Manzanares CS)

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Leonard Lowe

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Enterprise Products™

August 7, 2009

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

Certified Mail
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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
Manzanares Compressor Station -GW-301
SW/4, NW/4, Section 33, Township 30 North, Range 7 West, NMPM
San Juan County, NM**

Dear Mr. von Gonten:

Enterprise Field Services, LLC is submitting this letter in response to the site inspection conducted at the Manzanares Compressor Station on June 10, 2009, and items listed in Number 16 of the Discharge Permit approval conditions.

- open
1. Liquids will be removed from sumps within 72 hours. During the NMOCDD inspection, the facility had experienced precipitation the prior 48 hours.
 2. On July 23, 2009 attempts to collect a sample of the liquids within the secondary wall of BGT T411 were unsuccessful using a pump and tube. It appears that less than 1/2" of liquid is located within the secondary wall of BGT T411. BGT T411 and T412 will be scheduled for removal in late 2009. Below Grade Tanks (BGTs) are currently being inspected on a monthly basis. A copy of the most recent inspection is included as Attachment "A".
 3. Enterprise is currently evaluating the liquid handling process at Manzanares Compressor Station. Once this evaluation is completed, the condensate storage tanks from the location will either be removed or kept in place. If storage tanks remain in service, an impervious secondary containment will be installed on the applicable tanks in 2010. Please note that Tanks T406, T407, T408 and T409 do have a liner in place. Signage and labels are currently being upgraded in accordance with our discharge permit.
- OT

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,

Mary E. Hebert
Director, Environmental Compliance

/sjn
attachments
P.O. BOX 4324
HOUSTON, TX 77210-4324
713.381.6500

1100 LOUISIANA STREET
HOUSTON, TX 77002-5227
www.epplp.com

Attachment A

Monthly SPCC Inspection Form / NMOCD Discharge Plan Inspection Form

MONTHLY SPCC INSPECTION FORM / NMOCD DISCHARGE PLAN INSPECTION FORM

Manzanares Canyon Compressor Station

Page 1 of 2

<input checked="" type="checkbox"/> If Yes and insert Work Request number. A yes answer indicates that there is a deficiency and correction(s) are required.	Tank Field ID Number							
	T-401 500 Gal Lube Oil	T-402 500 Gal Lube Oil	T-403 500 Gal Lube Oil	T-404 500 Gal Lube Oil	T-405 75 Bbl BGT Comp Sidel Pump	T-406 1500 Bbl Condensate Storage	T-407 1800 Bbl Condensate Storage	T-408 1500 Bbl Condensate Storage
	Tank Asset ID Number							
Leakage is detected at seam connections, corrosion or gaskets.								
Leakage is detected at ancillary equipment, gauges and instrumentation.								
Leakage is detected from pumps, piping and fittings.								
Secondary containment is in substandard condition, cracks, breaches, leaks or damage is apparent or likely.								
Leakage is accumulating in area drains or ditches.								
Subgrade tank portal inspection indicates leaks.								
Leakage is accumulating in dike, if applicable.								
Any leakage/stained soil noted on site (if so, state in notes/comments)								
Any other issues noted? Please list in comments.								
Enter Work Request Number for Corrective Actions →								
Enter Work Order Number for Corrective Actions →								
NOTES: Berms on large tanks (1,000 BBL) has an opening on Berm for Load (In):								

Check X appropriate boxes as indicated. If leakage is noted, please write in the work order number in the appropriate box.

COMMENTS:

Send completed form to Environmental Representative to be retained for three years.

Inspector Robert J. Ray

Date

July-23-09

Supervisor

Date

Page 2 of 2

<input checked="" type="checkbox"/> If Yes and insert Work Request number. A yes answer indicates that there is a deficiency and correction(s) are required.	Tank Field ID Number							
	T-409 1500 Bbl Condensate Storage	T-410 120 Bbl BGT Produced Water Sump	T-411 100 Bbl BGT Thermal Oxidizer Sump	T-412 100 Bbl Glycol Storage	T-413 210 Bbl Condensate Storage	T-414 500 Bbl Condensate Storage	T-415 30 Bbl BGT Pig Receiver Sump	T-416 300 Gal TBO Storage
	Tank Asset ID Number							
Leakage is detected at seam connections, corrosion or gaskets.								
Leakage is detected at ancillary equipment, gauges and instrumentation.								
Leakage is detected from pumps, piping and fittings.								
Secondary containment is in substandard condition, cracks, breaches, leaks or damage is apparent or likely.			X					
Leakage is accumulating in area drains or ditches.								
Subgrade tank portal inspection indicates leaks.								
Leakage is accumulating in dike, if applicable.								
Any leakage/stained soil noted on site (if so, state in notes/comments)								
Any other issues noted? Please list in comments.								
Enter Work Request Number for Corrective Actions								
Enter Work Order Number for Corrective Actions								
NOTES:								

Check X appropriate boxes as indicated. If leakage is noted, please write in the work order number in the appropriate box.

COMMENTS:

Sump #4-11 to be removed

Send completed form to Environmental Representative to be retained for three years.

Inspector Robert J. Ray

Date

July-23-09

Supervisor

Date

GW-301, Manzanares CS

Inspection noted on last permit renewal.

Response was submitted within prescribe time.

See "PERMITS" for photographs attached to the latest permit.

16. OCD Inspections: The OCD performed an inspection of this facility on June 10, 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 & 2:** Owner/operator shall verify that sumps are maintained per Condition 11 of this permit.
2. **Photo 3 – 5:** The facility has 4 below grade tanks. They are all designed with a secondary containment (tank within a tank design) with a leak detection system. A proper cap shall be placed on the leak detection view port. All leak detection systems were all found to be dry, except for T411. There appeared to be a vicious fluid substance within the annular walls of the BGT. Owner/Operator shall investigate the reason for fluids in the leak detection system and if need be verify tank integrity. 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.
3. **Photo 6 & 7:** All above ground storage tanks (AST) must be properly lined. There appears to have been some overflow of contents in one tank. 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 7. At the time of inspection tanks were still not lined. **Enterprise is currently in violation of their discharge permit.**

Enterprise shall resolve items 2 and submit a work plan for item 3 **by August 10, 2009.**