

**GW - 148**

**INSPECTION**

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



September 25, 2009

7008 3230 0002 4442 8739  
Return Receipt Requested

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: Pump Mesa Compressor Station  
New Mexico Oil Conservation Division Inspection Report, GW-148  
NE/4, SW/4 Section 14, Township 31 North, Range 8 West, NMPM  
San Juan County, NM**

Dear Mr. von Gonten:

Val Verde Gas Gathering Company, L.P. is submitting this response to concerns noted at the above-referenced facility in the July 28, 2009 New Mexico Oil Conservation Division Discharge Permit Approval Conditions for the Pump Mesa Compressor Station

If you have questions or require additional information, please contact Don Fernald, Environmental Scientist at (505) 599-2141 or me directly at (713) 880-6518.

Yours truly,

A handwritten signature in black ink, appearing to read "Mary E. Hebert".

Mary E. Hebert  
Director, Environmental Compliance

/sjn  
attachments



TEPPCO Partners. L.P.  
Texas Eastern Products Pipeline Company, LLC. General Partner

P.O. Box 2521  
Houston, TX 77252-2521  
Office: 713/880-6500  
Fax: 713/880-6660

**Val Verde Gas Gathering L.P.  
Pump Mesa Compressor Station  
New Mexico Oil Conservation Division Inspection Report, GW-148**

Val Verde offers the following response for concerns (bold text) from the July 28, 2009 Discharge Permit Approval Conditions from the NMOCD.

- 1. Photos 1 & 6: Two below-grade tanks are on site. The BGT (photo 1) appears to be single walled with unknown leak detection. The BGT (photo 6) has a visual leak detection system port and appears to be a double bottom tank. Owner/operator shall verify these tanks meet the discharge plan permit condition 11. Owner/operator is reminded that all leak detection systems shall be monitored and recorded on a monthly basis. See Condition 11 for details.**

Response: Both BGTs noted in photos 1 & 6 are similarly designed and are double walled with electronic leak detection that is checked and documented on a monthly basis. Please find the attached construction specification (Attachment A) for the below grade tanks. These below grade tanks have an alarm that actuates if liquids are detected in the interstitial space between the primary tank and secondary wall. Monthly inspections are also conducted to determine the integrity of the sub-grade tank, please find a copy (Attachment B) of a recent representative inspection.

- 2. Photo 2 - 5: The single wall cement secondary containment is being used as a below-grade tank. The outer cement walls are deteriorating and are below grade. Owner/operator shall treat this catch containment as a sump by meeting the fluid criteria and engineering it to be above grade or re-engineering it to meet Condition 11 for a below grade tank.**

Response: This structure has been removed and has been replaced with an above ground double walled sump box. The sump box is inspected monthly and fluids are removed within 72 hours.

- 3. Photo 7 - 8: Above ground tanks lack secondary containment. Owner/operator shall line the AST's with an impermeable barrier. See condition 9 for details.**

Response: Val Verde Gas Gathering, L.P. has budgeted to install an impermeable barrier to comply with condition 9 of the Discharge Permit GW-148 in 2010.

- 4. Photo 9: Owner/operator shall inspect and clean out all sumps located at this facility and to operate them as sumps.**

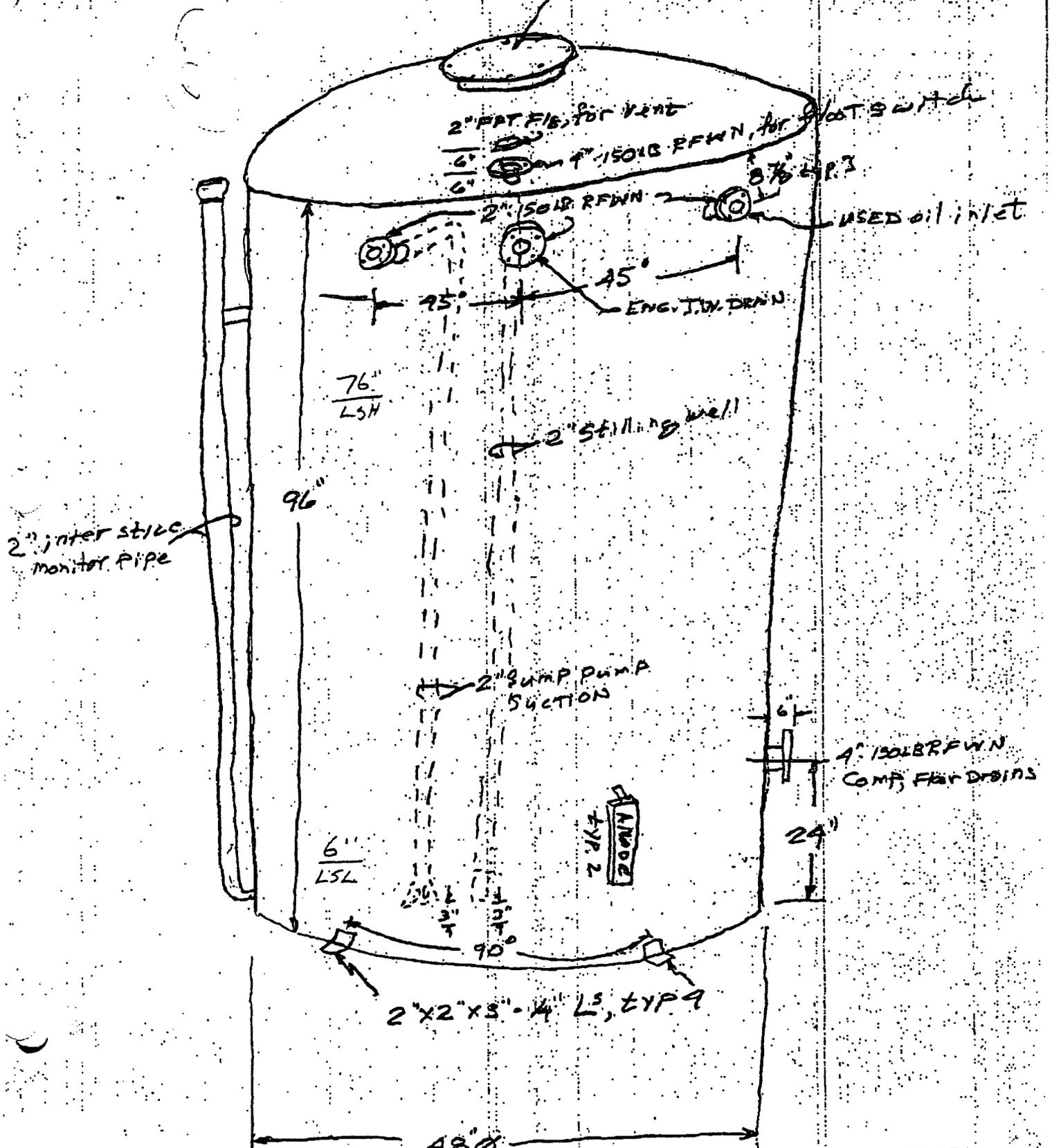
Response: Please note that they area had experienced precipitation in the prior 24 hours. Sediments located within this sump have been removed. Fluids located within secondary containments are to be removed within 72 hours.

**Attachment A**  
Sub Grade Tank Design

# Pump Mesa Sump

1A-106

24" Ø B&S Manhole



2" inter static monitor pipe

float switch

USED oil inlet

ENG. DRAIN

2" stilling well

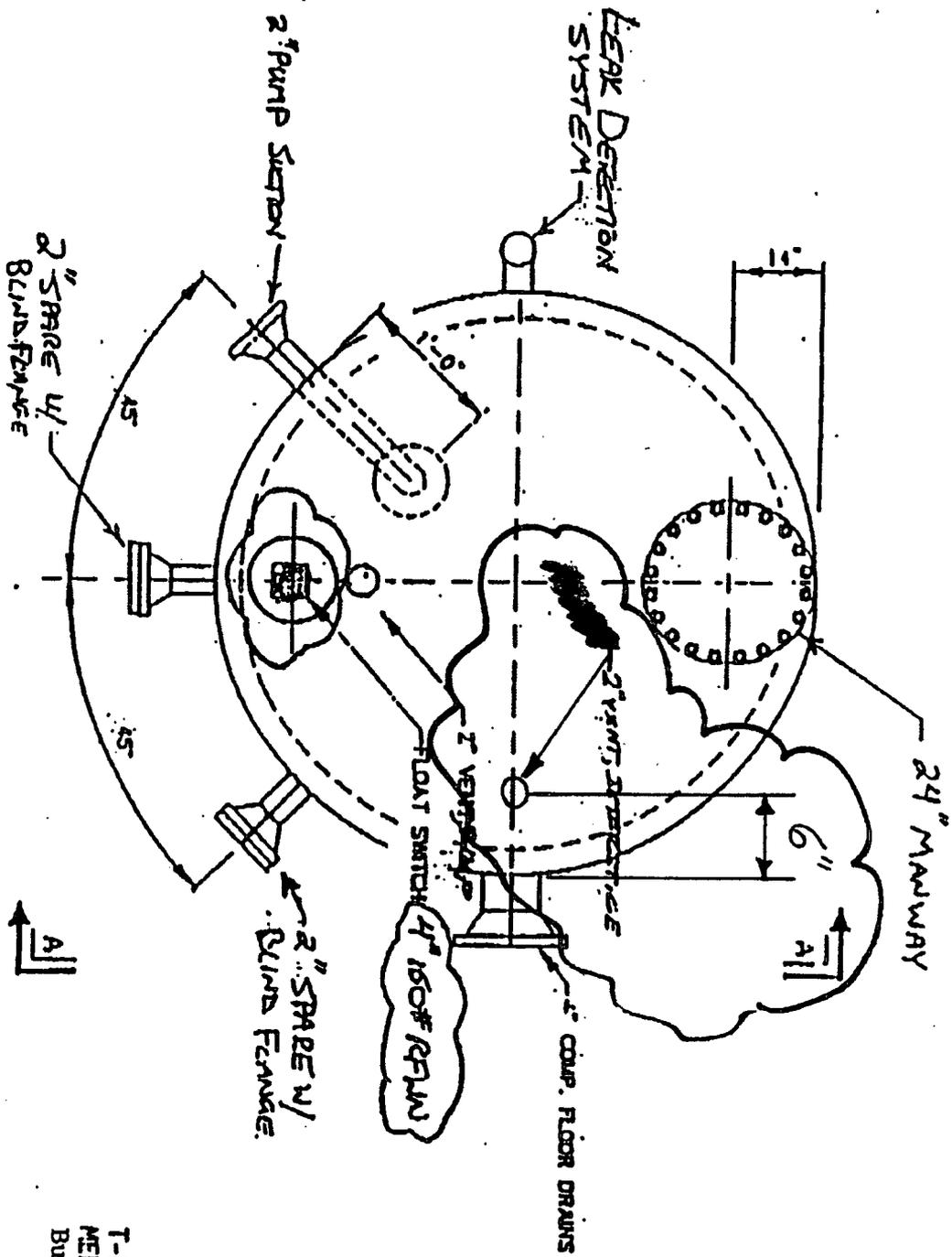
2" pump pump suction

4" 150LB RFWN COMP. FLOOR DRAIN

AMP 2 TYP 2

2" x 2" x 3/4" L<sup>s</sup>, TYP 4





T-108 sump  
 MERIDIAN OIL CO.  
 Buena Vista Compressor

**EQUIPMENT APPROVED  
 FOR MANUFACTURE  
 JOB 2335.03R  
 KTI FISH, INC.**

- APPROVED w/o EXCEPTION
- SR* APPROVED AS NOTED
- DISAPPROVED, REVISE AND RESUBMIT

APPROVED BY: *Stephen Pea*  
 DATE: 2/22/96

DRAWN	BY	DATE	DWG. NO.
1" = 1'	BYRD	3/13/95	313-95B

KOHLHAAS CORP. *JN*



**Attachment B**  
Recent Discharge Plan Inspection Documentation

**AUGUST - MONTHLY SPCC INSPECTION FORM / NMOC D DISCHARGE PLAN INSPECTION FORM**

**FACILITY NAME - PUMP MESA**

Inspection Date: 08/30/2009

	Tank Field ID Number					
	P.W.	N.O.	U.O.	Antifreeze	Triethgly	Site
	Tank Asset ID Number					
<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.	24781	25328	25329	25327	N/A	N/A
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 						
NOTES:						

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

COMMENTS: No Issues Noted.

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

Inspector: **Mel Biringer**

Date: 9/5/2009

Supervisor

Date

CIW-148

As noted within the renewal permit dated July 28, 2009.

**16. OCD Inspections:** The OCD performed an inspection of this facility on June 10, 2009. Mr. Clay Roesler and Ms. Runell Seale witnessed the inspection. All photographs referenced below are located in the attachment of this permit. As a result of this inspection OCD concluded the following:

1. **Photo 1 & 6:** Two below-grade tanks are on site. The BGT (photo 1) appears to be single walled within unknown lead detection. The BGT (photo 6) has a visual leak detection system port and appears to be a double bottom tank. Owner/operator shall verify these tanks meet the discharge plan permit Condition 11. Owner/Operator is reminded that all leak detection systems shall be monitored and recorded on a monthly basis. See Condition 11 for details.
2. **Photo 2 - 5:** This single wall cement secondary containment is being used as a below-grade tank. The outer cement walls are deteriorating and are below grade. Owner/operator shall treat this catch containment as a sump by meeting the fluid criteria and engineering it to be above grade or re-engineer it to meet Condition 11 for a below grade tank.
3. **Photo 7 - 8:** Above ground storage tanks lack secondary containment. Owner/Operator shall line the AST's with an impermeable barrier. See Condition 9 for details.
4. **Photo 9:** Owner/operator shall inspect and clean out all sumps located at this facility and to operate them as sumps.

Owner/operator shall resolve items 1 - 4 by **September 30, 2009** and submit their findings to the OCD for review.