

# General Correspondence

## YEAR(S): 2009 - 2014

## Lowe, Leonard, EMNRD

From:	Pablo, Alberta [Alberta.Pablo@Exterran.com]
Sent:	Wednesday, January 12, 2011 1:52 PM
To:	Lowe, Leonard, EMNRD
Subject:	RE: Integrity Testing Report for GW-401, Exterran HSE Farmington
Attachments:	Facility Sump revised.pdf

### I have made comments below and a revised facility map is attached. Thank You.

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Wednesday, January 12, 2011 11:05 AM
To: Pablo, Alberta
Subject: Integrity Testing Report for GW-401, Exterran HSE Farmington

Ms. Alberta Pablo,

Greetings and good morning.

OCD has received your recently conducted Drain line Integrity testing results for the Farmington Exterran GW-401 facility, OCD has a few questions.

- Exterran's submittal identified the areas for testing: Area #1 (Main shop), Area #2 (Main Shop), Area #3 (Exterior Sump Drain Discharge line) and Area # 4 (Wash bay 1 & 2 and Sump # 3). OCD cannot identify any of these locations on the submitted attached drawing for the Exterran facility. OCD does not want to assume these areas, please submit another drawing or give information on which lines were identified within the drawing.
   *See attached revised facility map.*
- 2. Please annotate the operating pressure for these lines tested, or note if they operate under atmospheric pressure.
  - 2. Atmospheric testing
- OCD does not understand pressure testing of a sump to 3 lbs/sqr inch., explain.
   The drain lines we're pressure tested and sump in the shops and below grade tanks were hydrostatic/ atmospheric tested.

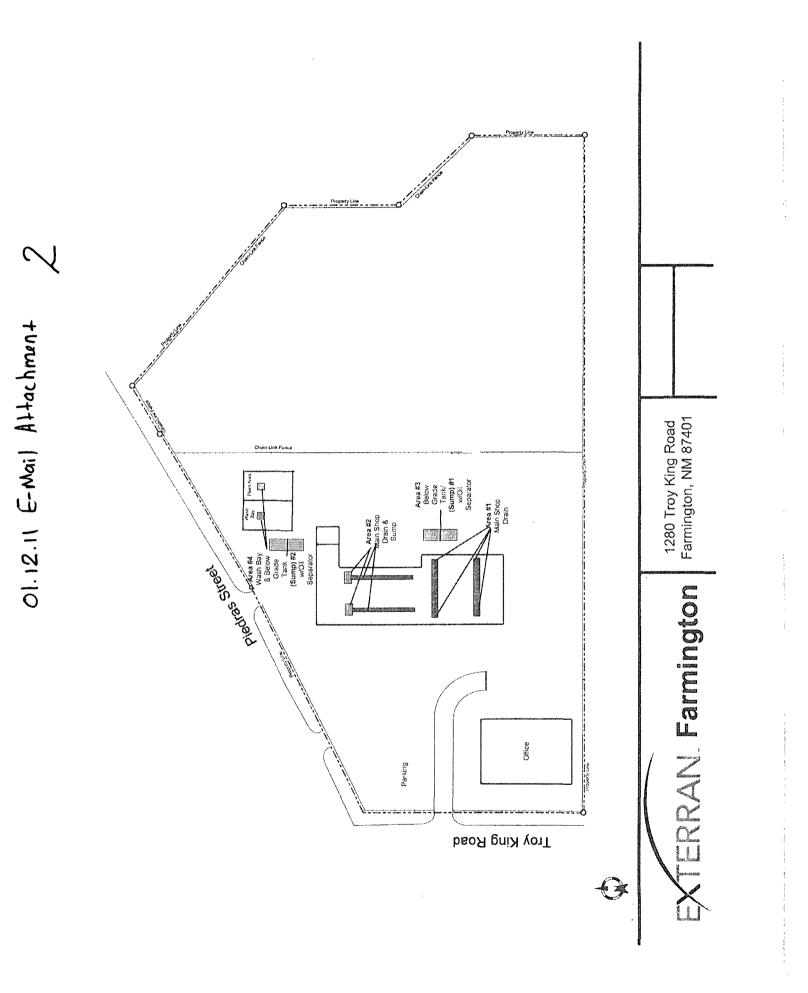
OCD has not processed your submitted discharge plan application due to litigation from the oil and gas field. OCD appreciates Exterran's efforts in performing such test. I have attached and EXAMPLE of what your permit will read like. Due to the litigation at this moment, OCD is separating all of its permits for Compressor Stations, Gas plants, Refineries and Service Companies. OCD is still working on this task. In due time we hope to process your application so that we may commence your permit approval. The attachment will read differently for a Service Company, but will have the majority of the same conditions. This is just for information ONLY. NOTE the difference between a SUMP and a Below Grade Tank and monitoring of them.

Thank you again for your efforts. Please

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, EMNRDSent:Wednesday, January 12, 2011 11:05 AMTo:'Pablo, Alberta'Subject:Integrity Testing Report for GW-401, Exterran HSE FarmingtonAttachments:8.OLD EXAMPLE Draft Permit.pdf

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- 2. Please annotate the operating pressure for these lines tested, or note if they operate under atmospheric pressure.
- 3. OCD does not understand pressure testing of a sump to 3 lbs/sqr inch., explain.

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### 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: <u>leonard.lowe@state.nm.us</u> Website: <u>http://www.emnrd.state.nm.us/ocd/</u>



Exterran 1280 Troy King Road Farmington, New Mexico 87401 U.S.A.

Main 505.325.3220 Fax 505.325.2997 www.exterran.com

January 6, 2011

Mr. Leonard Lowe Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

> Re: Discharge Plan Submittal Request (Designated GW-401) Integrity Testing report. Exterran, 1280 Troy King Road, Farmington, N.M. 87401 Section 12, Township 29 North, Range 14 West NMPM

Dear Mr. Lowe:

This letter is being provided with the Integrity testing report completed by Roto Rooter of Farmington, New Mexico. Attached also is a map of all drain lines on the facility along with pictures and video of the testing while it was being completed.

Exterran is committed to environmental compliance and appreciates the OCD's assistance. If you should have any questions, please do not hesitate to contact me at 505-325-3220.

Sincerely,

alberto Pablo

Alberta Pablo Exterran HSE-Farmington Facility

cc: Mr. Don Johnson – Exterran HSE Specialist Sr. - Farmington Mr. Bryan Richardson – Exterran West Region HSE Manager Ms. Nina McAfee – Exterran Sr. Environmental Manager



GW-401

Roto-Rooter of Farmington 601 S. Behrend Ave. Farmington, NM 87401 505.325.3395 Phone 505.324.0053 Fax

September 2, 2010

Alberta Pablo Exterran Facility Environmental Coordinator 1280 Troy King Road Farmington, NM 87401 RECEIVED OCD

Ms. Pablo,

Per proposal # 148, Rotor Rooter of Farmington inspected the integrity of all drain lines which included jetting lines prior to inspection to allow for optimal viewing, hydrostatic testing to three pounds per square inch, and inspection of oil sumps. The following observations were made:

All pipelines are schedule 40 PVC material. All lines and sumps were tested at 3 pounds per square inch for two hours. All pumping of sumps was done by others.

Area # 1(Main Shop):

There are four drains located in this area. All four drains were hydro-jetted from the clean outs to the building drains and then to the building sump. A camera was then run through these drains. No leaks, breaks, or any other damage were detected during this process. After performing the hydrostatic testing of this area, it was determined that the lines, drains and sump are in optimal condition without any leaks or damage.

Area # 2 (Main Shop):

There are two drains and two sumps located in this area. Both drains were hydro-jetted from the clean outs to the building drains and then to the two building sumps. A camera was then run through these drains. No leaks, breaks, or any other damage were detected during this process. After performing the hydrostatic testing of this area, it was determined that the lines, drains and sumps are in optimal condition without any leaks or damage.

GW-401



Roto-Rooter of Farmington 601 S. Behrend Ave. Farmington, NM 87401 505.325.3395 Phone 505.324.0053 Fax

Area # 3 (Exterior Sump Drain Discharge Line):

There is not an existing drain in this area. The sump in this area is below grade. Therefore, the sump in Area 1 pumps into the sump in Area 3. The line from the sump in Area 1 was hydro-jetted, inspected with camera and pressure tested for two hours. This line is in <u>optimal condition</u>.

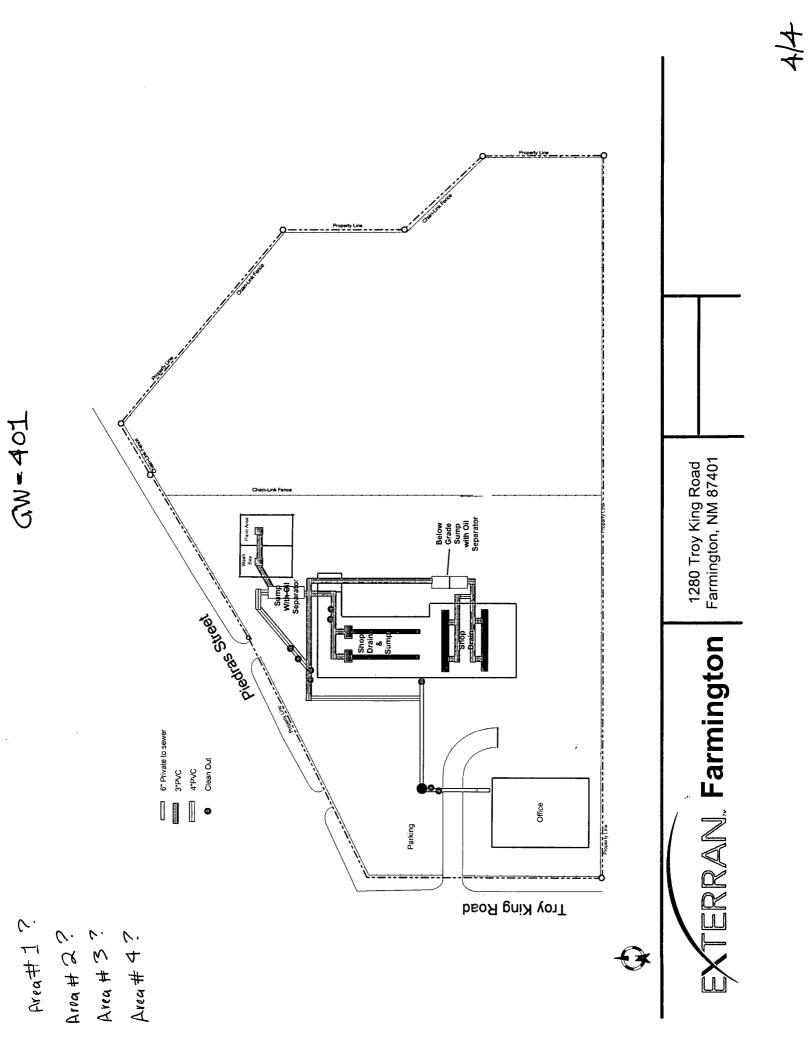
Area # 4 (Wash Bay 1 & 2 and Sump # 2):

Both wash bays in this area were hydro-jetted, inspected with the camera and pressure tested for two hours. We did not detect any leaks, breaks or any other damage in this area.

Overall, it has been determined that the areas of concern at the above stated facility are in favorable operating condition and not in need of any repairs.

Michael Kennedy

Field Supervisor Roto Rooter of Farmington



EXTERRAN

Alberta Pablo Facility Environmental Coordinator

Direct 505.955.970.908 Cell 505.215.3839 Fax 505.656.5322 325-279 7 alberta.pablo@exterran.com

Exterran 1280 Troy King Road 2<00 нау юнд коао Farmington, New Mexico 87401 U.S.A.

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