

GW - 255

INSPECTION

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, September 25, 2009 4:15 PM
To: 'bhebert@eprod.com'
Cc: 'Fernald, Donald'; Seale, Runell; Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD
Subject: GW-255, Teppco Buena Vista CS

Ms. Mary Hebert,

1. OCD is aware that sumps may retain fluids/debris at certain times. OCD can not verify that any sumps noted during the inspection have been in this state greater than 72 hours. OCD is only making Owner/Operator aware that such scenarios shall need to be addressed in a timely manner. Item is closed.
5. OCD is aware of the amount of precipitation in the region and the amount of fluids within the secondary containment. OCD is reminding the Owner/Operator that such scenarios to be addressed according. OCD assumes that the Owner/Operator is adhering to such conditions as noted within GW-255.

All concerns are addressed and closed.

The OCD appreciates Teppco's efforts in resolving these inspection concerns.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
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Website: <http://www.emnrd.state.nm.us/ocd/>



2009 SEP 14 PM 1 40

September 9, 2009

7008 3230 0002 4442 8678
Certified Mail

Mr. Leonard Lowe, Environmental Engineer
New Mexico Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
1220 St. Frances Drive
Santa Fe, NM 87505

**Re: Buena Vista Compressor Station
New Mexico Oil Conservation Division Inspection Report, GW-255
Letter B, Section 13, Township 30 North, Range 9 West, NMPM
San Juan County, NM**

Dear Mr. Lowe:

Val Verde Gas Gathering Company, L.P. is submitting this response to concerns noted at the above-referenced facility in the July 10, 2009 New Mexico Oil Conservation Division (NMOCD) Inspection Report GW-255, Buena Vista Compressor Station. These concerns were based on NMOCD findings during an onsite inspection of the facility on June 10, 2009.

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,

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.
Buena Vista Compressor Station
New Mexico Oil Conservation Division Inspection Report, GW-255**

Val Verde offers the following response for concerns (bold text) from the July 10, 2009 letter from the NMOCD.

- 1. Photos 1 - 4: Sumps are full of fluids or have sediments within them. Owner/operator must ensure that all sumps are maintained accordingly.**

Response: Please note that the area had experienced precipitation in the prior 24 hours. Liquids have been removed from the working sumps. Sediment and debris have also been removed from the sumps noted in photos 2 and 3.

- 2. Photo 5: Owner/operator shall verify that this below-grade tank meets Condition 11 of the permit conditions. Provide OCD documentation to verify all conditions are met for this below-grade tank. If conditions are not met the owner/operator shall submit a work plan to update this tank. Owner/operator is reminded that all below-grade tanks need to be monitored and recorded accordingly.**

Response: Please find the attached construction specification (Attachment A) for the below grade tank installed at the Buena Vista Compressor Station. This below grade tank has 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 representative inspection.

- 3. Photo 6 - 8: Owner/operator shall ensure that all used filters are disposed of per Condition 6 of the permit conditions. Update regulation for solid waste is Part 35,19.15.35.8 NMAC.**

Response: Filters noted in photos 6 - 8 are currently not being disposed. These filters are recycled by the Safety Kleen Corporation. GW-255 will be amended to include the disposition of these filters to Safety Kleen for recycling.

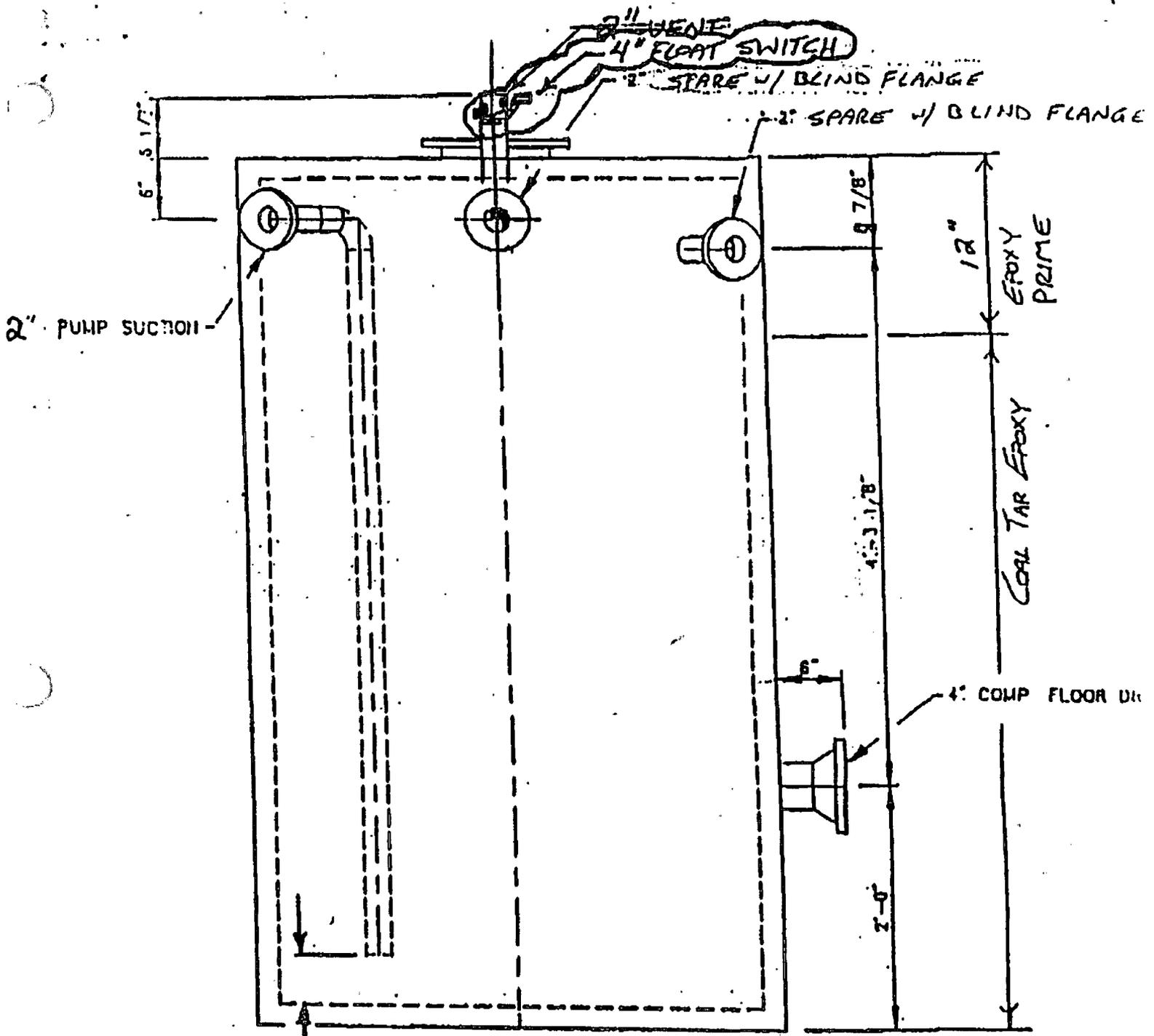
- 4. Photo 9 - 12: Owner/operator shall investigate the cause for this discharge on to the ground and prevent such future occurrences. Owner/operator shall appropriately clean up all discharges.**

Response: The high level kill switch on the dehydrator had been wired shut at some point in the past to prevent the unit from automatically shutting down. Since it was wired shut glycol and residual oil had filled the contactor with fluids. During an annual emergency shut down (ESD) test at the facility conducted on June 10, 2009 (same day as the NMOCD inspection), the fluids were swept out of the dehydrator and carried over to the facility ESD vent stack releasing a mist of fluids over the area as noted in photos 9-12. The high level kill switch has been restored to normal working operations. The discharge of glycol, water and oil has been appropriately cleaned up. Impacted gravel and soil been removed from the facility.

- 5. Photo 13 - 14: Standing fluids were noted in a few secondary containments. Secondary containments are meant to catch and retain fluids, but not for storage. Owner/operator shall ensure that containments are properly maintained.**

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

Attachment A



EQUIPMENT APPROVED
 FOR MANUFACTURE
 JOB 2335.03R

KTI FISH, INC.

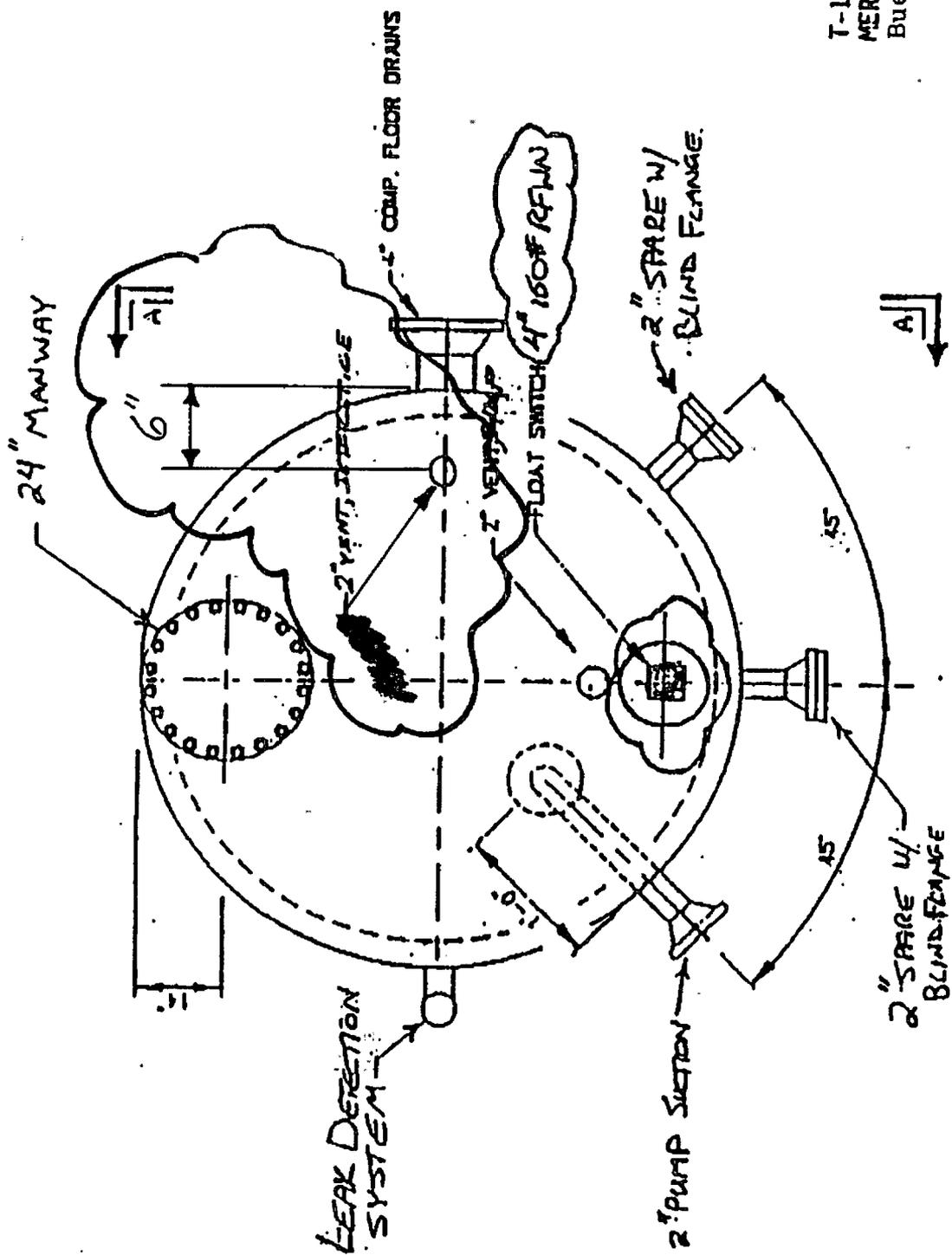
T-100 sump
 MERIDIAN OIL CO.
 Buena Vista Compressor

- SK APPROVED W/O EXCEPTION
- APPROVED AS NOTED
- DISAPPROVED, REVISE AND RESUBMIT

APPROVED BY: S. Rea
 DATE: 2/22/96

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

KOHLHAAS CORPORATION



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

APPROVED W/O EXCEPTION
 APPROVED AS NOTED
 DISAPPROVED, REWSE AND RESUBMIT

APPROVED BY: *[Signature]*
 DATE: 2/22/95

T-108 sump
 MERIDIAN OIL CO.
 Buena Vista Compressor

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

KOHLHAAS CORPORATION

47 1" DIA W/ W/ COVER

2" LEAK DETECTION FOR LEVEL WALL ANNULUS

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

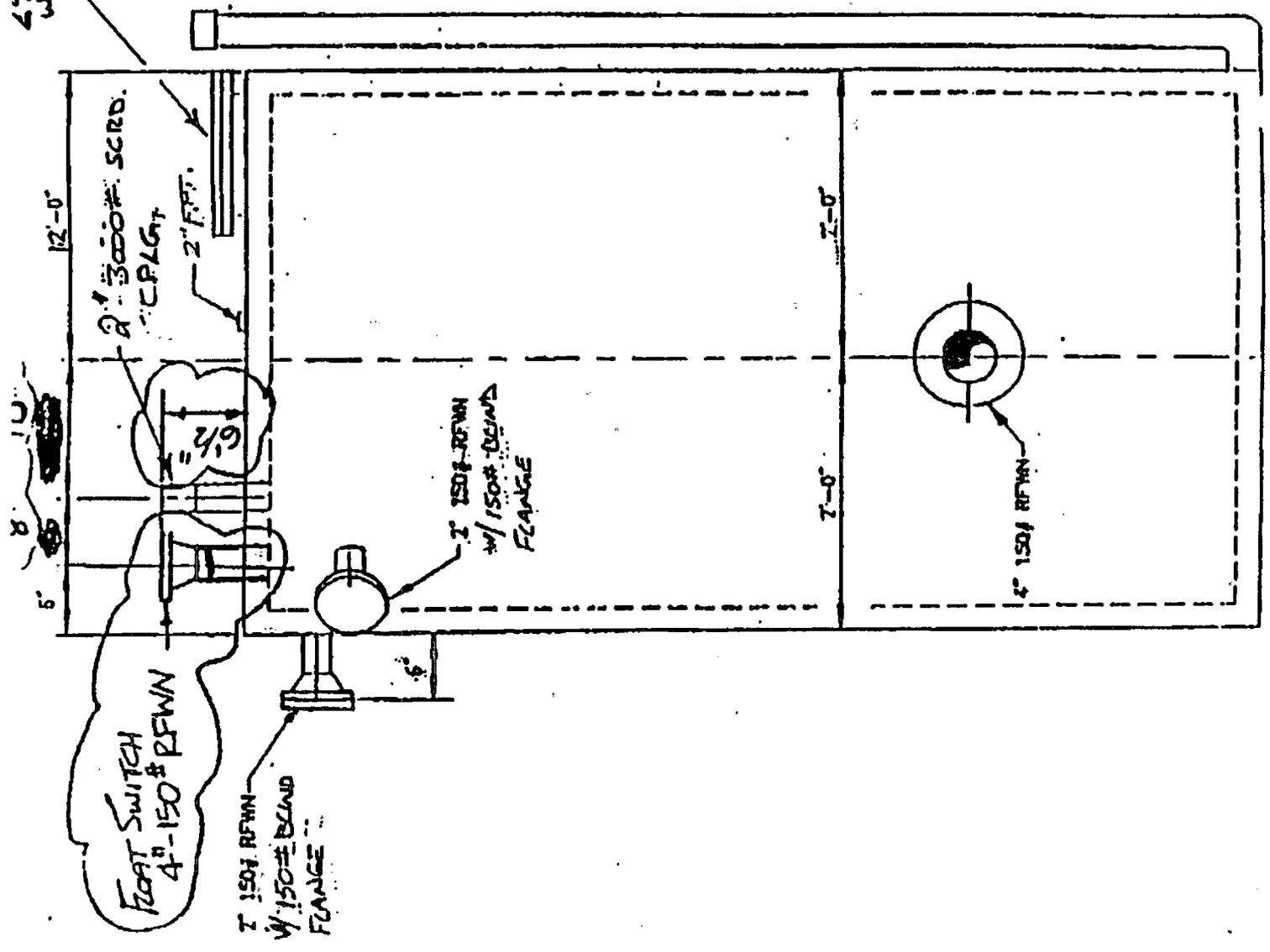
- SLA APPROVED W/O EXCEPTION
- APPROVED AS NOTED
- DISAPPROVED, REVISE AND RESUBMIT

APPROVED BY: Steph Lee
DATE: 2/27/96

T-108 sump
MERJIAN OIL CO.
Buena Vista Compressor

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

KOHLHAAS CORPORATION



Attachment B

JULY - MONTHLY SPCC INSPECTION FORM / NMOCD DISCHARGE PLAN INSPECTION FORM

FACILITY NAME - BUENA VISTA

Inspection Date: 07/27/2009

<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					
	P.W.	N.O.	U.O.	Antifreeze	Methanol	Site
	Tank Asset ID Number					
	1431-T-101	1427-T-104	1425 T-102	1429-T-105	03-1416	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: Mad Binger Date: 8/6/2009
 Supervisor: _____ Date: _____

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, July 10, 2009 2:40 PM
To: Roesler, Clayton
Cc: Powell, Brandon, EMNRD; 'Seale, Runell'; Fernald, Donald
Subject: GW-255, Buena Vista CS inspection letter
Attachments: GW-255, Inspection Letter.pdf; GW-255, Inspection Photos.pdf

Mr. Roesler,

Here is the inspection letter for GW-255.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
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New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson

Governor
Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



July 10, 2009

Mr. Clay Roesler

**Re: Inspection Report, GW-255
Buena Vista Compressor Station, Teppco
San Juan County, New Mexico**

Dear Mr. Roesler:

The Oil Conservation Division (OCD) performed an onsite inspection of Teppco's Buena Vista compressor station located in unit letter B Section 13, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico on June 10, 2009.

Teppco shall address the following concerns (reference photos in attachment):

1. **Photos 1 - 4:** Sumps are full of fluids or have sediments within them. Owner/operator must ensure that all sumps are maintained accordingly.
2. **Photo 5:** Owner/operator shall verify that this below-grade tank meets Condition 11 of permit conditions. Provide OCD documentation to verify all conditions are met for this below-grade tank. If conditions are not met the owner/operator shall submit a work plan to update this tank. Owner/operator is reminded that all below-grade tanks need to be monitored and recorded accordingly.
3. **Photo 6 - 8:** Owner/operator shall ensure that all used filters are disposed of per Condition 6 of the permit conditions. Update regulation for solid waste is Part 35, 19.15.35.8 NMAC.
4. **Photo 9 - 12:** Owner/operator shall investigate the cause for this discharge on to the ground and prevent such future occurrences. Owner/operator shall appropriately clean up all discharges.
5. **Photo 13 - 14:** Standing fluids were noted in a few secondary containments. Secondary containments are meant to catch and retain fluids, but not for storage. Owner/operator shall ensure that containments are properly maintained.

Teppco shall submit resolutions to all **items stated above by September 14, 2009**. If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us.

Sincerely,

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>



Mr. Clay Roesler
July 10, 2009
Page 2

Leonard Lowe
Environmental Engineer

xc: OCD District III Office, Aztec
 Runell Seale, EPCO
 Don Fernald, EPCO

OCD Inspection: Teppco Buena Vista CS, GW - 255

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Runell Seale and Clay Roesler

Date: 06.10.09

Time: 13:00 – 13:30

Page 1



Photo 1: Sump full of fluids.



Photo 2: Debris in sump.

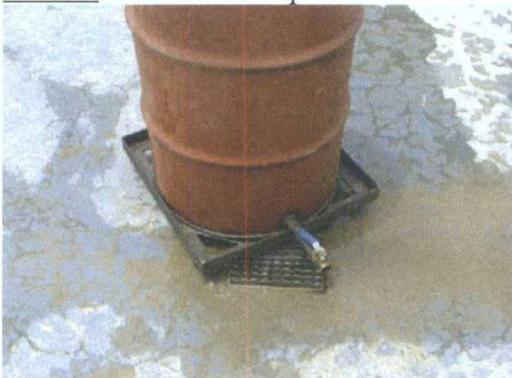


Photo 3: Sump full of sediments.



Photo 4: Sump full of fluids.



Photo 5: Below-grade tank.



Photo 6: Used filter.

OCD Inspection: Teppco Buena Vista CS, GW - 255

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Runell Seale and Clay Roesler

Date: 06.10.09

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Page 2



Photo 7: Used filters.



Photo 8: Drained used filters.



Photo 9: Spray out on site.

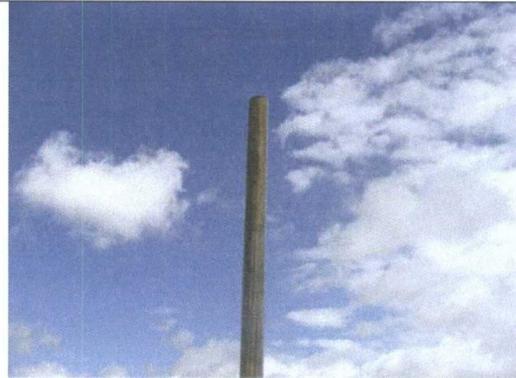


Photo 10: Assumed source of pipe liquids spray.



Photo 11: Spray out residuals off of building.



Photo 12: Spray out on ground.

OCD Inspection: Teppco Buena Vista CS, GW - 255

Inspector(s): Brandon Powell and Leonard Lowe

Company Rep: Runell Seale and Clay Roesler

Date: 06.10.09

Time: 13:00 – 13:30

Page 3



Photo 13: Secondary containment with fluids.



Photo 14: Fluids in secondary containment.