

GW - 303

INSPECTION

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

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, August 14, 2009 11:09 AM
To: 'bhebert@eprod.com'
Cc: Seale, Runell; 'Fernald, Donald'; Powell, Brandon, EMNRD
Subject: GW-303, Inspection Response (Navajo City CS)

Ms. Hebert,

The OCD appreciates Enterprises efforts in resolving these inspections findings at the Navajo City Compressor Station.

These findings are still considered OPEN until integrity tests are completed and resolved on the two Below-Grade tanks.

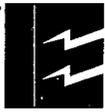
Enterprise shall provide a status update of integrity test by **September 25, 2009**. Unless all final results are completed and submitted to the OCD.

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
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/oed/>



Enterprise Products™

August 6, 2009

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

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

Certified Mail
7008 3230 0002 4472 9461

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

RECEIVED OOD
2009 AUG 12 A 11: 29

**Re: Enterprise Field Services, LLC
Navajo City Compressor Station -GW-303
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 (Enterprise) is submitting this letter in response to the site inspection conducted at the Navajo City Compressor Station on June 10, 2009, and items listed in Number 16 of the Discharge Permit approval conditions.

1. Below Grade Tanks (BGTs) are currently being inspected on a monthly basis. A copy of the latest inspection is included in attachment A.
2. Samples of fluids from the secondary containment leak detection systems were obtained on July 23, 2009, results are included in attachment B. Analysis indicates the presence of hydrocarbons. Enterprise is making plans to remove these liquids and conduct integrity testing of both tanks. The results of the testing will be submitted to the NMOCD.

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

- cc: Joe Velasquez, Enterprise
Ralph Morris, Enterprise
Runell Seale, Enterprise
Bennie Armenta, Enterprise
Randy Baysinger, Enterprise
Leo Francisco, Enterprise

Attachment A
Monthly SPCC Inspection / Discharge Plan Inspection

MONTHLY SPOC INSPECTION FORM / NMOCD DISCHARGE PLAN INSPECTION FORM

Navajo City Compressor Station

<input type="checkbox"/> If Yes and insert Work Request number. A "Y" answer indicates that there is a deficiency and correction(s) are required.	Tank Field ID Number														
	T-001	500 Gal Condensate	T-002	500 Gal Condensate	T-003	500 Gal Leach Oil	T-004	15,000 Gall Cyanide Wash Water	T-006	50,000 Gall Pig Wash Water	T-007	120,000 Gall From Wash Cond Water			
	Tank Asset ID Number														
Leakage is detected at steam connections, circulation or jackets.															
Leakage is detected at auxiliary equipment, gauges and instrumentation.															
Leakage is detected from pumps, piping and fittings.															
Secondary containment is in substandard condition, cracked, breached, leaks or damage is apparent or likely.															
Leakage is accumulating in area drains or ditches.															
Subsurface tank bottom inspection indicated leaks.									X	X					
Leakage is accumulating in dike, if applicable.															
Any leakage/leaked spill noted on the HUC, state it in the 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 to ensure all tanks are inspected. If leakage is noted, please enter in the work order number in the appropriate box.															
COMMENTS:															
Good accepted form is Environmental Representative to be reviewed for 2004 year.															
Inspector <u>Richard King</u>									Date	<u>July 23-08</u>					
SEP-2007									Date						

Attachment B
Analytical Data from Testing Liquids in BGT inspection ports



COVER LETTER

Wednesday, August 05, 2009

Tami Ross
Souder, Miller and Associates
612 E Murray Dr.
Farmington, NM 87401
TEL: (505) 325-5667
FAX (505) 327-1496

RE: EPCO/ Navajo City CS

Order No.: 0907501

Dear Tami Ross:

Hall Environmental Analysis Laboratory, Inc. received 2 sample(s) on 7/28/2009 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. Below is a list of our accreditations. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites.

Reporting limits are determined by EPA methodology. No determination of compounds below these (denoted by the ND or < sign) has been made.

Please don't hesitate to contact HEAL for any additional information or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman".

Andy Freeman, Business Manager

for Nancy McDuffie, Laboratory Manager

NM Lab # NM9425
AZ license # AZ0682
ORELAP Lab # NM100001
Texas Lab# T104704424-08-TX



Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-09

CLIENT: Souder, Miller and Associates
Lab Order: 0907501
Project: EPCO/ Navajo City CS
Lab ID: 0907501-01

Client Sample ID: T-307 Interstitial
Collection Date: 7/23/2009 3:35:00 PM
Date Received: 7/28/2009
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260: VOLATILES SHORT LIST						Analyst: HL
Benzene	64000	50000		µg/L	50000	8/3/2009 3:13:02 PM
Toluene	490000	50000		µg/L	50000	8/3/2009 3:13:02 PM
Ethylbenzene	61000	50000		µg/L	50000	8/3/2009 3:13:02 PM
Xylenes, Total	700000	100000		µg/L	50000	8/3/2009 3:13:02 PM
Surr: 1,2-Dichloroethane-d4	107	59.3-133		%REC	50000	8/3/2009 3:13:02 PM
Surr: 4-Bromofluorobenzene	96.7	80.4-119		%REC	50000	8/3/2009 3:13:02 PM
Surr: Dibromofluoromethane	104	59.5-134		%REC	50000	8/3/2009 3:13:02 PM
Surr: Toluene-d8	109	53.5-136		%REC	50000	8/3/2009 3:13:02 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: MMS
Total Dissolved Solids	5900	400		mg/L	1	7/31/2009

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

Hall Environmental Analysis Laboratory, Inc.

Date: 05-Aug-09

CLIENT: Souder, Miller and Associates
Lab Order: 0907501
Project: EPCO/ Navajo City CS
Lab ID: 0907501-02

Client Sample ID: T-307 Inner Tank
Collection Date: 7/23/2009 3:35:00 PM
Date Received: 7/28/2009
Matrix: AQUEOUS

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8260: VOLATILES SHORT LIST						Analyst: HL
Benzene	11000	1000		µg/L	1000	8/3/2009 2:13:37 PM
Toluene	140000	20000		µg/L	20000	8/3/2009 1:44:39 PM
Ethylbenzene	94000	1000		µg/L	1000	8/3/2009 2:13:37 PM
Xylenes, Total	2100000	40000		µg/L	20000	8/3/2009 1:44:39 PM
Surr: 1,2-Dichloroethane-d4	110	59.3-133		%REC	1000	8/3/2009 2:13:37 PM
Surr: 4-Bromofluorobenzene	92.5	80.4-119		%REC	20000	8/3/2009 1:44:39 PM
Surr: Dibromofluoromethane	115	59.5-134		%REC	1000	8/3/2009 2:13:37 PM
Surr: Toluene-d8	105	53.5-136		%REC	1000	8/3/2009 2:13:37 PM
SM2540C MOD: TOTAL DISSOLVED SOLIDS						Analyst: MMS
Total Dissolved Solids	1980	400		mg/L	1	7/31/2009

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Estimated value
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- RL Reporting Limit

QA/QC SUMMARY REPORT

Client: Souder, Miller and Associates

Project: EPCO/ Navajo City CS

Work Order: 0907501

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: EPA Method 8260: Volatiles Short List									
Sample ID: 5ml rb		<i>MBLK</i>							
	Batch ID:	R34729							Analysis Date: 7/30/2009 9:09:14 AM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: b6		<i>MBLK</i>							
	Batch ID:	R34729							Analysis Date: 7/30/2009 10:08:27 PM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: 5ml rb		<i>MBLK</i>							
	Batch ID:	R34748							Analysis Date: 7/31/2009 10:52:41 AM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: 5ml rb		<i>MBLK</i>							
	Batch ID:	R34755							Analysis Date: 8/3/2009 8:51:09 AM
Benzene	ND	µg/L	1.0						
Toluene	ND	µg/L	1.0						
Ethylbenzene	ND	µg/L	1.0						
Xylenes, Total	ND	µg/L	2.0						
Sample ID: 100ng lcs		<i>LCS</i>							
	Batch ID:	R34729							Analysis Date: 7/30/2009 10:06:58 AM
Benzene	20.49	µg/L	1.0	102	86.8	120			
Toluene	19.55	µg/L	1.0	97.7	64.1	127			
Sample ID: 100ng lcs_b		<i>LCS</i>							
	Batch ID:	R34729							Analysis Date: 7/30/2009 11:06:02 PM
Benzene	20.04	µg/L	1.0	100	86.8	120			
Toluene	18.41	µg/L	1.0	91.0	64.1	127			
Sample ID: 100ng lcs_b		<i>LCS</i>							
	Batch ID:	R34748							Analysis Date: 7/31/2009 1:26:36 PM
Benzene	19.44	µg/L	1.0	97.2	86.8	120			
Toluene	18.75	µg/L	1.0	92.9	64.1	127			
Sample ID: 100ng lcs		<i>LCS</i>							
	Batch ID:	R34755							Analysis Date: 8/3/2009 10:17:53 AM
Benzene	21.68	µg/L	1.0	108	86.8	120			
Toluene	18.51	µg/L	1.0	92.6	64.1	127			

Method: SM2540C MOD: Total Dissolved Solids

Sample ID: MB-19764		<i>MBLK</i>							
	Batch ID:	19764							Analysis Date: 7/31/2009
Total Dissolved Solids	ND	mg/L	20.0						
Sample ID: LCS-19754		<i>LCS</i>							
	Batch ID:	19754							Analysis Date: 7/31/2009
Total Dissolved Solids	1002	mg/L	20.0	100	80	120			

Qualifiers:

E	Estimated value	H	Holding times for preparation or analysis exceeded
J	Analyte detected below quantitation limits	ND	Not Detected at the Reporting Limit
R	RPD outside accepted recovery limits	S	Spike recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory, Inc.

Sample Receipt Checklist

Client Name SMA-FARM

Date Received:

7/28/2009

Work Order Number 0907501

Received by: ARS

Checklist completed by: [Signature]

Date 7/28/09

Sample ID labels checked by: [Initials]

Matrix:

Carrier name: Greyhound

- Shipping container/cooler in good condition? Yes No Not Present
- Custody seals intact on shipping container/cooler? Yes No Not Present Not Shipped
- Custody seals intact on sample bottles? Yes No N/A
- Chain of custody present? Yes No
- Chain of custody signed when relinquished and received? Yes No
- Chain of custody agrees with sample labels? Yes No
- Samples in proper container/bottle? Yes No
- Sample containers intact? Yes No
- Sufficient sample volume for indicated test? Yes No
- All samples received within holding time? Yes No
- Water - VOA vials have zero headspace? Yes No VOA vials submitted Yes No
- Water - Preservation labels on bottle and cap match? Yes No N/A
- Water - pH acceptable upon receipt? Yes No N/A
- Container/Temp Blank temperature? 3.1° <6° C Acceptable

Number of preserved bottles checked for pH: <2 >12 unless noted below.

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding: _____

Comments: _____

Corrective Action _____

Chain-of-Custody Record

Client: SMA

Address: 102 E MURRAY

FARMINGTON NM 87409

Phone #: (505) 325-5667

email or Fax#:

QA/QC Package:

Standard Level 4 (Full Validation)

Other

EDD (Type) _____

Turn-Around Time:

Standard Rush

Project Name:

EPCO / NAVAJO City CS

Project #:

5119363

Project Manager:

Tami Russ

Sampler: L.L.

Sample container

Date Time Sample Request ID

7/23/09 1535 T-307 Interstitial

" " T-307 Inert tank

Container Type and #

Plastic/glass " "

Preservative Type

HgCl2 " "

HEAL No.

0907301

1

2

Analysis Request

BTEX + MTBE + TMB's (8021)

BTEX + MTBE + TPH (Gas only)

TPH Method 8015B (Gas/Diesel)

TPH (Method 418.1)

EDB (Method 504.1)

EDC (Method 8260)

8310 (PNA or PAH)

Anions (F, Cl, NO₃, NO₂, PO₄, SO₄)

8081 Pesticides / 8082 PCB's

8260B (VOA) BTEX

8270 (Semi-VOA)

X + TDS

Air Bubbles (Y or N)

Date: 7/27/09 1630

Relinquished by: Tami Russ

Relinquished by: _____

Received by: _____

Received by: 9:00 7/28/09

Remarks:

Bill To EPCO

Inspection noted in latest permit.

16. OCD Inspections: The OCD performed an inspection of this facility on June 9, 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, OCD inspection concluded the following: *SEE "PERMITS" FOR PHOTOGRAPHS*

- 1. Photo 1:** BGT (T302) had no fluids within the leak detection system. 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 & 3:** Both BGT (T306) and BGT (T307) indicated fluids within its leak detection system. Owner/Operator shall investigate the reason for fluids in the leak detection system and if need be verify tank integrity. The owner/operator shall monitor and keep record of these leak detection systems on a monthly basis. See Condition 11 for details.

The Owner/operator shall resolve **item 2 by August 10, 2009**, and submit their findings to the OCD for review.