

GW - 302

INSPECTION

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

Lowe, Leonard, EMNRD

From: Fernald, Donald [dfernal@epco.com]
Sent: Tuesday, September 29, 2009 9:50 AM
To: Lowe, Leonard, EMNRD
Cc: Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD; Hebert, Beth; Seale, Runell; Lee, Stephen; Nolan, Shiver
Subject: RE: Enterprise GW-302, Potter Canyon CS
Attachments: BGT T509 test 2009-9-17.pdf

Hi Leonard,

In response to your email, please the following and the attached BGT test.

2. Enterprise will provide documentation and notification to the NMOCD for the removal of T511.

Please find the attached copy of the recent BGT test completed on T509 at Potter Canyon Compressor Station GW-32 in response to your question stated as follows: BGT T509: The integrity of the primary tank, not the secondary, is in question. Enterprise may verifying integrity of the secondary containment. The question is still posed, does the primary tank have integrity.

3. Enterprise will notify the NMOCD when a decision is made regarding the storage of condensate at this facility.

Sincerely,

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, September 25, 2009 3:24 PM
To: Hebert, Beth
Cc: Fernald, Donald; Seale, Runell; Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD
Subject: Enterprise GW-302, Potter Canyon CS

Ms. M. Hebert,

OCD's response to EPCO's reply to the June, 2009 OCD inspection.

All items not mention are considered closed, pertaining to the inspection.

2. OCD is made aware the BGT T511 is no longer in service.

Ensure that:

There are no standing fluids within the tank at this time, or remove them as soon as possible.

There are no fluids are going into the tank.

Prior to tank removal please submit to the OCD the work plan indicating procedures to remove the tank.

[illegible]

Lowe, Leonard, EMNRD

From: Fernald, Donald [dfernal@epco.com]
Sent: Tuesday, September 15, 2009 3:52 PM
To: Powell, Brandon, EMNRD
Cc: Lowe, Leonard, EMNRD; Marquis, James; Lee, Stephen
Subject: Sub grade tank testing Notification Enterprise

Enterprise will be conducting sub-grade tank testing of the following locations on Thursday, September 17, 2009. The work is being conducted in conjunction with a facility shut down.

GW Discharge Permit No.	Location	Asset	Description	Scheduled Date
GW-302	Potter CS	POTT-T-509 PRODUCED WATER TANK	Test BGT for leakage. We will the inspection portal area is dry, then fill inner tank with water then re-check the test area in 6 hours and if the water is back in the test area, then we will remove tank and replace. If no water is in the inspection portal area, the tank is deemed to be not leaking.	9/17/2009 00:00:00
GW-302	Potter CS	POTT-T-511 THERMAL SUMP	This BGT is scheduled for removal later in 2010 and is currently not in use.	To be removed

If you have any questions or need additional information, please let us know.

Sincerely,

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

This inbound email has been scanned by the MessageLabs Email Security System.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Friday, September 25, 2009 3:24 PM
To: 'bhebert@eprod.com'
Cc: 'Fernald, Donald'; Seale, Runell; Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD
Subject: Enterprise GW-302, Potter Canyon CS

Ms. M. Hebert,

OCD's response to EPCO's reply to the June, 2009 OCD inspection.

All items not mention are considered closed, pertaining to the inspection.

2. OCD is made aware the BGT T511 is no longer in service.

Ensure that:

There are no standing fluids within the tank at this time, or remove them as soon as possible.

There are no fluids are going into the tank.

Prior to tank removal please submit to the OCD the work plan indicating procedures to remove the tank.

Will the drain line going in to the tank be removed as well? If not what does Enterprise intend to do with that line?

BGT T509: The integrity of the primary tank, not the secondary, is in question. Enterprise may verifying integrity of the secondary containment. The question is still posed, does the primary tank have integrity.

3. ASTs: OCD approves the proposed method of engineering the secondary containment and liner. OCD will be waiting on notification on what Enterprise intends to do.

The Enterprise letter will be scanned in to on line viewing today. See Inspection thumbnail.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
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Santa Fe, N.M. 87505
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Enterprise Products™

ENTERPRISE PRODUCTS PARTNERS LP
ENTERPRISE PRODUCTS OPERATING LLC

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

August 14, 2009

Certified Mail
7008 3230 0002 4442 9323

Mr. Glenn von Gonten, Acting Environment 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
Potter Canyon Compressor Station -GW-302
NW/4, NW/4, Section 19, Township 30 North, Range 10 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 Potter Canyon Compressor Station on June 10, 2009.

1. Below grade tanks (BGTs) T512 and T504 are currently being inspected on a monthly basis. Documentation of the inspections is being maintained by Enterprise. ✓
2. BGTs T511 and T509 contained a small amount of fluid within the leak detection system. Enterprise contracted a third party environmental firm to use a pump and hose to collect liquid samples for testing. The amount of liquid within the leak detection system was not significant enough to collect for sampling.

BGT T511 is no longer in service and will be scheduled for removal in 2010, after evaluation of facility liquid handling requirements. ✓

BGT T509 will be scheduled for a pressure test to ensure the integrity of the secondary containment. Verbal notification for testing BGT T509 will be provided to the NMOCD 48 hours in advance. A report of the test will be provided to the NMOCD. ?

Below grade tanks (BGTs) are currently being inspected on a monthly basis. Documentation of the inspections is currently being maintained by Enterprise.
3. Fluids will be removed from sub-grade sumps within 72 hours. Please note that this area had experienced precipitation within the prior 48 hours. ✓
4. Above ground storage tanks (ASTs) are required to be properly lined.

Enterprise Field Services, LLC
Potter Canyon Compressor Station -GW-302
NW/4, NW/4, Section 19, Township 30 North, Range 10 West, NMPM
San Juan County, NM

Enterprise currently removes condensate and produced water liquids from the facility gathering system at the Potter Canyon Compressor Station and stores the liquids at the facility until they can be trucked to another facility for processing. An option being evaluated includes collecting the liquids in a pressurized vessel at the station inlet and then injecting the liquids into the facility discharge pipeline. The liquids would be then carried via pipeline further downstream for processing at a central facility (Blanco Plant).

Once the engineering evaluation is completed and Enterprise determines such a project is feasible, Enterprise will notify the NMOCD that the liquid storage facilities at Potter Canyon Compressor Station will be removed in 2010. If the project is determined to not be feasible, Enterprise will proceed with installing a lined containment system in 2010.

The containment system would accommodate 133% of the liquids from the largest tank, or combination thereof if they have a common header. The lined containment system would likely be a combination of a solar resistant 30 mil HDPE and spray-on liner. Several of these lined containment systems have been installed and have been found to be adequate to handle releases and spills from the tanks. Additionally, the liner would not be covered with gravel or other material which allows for inspecting the integrity of the liner on a routine basis (documented monthly) and easy removal of accumulated liquids within the containment.

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,

Enterprise Field Services LLC
Enterprise Products Operating LLC



Mary E. Hebert
Director, Environmental Compliance

/sjn

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

Inspection noted within the Discharge Permit Condition 16.

16. OCD Inspections: The OCD performed an inspection of this facility on June 9, 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:** BGT (T512) and BGT (T504) verified dry with 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 3 & 4:** Both BGT (T511) and BGT (T509) 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.
3. **Photo 5 - 9:** Fluids were noted to be present within the pigging sump/catch basin. Owner/Operator shall clean out and inspect the containment area. The presence of fluids and its below-grade construction qualifies this containment as a below grade tank, unless the owner/operator treats it as a sump. Fluids must be removed within 72 hours. See Condition 11 and 14 for details.
4. **Photo 10:** Above ground storage tanks are not lined. Owner/Operator shall AST's line with an impermeable barrier. See Condition 9 for details.

Enterprise shall resolve **item 1 - 4** by **August 15, 2009** and submit their findings to the OCD for review.