

# GW - 304

# INSPECTION

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

## Lowe, Leonard, EMNRD

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**From:** Fernald, Donald [dfernal@epco.com]  
**Sent:** Wednesday, October 14, 2009 1:47 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. The work is being conducted in conjunction with a facility shut down.

GW Discharge Permit No.	Location	Asset	Description	Scheduled Date
GW-304	Turley CS	T-206	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.	10/21/2009
GW-303	Navajo City CS	T-306 & T-307	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.	10/22/2009

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](mailto:dfernal@epco.com)

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## **Lowe, Leonard, EMNRD**

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**From:** Fernald, Donald [dfernal@epco.com]  
**Sent:** Tuesday, September 29, 2009 11:02 AM  
**To:** Lowe, Leonard, EMNRD; Hebert, Beth  
**Cc:** Seale, Runell; Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD; Lee, Stephen; Nolan, Shiver  
**Subject:** RE: GW-304, Turley CS OCD reply

Leonard,

Thanks for the response to our inspection resolution.

2. We plan to test the BGT at Turley by filling the BGT to capacity with water for six (6) hours and then viewing/inspecting the leak detection portal to determine if there are any leaks in the primary tank. We will provide the NMOCD with a 48 hour notification prior to testing.

3. Once a resolution for liquids handling has been determined, we will notify the NMOCD of our intended actions.

Please let us know if you have additional questions.

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](mailto:dfernal@epco.com)

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**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Friday, September 25, 2009 3:44 PM  
**To:** Hebert, Beth  
**Cc:** Fernald, Donald; Seale, Runell; Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** GW-304, Turley CS OCD reply

Ms. Mary Hebert,

OCD response to Enterprise's inspection resolution.

Items mentioned below are considered open items until resolved:

2. Integrity of the primary tank would verify the condition of the initial integrity. Enterprise may verify integrity testing of the secondary containment. How does Enterprise intend to integrity test?

3. OCD approves the method of lining the tanks. OCD will be kept informed on how Enterprise intends to move fluids.

Enterprise's letter is located on the GW-304 file under INSPECTIONS.

## **Lowe, Leonard, EMNRD**

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**From:** Lowe, Leonard, EMNRD  
**Sent:** Friday, September 25, 2009 3:44 PM  
**To:** 'bhebert@eprod.com'  
**Cc:** 'Fernald, Donald'; Seale, Runell; Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD  
**Subject:** GW-304, Turley CS OCD reply

Ms. Mary Hebert,

OCD response to Enterprise's inspection resolution.

Items mentioned below are considered open items until resolved:

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3. OCD approves the method of lining the tanks. OCD will be kept informed on how Enterprise intends to move fluids.

Enterprise's letter is located on the GW-304 file under INSPECTIONS.

llowe

### **Leonard Lowe**

Environmental Engineer  
Oil Conservation Division/EMNRD  
1220 S. St. Francis Drive  
Santa Fe, N.M. 87505  
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Enterprise Products™

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ENTERPRISE PRODUCTS OPERATING LLC

RECEIVED OCD

ENTERPRISE PRODUCTS GP, LLC, GENERAL PARTNER  
ENTERPRISE PRODUCTS OLPGP, INC., SOLE MANAGER  
2009 AUG 18 A 11: 25

August 14, 2009

Certified Mail  
7008 3230 0002 4442 9293

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  
Turley Compressor Station -GW-304  
SE/4, NW/4, Section 29, Township 30 North, Range 9 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 Turley Compressor Station on June 10, 2009.

1. Below grade tanks (BGTs) T206, T207 and T208 are currently being inspected on a monthly basis. Documentation of the inspections is being maintained by Enterprise.
2. BGTs T206 contained fluids within the leak detection system. Erosion on the site had covered the BGT and the inspection portal in soil, sand and gravel. We anticipate that along with the soil and gravel, storm water had settled in this area and seeped into the inspection portal. The content of the inspection portal, secondary containment appeared to be water and has been removed.

BGT T206 will be scheduled for a pressure test to ensure the integrity of the secondary containment. Verbal notification for testing BGT T206 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. Above ground storage tanks (ASTs) are required to be properly lined.  
Enterprise is currently evaluating the need for removing condensate and produced water liquids from the facility gathering system at Turley Compressor Station and storing the liquids at the facility until they can be trucked to another facility for processing. This evaluation 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

Enterprise Field Services, LLC  
Turley Compressor Station -GW-304  
SE/4, NW/4, Section 29, Township 30 North, Range 9 West, NMPM  
San Juan County, NM

engineering evaluation is completed, Enterprise will determine if such a project is feasible and notify the NMOCD that we will be removing the liquid storage facilities at Turley Compressor Station in 2010. If the project is not deemed 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. We have installed several of these lined containment systems and have found them 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  
attachments

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 10, 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 (T207) and BGT (T208) 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:** BGT (T206) 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 leak detection system was covered in 6 inches of soil/gravel and had to be cleared prior to verifying through the port. The leak detection verification port appeared to be corroded shut and took two individuals to open, as shown in photograph 3. OCD assumes that the owner/operator has not properly monitored the leak detection system. The owner/operator shall monitor and keep record of these leak detection systems on a monthly basis. See Condition 11 for details.
3. **Photo 4 - 5:** Above ground storage tanks are not lined. Owner/Operator shall line the AST's with an impermeable barrier. See Condition 9 for details.

Enterprise shall resolve **item 1 - 3 by August 15, 2009** and submit their findings to the OCD for review.