

**GW - 146**

**INSPECTION**

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



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2009 SEP 30 AM 11 39

September 25, 2009

7008 3230 0002 4442 8739  
Return Receipt Requested

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

**Re: Sims Mesa Compressor Station  
New Mexico Oil Conservation Division Inspection Report, GW-146  
NE/4, NE/4 Section 22, Township 30 North, Range 7 West, NMPM  
Rio Arriba County, NM**

Dear Mr. von Gonten:

Val Verde Gas Gathering Company, L.P. is submitting this response to concerns noted at the above-referenced facility in the July 28, 2009 New Mexico Oil Conservation Division Discharge Permit Approval Conditions for the Sims Mesa Compressor Station

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

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**Val Verde Gas Gathering L.P.  
Sims Mesa Compressor Station  
New Mexico Oil Conservation Division Inspection Report, GW-146**

Val Verde offers the following response for concerns (bold text) from the July 28, 2009 Discharge Permit Approval Conditions from the NMOCD.

- 1. Photos 1 & 2: Above ground storage tanks lacking secondary containment. Owner/operator shall line the AST's with an impermeable barrier. See Condition 9 for details.**

Response: Val Verde Gas Gathering, L.P. has budgeted to install an impermeable barrier to comply with condition 9 of the Discharge Permit GW-146 in 2010.

- 2. Photo 3 - 7: Sumps were being used as below-grade tanks or have fluids within them. Owner/operator shall either use sumps for their intended purpose and keep them dry or re-engineer them to a below-grade tank per Condition 11.**

Response: Fluids are removed from sump boxes within 72 hours. Please note that the area had experienced precipitation in the prior 48 hours.

- 3. Photo 8 - 9: A below-grade tank is located behind the compressor building. It was not determined if the tank had a double walled leak detection system. Owner/operator is reminded that all below-grade tanks need to be inspected monthly.**

Response: The below-grade tank located behind the compressor building includes a double-wall with a leak detection system. The system is inspected monthly. Please see attachment A which shows the construction specifications for this below-grade tank. Please see Attachment B which shows documentation of a recent inspection of tanks located at this facility.

**Attachment A**  
Sub Grade Tank Design



**Attachment B**  
Recent Discharge Plan Inspection Documentation

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

FACILITY NAME - SIMS MESA

Inspection Date: 05/27/2009

<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	Triethgly	Site
	Tank Asset ID Number					
No plate	25374	25376	25375	N/A	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:

Send completed forms to Environmental Representative to be retained for three years.

Inspector: **Mel Biringer**

Date: 6/8/2009

Supervisor:

Date

GW-146

As noted within the renewal permit dated July 28, 2009.

**16. OCD Inspections:** The OCD performed an inspection of this facility on June 10, 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:

1. **Photo 1 & 2:** Above ground storage tanks lacking secondary containment. Owner/Operator shall line the AST's with an impermeable barrier. See Condition 9 for details
2. **Photo 3 - 7:** Sumps were being used as below-grade tanks or have fluids within them. Owner/operator shall either use sumps for their intend purpose and keep them dry or re-engineer them to a below-grade tank per Condition 11.
3. **Photo 8 - 9:** A below-grade tank is located behind the compressor building. It was not determined if the tank had a double walled leak detection system. Owner/operator shall verify this tank meets Condition 11 for a below-grade tank. Owner/operator is reminded that all below-grade tanks need to be inspected monthly.

Owner/operator shall resolve items 1 - 3 by **September 30, 2009** and submit their findings to the OCD for review.