

GW-262

**General
Correspondence**

YEAR(S): 2010 - 2014

Lowe, Leonard, EMNRD

From: Stanley, Curt D. [Curt.Stanley@SUG.com]
Sent: Thursday, January 27, 2011 11:04 AM
To: Lowe, Leonard, EMNRD
Cc: Leking, Geoffrey R, EMNRD; Slade, Rose; Rich, Roy
Subject: C-4 Compressor Station Discharge Plan Modifications
Attachments: C-4 DP modification proposal.docx

Mr. Lowe

Attached is a proposed Discharge Plan (Permit) modification for the Southern Union Gas Services C-4 Compressor Station (GW-262). Southern Union would like to begin the activities outlined in the attached document as soon as possible.

Thank you,

Curt D. Stanley
EHS Compliance Specialist
Southern Union Gas Services
Monahans, Texas

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

In Review as of 01.31.11 H Lowe



1507 W. 15th
Monahans, Texas 79756

432.943.1100 Fax: 432.943.1101

January 27, 2011

Mr. Leonard Lowe
Oil Conservation Division / EMNRD
1220 South St. Francis
Santa Fe, New Mexico 87505

Re: Existing Discharge Plan Modification
Southern Union Gas Services, Ltd
C-4 Compressor Station – GW-262
Unit “N” (SE1/4 of the SW1/4), Section 9, Township 22 South, Range 36 East, NMPM
Lea County, New Mexico

Mr. Lowe,

Southern Union Gas Services (SUGS) requests New Mexico Energy, Minerals and Natural Resources Department (EMNRD) approval for proposed modifications to the following Discharge Plan and Permit:

C-4 Compressor Station – GW-262
N 32° 23.979', W 103° 16.389'
Unit “N” (SE1/4 of the SW1/4), Section 9, Township 22 South, Range 36 East, NMPM
Lea County, New Mexico

SUGS approval request was prepared pursuant to WQCC Regulation 20.6.2.3107.C and 20.6.2.3109 NMAC.

SUGS proposes to remove the 50 barrel (bbl) sub grade reinforced fiberglass scrubber liquids storage tank (TK-1) and replace the 50 bbl tank with a 210 bbl steel above ground storage tank. The 210 bbl storage tank will be placed in a secondary containment, consisting of an earthen floor covered with a geotextile liner coated with an 80-mil-thick polyurea liner and 26-inch-high corrugated iron walls also coated with polyurea to a thickness of 80 mils. The 24-foot by 48-foot secondary containment structure has a storage capacity of approximately 18,645 gallons, which exceeds the capacity of the largest tank (8,400 bbl), plus an allowance for precipitation.

Following the removal of the 50 barrel (bbl) sub grade reinforced fiberglass scrubber liquids storage tank, SUGS will photo document the soil underlying the tanks. An adequate number of soil samples will be collected to characterize the status of the soil, soil samples will be analyzed for concentrations of benzene, toluene, ethyl benzene and xylene (BTEX), total petroleum hydrocarbons (TPH), and chloride. The depth to groundwater at the C-4

Compressor Station is approximately 200 feet below ground surface (bgs). Based on the depth to groundwater, the New Mexico Oil Conservation Division (NMOCD) remediation guidelines indicate cleanup threshold levels should be:

Benzene: 10 mg/Kg
BTEX: 50 mg/Kg
TPH: 5,000 mg/Kg
Chloride: Site specific

If the analytical results indicate a release has occurred from the sub grade reinforced fiberglass scrubber liquids storage tank, SUGS will remediate the impacted soil to the NMOCD regulatory requirements.

SUGS also proposes to remove the above ground 1,000 gallon Pad Drainage tank (TK-4). The existing tank will be replaced with a 410 gallon double wall sump. The double wall sump tank is equipped with a viewing port between the walls of the tank, which will be monitored on a regular schedule to verify the integrity of the inner wall of the tank. Due to the double wall features of the proposed sump, secondary above ground containment will not be required. As detailed above, SUGS will collect soil samples to evaluate the status of soil underlying the existing Pad Drainage tank.

SUGS will also be replacing existing poly line dump lines with two (2) inch steel piping. During the compressor station turn-around, the existing rental compressor and engine will be replaced with a company owned compressor and engine of reduced horsepower. On completion of the above stated activities, a fence will be erected around the perimeter of the compressor station to discourage theft and vandalism.

A NMOCD Form C-144 (Pit, Closed-Loop System, Below-Grade Tank or Proposed Alternative Method Permit or Closure Plan Application) will be prepared and submitted to the NMOCD Hobbs District Office for approval.

SUGS requests EMNRD approval to operate the C-4 Compressor Station facility under the existing Discharge Plan. If approved, the proposed modifications will be documented in the C-4 Compressor Station renewal application and Discharge Plan. If you have any questions, comments or are in need of additional information, please contact me at 432-390-7595 or Rose Slade at 432-940-5147.

Respectfully submitted,

Curt D. Stanley
EHS Compliance Specialist
Southern Union Gas Service, Ltd
1507 W 15th Street
Monahans, Texas 79756

Cc: Geoffrey Leking, NMOCD Hobbs District Office
Environmental Files