

**GW-049-1**

**General  
Correspondence**

**YEAR(S): 2011 - 2015**

## **Lowe, Leonard, EMNRD**

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**From:** Smith, David [DRSmith@eprod.com]  
**Sent:** Wednesday, April 06, 2011 12:52 PM  
**To:** Lowe, Leonard, EMNRD; Griswold, Jim, EMNRD  
**Cc:** Powell, Brandon, EMNRD; Seale, Runell  
**Subject:** RE: Enterprise Field Services / Kutz Hydrocarbon GW 049-01  
**Attachments:** Kutz 8\_19\_08.JPG; Kutz 8\_19\_08a sump.JPG; Kutz 9\_10\_10.JPG; Kutz 9\_10\_10a.JPG; Kutz 9\_10\_10b.JPG; Kutz 5\_04\_09.JPG; Kutz 8\_19\_08 lube tank.JPG

Leonard, to answer your questions below:

- 1) There was only one below grade tank at this facility, I have included a photo of the tank. It was only partially below-grade, and extended about three feet below the containment that is shown in the photo. It looks like the concrete containment structure was added after the tank was built, and there was no underlying containment. We did not operate the tank, so I don't know exactly how the tank was operated historically.
- 2) Enterprise acquired the facility during 2004, and, to my knowledge, has only used the used oil storage tank. This is the green 100 bbl tank included in the photos.

I have included some site photos. One photo shows a portion of a covered soil pile (about 100 cubic yards) that was removed from beneath the tanks. We originally planned to dispose of these soils offsite, but testing showed a TPH DRO of 910 mg/Kg, so they were spread onsite. I have a report prepared for the OCD that documents the facility decommissioning. I didn't know there was a discharge plan associated with this facility, or would have submitted a plan before this work was conducted. We did some preliminary soil boring investigations to determine if there were any impacts from the facility, and did not encounter any. This work, and confirmation sampling conducted following removal of the equipment on site, is documented in the closure report. Thanks.

Runell, let me know if this is correct, and if you have any other info on this site or Discharge Plan.

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**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Wednesday, April 06, 2011 12:26 PM  
**To:** Smith, David; Griswold, Jim, EMNRD  
**Subject:** RE: Enterprise Field Services / Kutz Hydrocarbon GW 049-01

Mr. Smith,

A few questions:

1. How many below grade tanks were at this location? Quantify/Identify them and note what effluent they received.
2. According to our verbal conversation this morning, EPCO did not operate this facility for its purpose. Operations of this facility was done under the previous owner/operator, correct?
3. What is the size of that remaining tank? Volume.

The last submitted discharge plan application, the Owner/Operator stated:

"Should Operator choose to permanently close the facility a closure plan will be submitted in accordance with provisions of WQCC Section 3107.A.11. Operator will submit the detailed closure plan to the NMOCD prior to closure. All reasonable and necessary measures will be taken to prevent the exceedance of WQCC Section 3103 water quality standards.

Generally, closure measures will include removal or closure in place of underground piping, all above and below ground tanks and other equipment. All wastes will be removed from the site and properly disposed of in accordance with the rules and regulations in place of underground piping, all above and below ground tanks and other equipment. All wastes will be removed from the site and properly disposed of in accordance with the rules and regulations in place at the time of closure. When all fluids, contaminants, and equipment have been removed from the site, the site will be graded as close to the original contour as possible and seeded.

Should contaminated soil be discovered, any necessary reporting under the NMOCD Rule 116 and WQCC Section 1203 will be made and clean-up activities will commence. Post-closure maintenance and monitoring plans would not be necessary unless contamination is encountered."

Thank you for your attention.

Lowe

**Leonard Lowe**

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**From:** Smith, David [<mailto:DRSmith@eprod.com>]  
**Sent:** Tuesday, April 05, 2011 11:59 AM  
**To:** Griswold, Jim, EMNRD; Lowe, Leonard, EMNRD  
**Subject:** Enterprise Field Services / Kutz Hydrocarbon GW 049-01

Jim/Leonard, I am preparing to submit a closure/decommissioning report for the Enterprise Field Services, LLC Kutz Separation & Hydrocarbon Recovery Plant (GW 049-01). We have completed removal of inactive facility equipment, and removed a small amount of affected soil at one location. No historical facility impacts were identified requiring further remedial actions.

I have a question regarding the status of the Groundwater Discharge Permit GW 049-01. There is one tank remaining in service for storing used oil at the facility. Will the permit need to remain in place due to the presence of the tank?  
Thanks!

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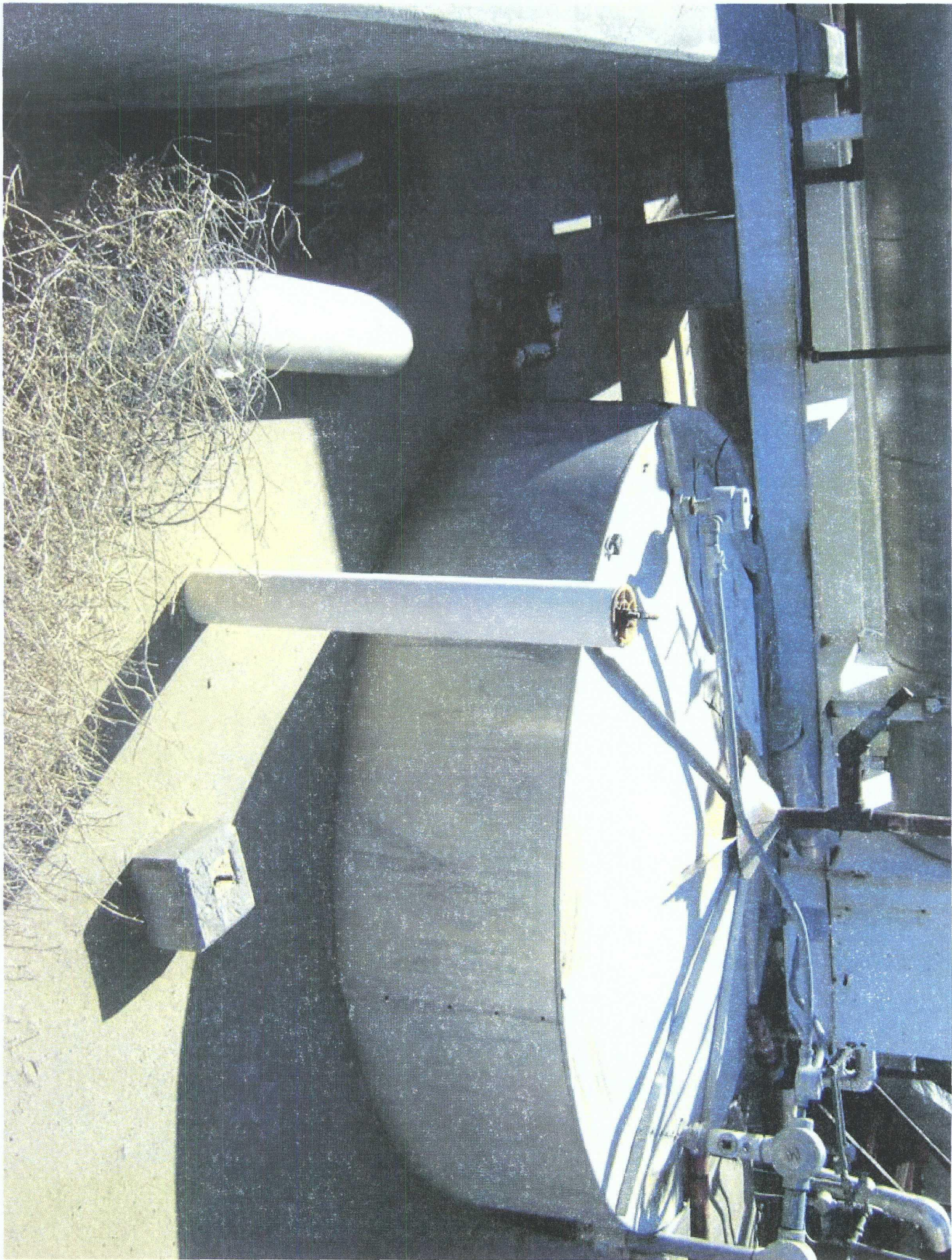




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KUTZ 8-19-08a

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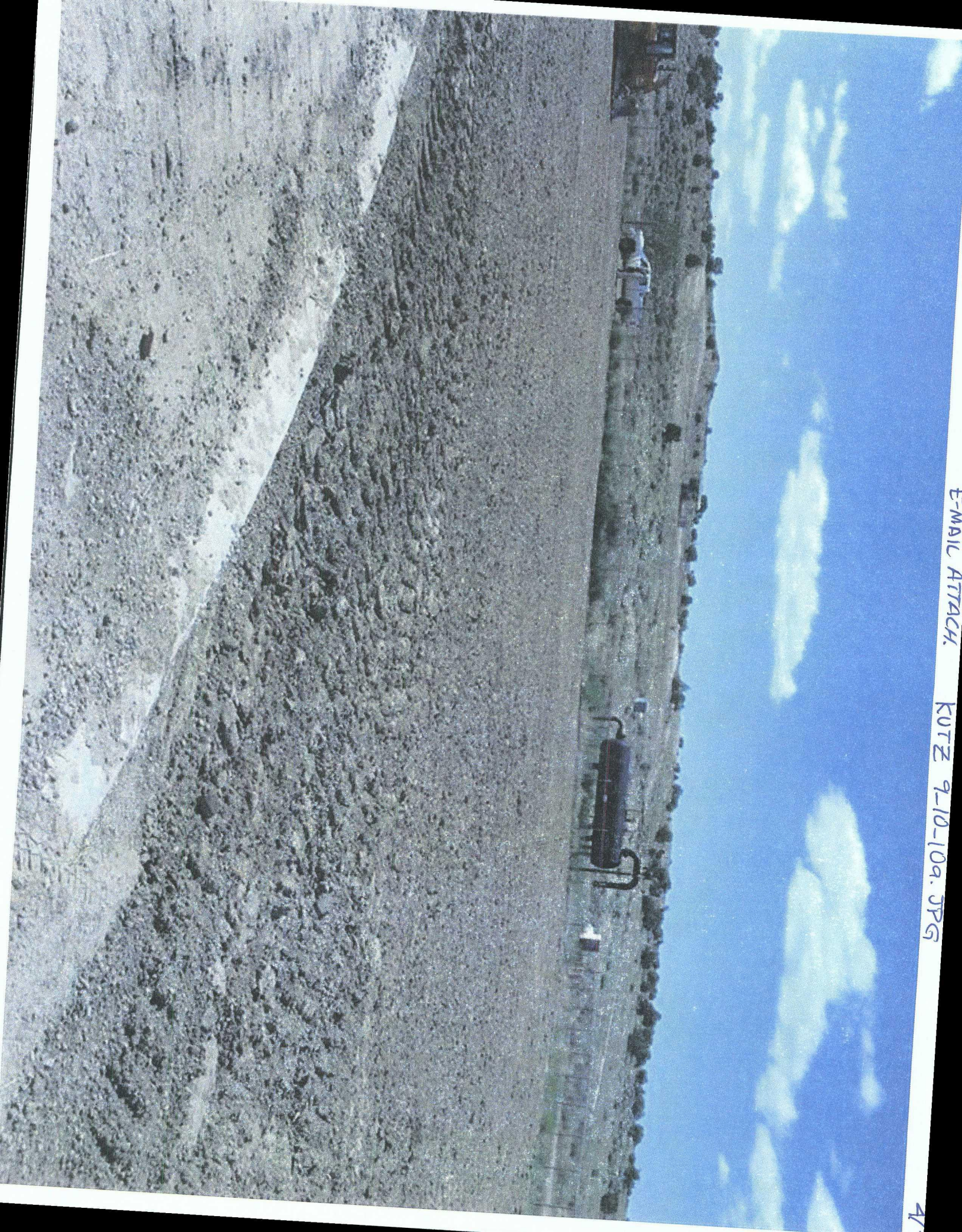






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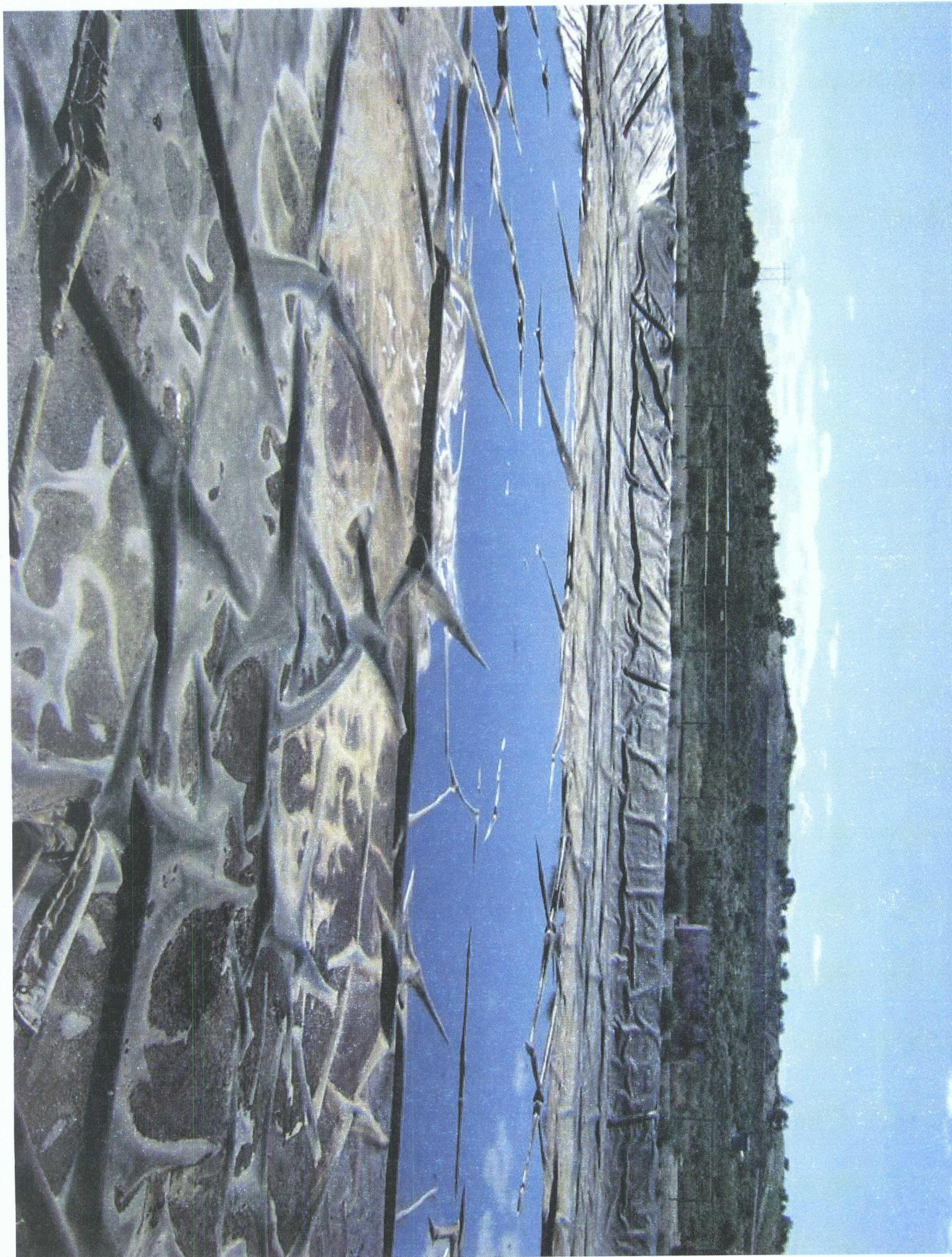
KUTZ 9-10-10a. JPG















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